

**CODE OF ETHICS AND CONDUCT
CONSULGAL GROUP**

Revision 01 - July 2025

1. BACKGROUND

- 1.1. This **Code of Ethics and Conduct** includes a set of principles that guide the activity of the CONSULGAL Group companies and a set of ethical, deontological and anti-corruption rules to be observed by the members of the governing bodies and all employees in their relations with each other, with customers, service providers, suppliers, partners, associates and other stakeholders.
- 1.2. It reflects our culture, the values we believe in and our identity.
- 1.3. This document aims to materialise the fundamental ethical guidelines, the Mission and Corporate Values of the CONSULGAL Group into principles of action.
- 1.4. CONSULGAL believes in trust as a determining factor, in acting with transparency and integrity, in loyalty to its clients and in a respectful attitude in all relationships.

2. MISSION AND VALUES

- 2.1. CONSULGAL's **mission is to** fully satisfy its customers and achieve sustained commercial and business success, with a high sense of social responsibility.
- 2.2. CONSULGAL's **Values**:
 - **Quality of** service provision;
 - Brand **credibility** in the market;
 - **Trust of** our clients and partners;
 - **The seriousness of** our team;
 - **Rigour** in our processes and procedures;
 - **Competence** of our professionals;
 - **Transparency** in our relationship with all those involved;
 - **Sharing of** results;
 - **Professionalism** in our performance;
 - **Commitment to** innovation;

- **Valuing** our employees;
- **Maximising** the value delivered to customers and shareholders;
- **Corporate culture** focussed on customer satisfaction and creating a working environment conducive to productivity, without forgetting social responsibilities and environmental protection;
- **Operational excellence** supported by processes, technology and continuous improvement.

3. CUSTOMERS

3.1. Customer satisfaction and the provision of an excellent service implies not only the involvement and commitment of CONSULGAL's governing bodies, but also of all its employees and/or service providers.

3.2. Thus, behaviours are adopted that determine:

- Customer trust;
- Transparent and truthful information regarding any question posed by clients or the submission of proposals;
- Professionalism, respect and loyalty;
- Fulfilment of obligations and other agreed conditions;
- Respect for personal data and other protected information relating to clients.

4. EMPLOYEES

4.1. Employees and members of the governing bodies of the CONSULGAL Group must carry out their activities and conduct themselves in accordance with the rules of this Code of Ethics and Conduct, refraining from, by action or omission:

- Disclosing or allowing access, by any means, to confidential or privileged information, with a view to obtaining any advantage for themselves or for third parties;
- Disclosing in conversations with third parties, events or facts occurring in the company, the intention to participate in business by any company of the CONSULGAL Group, the outlines of such business or contracts, prices or costs, in such a way as to allow such third parties, directly or indirectly, to use such facts for their own or others' benefit;
- Intervening in decision-making processes or contracts that directly or indirectly involve companies with which they collaborate, whatever their relationship, or have collaborated, or people with whom they are related by family or friendship ties;

