

CODE OF BUSINESS ETHICS AND CONDUCT

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1. Sphere of Application

This Code of Business Ethics and Conduct (hereinafter referred to only as “Code”) establishes the guidelines for corporate ethics and Governance applicable to CasaisInvest SGPS (top holding company) and can be extended to all entities included in its consolidation perimeter and scope of management (CASAIS Group), and of personal conduct that should guide the performance of all CASAIS Group employees, being understood as such all employees of any of the companies that are owned in part or in total by the CASAIS Group, assuming that it is part of its business universe, regardless of its business area, geographical location or activities, naturally including the Board of Directors and all members of the Board of Directors and/ or Management of the entities of the CASAIS Group. This Code of Business Principles and Standards identifies values, the mission and defines ‘ethical awareness’, which in their standards establishes and encourages ethical conduct and behavior in the organization and in its relationship with other employees and in external relations with clients, suppliers and all third parties that are directly and indirectly part of its activity.

The application of the Code and its observance does not prevent or exempt from the application of other rules of conduct or ethics, namely those of industry ethics or sector of activity and those of specific programs or participated groups, whether from a legal source or any other source, applicable

to certain functions, activities or professional groups, or even those arising from the regional legal nature where the activity is being developed.

The CASAIS Group is committed to ensuring that the principles adopted in this Code are communicated and respected by all direct and indirect employees and business partners.

We are judged by the way we act. Our reputation will be maintained if we act in accordance with the laws and our Business Principles. We therefore encourage our business partners to live by the same or equivalent principles. As part of the management system, the Management is also responsible for providing employees and third parties with secure and confidential channels to address sensitive issues and report cases of non-compliance with the Business Principles. On the other hand, it is the responsibility of employees to report to CASAIS any suspected breach of the Business Principles.

The CASAIS Business Ethics and the conduct of all Entities and recipients of the EC are fundamental to the way in which we conduct our business and characterize the perpetuation of the ‘mastery’ left by its Founders, in particular, Mestre Casais. The legacy has characterized the way of acting throughout more than 60 years of history, constituting the foundations of the CASAIS DNA and incentive for its growth. These are the ethical values that we qualify as ‘owned’ by CASAIS.

2. **CASAIS general business principles**

The Business Principles apply to all transactions, large or small, and guide the expected behavior of each employee in each company or CASAIS unit in conducting its activities at all times.

It is the responsibility of the Boards to lead by example in order to ensure that all employees are aware of these principles and behave in accordance with the spirit and the text of this Code.

The application of these principles is supported by a comprehensive set of processes, designed to ensure that our employees understand the principles and confirm that they act in accordance with them.

As part of the Business Principles, we are committed to contributing to sustainable development. This requires balancing short- and long-term interests, integrating economic, environmental and social considerations into the company's decision-making process.

2.1. **Our Vision**

To be a reference of knowledge and solidity in the areas of engineering and construction, industry, energy, and asset management.

2.2. **Our Mission**

Manage with mastery and innovation privileging strategic partnerships and new markets based on a culture of rigor and sustainability.

2.3. **Our Principles and Values**

Compliance with the law, regulations, statutory provisions, behavior based on integrity, ethics, transparency and honesty is a commitment of each and every one of the CASAIS Group's employees and that must characterize the entire organization before the communities in which it operates.

The conduct of the business and corporate activities of the CASAIS Group, wholly or partially held, must be carried out within a framework of transparency, professionalism, rigor and with full respect for the competition rules, and in this context must respect the legal practices instituted by public entities and private with whom we have a relationship or are obliged to provide our accounts and other responsibilities that arise from the activity developed.

The CASAIS Group values are:

a) **Knowledge**

We encourage the sharing of knowledge and good practices and promote training, innovation and business diversity.

In this value, there are concrete examples of the expected behaviors:

- Propose creative solutions and contribute to continuous improvement.
- Share knowledge and experience with colleagues.
- Try to update yourself through training actions that allow personal and professional development.
- Promote the implementation and dissemination of good practices.
- Availability to learn and to teach.

b) **Cooperation**

We contribute to an environment of collaboration and teamwork, creating synergies to achieve global goals.

