

CODE OF CONDUCT, ORGANIZATIONAL ETHICS AND ANTI-CORRUPTION

Normática – Serviços de Informática e Organização, S.A.
Share Capital 195.000,00€ | VAT N.º 501782230
Rua de Pedrouços, N.º 28, 1400 - 290 Lisbon, Portugal | +351 21 341 60 00 (call to the national fixed network) | geral@normatica.pt | www.normatica.pt

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MESSAGE FROM THE ADMINISTRATION

Normática - Serviços de Informática e Organização S.A. has been operating in the IT market since 1986 and is proud to be a 100% Portuguese SME operating solely with its own capital. It has always acted on the premise of guaranteeing the satisfaction of its clients' needs and creating value for their businesses.

Normática recognizes that its values and principles, firmly anchored in its Code of Conduct, Organizational Ethics and Anti-Corruption, and focused on its human relations and the environmental and economic aspects of the business, are fundamental to build and protect its prominent position in society and growing solidly.

In this way, Normática intends to continue to promote an open culture of mutual respect in a collaborative environment, professional and serious conduct by its employees and demonstrate that it is worthy of the trust of its customers and partners.

Normática's success therefore depends on an upstanding conduct and a business strategy based on rigor and transparency, which is why Normática acts in accordance with the rules of conduct compiled in this Code and will ensure that they are complied by all those who represent it, regardless of their level of responsibility.

Martinho Almeida, CEO

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1. SCOPE AND OBJECTIVE

This Code of Conduct, Organizational Ethics and Anti-Corruption (hereinafter referred to as the “Code”) is intended to govern all the activities carried out by Normática and aims to establish a set of rules of conduct, ethical principles and basic duties in terms of honesty, integrity and transparency, with the aim of preventing illicit conduct that potentially or actually constitutes the practice of acts of corruption, and to safeguard potential situations of conflicts of interest.

In terms of Anti-Corruption, Normática has established internal procedures to combat, prevent and safeguard against the practice of any corrupt or unfair behavior, both in the workplace and in relationships with third parties - clients, public partners, suppliers, among others.

This Code, as a useful instrument of self-regulation, aims to:

- i) Disseminate, in a clear and comprehensible manner to employees and other stakeholders, the values and principles that guide Normática's activity, as well as the fundamental rules of an ethical and deontological nature that should guide its day-to-day practices and conduct;
- ii) Ensure compliance with these principles and duties by employees, clients, suppliers, shareholders, consultants, agents, partners of Normática, other stakeholders and any other third parties or entities that represent and/or act in the name of and on behalf of Normática;
- iii) To consolidate customer confidence in the work carried out, based on the values pursued by Normática;
- iv) To promote greater transparency in practices and procedures, providing guidelines for the exercise of Normática's professional activity.

The application of this Code and its observance does not preclude or dispense with the application of and compliance with other duties and obligations arising from any other legal source or of any applicable nature, namely deontological and ethical rules applicable to certain functions, activities or professional groups.

It should be noted that more restrictive practices than those set out in this Code may be implemented, especially in countries where this is required under applicable law.

2. DEFINITIONS

For the purposes of this Code, the following definitions shall apply:

- **Unlawful act** – any action or omission, whether voluntary or involuntary, intentional or negligent, which violates any mandatory legal provision.
- **Employee** – any person employed by Normática, whether under an employment contract or a contract for the provision of services, or in any other capacity, even on a temporary basis, for a fee, or free of charge, including directorships or management positions, or trainees.
- **Conflict of interest** – any situation in which the personal interests of employees are actually and potentially contrary to the interests of Normática.
- **Corruption** – abuse of power entrusted to someone to benefit or obtain undue advantages for oneself or for third parties, whether in the public or private sector, and including international trade, regardless of its name, and may consist of obtaining patrimonial or non-patrimonial advantages.
- **Family or family relations** – the spouse or de facto spouse, ascendants, descendants and other relatives, and relatives up to the 4th degree, in the straight or collateral line (including siblings, brothers-in-law, in-laws, nephews and cousins).
- **Professional gifts** – gratuities, gifts, benefits, gifts, payment of expenses, entertainment, acts of hospitality, or participation in events.
- **Facilitation payment** – any payment intended to encourage or expedite the performance of an act, to obtain an omission or refusal, or to obtain favorable treatment, even if attempted, whether or not contrary to the duties of the respective positions or functions.
- **Third party** – any person, natural or legal, who is not an employee of Normática, participates in activities promoted by Normática, or maintains a commercial or similar relationship with Normática, as a service provider, consultant or supplier of goods or services, directly or indirectly.

