



CODE OF CONDUCT

It specifies the code of conduct for Winprovit's professionals at service.

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SCOPE

This Code of Conduct is intended to define the principles that guide the performance of employees of WINPROVIT, to build and maintain a reputation and a good name, whose solidity is based on good faith, impartiality, and responsibility, and which is present in all activities or decisions.

The Code of Conduct also defines accepted standards of behavior as appropriate, in situations whose nature or context may generate doubts about the best model to follow.

WINPROVIT intends to give to all those related, in the role of customer, supplier, partner, competitor, employee, candidate or in any other situation, guarantees of a fair, impartial, and ethical conduct.

This Code of Conduct applies to all WINPROVIT employees without exception.

CORPORATE CITIZENSHIP

WINPROVIT expresses its support for fundamental human rights and avoids participating in activities or businesses that abuse such rights.

We act in a socially responsible manner, complying with the laws and respecting the customs and traditions of the countries in which we are present, and contribute responsibly to the development of communities. Whenever possible, we seek to hire qualified local employees. WINPROVIT will scrupulously maintain ethics regarding recruitment. Thus, it will not directly address an employee of a Customer, Partner or Supplier, in order to delight him to join WINPROVIT. If the Customer's employee, Partner, or Supplier apply spontaneously or specifically to a job at WINPROVIT, and only in this case, it will be accepted in process.

When situations of non-compliance with our Code of Conduct are reported, or where there is suspected non-compliance, measures will be taken to investigate and, if deemed appropriate, to correct the situation.

WINPROVIT employees are encouraged to report and express their concerns and should do so in good faith, with impartiality, honesty, and respect. WINPROVIT undertakes to protect them against any retaliation arising from the application of the provisions of this Code.

WINPROVIT employees are also encouraged to influence other companies or citizens with whom they contact within their role and to follow the values and principles set out in this Code.

WINPROVIT does not officially support any political party, nor does it contribute financially to any of them. It remains equidistant from the political-party forces, but it cannot intervene in political debates on issues of legitimate concern for WINPROVIT, its collaborators or the communities where it operates.

EQUAL TREATMENT AND NON-DISCRIMINATION

WINPROVIT employees may not engage in discrimination, harassment or intimidation based on race, sex, age, marital status, physical disability, sexual preference, political opinions, religious beliefs, or any other situation protected by law.

Any retaliation against individuals who make claims related to any type of discrimination or harassment is also prohibited.

WORK ENVIRONMENT

WINPROVIT must maintain a fair, safe, and friendly working environment.

For this, the treatment between employees, customers, suppliers, or any other persons with whom employees contact daily, should be based on respect, dignity, impartiality, and courtesy.

Any circumstances that inspire doubts or fears about how to act in the relationship with people, should be reported to the person responsible for human resources management, or to the administration of the organization, which will provide help in the reflection or execution of the best way to deal with the problem.

The Role of Managers

Employees with leadership roles, regardless of the hierarchical level at which they perform it, must scrupulously follow these same principles, and refrain entirely from any attitudes of discretion, hostility and intimidation.

The Manager at WINPROVIT should provide clarity in the definition of the mission and objectives of employees, help in establishing priorities and in solving critical situations.

It also has the task of seeking the most appropriate solutions in terms of reconciling and balancing the employee's work priorities and family life. WINPROVIT argues that the reconciliation between family and professional life should be seen as possible and desirable, to contribute to the emotional balance of employees, so necessary for its success. When the conciliation effort seems momentarily impossible, one should choose to alternately prioritize one and the other aspect of the employee's life, in short periods, but not give up any of them. It should guide its decisions, on recruitment, stimulus, and progression, on the merits shown and prevent prejudices or personal affinities from interfere with their ability to judge.

The mission of the People Manager must also be guided by the improvement of the individual and collective value of the members of its team, for which, in addition

to other methodologies that WINPROVIT provides, should teach and develop capabilities.

Internal Transfers

The working environment at WINPROVIT must be of stability and confidence, so that learning and productivity are therefore optimized.

Therefore, no WINPROVIT employee or manager should, on his own account, exploit rumors, probe or address invitations to employees, aimed at or may lead to internal transfers.

Presentation

WINPROVIT employees represent the company in any situation in which they are in this capacity.

