

SUPPLIER CODE OF CONDUCT

1. Framework

The CONSULGAL Group's Supplier Code of Conduct aims to promote effective and efficient communication by establishing a commitment between the parties to respect the environment, promote health and safety at work, comply with the law and applicable regulations in their commercial relationship and guarantee the quality of the products and services supplied.

2. Integrated Management Policy

The CONSULGAL Group's Management Policy establishes a set of guidelines that promote continuous improvement in the areas of quality, safety and the environment and encourage suppliers and stakeholders to adopt more sustainable management behaviours.

3. Supplier Relations

The CONSULGAL Group aims to establish relationships of trust with its suppliers and subcontractors based on respect and co-operation that promotes the principles mentioned in this Code of Conduct.

4. Social Responsibility

By adopting a socially responsible stance, the CONSULGAL Group aims to create a safe and healthy working environment where ethics and transparency prevail in relationships, promoting solidarity, both internally and externally.

- not only does it not use or tolerate the use of child labour, minors under the age of 16, but it repudiates all practices and companies that engage in or use it;
- does not authorise forced labour or compulsory labour under any condition, such as the deposit of bonds, documents and/or compulsory labour imprisonment;
- ensures equal treatment in all matters;
- promotes and respects ethical, moral and human integrity standards;
- does not allow any kind of abusive practices, whether verbal, physical, harassment or other discriminatory practices;
- consistently ensures respect for the mental, emotional and physical integrity of those involved;
- authorises and respects all efforts by trade union associations and collective bargaining without any direct or indirect hindrance or negative consequences;
- does not boycott or attempt to control the activities of workers' associations;

- complies with the weekly and annual limits on working hours defined in the applicable legislation;
- transmits information about its management practices with truth and rigour.

5. Environmental Aspects and Impacts, Hazards and Risks

The CONSULGAL Group ensures the disclosure of environmental aspects and impacts, hazards and risks resulting from the activities or services of suppliers and subcontractors through the Environmental Impacts, Hazards and Risks Assessment Matrix. The supplier also undertakes to promote a culture of respect for the environment and health and safety at work, establishing and implementing management practices for its environmental aspects, hazards and risks with a view to continuously improving its performance.

6. Communication and Verification

When requested, the supplier must provide information on the aspects considered relevant to the activity to be carried out on the premises of the CONSULGAL Group, as well as that of its subcontractors, in order to assess the compliance of its practices with what is described in this Code of Conduct.

7. Compliance Commitments

The Consulgal Group undertakes with its suppliers and subcontractors to:

- Comply with current national and international legislation applicable to the contractual relationship (laws, regulations, operational, technical and sectoral standards and procedures, processing and protection of personal data, anti-corruption, separation of sector activities, competition, environment, health and safety, intellectual property rights, as well as contractual provisions established with CONSULGAL Group companies);
- Not to pursue, allow, consent to or connive at any activity, practice or conduct that may constitute or appear to constitute an act of bribery and/or corruption, punishable by criminal offences under the applicable legislation, by putting in place procedures and implementing the necessary and appropriate measures with a view to preventing its occurrence;
- Respect internationally accepted principles, values and best business practices in terms of human rights, labour rights, health and safety at work and preventing and prevention and combating corruption, refraining from engaging in acts of unfair competition or those aimed at restricting competition in the market.

8. Commitments to Stakeholders

The Consulgal Group undertakes with its suppliers and subcontractors to:

- to fulfil the agreed conditions;
- maintain impartial and predetermined selection criteria;
- monitor the conduct of suppliers;
- respect the confidentiality of information and the intellectual property of suppliers;
- promote the implementation of good quality, safety and environmental practices by suppliers, as well as the labour legislation in force.



9. Process Management

Compliance with the principles enshrined in this document will be reflected in the assessment of each supplier and will be decisive in weighing up its qualification as a supplier to the CONSULGAL Group.

Supplier evaluation is a tool used to assess compliance with the requirements demanded of each supplier.

Supplier assessment requirements:

- delivery times
- price of services
- ease of contact/accessibility
- efficient problem-solving
- speed of problem resolution
- quality of service
- good environmental and safety practices
- GDPR compliance (applicable in the case of suppliers/subcontractors who process personal data on behalf of Consulgal)

Quantification Levels

Criteria	Score			
	4	3	2	1
Delivery times	On time	Delay of 1 < working days ≤ 5	Delay of 5 < working days ≤ 15	Delay > 15 working days
Price of services	Below average	Average	Above average up to 5%	Higher than average by 5%
Ease of contact contact/accessibility	Always answered	Mostly helpful	Minority of the time	Never answered
Efficiency in resolving problems/complaints	Effective(*)	Mostly effective(*)	Less effective (*)	Ineffective(*)
Speed in resolving problems/complaints	Resolved on the day	Resolved the next day	Resolved within 1 week	Not resolved or takes more than 1 week
Technical quality of quality	Always fulfils specified requirements	Mostly fulfils the specified requirements	Minority fulfils specified requirements	Does not fulfil the specified requirements
Good environmental and safety practices	The company is certified according to the three standards ISO 9001, ISO 45001 and ISO 14001 (quality, safety and environment)	Company certified in at least at least one of the references, namely ISO 9001, ISO 45001 and ISO 14001 (quality, safety and environment)	Non-certified company with non-significant environmental impacts or non-significant safety risks (**)	Non-certified company with significant environmental impacts or safety risks. (**)
GDPR compliance (***)	Company certified in both ISO 27001 standards (Information Security Management System) te ISO 27701(Privacy Information Management System (PIMS)) and the GDPR compliance questionnaire has a maximum rating	Company certified in at least one of the ISO 27001 (Information Security Management System) or ISO 27701 (Privacy Information Management System (PIMS)) and the GDPR compliance questionnaire has a maximum rating	Company not certified, but GDPR compliance questionnaire has maximum rating.	Company not certified, but the GDPR compliance questionnaire does not have a maximum rating.

(*) According to the Customer satisfaction assessment, if applicable
(**) Environmental Impact is associated with the change in the environment or the environmental effect considered significant, resulting from the activities, products or services of an organisation. Significant Safety Risk is the probability of a dangerous phenomenon occurring with the seriousness of the injuries or damage to health that such a phenomenon could cause
(***) Criterion only applicable to Suppliers/Subcontractors who provide services where they process personal data on behalf of Consulgal.

Weighting Levels

Criteria	Weighting	
Delivery times	15%	15%
Price of services	20%	20%
Ease of contact/accessibility	7,5%	7,5%
Efficiency in resolving problems/complaints	10%	10%
Speed in resolving problems/complaints	7,5%	7,5%
Technical quality of service	30%	20%
Good environmental and safety practices	10%	10%
*** Has processes in place to comply with the GDPR	—	10%

Qualification Levels

Rating	Supplier Class
>3,25 a ≤ 4	A-Very good
>2,3 a ≤ 3,25	B-Good
>1,5 a ≤ 2,3	C-Sufficient
≤ 1,5	D - Insufficient

The CONSULGAL Group considers the Supplier Code of Conduct to be a privileged communication tool and makes it available to interested parties.

If any non-compliance with the stated requirements is identified, the CONSULGAL Group reserves the right to report the situation to the competent authorities.

The supplier undertakes to comply with all the rules established under its responsibility, bearing in mind that its activity must be carried out in such a way as to achieve compliance with the requirements of the CONSULGAL Group Policy and Management System.

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