3. CORPORATE CULTURE

Normática's mission is:

- To provide a service of excellence that makes a difference to its clients and contributes to their development and innovation;
- To develop partnerships and foster relationships of synergy and mutual benefit;
- Continuously improving processes in order to streamline its operations;
- Promote specialized technical training for its employees, ensuring scrupulous compliance with all the normative and regulatory framework of its partners.

In pursuit of its objectives, Normática is committed to relationships of proximity, trust and mutual respect and to recognition for the competence of its services and compliance with the commitments made, in order to increase its effectiveness and efficiency, through objectives and targets, in all functions and sectors of the organization.

To this end, Normática compromises to:

- i) Transmit to all partners and clients the confidence of an organization capable of responding to their demands, always within the framework of compliance with all legal and other applicable requirements to which the organization subscribes, these being considered in all decisions and applied through appropriate methodology;
- ii) Implement and develop practices and procedures capable of preventing and identifying non-conformities and responding in a timely manner to the demands of its clients;
- iii) To ensure that all employees are highly competent and that the climate fosters and encourages their commitment, technical development and excellent customer relations.

4. VALUES AND PRINCIPLES

In carrying out its professional activity, especially in its relations with each other and with third parties, Normática strives to maintain an integrated ecosystem based on solid values and ethical principles in which all stakeholders are equally important.

Normática's core values are:

- ***Customer Orientation***
Customers are the key to Normática's business, so one of our fundamental values will be to respond promptly and in the best way to their needs, prioritizing solid and lasting relationships.
- ***Professional Excellence***
Normática prioritizes quality, differentiating itself by following up on its business opportunities. To this end, Normática provides clients with the best talent and solutions tailored to their objectives.
- ***Dedication***
Normática dedicates itself daily, professionally and with integrity, to providing security and credibility to all stakeholders.
- ***Team spirit***
Normática's internal relations are governed by the values of communication, sharing, a positive attitude and humility, which are fundamental to achieving its common goals.
- ***Resilience***
The Normática team always strives to outdo itself and works every day to empower people, grow the economy and enrich society, being flexible enough to adapt to any challenge.

Normática conducts itself in a professional and serious manner, aware of the importance of human relations, without ever neglecting the creation of value for its business.

Normática's five basic principles of its corporate culture:

- ***Transparency***

Normática, particularly regarding its relations with third parties, acts in compliance with the requests addressed to it, doing so in a complete, transparent and appropriate manner. To this end, Normática undertakes, vis-à-vis the authorities and regulatory bodies, its shareholders, stakeholders and the market in general, to:

- i. Accurately, truthfully and transparently describe the company's financial information in its accounting documents;
- ii. Keep an up-to-date record of all corporate documentation (i.e. minute books, share register, etc.) for a period of 10 years;
- iii. Provide the financial information requested in an appropriate, timely and transparent manner and with the required standard of professionalism;
- iv. Act objectively, honestly and professionally and in accordance with good faith standards in relations with suppliers and other business partners;
- v. Comply with and enforce compliance with this Code;
- vi. Complying with and enforcing compliance with all legislation in force on employment matters and within the scope of regulations and legislation on the protection of personal data;
- vii. Respect the rules and dynamics of any inspections or investigations carried out by any authorities.
- viii. Respect the rules and dynamics of any inspections or investigations carried out by any authorities.

