

Supplier's Code of Conduct

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GRUPO
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1. Introduction

In the course of its business, the MC Group works with a network of suppliers (service providers, goods suppliers, and contractors) (hereinafter referred to as “**Suppliers**”), who play a crucial role in the success of its subsidiaries. As an integral part of this success, all Suppliers must comply with the same standards and code of conduct as the MC Group.

2. General provisions

This Code (hereinafter referred to as the “**Code**”), addressed to all Suppliers of the MC Group, establishes the principles and rules of conduct that must be respected by all those who provide or intend to provide services, supply goods, and conduct works for the MC Group.

This Code does not impose obligations that conflict with laws, regulations, or existing contractual provisions, nor does it create or modify any rights; rather, it serves as a complementary set of guidelines. If local laws and regulations are less restrictive than the Code, Suppliers must adhere to the principles established in this document.

By signing the attached declaration, Suppliers commit to complying with the applicable principles and rules set out in this document and to endeavour to adopt all necessary measures to this end.

3. Principles

3.1 Diligence, efficiency, and responsibility

1. Perform assigned responsibilities and duties with diligence, efficiency, transparency, and integrity, considering expectations regarding conduct.

2. Respect and uphold the MC Group's mission, vision, commitments, and values, as well as the principles outlined in this Code, both in their internal and external relations.
3. Ensure the protection and proper maintenance of the resources, assets, and equipment provided by the MC Group for the performance of their duties or to which they have access by virtue of their duties, ensuring their rational and efficient use solely for designated purposes.
4. Communications within the commercial relationship, including emails, must be strictly professional. The sharing of confidential information and/or any other acquired data with third parties unrelated to the MC Group is strictly prohibited.

3.2 Compliance with legislation, commitments, and Group policies

1. Comply with all applicable legal and regulatory requirements related to their commercial relationship with the MC Group and related commitments.
2. Ensure that their activities do not breach the law or regulations applicable to their specialisation, including when acting on behalf of MC Group companies.

4. Rules of conduct

4.1 Loyalty, independence, and information

1. Commit to loyalty towards the Group, ensuring that the Group's credibility, prestige and image are not jeopardised in the context of the supply, service or contract.
2. While carrying out their duties and competences, always bear in mind the common interests, acting impartially, responsibly and with professional ethics.
3. To act in strict compliance with the limits of the responsibilities inherent in their duties, and not to go beyond what has been assigned to them.

4.2 Confidentiality and data protection

1. Protect and maintain absolute secrecy regarding any and all sensitive information accessed in the course of their duties, and refrain from using it for any other purpose, for their own benefit or for the benefit of third parties and comply with the legally provided data protection principles.
2. Refrain from making any public statements or expressing opinions on matters that should be addressed by the MC Group, particularly those that could affect its public image.

4.3 Conflict of interests

1. Implement all appropriate measures to prevent any conflict of interest, including those arising from family or personal relationships, or any other common interests, that could compromise impartial and objective execution.

4.4 Competition and intellectual property

1. Comply with applicable national and international legal standards regarding competition.
2. Refrain from anti-competitive practices and from engaging in agreements or activities that restrict competition, are considered unfair, encourage unfair conditions, or discriminatory practices, and may result in violations of applicable laws and regulations.
3. Respecting the intellectual and material property of competitors, as well as the Group itself, by being aware and proactive in ensuring that all steps are taken to protect and formalise it.
4. Refrain from making any comments or act in any way that could damage the image and reputation of competitors and may not disclose confidential information about them.

4.5 Relationship with third parties

Conduct interactions with third parties in line with this Code of Conduct, fostering cooperation and participation.

4.6 International sanctions and exports

1. Respect and comply with all applicable international legislation regarding the export of goods and services in order to foster a secure supply chain.

4.7 External communication and production of information

1. In the context of their business relationship with the Group, provide external information only if they have been previously authorised to do so.
2. Uphold best practices in communication and information production, ensuring that no false and/or fraudulent information is included or disclosed.

4.8 Corruption Prevention

1. Any situation that could constitute corruption or related offences, such as influence peddling, improper receipt of an advantage, embezzlement, economic participation in business, coercion, abuse of power, money laundering or fraud in obtaining or diverting a subsidy, grant or credit, is prohibited.
2. The Group enforces a zero-tolerance policy with regard to the delivery, promise and/or receipt of any benefits not expressly permitted by this Policy, the Policy on the Offer and Acceptance of Gifts and Hospitality, and any applicable legal standards.

4.9 Quality and Safety

1. Ensure that products, services, and works comply with contractual, quality, and safety requirements, making these a critical success factor.

2. Promote compliance with legal requirements applicable to the product, service or contract and continuous improvement, to enhance efficiency and effectiveness.

4.10 Environment

1.To be committed and contribute, in their activities, to the continuous improvement of environmental conditions, in line with the Group's commitments, with a view to sustainable development.

2.To support and share the Group's approach to protecting the environment, preserving resources, and reducing the environmental impact of its activities, products and services, namely:

- ✓ Ensure compliance with national and international laws on environmental protection standards.
- ✓ Identify, monitor, and mitigate the environmental risks and impacts of its activities, products and means of transport, promoting continuous improvement and preserving the environment.
- ✓ Ensure efficient management of energy, natural resources and the reduction of emissions and waste generated by its activities.
- ✓ Comply with the MC Group's environmental requirements when acting on its premises or on its behalf.
- ✓ Report any environmental incident to the contract manager / appointed spokesperson, particularly when it occurs on the premises of subsidiaries.

4.11 Occupational Health and Safety

1. Ensure compliance with the legal and regulatory provisions on safety, hygiene and health in the workplace. Report to the MC Group any facts of which they are aware that may breach these provisions and/or jeopardise safety.

