

# CODE OF ETHICS AND CONDUCT



Floene has been going through a process of profound transformation, creating a new identity, a new ambition, and a new purpose. This new Code of Ethics and Conduct was drafted based on our also new values: **Collaboration**, **Respect**, and **Audacity**.

This code and the internal policies and norms provide several essential elements for ethical behavior. However, it's not always possible to provide a response for every situation, and doubts may sometimes arise about the decisions to be made. Therefore, it's important to know the resources available to raise questions or concerns regarding well-founded suspicions or confirmation of behaviors that are incompatible with our Code. In these situations, we support, encourage, and advocate for the communication of such concerns.

## In case of doubt:

How to identify unethical behavior? Review the Code of Ethics. If you still have doubts, engage with the Ethics Committee.

If you witness a breach of the Code of Ethics by third parties (external or internal entities), what should you do? Engage with the Ethics Committee.

Am I aware of the potential risks, including reputational risks, and their alignment with the tolerance level for these risks? Engage with the person responsible for overseeing your role.

I am aware that a colleague is experiencing workplace harassment. Knowing that no complaint has been made due to fear of retaliation, can I be the one to report this situation? Yes, through the ComunicaÉtica channel.

## OUR VALUES

### Collaboration



### Respect



### Audacity



### Supporting documents

Code of Ethics and Conduct  
Ethics and Conduct Committee  
Procedure for Reporting Irregularities



### Contacts

ComunicaÉtica Channel  
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The Floene ComunicaÉtica channel ensures the strictest confidentiality of the conveyed information, and the rights of access and rectification of data are guaranteed in compliance with current legal regulations.

Reading this flyer does not replace the full consultation of the Code of Ethics and Conduct.



# COLLABORATION

## Commitments to Our People

### Do's

- Report any unsafe act or condition.
- Report and ensure the investigation of all accidents (including those occurring during teleworking), regardless of the damage caused. Identify root causes and define action plans to prevent future events.
- Reject any intimidating behaviors and assume the duty to report to Floene's Ethics and Conduct Committee (ECC) any situations of which you have knowledge or reasonable suspicion that affect the Group or any of our people and that may constitute harassment and/or bullying.
- Promote dignified employment, reject any acts of forced labor or labor exploitation within Floene or among its stakeholders.
- Treat people with respect, dignity, and professionalism, without resorting to threats or other forms of humiliation.
- Respect rest time, as well as personal and family privacy.

### Don'ts

- Compromise any safety practices, behaviors, or conditions at the expense of performing an activity/task.
- Ignore signs of stress, distress, or burnout in colleagues, promoting a workplace where everyone is available to speak openly without fear of any form of retaliation.
- Appropriate ideas, proposals, projects, or work from colleagues or collaborators improperly.
- Use prejudices or personal preferences to influence decisions related to the hiring of employees or suppliers, evaluation, training, termination, among others.
- Share personal data with third parties without the explicit consent of the person involved or other legal grounds.

## Questions & Answers

**Q1.** Can Floene access data from my personal electronic communications?

**A1.** This is only allowed under applicable legal terms, especially when there is suspicious of a crime being committed.

**Q2.** If I am a victim of harassment or bullying or witness such behavior, how can I ensure that these behaviors are addressed under this code?

**A2.** Report it to the ECC (Ethics and Conduct Committee).

**Q3.** Is a person at Floene exempt from training on this code?

**A3.** No. Periodically, our employees must receive training on it.

**Q4.** In the workplace, I have come across an unsafe practice that could lead to an environmental problem. What should I do?

**A4.** Internally report it to Floene's Health, Safety, and Environment department to prevent significant harm to the company and the environment.

**Q5.** If I am questioned or devalued, explicitly or implicitly, regarding my worth or merit to hold a position within the organization, are these behaviors covered by this code?

**A5.** Yes, and you should report it to the Ethics and Conduct Committee.



# RESPECT

## Commitments to Our Stakeholders

### Do's

- Treat all records of financial and non-financial indicators authentically, complying with legal and internal requirements for handling documentary information, and ensuring the integrity, accuracy, and clarity of published information.
- Internally communicate, through the means provided in this code, any requests to engage in behaviors related to illicit practices.
- Assume that computer equipment and software should be used for professional purposes, and their personal use must be occasional, brief, and secure.
- Ensure strict respect for the intellectual and industrial property rights of business partners.
- Conduct our business with careful consideration for the recognition and protection of the dignity, freedom, and equality of human beings, as well as the protection of labor and union rights, health and safety in the workplace, and the environment.