In their dealings with public bodies or authorities, employees must provide, in accordance with the law, all the cooperation requested, responding in good time to requests made to them and refraining from adopting any behavior that could impede or hinder the exercise of those authorities' powers.

- ***Integrity***

Normática carries out its business guided by minimum standards of moral integrity, rigor and loyalty and behaves ethically in all its areas of activity.

Likewise, Normática seeks to promote compliance with the principles and standards contained in this Code among its employees and is committed to doing business only with third parties who guarantee respect for the values extolled in its business.

Therefore, Normática's employees, customers, suppliers and other stakeholders must comply with the following rules:

- i. Being upright, honest and transparent and observing the appropriate rules of politeness, courtesy and treatment;
- ii. Treat competitors and partners with loyalty and respect;
- iii. Avoid actions or relationships that constitute, or may appear to constitute, a conflict of interest, i.e. situations in which an employee's private interest interferes in any way with the interests of Normática as a whole or an employee or close family members or friends receive an improper personal benefit as a result of that employee's position in Normática;
- iv. Take care to maintain and promote Normática's good reputation;
- v. Comply scrupulously with their duties and contractual employment obligations.

- ***Respect and compliance with legislation***

Normática conducts its business with respect for compliance with applicable legislation. Normática prides itself on respecting not only human rights, within the framework of the Universal Declaration of Human Rights, but also all obligations arising from the law, any regulations or internal corporate instruments to which Normática is bound, in business and employment matters, which translates, in particular:

- i) Strict observance of the secrecy of confidential information and data privacy;
- ii) Compliance with the legal procedures for recruiting, hiring, training, salary processing and any dismissals of employees;
- iii) Respect for intellectual property rights held by third parties;
- iv) The preparation of financial and accounting documents in a transparent manner and compliance with its legal and commercial obligations;
- v) Relations with its competitors based on standards of good faith and abstention from any conduct that prevents, distorts or restricts free competition;
- vi) Interaction with its partners in harmony and in line with its basic principles and standards of action.

- ***Gender equality***

Normática values difference and prides itself on creating an inclusive working environment by combating discrimination, particularly discrimination against women. As measures to promote gender equality within Normática, it seeks to ensure pay parity between men and women in the same job, female representation in its jobs through equal access and career progression opportunities, regardless of gender, and to promote a corporate environment free of harassment, including sexual harassment.

Any practices or behaviours aimed at promoting any measure of inequality and/or which symbolize conduct or practices of harassment, including sexual harassment, deserve

and will be censured by Normática.

- ***Sustainability and strategy for the future***

Normática is aware of the need to safeguard the environment and recognizes its responsibility in the fight for sustainability. Indeed, Normática assumes that its business strategy should seek to protect the future of its company and of society.

Digital transformation is seen as a path to sustainability in the management of Normática's business, which will seek to develop its services with a view to customer satisfaction based on a transparent ethical, social and environmental stance in the communities in which it operates.

To this end, it is promoting, internally and externally, the use of digital means and technologies that simplify all procedures in the processing of all necessary commercial information.

5. LABOR RELATIONS

Normática values its human component and is committed to defending the human rights of its employees, treating them with dignity and respect, and striving to guarantee them a healthy and pleasant working environment, fair and adequate remuneration, in order to promote their ongoing satisfaction.

In this way, Normática respects and complies with applicable employment rules, including but not limited to equality, non-discrimination, harassment at work and health and safety at work.

Normática applies a fair salary policy appropriate to the functions performed, providing salaries, benefits in accordance with national and European legislation and Collective Bargaining Agreements, where applicable.

The salary policy and the remuneration variations applied are justified by the nature and complexity of the duties performed, adopting internal measures that safeguard gender equality and value each individual's ability to work.

Normática also promotes apprenticeships and professional training cycles during and throughout the professional career of its employees.