In this value, there are concrete examples of the expected behaviors:

- Encourage teamwork and partnerships, both internal and external.
- Guide partners and teams, establishing and communicating objectives and deadlines clearly.
- Deal with disagreements constructively and positively.
- Promote the involvement of different areas in solving problems.
- Valuing and respecting personal differences.
- Seek to motivate teams by encouraging them to succeed.
- Recognize, share and celebrate success.

c) **Dedication**

We encourage commitment and effort to achieving goals.

In this value, there are concrete examples of the expected behaviors:

- Availability to face new challenges.
- Undertake commitments to the team and company.
- Demonstrate commitment to performing day-to-day tasks.
- Demonstrate an attitude of interest and availability to clients, partners and colleagues.

d) **Determination**

We encourage proactivity and leadership oriented towards objectives and results, reinforcing sustained decision making.

In this value, there are concrete examples of the expected behaviors:

- Analyze the situation and predict possible scenarios.
- Make decisions in a thoughtful and sustained manner.
- Demonstrate persistence in achieving the objectives.

e) **Flexibility**

We support mobility and availability by creating conditions for adaptation in the face of change and challenges.

In this value, there are concrete examples of the expected behaviors:

- Demonstrate the ability to adapt to change.
- Responsiveness to develop other tasks and acquire new knowledge.
- Availability for national and international mobility.
- Incite a culture of flexibility with your team.

f) **Humanism**

We develop effective relationships through mutual respect, solidarity and friendship between Employees and with Business Partners and Communities.

In this value, there are concrete examples of the expected behaviors:

- Show respect in the relationship with colleagues and partners.
- Demonstrate responsible and supportive attitudes.
- Develop interpersonal relationships.
- Take a cordial posture.
- Encourage dialogue and communication with the purpose of giving feedback on attitudes, behaviors and objectives.

g) **Integrity**

We assume a conduct of seriousness, impartiality and loyalty in the execution of activities, ensuring relationships of trust, overlapping the good of the “whole” with the individual.

In this value, there are concrete examples of the expected behaviors:

- Impartiality in analyzing situations and handling information.
- Guarantee the confidentiality of information.
- Privileging relationships based on principles and values.
- Frontality in relationships.
- Make commitments and honor the commitments you make.
- Defend the values of the CAS AIS Group.

h) **Accuracy**

We encourage discipline and responsibility in the execution of tasks, ensuring compliance with the commitments assumed.

In this value, there are concrete examples of the expected behaviors:

- Compliance with company policies and guidelines related to quality, environment and safety.
- Task planning with method.
- Compliance with established procedures and seek to solve problems, analyzing their cause and presenting solutions that avoid future errors.
- Demonstrate rigor and ability to establish, comply and communicate the objectives and deadlines.
- Try to minimize costs and optimize processes, whether for the benefit of the company, the customer or the partner.

In the CAS AIS Group we cultivate partnerships and principles of internal and external collaborative work, so we encourage the sharing of knowledge and information, promoting group spirit and valuing collective actions; we support creativity and a disruptive vision, promoting a behavior with an open mind to growth, accepting criticism, so that processes of evolution and updating can take place with a view to enriching our human capital and maintaining a cycle of permanent updating that is essential for development and business progress; and we encourage the introduction of innovation and industrialization processes in the sector, promoting the integration of tasks and equipment that allow an increase in productivity, better safety conditions and an appreciation of the profession in the field of society in which it operates;

In the CASAIS Group we promote the transfer of CASAIS DNA and we are guided by the development of an activity based on ethical principles that constitute in themselves a strong link between the Vision, Mission and Values of the Company.

3. Goals

The CASAIS Group is committed to:

- a)** Assume a transparent, responsible and ethical posture in its internal and external relations;
- b)** Incorporate ethical and social concepts based on a set of values that provide social and personal development for employees in a broad sense of community and business culture;
- c)** Assume social responsibility as strategic in the business environment with the objective of generating positive return in its integration in the regions and communities where it operates and in the scope of the business it promotes;
- d)** To manage its employees based on principles of social sustainability and knowledge promotion, with the aim of increasing satisfaction, aligning personal and family goals with organizational ones, retaining talents, increasing training and productivity;
- e)** Maintain and grow the company's reputation and institutional reputation;
- f)** Value the quality of services and products as a recognized brand, respecting global sustainability, with a socially responsible and value-creating dynamic;