Thus, they must follow the customs and customs of the country where their job is located, showing respect for the culture of the society in which they are located.

The presentation of the employee must follow the models accepted as appropriate to their function and situation in which they are, both in terms of clothing and with regard to any other protocol rules that are expected.

Employee's Private Life Reserve

WINPROVIT accepts and subscribes to the right to reserve the employee's private life. Any revelation of facts, preferences, habits or lifestyles, should only be made by himself, who is responsible for deciding what he wants to make public.

WINPROVIT will not be interested in any aspect of the private life of its employees, provided that the reputation that arises is not incompatible with the image of suitability that WINPROVIT intends to preserve. All this applies to life in society and virtual presence, whether on websites, blogs or social networks.

Communications made from the means made available by WINPROVIT will be kept confidential. In the event that there are suspected suspicions of unlawful behavior or contrary to this Code, the employee will be requested to verify his/her communications.

RESPONSIBILITY

In the performance of their duties, all employees are responsible for complying with the Law, business rules and this Code of Conduct, personally responsible for the infractions or omissions committed.

Leadership requires courage, vision, and integrity. Employees with leadership functions, whatever their hierarchical level, are required even more responsibility in compliance with the Law, business rules and this Code of Conduct, so that they can exercise their role through example.

It is expected that managers, in addition to leading employees to meet WINPROVIT's objectives, will be an example in thinking leadership and coherence of their actions with the best interest of WINPROVIT.

WINPROVIT PROPERTY

Employees must ensure ownership of WINPROVIT, as if it were their property.

Any installations, equipment, vehicles, materials, or work tools, whether or not attached to you or distributed, should be the best attention of you in order to avoid damage, deterioration, misuse, exposure to theft or unnecessary risk.

Similarly, WINPROVIT's intellectual property must be protected by the employee.

Everything that is not public, but is valuable to WINPROVIT, such as development processes, or marketing of products, databases, projects or prototypes of products or services, studies acquired or conducted by WINPROVIT and not published and software acquired or developed by WINPROVIT, belong to the company's assets, and must be protected by employees.

WINPROVIT databases cannot be used for purposes other than those for which they were built. Any WINPROVIT databases, such as those of customers, partners, business, etc., cannot be used for purposes other than those defined at the time of its creation.

The use of the company's equipment for private purposes is permitted but should be occasional and restricted to what is indispensable to ensure the balance between personal and professional life. Included in this context are equipment whose use generates direct costs for the company, such as telephones and mobile phones, as well as the consultation of entertainment sites or personal email boxes that take place at work time.

WINPROVIT's financial resources should be used with weight, as if it were own resources. Winprovit employee decisions should include, first, the orientation for a balanced expenditure, appropriate to the situation and cost-effective.

Where a WINPROVIT employee detects access to or possibility of undue access to information, documents or licenses of use, he/she shall alert the department responsible for the management of the matter concerned, in order to take appropriate action. Similarly, security flaws that may be found in WINPROVIT's systems must be reported immediately by those who have found them and never explored them, either to analyze, solve or evaluate the real scale of the problem, responsibility that is always and only to the department to which it is assigned.

ALLEGIANCE

Conflict of Interest

Employees must remain loyal to WINPROVIT.

They are free to initiate and maintain any activity in their private life, but they must prevent a conflict of interest from arising, or that any observer may suspect a conflict of interest and doubt their loyalty to WINPROVIT.

To do this, you must:

- Avoid pursuing personal interests in the performance of their duties, which may conflict with WINPROVIT interests.
- Avoid favoring third parties or entities, during the performance of their work for WINPROVIT, which harm or may harm WINPROVIT interests;
- Avoid exploiting business opportunities or financial investment opportunities in the performance of their duties that lead to or may lead to the conclusion that there is or appears to be a conflict of interest.

Provision of services in Customers, Suppliers or Partners

WINPROVIT employees shall not accept a provision of services on an individual behalf, in Customers, Suppliers or Partners without the express authorization of WINPROVIT.

The provision of services on an individual's behalf, in Customers, Suppliers or Partners will not, in general, be permitted. This situation is a precursor to a conflict of interest, since the employee has or may have privileged access to information that may disturb the impartiality with which he/she must treat Partners, Customers and Suppliers.

The provision of services on an individual behalf in competing companies or offering some services or products competing with WINPROVIT is prohibited.