- Not notifying the Employee's superior in advance and, if the Employee holds a management position, the Board of Directors, for the purposes of prior authorisation, which cannot reasonably be denied, of collaboration, participation or intervention in any public event, including those covered and broadcast by the media or social networks on matters related to the CONSULGAL Group's activity, whether through conferences, symposiums, lectures, opinion articles, *online* conferences through the various platforms available for this purpose.
- 4.2. Interpersonal relationships within the CONSULGAL Group are guided by principles of mutual respect, loyalty, co-operation and honesty and non-discrimination in any form, including gender discrimination, and these values should permeate not only the relationship between employees, but also between them and their superiors or governing bodies, as well as with customers, service providers, suppliers, partners, associates and other stakeholders.
 - 4.3. Employees must refrain from commenting on aspects of the private life of any of them and/or any member of the CONSULGAL Group's governing bodies of which they are aware, and which may in any way jeopardise the personal and/or family dignity of the person concerned.
 - 4.4. Employees and members of governing bodies must therefore combat the use of rumour and misinformation, refraining from reproducing them or encouraging their reproduction, including, but not limited to, spreading such rumours on social networks.
 - 4.5. In external relations, in the performance of their duties, both employees and members of the governing bodies of the CONSULGAL Group must adopt a suitable, dignified and integral behaviour, thereby safeguarding the image of the Group and the CONSULGAL brand.
 - 4.6. Any conduct carried out by one employee towards another that can in any way be traced back to moral and/or sexual harassment is considered to be serious conduct that can lead to a break in the employment relationship, creating, due to its seriousness and/or degree of repetition, an attack on dignity and an intimidating, hostile, humiliating and certainly destabilising environment in terms of working relationships.
 - 4.7. Employees must also refrain from any form of physical or verbal aggression, both in the instructions they give their colleagues and in their instructions to their superiors.
 - 4.8. In order to prevent the existence of any behaviour that could amount to *bullying* or *mobbing*, the CONSULGAL Group undertakes to launch training programmes for its employees in order to make them aware of this reality which, if it occurs, in addition to its unlawfulness, including of a criminal nature, will disrupt not only interpersonal relations, but also the productivity and image of the CONSULGAL Group companies.
 - 4.9. CONSULGAL Group employees must scrupulously observe all procedures, internal regulations, instructions and standards in force within the CONSULGAL Group, regarding the use of any company resources placed at their disposal and must also comply with all provisions in force regarding the protection of personal data, intellectual and industrial property and the use of software licences.
 - 4.10. As a result of the above, any employee is specifically prevented from modifying the computer standards in force in the company, in particular by adding or uploading non-standardised, unlicensed software programmes or for which any of the CONSULGAL Group companies may be accused of piracy or violation of intellectual and/or industrial property rights.

- 4.11. To reduce the risk of contamination of the computer system of CONSULGAL Group companies, employees must refrain from entering any computerised data into the system of CONSULGAL Group companies without being duly authorised to do so.
- 4.12. Employees must refrain from entering programmes, software, documents, files, information or data, such as those mentioned above, into their workstation history as users and, above all, must also refrain from entering and/or keeping files that are pornographic, racist or, in general, prohibited by law or offensive to good morals.
- 4.13. Employees must also refrain from inserting any data or files related to incitement to violence and racism in any form whatsoever into hardware owned by the Company, as well as files of a paedophile nature or incitement to prostitution.
- 4.14. Employees must ensure that their behaviour, whether by action or omission, does not directly or indirectly contribute to the violation of the principle of gender non-discrimination.
- 4.15. Employees must behave in accordance with the rules and regulations of hygiene, safety at work and the environment, avoiding any conduct that may violate them and must proactively adopt conduct and procedures that may contribute to safeguarding not only the CONSULGAL Group's assets but also safety, people's lives and the preservation of the environment.
- 4.16. Employees undertake to strictly prohibit the use of drugs, narcotics and alcohol in their workplace and/or while carrying out their duties.
- 4.17. Employees and/or members of the governing bodies of the CONSULGAL Group must not accept, for their own benefit, directly or indirectly, goods, services or advantages with a value of more than 50.00 € (fifty euros) from customers, service providers, suppliers, partners, associates or any individual or collective entity, public and/or private, which has had or intends to have or maintains business relations with the CONSULGAL Group.
- 4.18. Whenever, for any reason, it becomes inadvisable to return an offer, the acceptance of which is forbidden under the terms of the previous paragraph, the employee should hand it over to his or her superior, asking him or her about the best way to dispose of it.
- 4.19. Excluded from the restrictions set out above are gifts or payments for goods or services, including travel, accommodation, meals, registration for symposia and/or congresses or similar, shows and sporting events or others that are attributed to any employee or member of the governing bodies by virtue of the exercise of their position and/or within the limits of representing the CONSULGAL Group and in its interests.
- 4.20. Notwithstanding the above, employees must inform their hierarchical superior or, failing this, the Board of Directors, of the occurrence of any event that may be included in the previous paragraph.
- 4.21. Giving or receiving any money in cash, cheque or bank transfer in the name of and on behalf of the company is absolutely forbidden.
- 4.22. As part of their duties, employees also subscribe to the Codes of Ethics of their professional organisations, where applicable:

- Code of Ethics and Deontology - Order of Engineers
https://www.ordemdosengenheiros.pt/fotos/gca/blocks_items/codigo_ed_143278024064df56810f53a.pdf
- Code of Ethics - Order of Technical Engineers
<https://files.diariodarepublica.pt/2s/2016/09/186000000/2918229184.pdf>
- Deontology Regulations - Order of Architects
https://ordemdosarquitectos.org/backend/uploads/Regulamento_de_Deontologia_e_Procedimento_Disciplinar_f9aee8898d.pdf
- Code of Ethics - Order of Certified Accountants
https://www.occ.pt/sites/default/files/public/2024-02/Estatuto2024_Web.pdf

5. SERVICE PROVIDERS AND SUPPLIERS

- 5.1. In its relationship with service providers and suppliers, the CONSULGAL Group has implemented a **Supplier Code of Conduct**, promoting the adoption of ethical principles and rules in the relationship between the parties, making its subscription part of the contracts it enters into with its service providers and suppliers of goods and/or services (<https://grupoconsulgal.sharepoint.com/sites/SIGQSA/Políticas%20Organogramas%20Cdigos%20e%20Regulamentos/Forms/AllItems.aspx?id=%2Fsites%2FSIGQSA%2FPolíticas%20Organogramas%20Cdigos%20e%20Regulamentos%2FC%3B3digo%20de%20Conduta%20do%20Fornecedor%20%2Epdf&parent=%2Fsites%2FSIGQSA%2FPolíticas%20Organogramas%20Cdigos%20e%20Regulamentos>).

6. COMMITMENTS MADE BY THE CONSULGAL GROUP

- 6.1. Following on from the establishment of the main standards of conduct to be respected by employees or by employees and members of the governing bodies of CONSULGAL Group companies, it is important to reiterate that they also make commitments to their employees, service providers, suppliers and other stakeholders, under the terms of the following points.
- 6.2. To act with professional ethics and deontology in carrying out their activities with excellence.
- 6.3. Transmitting information about its practices and management with truth and rigour.
- 6.4. Promote respect, honesty, transparency and integrity, values that are recognised across the board as pillars of a Culture of Professional Ethics, in the relationship between all parties.
- 6.5. Adopt a socially responsible stance, creating a safe and healthy working environment where ethics and transparency prevail in relationships, promoting internal and external solidarity.
- 6.6. Consistently ensuring respect for the mental, emotional and physical integrity of employees and others involved in the activities of CONSULGAL Group companies.
- 6.7. Valuing the proactivity of each and every one of its employees, encouraging individual and collective creativity, stimulating the professional development of its employees, as well as their individual merit, in the development of their functions and in the fulfilment of their duties.

- 6.8. To guarantee employees fair remuneration and personal and professional development focussed on merit, qualifications and equal opportunities without discrimination in any form.
- 6.9. Safeguard and guarantee the principles of gender equality and non-discrimination based on gender, race, nationality, religious confession or political or party and/or trade union affiliation, age, marital status, family situation or disability.
- 6.10. Prohibiting and safeguarding the absence of any kind of abusive practices, whether verbal, physical, harassment or other discriminatory or intimidating practices.
- 6.11. Ensure strict compliance with maternity and parenthood protection rules for employees, refraining from any acts or decisions that affect maternity and parenthood rights.
- 6.12. Refrain from employing minors and repudiate all practices and companies that do so.
- 6.13. Refrain from maintaining or allowing to be maintained labour relations that may in any way, directly or indirectly, contribute to any type of inhumane, discriminatory or enslaving work.
- 6.14. Guarantee conditions for employees with a chronic illness or active oncological disease, so that they do not lose their job or be affected in their career progression, while guaranteeing special respect for the rules issued by Law no. 93/2019, of 4 September, regarding the organisation of working time for employees with a disability or chronic illness, namely active oncological disease.
- 6.15. Refrain from limiting the exercise of rights and guarantees for employees and other persons identified in Law 93/2021 of 20 December and the RGPC, about internal and/or external whistleblowing procedures, as defined in the PPR and the Whistleblowing Channel.
- 6.16. Comply with the national legislation of each of the geographies where it operates and international legislation in force, which is applicable within the scope of the contractual relationships established by CONSULGAL Group companies, namely laws, regulations, operational, technical and sectoral standards and procedures, processing and protection of personal data, prevention and fight against corruption, competition, environment, health and safety, intellectual property rights, prevention and fight against harassment at work, as well as the contractual provisions established with CONSULGAL Group companies.
- 6.17. Promote and guarantee that the professional activities carried out in CONSULGAL Group companies are carried out safely, namely with accident prevention measures and in strict compliance with the occupational safety regulations in force.
- 6.18. Preventing potential situations of conflict of interest, namely in relations with stakeholders, safeguarding the transparency of all transactions, maintaining at all times a contractual and legal record to support them, as well as accounting control of the transactions carried out, in accordance with the framework and practices established in the instruments that make up the RGPC regulatory compliance programme, set out in the PPR.
- 6.19. Not to pursue, allow, consent to or connive in any activity, practice or conduct that may constitute or appear to constitute an act of corruption or a related offence, punishable by criminal law under the applicable legislation, in accordance with the framework and practices established in the