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etica@casais.pt

g) Develop relations with the internal and external community and be a development agent with other community and mutual institutions and social development institutions and associations;

h) Improve internal and external communication, reinforcing and strengthening the relationship with the people and communities where it operates or develops its activity;

i) Promote the individual and collective social participation of employees in the communities where they operate;

j) Invest in education and environmental preservation programs and become a diffuser of environmental values and good practices, promoting global sustainability and improving people's quality of life;

k) Recognize and respect the rights of Customers, Employees, Shareholder, Partners and Suppliers, ensuring that their expectations are taken into account in decision-making and in the development of activities;

l) Conduct all business and partnerships with integrity and professionalism, in a fair and honest manner, complying with all applicable legislation;

m) Adopt a zero-tolerance policy towards corruption and bribery, prohibiting corruption or bribery in any form, either directly or through third parties, anywhere in the world.

n) Comply with the OECD Guidelines for Multinational Enterprises, which reflect the four principles contained in the ILO Declaration on Fundamental Principles and Rights at Work;

o) Comply with the Ten Principles of the United Nations Global Compact;

4. Responsibilities, Rules of Conduct and Relations

4.1. Shareholders

Protect shareholders' investment and provide them with a long-term return, competitive with that of other companies in the sector.

- a)** Profitability that ensures the sustainable development of the organization;
- b)** Transparency of accounts and business;
- c)** Provide all financial and administrative information whenever requested by the body with competence attributed within the Group;
- d)** Comply with the provisions of the global directives and policies in force in the universe of the Group;
- e)** Ensure compliance and maintenance of the rules and applications of the existing Family Protocol and other guidelines based on the governance model.

4.2. Clients

Conquer and maintain clients by providing them with works, products and services that add value in terms of price, quality, safety and environmental impact, providing all the necessary innovation, technology, environmental and commercial skills.

- a)** Compliance with the agreed solutions and requirements;
- b)** Monitoring the evolution of your needs and expectations;
- c)** Promotion a good image in the execution of works and overall satisfaction with the implemented solutions;
- d)** Increase the collaborative schemes that allow a balance and efficiency in the processes, promoting a balanced participation of all the interlocutors in the search for the maximization of the models and the profitability of the projects;
- e)** Relationship based on transparency, equality, loyalty and ethics;
- f)** Promote customer loyalty, adopting best practices in terms of fair and responsible marketing, providing factual information that promotes sustainable consumption and health and safety;
- g)** Create tools and support services for handling complaints, resolving conflicts, protecting data and privacy of Customers;

h) To ensure that employees act in an integral manner with Customers, aiming at excellence in service provision and the development, in the long term, of relationships based on trust and mutual respect.

4.3. Collaborators

Respect the human rights of our employees and give them dignified and safe working conditions, as well as creating an inclusive work environment, providing access to opportunities for talent and career development.

- a)** Confidence in the future of the organization;
- b)** Development of their technical and behavioral skills;
- c)** Promotion of motivation, involvement of the organization and the personal satisfaction of employees;
- d)** Search and adoption of best practices and the availability of resources that promote the improvement of occupational health and safety conditions;
- e)** Full compliance with legislation and regulations, as well as minimizing risks in terms of safety management;
- f)** Adoption of good environmental practices and the consequent minimization of the impacts in this chapter resulting from its activities.

4.4. Suppliers and Partners

Seek mutually beneficial relationships with subcontractors, suppliers and service providers and, in doing so, promote the application of these rules of conduct and equivalent business principles in such relationships.

- a)** Strengthening and encouraging partnerships;
- b)** Compliance with established commitments;
- c)** Encouragement and support in improving safety and environmental protection conditions, particularly for subcontractors;
- d)** Honor the commitments assumed and ensure full compliance with the obligations, good practices and rules underlying the activity and business in question, taking into account the normal functioning of the market
- e)** Establish a relationship of trust, honesty and transparency, encouraging cooperation, the sharing of knowledge and experiences that contribute to the achievement of common objectives and benefits.
- f)** Promote its ethical principles, integrity and social and environmental responsibility, generating sustainable relationships;
- g)** Ensure that suppliers, subcontractors and service providers assume the shared commitment and principles defined in this Code during their functions and execution of work for the CAS AIS Group.