In the same way, Normática expects its employees to comply with the principles and standards contained in this Code, and employees must conduct themselves with moral integrity and loyalty.

- **Equality and non-discrimination at work**

The diversity of Normática's employees is an excellent business asset and every employee contributes fundamentally to the success of the organization, so all employees, including trainees and service providers, are guaranteed employment opportunities, training and working conditions, in the belief that cooperation between people with different cultures, abilities, skills, perspectives and experiences is fundamental to attracting talent and enabling business growth and innovation.

Likewise, Normática is continually dedicated to combating discrimination of any kind, particularly on the grounds of ancestry, age, sex, sexual orientation, gender identity, marital status, family or economic situation, education, social origin or condition, reduced working capacity, disability, chronic illness, nationality, race, territory of origin, language, religion, political or ideological beliefs and trade union membership.

The defense of non-discrimination involves making decisions regarding recruitment, hiring, training, evaluation and promotion based exclusively on their skills, merit and professional performance.

Anyone who has knowledge or reasonable suspicion of conduct that could constitute

discriminatory treatment in the company and violate the provisions of this Code should report it to the Human Resources Department.

- **Harassment at work**

The practice of harassment in any form or expression is expressly forbidden, which is why Normática is dedicated to preventing and combating harassment at work and ensuring compliance by all employees.

Bullying is the exposure of people to embarrassing and humiliating situations in the workplace on a repetitive and prolonged basis, causing damage to their dignity and integrity. It can be practiced through words, gestures, acts or written messages. Isolated situations can cause moral damage, but do not constitute moral harassment in the sense described.

Sexual harassment is attitudes, gestures and words that cause embarrassment, which may or may not involve physical contact, and can be explicit, expressed through direct words, messages, gestures or insinuations. This type of harassment is aggravated if it includes coercion or blackmail and takes place against the victim's will, violating their sexual freedom. Depending on the situation, it can be a crime, as defined in criminal law. Compliments without sexual content, messages without a sexual or sentimental nature, which may be inappropriate in the workplace, are not considered or included in the concept of sexual harassment.

On the other hand, the practice of behavior that reflects any form of “bullying” or “mobbing” deserves to be censured by Normática, and it also strives to disseminate the principles that are essential to maintaining and consolidating a culture of risk prevention in the workplace.

To this end, Normática is dedicated to identifying and evaluating unwanted behavior and improving the culture of diversity and inclusion in all aspects of workplace management, through the implementation of internal procedures based on transparency, communication and mutual support between colleagues and on a cordial direct relationship between employees and management.

- **Health and safety at work**

Normática undertakes to ensure a safe and healthy working environment for its employees, ensuring compliance with the applicable rules on health and safety at work, the adoption of correct preventive measures and the provision of the necessary resources to safeguard the physical integrity and health of its employees, namely:

- i. Normática is concerned with identifying, assessing and controlling employee exposure to health and safety risks, including stress factors;

- ii. Normática provides all its employees with up-to-date work tools, adjusted and appropriate to the performance of their duties, enabling its employees to work on Normática premises or at its clients, on all types of projects;
- iii. Normática has best practice procedures for preventing, managing, monitoring and recording injuries and illnesses;
- iv. Normática provides adequate individual and collective protection equipment to ensure a healthy and safe environment in the workplace;
- v. Normática has emergency and contingency plans, which are duly communicated to employees;
- vi. Normática provides adequate and comfortable working facilities for the performance of each employee's duties, including clean sanitary facilities, drinking water and clean and safe facilities for the storage and consumption of food;
- vii. Normática encourages employees to report risks to the health and safety of employees and third parties who frequent Normática's facilities, as well as to receive medical treatment and/or implement any other corrective actions in order to achieve an environment suitable for the performance of each employee's duties;
- viii. All equipment or work instruments provided by Normática must be used by employees in an appropriate and prudent manner, and their sale, assignment, transfer, encumbrance, donation, or any act transferring ownership to third parties is expressly prohibited without the prior express consent of Normática.