Second Job

WINPROVIT employees must not accept a second job without the express permission of WINPROVIT.

Overall, a second job conflicts with the employee's ability to rest and regain energy and work capacity to fulfill their responsibilities at WINPROVIT.

Second employment in Customers, Suppliers or Partners will generally not be permitted. This situation is a precursor to a conflict of interest, since the employee has or may have privileged access to information that may disturb the impartiality with which he/she must treat Partners, Customers and Suppliers.

Second employment in competing companies or companies offering some **competing services or products with WINPROVIT is prohibited.**

Participation in the Structure of Other Companies or in the Capital of Other Companies

The participation of WINPROVIT employees in the capital of other companies, in the organizational structure of other companies or organizations, with functions on the Board of Directors, Fiscal Council, Advisory Board or Strategy Board is free, provided that:

- WINPROVIT is informed in advance
- Do not impair the performance of the functions to which they are required;
- There is no indirect interference with your decisions in WINPROVIT and vice versa.
- Don't be a competitor to WINPROVIT.
- The income from the employee's participation in other companies is not in total more than 20% of their total income.

Employment of People with Personal Connections Close to WINPROVIT Employees

The employment of persons with close personal connections, such as family members, cohabitants or other persons closely related to WINPROVIT employees, is free, but should be treated with caution because it may disturb the objectivity and impartiality with which the targeted perform their duties.

The employment of persons with close personal connections to WINPROVIT employees may be accepted if:

- WINPROVIT is informed of such a possibility

- The functions performed by both do not imply decisions that directly or indirectly affect the person with whom they have a personal connection.

At any time, if these cases have occurred, WINPROVIT may determine the change of position of one of the actors in the relationship, in order to minimise any losses to WINPROVIT.

Employment of People with Personal Connections Close to Employees of Customers, Suppliers, Partners or Competitors

The employment of people with personal connections close to employees of WINPROVIT Customers, Suppliers, Partners and Competitors is free. The WINPROVIT employee, in the best interest of all parties, should avoid exchanging information about products, services, pricing, business rules or position in any internal ranking that may benefit or harm any of the companies.

The WINPROVIT employee who has personal connections close to employees of Customers, Suppliers or Partners, should use all caution in the reflection and decision on situations involving this company, because its objectivity may be reduced and lead him to reflect or decide without guaranteeing the best interest of WINPROVIT.

If the WINPROVIT employee has close personal connections to competitors' employees, they should avoid exchanging information that is not public and published.

If, for any reason, the WINPROVIT employee is aware of confidential information in relation to the competing company, he/she should not use it in the performance of his/her duties or disclose it to WINPROVIT to avoid creating an advantage based on contexts of competitive injustice.

Political-Party Activity

WINPROVIT recognizes the right of employees to actively participate in political life, respecting the accepted form as appropriate for their country. However, the employee must make it clear that he does not represent WINPROVIT during his participation in a party-political process. If the employee wishes to apply for or accept a public office, he/she must communicate the fact in advance to his hierarchy and carry out together the assessment of the negative consequences that may arise from it for his commitments to WINPROVIT and define how to minimize them.

CORRUPTION AND RELATED OFFENCES

WINPROVIT, repudiates all actions related to corruption and related offenses, understood by this reason, all crimes of corruption, receipt and offer of advantage, influence peddling, laundering and fraud in obtaining subsidy, subsidy or credit, in accordance with the provisions of Decree-Law No. 109-E/2022, which establishes the General Regime for the Prevention of Corruption (RGPC).

Responsibilities

The Administration has appointed an internal team responsible for regulatory compliance (Compliance) that holds the responsibility for ensuring compliance with the requirements of the RGPC in Winprovit.

The other stakeholders, namely administrators, employees, managers, managers, suppliers and partners, have the responsibility to comply with and enforce this Code of Conduct.

Secondary personal gain, extortion and corruption

The WINPROVIT employee cannot obtain secondary gains from the performance of his activity at WINPROVIT, in addition to the remunerations, subsidies and benefits attributed by WINPROVIT.

Gratuities of third parties or privileged access to goods or services at reduced prices are not acceptable unless they result from agreements established by WINPROVIT itself, for its employees.