4.5. Image Protection and the Media

We communicate in different ways, and as collaborators everything we write or say is reflected in CASAIS' reputation. Whatever the means used, inside or outside the company, CASAIS' rules on public disclosure and business communication must be followed, including the rules applicable to the use of e-mail and social networks.

- a)** CASAIS Group Employees must manage contacts with the media with care;
- b)** If you are not an official spokesperson for the CASAIS Group, you should not identify yourself to the media as a representative of the CASAIS Group or Group companies, except when specifically authorized to do so by a member of the Executive Committee;
- c)** All matters addressed with the media must always be previously articulated with the hierarchy and with the support of the institutional communication structures of the CASAIS Group, since the exhibition may have an influence on the image, reputation and credibility of the CASAIS Group and respective companies;
- d)** All requests for information about the CASAIS Group made by the media should be addressed to mic@casais.pt;
- e)** All information made available to the media and disseminated publicly must be of an informative and truthful nature;

- f)** All public information communicated by the CASAIS Group must respect the legislation and regulations in force.

4.6. With Society

Conduct business as responsible corporate parties in society, accept applicable laws and regulations, support fundamental human rights in line with the legitimate conduct of business and give adequate attention to health, safety and the environment.

5. Rules of Internal Conduct

The business and professional behavior of the entities and persons subject to this Code must adapt to the following basic principles:

- a)** Respect and protect the human rights recognized in the Universal Declaration of Human Rights and in the main international agreements in this regard, as well as additional local rules that strengthen these principles;
- b)** Do not admit or support the use of child labor and defend all the guidelines of the International Labor Organization regarding the work of minors;
- c)** Provide equal opportunities based on professional merit and respect for differences in ethnicity, social class, nationality, religion, disability, gender, sexual orientation, age, and association with a union or political affiliation;
- d)** Not to use discrimination practices, respect and comply with the legislation of the countries in which we operate and defend, among all, respect for cultural diversity, local habits and customs;

e) Develop and diversify internal and external communication processes and means, seeking to ensure access to information and involvement of all employees and other interested parties, such as customers, service providers, suppliers and other external partners;

f) Ensure confidentiality and privacy of data with third parties and competition and do not allow the misuse of this information and preserve the Group's industrial and intellectual property, maintaining the data in the context of internal and secure databases;

g) Guarantee and apply the Safety and Health at Work standards in accordance with the legislation in force, with the best practices in the sector and the internal rules defined within the scope of the Management System, even when the countries where we operate do not have regulations for that;

h) Guarantee compliance with safety rules and rules as an obligation of all, assuming the duty to inform the services responsible of the occurrence of any irregular situation that could compromise the safety of the people, facilities or equipment of your company.

6. Rules of Conduct applicable between Employees and the Company

The relationship of the CASAIS Group with its employees and the relationship between them should be based on the fulfillment of the following commitments:

6.1. Respectful Treatment and Elimination of Discrimination

The CASAIS Group assumes the responsibility of maintaining a working environment without any discrimination or any conduct that implies personal harassment;

All workers must be treated fairly and with respect from their superiors, subordinates and colleagues;

Any abusive, hostile or offensive attitude or conduct, whether verbal or physical, is not tolerated.

6.2. Abolition of Child Labor

The CASAIS Group does not admit child labor nor will it incorporate in its business activity any product or service arising from it and will ensure compliance with all the provisions of the International Labor Organization regarding the work of minors;

The CASAIS Group requires all its employees and suppliers to carefully observe these principles.

6.3. Equal opportunities

All employees will enjoy equal opportunities to develop their professional careers, regardless of their age, sex, marital status, race, nationality and beliefs;

The CASAIS Group undertakes to establish an effective policy of equal opportunities for its employees to develop their activity and internal growth based on the principle of merit;

Promotion decisions will always be based on circumstances and objective assessments in force in the company;

Similarly, the CASAIS Group is committed to maintaining a policy of investment in the learning, training and personal and professional training of its employees;

CAS AIS Group employees will respect the policy of equal opportunities in their professional scope and will support the personal and professional learning of their colleagues by sharing knowledge and good practices.