instruments that make up the RGPC compliance programme set out in the PPR, namely and among others: Prohibit employees and third parties acting on behalf of CONSULGAL Group companies from engaging in the following conduct: offering, promising or authorising undue pecuniary or non-pecuniary advantages to persons, public entities or related parties, with a view to obtaining advantages for themselves, for the CONSULGAL Group or for third parties; accepting advantages, offers and other benefits for themselves, for third parties or for the CONSULGAL Group, limiting the sphere of action to the relationship regulated in service contracts, with customers and service providers, suppliers, partners and/or associates.

6.20. The CONSULGAL Group has implemented internal control mechanisms to mitigate risks and address the transparency of transactions, namely:

- All transactions are recorded in the accounts in accordance with the required standards;
- Transactions and accounts are audited annually by an independent auditor, who expresses his qualified opinion in the Legal Certification of Accounts, including the CONSULGAL Group companies in the consolidation perimeter, in accordance with the Portuguese Companies Code;
- CONSULGAL Group companies maintain a system of internal approvals, guaranteeing segregation of duties, with a view to transparency;
- The Integrated Quality, Safety and Environmental Management System, which integrates the various internal processes and procedures, is audited periodically (at least annually) by independent auditors, verifying its compliance.

6.21. The CONSULGAL Group undertakes to promote measures to prevent corruption and related offences among customers, service providers, suppliers, partners, associates and other interested parties, and to develop the best practices in the market, with a view to continuous improvement, in accordance with the standards of action recommended in the RGPC process, documents and mechanisms that form part of it or are associated with it.

6.22. The CONSULGAL Group undertakes to respect internationally accepted principles, values and best business practices in terms of human rights, labour rights, health and safety at work, the environment and preventing and combating corruption and related offences, and refrains from engaging in acts of unfair competition or those aimed at restricting competition in the market.

7. DISCIPLINARY AND CRIMINAL SANCTIONS

7.1. In order to comply with the provisions of article 7.2 of the RGPC, it is established that non-compliance with the rules contained in the Code of Ethics and Conduct by any employee or member of the governing bodies will be investigated under the same terms as set out in paragraph 2.8 of the Whistleblowing Channel and, consequently, will be subject to the disciplinary sanctions that result from the conclusions of the investigation process, or the criminal sanctions determined by law, whenever this non-compliance reflects the commission of any acts of corruption or related offences.

8. REVISION OF THE CODE OF ETHICS AND CONDUCT

- 8.1. The Code of Ethics and Conduct will be reviewed at the same regular intervals as the SIGQSA, without prejudice to any extraordinary reviews that may prove necessary as a result of the annual assessment, changes to current legislation or any extraordinary events that justify it.

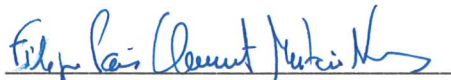
9. DISCLOSURE

- 9.1. This revision of the Code of Ethics and Conduct will be published on CONSULGAL's website (www.consulgal.pt), on the CONSULGAL Group intranet and available to all employees.

10. ENTRY INTO FORCE

- 10.1. This revision of the Code of Ethics and Conduct comes into force the day after it is signed.

Carcavelos, 29 July 2025



Filipe Pais Clemente Monteiro Nunes
Chairman of the Board of Directors



Alvaro Manuel de Sousa Freitas
Director