The acceptance of third-party gifts related to WINPROVIT and the performance of its function in WINPROVIT should be carefully analyzed. In general, gifts or services of high value, or performed at non-traditional moments in the local culture may be an indication of intention to condition the decisions of the WINPROVIT employee. In the event that the employee suspects this intention, he shall reject any offer that may impair his clairvoyance and decision-making capacity.

Payments and receipts

WINPROVIT does not accept or pay bribes.

Any payment or receipt must be based on a legitimate, legal and accounting accepted document.

WINPROVIT applies payment terms to its Partners based on clear and universal rules.

Benefits and offers

It is expressly forbidden to offer or promise cash or gender benefits to any private or public sector representatives.

It is also forbidden to receive the same benefits or offers.

Some benefits may be offered, if you observe some rules and their reasonableness, including:

- Not being illegal;
- do not go against the provisions of this Code of Conduct;
- Belong to the professional or institutional context of WINPROVIT;
- be of an occasional nature, socially acceptable and in adequate and reasonable quantity and form;
- Do not have the purpose of obtaining any kind of advantage;
- Are approved by the Administration, after the assent of the Compliance team.

Communication channels

Two communication channels have been established for issues related to corruption and related infringements.

Any questions or clarifications should be forwarded to the e-mail: compliance@winprovit.pt. All information exchanged during clarifications will be treated confidentially.

A confidential channel for complaints has been created, in line with the legislation in force, to allow any irregularities or deviations to be reported to the provisions of this code of conduct and the Law in general. This reporting channel is accessible through the Winprovit website from: <https://whistleblowersoftware.com/secure/winprovit>

Whistleblower protection

A whistleblower is defined as the natural person who publicly denounces or discloses an offence based on information obtained during his professional activity, regardless of the nature of that activity and the sector in which it is carried out.

Considering the sensitivity of the issues related to complaints and the provisions of the Law, WINPROVIT guarantees the protection of whistleblowers who will file complaints about WINPROVIT. The protection of anonymous whistleblowers who are subsequently identified is also guaranteed.

The protection referred to implies the prohibition of the practice of acts of retaliation against the whistleblower, acts that may cause the whistleblower to have property or non-property damage, in a professional context. They are also valid as retaliation, threats or attempts at acts or omissions.

CONFIDENTIALITY

Confidentiality is one of the basic attributes of information security, along with Integrity and Availability.

Confidentiality is the property that information is not accessible or made available to unauthorized persons, entities or processes. Integrity is the property that ensures that the manipulated information retains all the original characteristics established by the owner of the information. Availability is the property that ensures that the information is accessible for legitimate use, that is, by entities authorized by the owner of the information.

To meet the confidentiality, integrity, availability, and privacy issues assumed by the top management, WINPROVIT has defined a set of policies, namely Information Classification Policy, Information Security Policy and Privacy Management Policy.

All internal documents are the property of WINPROVIT and classified in accordance with the Information Classification Policy. They should therefore not be delivered to third parties or in any way, made available outside the organization, except those classified as public information, drawn up for the purpose of being distributed to the public.

WINPROVIT has determined in the form of a Policy its commitments to Information Security. It is the duty of all employees to comply with and enforce the determinations of this Policy, to prevent the information from circulating by unauthorized persons, either internally or externally.

In the case of employees working in areas considered sensitive and therefore access confidential or secret information, they will be invited to sign a Confidentiality Agreement, which will ensure the understanding of the booking duties to which they are subject.

WINPROVIT does not accept to receive confidential information from companies in which an employee has worked and for this reason has had access to it. Likewise, it prohibits any provision of confidential information, the authority of which is not granted to the employee

who has decided it. WINPROVIT also considers it unacceptable, and will formally hold the former employee responsible, for providing confidential information to his/her current employer.

Privacy of personal data

To comply with the current European rules on the privacy of personal data (GDPR), Winprovit has established a Privacy Management Policy, the objective of which, in addition to compliance with the regulation, is to present and clarify its commitments to the privacy of the personal data of the data subjects with whom you interact. To this end, Winprovit has developed and maintains an up-to-date inventory of personal data, addressing its processing purposes, in order to ensure compliance with the rights of its holders.

Internal and External Communications

The open internal discussion on various issues, such as the business in which WINPROVIT is involved, planned activities, business strategy, etc., makes employees informed about matters that may have defined a specific communication plan.