6.4. **Health and Safety at work**

The CAS AIS Group will provide its employees with a safe and stable environment, updating measures to prevent occupational risks and strictly respect the rules applicable in this matter in all places where their business activities are developed;

All employees are responsible for strictly complying with health and safety standards in order to protect themselves and other employees or third parties;

Likewise, they must use the assigned and specified equipment responsibly when carrying out risky activities and disseminate knowledge among their colleagues and subordinates, promoting compliance with risk protection practices.

6.5. **Respect for the Privacy and Confidentiality of Employee Information**

The CAS AIS Group undertakes to request and use exclusively the data of employees necessary for the effective management of its business or whose frequency is required by applicable law;

Likewise, the CAS AIS Group will take all necessary measures to preserve the confidentiality of the personal data at its disposal, to ensure that the confidentiality in the transmission of the data, when necessary for business reasons, is in accordance with the current legislation;

Employees who, in the performance of their professional activity, have access to information from other employees, will respect and promote the confidentiality of this information and make a responsible and professional use of it.

6.6. **Fostering Personal and Professional Balance**

The CAS AIS Group values the benefits that, for the employee and the company, imply the existence of a balance between professional and personal responsibilities, so it will encourage measures aimed at reconciling these two areas.

6.7. **Conflict of Interests**

Employees must not engage in any external professional activity that conflicts with the interests of the Company or the CAS AIS Group, or that interferes with the proper fulfillment of their obligations.

7. Commitment to Third Parties and the Market

7.1. Quality

The CAS AIS Group establishes as a guideline for its business performance the search for quality in its products and services and makes available to its employees the means necessary for the development of the most appropriate quality management systems at each moment or business cycle;

The CAS AIS Group seeks the best satisfaction of the expectations of its customers, promoting the innovation of processes and methodologies with a view to anticipating their needs as well as creating complementary value in the provision of services and or products.

7.2. Confidentiality and Protection of Personal Data

The CAS AIS Group guarantees respect for the confidentiality and privacy of third-party data;

The CAS AIS Group agrees to preserve the confidentiality of data relating to third parties, without prejudice to legal, administrative or judicial provisions that require its delivery to entities, persons or make them public;

Likewise, the CAS AIS Group guarantees the right of affected third parties to consult and promote the modification or rectification of data whenever necessary;

The employees of the CAS AIS Group, in the performance of their professional activity, must maintain the confidentiality of the data in the terms set out above and refrain from any inappropriate use of this information;

7.3. Transparency, Value Creation and Corporate Governance

The CAS AIS Group and its employees base their relations with customers, suppliers, competitors and partners as well as with shareholders, investors and other market agents on the principles of integrity, professionalism and transparency;

The CAS AIS Group assumes as a guideline of its business behavior towards its shareholders, investors, analysts and the market in general, the transmission of truthful, complete information that expresses the faithful image of society and the Group, its business activities and the business strategies;

Communication must always be carried out in accordance with the rules and within deadlines established by the applicable legislation in force;

The business action and strategic decisions of the CASAIS Group focus on creating value for the Group, transparency in its management, the adoption of the best corporate governance practices in its companies and the careful observation of the rules related to this matter in force in each case.

7.4. **Confidentiality, Privileged Information and Protection of Corporate Heritage**

The CASAIS Group and its employees always seek to obtain, within their scope and obligations, the best protection of the assets and rights that constitute the assets of the Group's companies, whether physical, monetary or intellectual, preserving the confidentiality of information related to it, which can only be used within the scope of the company's activities. Employees are responsible for preserving and maintaining the assets of the CASAIS Group that have been entrusted to them and protecting them against all losses, damages, thefts or illegal and dishonest uses. It is the duty of each employee to report their innovations and inventions to the Legal Department so that they can be subject to the protection of industrial property rights or similar. It is also important to respect and avoid infringing on the industrial property rights of others.

It is the duty of each employee to classify and store commercial and technical information appropriately, and with appropriate access controls. The employee must not disclose confidential information outside the company without permission or due written agreement. Also, you must not accept confidential information from third parties, unless you have written permission to do so.

It is likewise prohibited its misuse or temporary and/ or definitive appropriation by any employee, regardless of the functions he occupies. In addition, it is forbidden to create liens or mortgages that are not duly foreseen or authorized by the application of instructions that respect the directives or service orders in force in the company.