2. Actively promote the safety and health of its workers, namely:

- ✓ Identify hazards, assess risks, and establish appropriate preventive measures to prevent damage to the health and safety of workers and third parties, as well as to safeguard installations and equipment, including the prevention of serious accidents.
- ✓ Training and informing workers about hazards and risks and the preventive measures to be implemented, as well as making them aware of compliance with safety rules and procedures.
- ✓ Provide the necessary means and equipment, ensuring adequate working conditions.
- ✓ Establish accident management and emergency response measures suited to the type of activity, location, and circumstances.
- ✓ Comply with the MC Group's Health and Safety requirements when acting on the premises or on its behalf.
- ✓ In the latter case, and during work hours, they must strictly comply with the provisions of the Group's alcohol and drugs policy.
- ✓ Report any occupational health and safety incidents to the control officer / authorised spokesperson, particularly whenever they occur on the premises of subsidiaries.

4.12 Human Rights and Working Conditions

1. Follow recommendations and applicable policies regarding human rights and labour standards, and the Group will not tolerate any non-compliance.
2. Promote the implementation of human rights due diligence mechanisms, both internally and in its value chain, by supplying and contracting goods and services with third parties that, to the best of its knowledge, respect human and labour rights.
3. Being committed to creating respectful working environments, protecting human and labour rights, in line with the human rights conventions provided for by law, commitments made, and established Group policies, thus contributing, through its activities, towards their alignment, namely:

- ✓ reject the use of child labour and any form of forced or compulsory labour and human trafficking in any form or condition.
- ✓ Providing access to decent work, promoting the right to rest, access to social protection programs and benefits, and facilitating work-life balance.
- ✓ respect freedom of association and the right to collective labour agreements, based on constructive dialogue that benefits all parties.
- ✓ not accept discrimination of any kind, especially on the basis of ethnic and racial origin, colour, language, gender identity, age, education, economic situation, physical condition and/or social status, sexual orientation, political convictions, nationality, religion or ideology, and to promote equal opportunities and equal treatment at all stages of human resources management. Valuing diversity, fairness, and inclusion, including regarding migrants and people with disabilities.
- ✓ rejecting all forms of harassment, abuse, and violence, condemning and punishing any behaviour or act with the aim or effect of humiliating, any act of intimidation or threat or any other form of physical, verbal, or psychological coercion.
- ✓ implement disciplinary practices in strict compliance with applicable laws (wherever such laws exist) and not tolerate nor support the use of corporal punishment, mental or physical coercion or verbal abuse.
- ✓ Respecting the right to a decent wage in accordance with the obligations and/or principles laid down in international conventions, endeavouring to meet basic needs and providing some extra income and ensuring payment is received on time and on schedule.
- ✓ Observe the maximum number of weekly and overtime working hours and rest periods.
- ✓ Encouraging transversal development, mentoring and sharing projects.

5. Communication

1. In the event of any doubt regarding the application and/or interpretation of this Code, any of its articles and/or related topics, suppliers may contact the GMC Group's procurement department.

2 The MC Group also has an internal whistleblowing channel for reporting irregularities in the Group's companies concerning matters covered by this Code, which may also be voluntarily communicated to the MC Group by Suppliers.

3 The internal rules and procedures applicable to the receipt, recording and processing of communications made in this context are detailed on the applicable regulation on reporting irregularities, available on the MC Group's website.

4 Complaints and reports of irregularities may be submitted in writing and/or verbally to the Ethics Committee, and the complainant can provide identification or remain anonymous.

5 Written reports on irregularities can be sent to the following email address: etica@manuelchampalimaud.pt or by letter to the Chairman of the Ethics Committee at the following address - Avenida Duque de Ávila, no. 79, 1000-139 Lisbon.

6 In accordance with the above-mentioned whistleblowing regulations, the confidentiality of reports is guaranteed, as well as the rights of both the whistleblower and the reported.

6. Adherence, implementation, and monitoring

1. Acceptance of and compliance with the Supplier's Code of Conduct constitutes a contractual obligation, which will be an annex to the consultation document released by the MC Group, as well as to the contracts for the provision of services, supply of goods and works to be concluded between the Supplier and any subsidiary company.

2. The MC Group reserves the right to adopt the measures it deems appropriate, which may include terminating the existing contractual relationship, in the event of serious or systematic non-compliance with what is established in this Code.

3. The MC Group may, at any time, ask the supplier to verify compliance with the provisions of this Code.

4. Suppliers should endeavour to ensure that their own supply chains implement rules of conduct in line with the provisions of this document.

5. This Code does not change or reduce any other contractual requirements covered by procurement documents.

7. Review and Disclosure

1. This Code will be reviewed and updated regularly as necessary..

3. The Code will be made publicly available on the Group's website and through training or awareness-raising campaigns with suppliers.

MANUEL CHAMPALIMAUD GROUP'S CODE OF CONDUCT
DECLARATION (SUPPLIERS)

I,, acting as representative of Company with the company name, in the context of the contract for the provision of services/ supply of goods / construction works (delete as applicable).

-----I hereby declare that I have read the Manuel Champalimaud Group's Suppliers Code of Conduct.

I further declare that I have read and fully understood its contents and expressly agree to its principles and commit to compliance.

By signing this declaration, I undertake to comply with said principles and rules applicable to me in the context of said provision services / supply of goods / construction works (delete as appropriate), expressed in the aforementioned document, and to endeavour to adopt all the measures necessary to this end.

Signature:

Date:

This declaration must be returned to the procurement department within the deadline set for this purpose as part of the supplier qualification process. Failure to return this declaration by the deadline will, for all intents and purposes, result in non-adherence.