Because many employees make frequent communications internally or externally, they must make sure that they are transmitting information that can be presented in the specific context, or that is public.

In external communications, this care should be redoubled. In case of doubt, the Marketing Director or the person responsible for managing the corresponding functional area should be consulted.

WINPROVIT employees may not use the @WINPROVIT.pt address to disseminate discriminatory, xenophobic, or pornographic messages.

Exchange of Confidential Information with Customers and Partners

WINPROVIT employees may only pass confidential information to Partners after the partnership agreement has been signed.

In no event will WINPROVIT employees transmit confidential information between Partners, between Customers or between Partners and Customers.

Employee Information

WINPROVIT maintains an authorized database with information about its employees, for the purposes of fulfilling its obligations as an employer and also to optimize the management of human capital.

The use of employees' personal data for purposes other than those described in the Privacy Management Policy, or their transmissão to third parties, is prohibited. Any situation that is strictly necessary and that is not provided for in the Privacy Management Policy, will be the subject of a request for consent to the employee, explicit and voluntary.

CLIENTS

The relationship with customers must be guided by trust.

Thus, WINPROVIT employees must make sure that they can fulfill what they are hired, refraining from creating unrealistic expectations, which will later damage WINPROVIT's image.

The performance of contracts with clients must be subject to models clausued by legal advice and, any additions or side-letters, must also be sanctioned by the same services. This procedure aims to protect winprovit's interests, as well as avoid differences of understanding about the object of the deal for both parties.

WINPROVIT employees should not agree on the obligation to acquire the goods of a customer and only this one, and may, in order to conduct a business, fail to safeguard the interest of WINPROVIT when it is in the position of buyer.

Employees have a duty of confidentiality about information or databases of clients who have in their possession or with which they have come into contact, in the performance of their functions. After the transaction with the client, or provided the service, if they are personal data, these must be kept for the period determined in the Privacy Management Policy. In the case of other information, it should only be kept in agreement with the customer if it proves useful for both parties. This conservation agreement shall be formalized in writing.

SUPPLIERS

WINPROVIT employees dealing with suppliers must use impartiality and integrity.

When they wish to purchase goods, they shall ensure that all suppliers meeting the desired requirements are duly informed of the details of the purchase, as well as on the time limits for submitting tenders or budgets.

The deadlines indicated for the submission of proposals or budgets must be scrupulously met, thus ensuring the exemption and good faith that must contextualize the business done with WINPROVIT.

The decision should be based on the pursuit of WINPROVIT's best interests, not only in the immediate but preferably in the long term.

WINPROVIT employees shall not condition a supplier's acceptance to the obligation to purchase goods or services from WINPROVIT.

All payments made by WINPROVIT for the purchase of goods or services must be included in the contract, proposal or budget. In addition, all payments to be made must be legal and common for the type of business.

PARTNERS

WINPROVIT Partners support our business and development in many and varied aspects.

Winprovit employees must therefore be absolutely loyal to them.

They must also act with neutrality and equidistance in relation to the various Partners.

COMPETITORS

WINPROVIT does not coordinate prices with competitors.

It operates in a market with free competition and strives to win business and outperform its competitors, in a wholesome and good faith attitude.

WINPROVIT employees will try to obtain and process information about the competition, but only information obtained legitimately. WINPROVIT employees will not seek to obtain business secrets or confidential information about competitors using dishonest methods.

WINPROVIT employees who have contact with competitors should not disclose internal affairs, prices, sales conditions, market strategies or customer lists, so that this information will not be used to obtain illegitimate advantages over WINPROVIT.

DOUBTS

In the day-to-day of the WINPROVIT employee, situations may arise in which he has difficulty in applying the principles described here and making a clear judgment.

In such circumstances, the employee shall request the opinion of his or her superior and/or compliance team (compliance@winprovit.pt) to obtain an opinion on the compliance of the situation in question with the principles of this Code.

SANCTIONS

This Code of Conduct binds all employees and managers of any hierarchical level, including WINPROVIT Management.

This document clarifies and emphasizes the best practices that must be followed at WINPROVIT so that relationships between employees, or these with customers, partners, suppliers, competitors, or the public, are based on trust.

All provisions of this Code of Conduct are based, directly or indirectly, on legislation that is published and in force; failure to comply with any of the points provided herein may be sanctioned under disciplinary, civil, or criminal liability.