7.5. **Conflicts of Interest**

All employees of the CASAIS Group must avoid situations that may lead to a conflict between their personal interests and those of the CASAIS Group and avoid representing a Group company or intervening or influencing decision-making when, directly or indirectly, itself or a third party connected to you by any significant economic, personal or professional relationship has a direct or indirect interest in the business.

Employees who are in conflict are obliged to report it to their superior or to the President of the Ethics Committee. (to the President of the Ethics Committee in the case of: (i) Directors of the Company, of the Business Unit of the CASAIS Group, (ii) Financial Directors, and to the President of the Ethics Committee or his superior, in the case of any other Recipient of the EC).

Conflicts between personal interests and the interests of the CASAIS Group will always be resolved for the benefit of the latter.

7.6. Money Laundering

Money laundering occurs when criminal capital is hidden in legitimate business transactions, or when legitimate funds are used to finance criminal activities. All employees must be alert to help protect the CASAIS Group's reputation and ensure compliance with the law.

No employee should knowingly deal with criminals, criminal suspects or with proceeds from criminal acts. Each employee must ensure that their business transactions do not involve the acquisition, use or possession of financial income or goods acquired with money from criminal acts. You must not hide the origin or nature of property arising from criminal acts. If you suspect that a counterparty is involved in money laundering in connection with your transaction, you must immediately report the fact to the Ethics Committee. In order to comply with legal requirements, do not let the counterparty become aware of your suspicions. Do not forge, hide, destroy or discard relevant documents.

7.7. Fighting Bribery and Corruption

Employees must not use the funds or resources of the CASAIS Group, directly or indirectly, to obtain illicit commercial advantages, nor for the illicit financing of political campaigns, political parties, political candidates, or anyone associated with them.

7.8. Participation in Political and Public Life

All employees must make it clear that, in political terms, the opinions expressed or the actions they carry out are their own, and not those of the CASAIS Group. The employee must be aware of the rules on conflicts of interest and ensure that participation in politically motivated activities must not involve the employee or the CASAIS Group in a conflict of interest.

Outside of work, one has the right to participate in legal political activities in free time. However, to protect CASAIS' interests and reputation it is important to keep personal political activities separate from the position in the CASAIS Group. To apply for a public office, while maintaining a role in the CASAIS Group, one must consult and obtain prior approval.

7.9. Reporting Illicit

As part of the management system, the Boards have the responsibility to provide employees and third parties with secure and confidential channels to address sensitive issues and report cases of non-compliance with this Code.

8. Commitments to the Community

8.1. Environment

The CASAIS Group has the greatest possible respect for the environment in which it develops its activities and, therefore, tries to minimize the negative effects that they may cause, by making available to its employees the most appropriate means to do so.

Similarly, the CASAIS Group contributes to the conservation of natural resources and those spaces that have an ecological, landscape, scientific or cultural interest. To this end, it establishes best practices and promotes knowledge and use of them among its employees.

The CASAIS Group agrees to strictly comply with the applicable environmental legislation and will seek to encourage actions and methodologies that promote sustainability.

8.2. Social Commitment

The CASAIS Group undertakes to act in a socially responsible manner, in compliance with the law of the countries in which it operates and, in particular, to respect cultural diversity and the customs and principles in force among the people and communities affected by its activities.

9. Final Dispositions

9.1. Code Violations

Failure to comply with this Code may constitute an infraction and may be subject to legal proceedings. In the case of being a collaborator of the CASAIS Group, it may also constitute a labor infraction and be subject to disciplinary sanction, regardless of other responsibilities that the employee may have incurred.

9.2. Ethics Committee

For the resolution of incidents or doubts related to the interpretation of this Code or to propose improvement measures, an Ethics Committee will meet, whenever justified.

The Ethics Committee will be formed by a minimum of three members appointed by the Executive Board, who may be Directors. Most members must be Independent. The Executive Board will designate its Chairman.

The communication of any irregularities or infractions to this Code must be addressed in writing, in paper or digital format to the electronic address etica@casais.pt, or through the + Alert application, by any employee of the CASAIS Group, shareholder, customer, supplier or any other interested party.



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