### Don'ts

- Participate in any fraud scheme in the handling of funds or assets, or in the falsification of any documents or information.
- Engage in bribery or influence peddling, in any form or manner, to achieve any result, whether lawful or unlawful, contrary or not to the company's goals and objectives.
- Discuss or work with confidential information, whether in a public or private setting where its confidentiality may be compromised.
- Share outside of the company, including after the termination of employment, any information they have become privy to as a direct and exclusive result of their position within the company.
- Disrespect the applicable rules regarding the processing of customers' personal data, including not using their data for purposes other than those for which they were collected or for marketing purposes without the necessary consent.
- Post on the internet or through other channels any content that has not been made public previously without the proper authorization from the Company.
- Express views or opinions on social media without clarifying that they are personal and do not necessarily reflect the position of the Company.

## Questions & Answers

**Q1.** I have a cousin who has a dispute with Floene and is asking me to intervene internally to resolve it. He says he's tired of trying to resolve the issue and is certain he's right. Should I intervene?

**A1.** No. To assist your cousin, you can try to identify the problem internally, but you should not actively promote its resolution or request that it be resolved in a way that unjustifiably benefits your family member.

**Q2.** Floene's marketing department is considering using third parties to conduct marketing activities for Floene, which will involve the processing of customer data by these third parties. Should I contact any specific department?

**A2.** You should contact Floene's Data Protection Officer (DPO) so that this marketing action can be properly framed in accordance with applicable data protection legislation.

**Q3.** During the certification of an installation, I identified a defect that will require its rejection according to applicable legislation. The client became very upset and proposed hiring me to repair the equipment. Can I repair the equipment since I have the technical knowledge to do so and then proceed with the approval?

**A3.** No. You should inform the client that you have no alternative but to reject the installation and explain the specific defect identified so that they are adequately informed. Only by doing so are you complying with applicable law, not putting the client at risk, and being loyal to the company.

**Q4.** In the context of a new hiring, the head of a particular department receives a commercial proposal from a company with which they had a contractual relationship. Can the responsible person directly award the proposal to this company?

**A4.** No, they cannot directly award it. They must remain impartial and comply with the rules and stages of the hiring process according to internal regulations.





# AUDACITY

A sector in transformation



## Do's

- Commit to actively participate in the implementation of the most advanced environmental policies in Floene, with a view for sustainable development.
- Use resources efficiently, minimizing waste generation.
- Promote communication of environmental policy commitments to partners, suppliers, and other stakeholders.
- Report any abnormal situations or environmental risks during the course of your activities.
- Plan solutions and investments with prior analysis of their climate, environmental, and social impacts.
- Ensure that everyone is aware of and complies with Floene's Code of Ethics.

## Don'ts

- Acquire products or services without assessing the supply chain impacts and without ensuring the sustainability principles advocated by Floene.
- Fail to foster a culture of learning from mistakes and transparency among parties, in order to enhance the final outcome of projects/partnerships.
- Nurture a culture that points fingers at mistakes, thereby paralyzing decision-making and hindering the proposal of innovative solutions.
- Fail to comply with confidentiality agreements, ensuring the protection and respect for the intellectual property of our partners.
- Neglect to promote the identification and analysis of risks, creating conditions for experimentation and testing of common solutions.

## Questions & Answers

**Q1.** During a weekend walk, I found waste cables and packaging from hazardous products near one of our facilities that had undergone maintenance. What should I do?

**A1.** You should report this situation as soon as possible, preferably to the department responsible for the maintenance work, and alert them to the need to collect the waste left at the work site and send it to a licensed Waste Operator. Additionally, you should emphasize the importance of restoring the environmental conditions at the site.

**Q2.** We were planning a series of working meetings within the team that would involve several trips around the country. I suggested that we conduct the meetings located farther away through online sessions to avoid extensive travel. Despite my suggestion not being appreciated, did I act correctly?

**A2.** Yes, you acted correctly. Taking actions that align more closely with Floene's commitments regarding the reduction of pollutant emissions is the most appropriate course of action.