- **Respect for employees' private lives**

Normática guarantees all its employees the right to privacy and confidentiality with regard to their private lives, as well as personal and non-professional information, in particular their personal and clinical data.

- **Acting loyally, exclusivity and impediments**

In accordance with the principle of loyalty which should guide their conduct, employees may not provide any consultancy or technical assistance to suppliers, clients or service providers, unless they are expressly authorized to do so.

It is also forbidden to use Normática property or resources made available to employees for the performance of their duties for their own benefit.

Normática requires its employees, except in truly exceptional and formally authorized situations or circumstances, to provide their work on an exclusive basis, refraining from taking or promoting any action that affects the quality of their performance and their duties as employees, regardless of the type of contractual relationship in force.

Normática also believes that its employees must refrain from intervening in projects or

activities with external entities in which their family members or people and organizations with whom they maintain or have maintained a professional relationship in the service of Normática are involved.

6. CONFIDENTIALITY AND PRIVACY OF PERSONAL DATA

In the course of its business, Normática has access to sensitive information, work and business documents, human resources, clients, bank information and personal data, both from clients and its own employees.

Normática protects all information that may be subject to an obligation of secrecy or may be classified as confidential, under contractual and/or legal terms, guaranteeing its confidentiality, avoiding improper disclosure and undue destruction.

Likewise, the processing of personal data, whether of clients, employees or third parties, that Normática promotes is done in a lawful and appropriate manner, to the extent strictly necessary to guarantee the security of the network and information, always fully respecting the grounds for lawfulness and the respective purposes for processing information, as provided for in the legislation in force.

Electronic mail, the internet and computer media or any other electronic support, equipment or material of a similar nature made available to employees to carry out their work, must be used with due care for the security of the information processed, and the dissemination of illicit or illegal messages or messages with content that is less appropriate or does not comply with the socially acceptable standards followed by Normática is not permitted.

All employees must be committed to using institutional email accounts to deal with matters and issues of a strictly professional nature.

Employees should also bear in mind that any passwords for accessing computers, IT equipment and/or any type of information, whether confidential or not, should not be shared with third parties, or referred to in public places or places where third parties have easy and unconditional access.

On the other hand, passwords or access passwords to platforms, document media, clouds or other information storage systems provided by Clients must be kept and maintained as confidential and may not be shared or referenced in public places or places where third parties have easy and unconditional access.

Normática prohibits any conduct by its employees or stakeholders that violates this Code of Conduct, Organizational Ethics and Anti-Corruption, the General Data Protection Regulation and other legislation in force at national level.

7. ANTI-CORRUPTION MEASURES

Normática has always prided itself on having an upstanding business reputation, for which compliance with all applicable anti-corruption and anti-money laundering regulations is imperative.

Normática has a zero-tolerance policy for any situation or scenario of corruption, undue receipt of an advantage or payment of any benefit contrary to the procedures set out in this Code.

All facilitation payments are expressly prohibited, regardless of the context (public or private) or the circumstances in which they occur.

Any violation or suspected violation of duties and obligations established through internal regulations and/or legislation relating to Anti-Corruption, Anti-Fraud and Money Laundering policies must be immediately reported to the Human Resources Department.

a) Professional offers

Normática does not allow its employees, in the performance of their duties or because of them, to accept, solicit, promise or offer professional gifts, except when:

- i) Professional gifts are permitted by law;
- ii) The professional offer must be occasional and in specific circumstances;
- iii) The professional offer may not consist of a delivery or deliveries of cash or cash equivalents (i.e. vouchers, credit notes, checks, bills of exchange or promissory notes, deposit in a bank account or transfer of funds);
- iv) The professional offer must be in line with good customs, be appropriate and must correspond to socially accepted commercial practices and must not be interpreted, even in the slightest way, as intended to obtain an undue favor or advantage;
- v) The professional offer may never be offered or accepted in the context of the negotiation or review of contracts or in tendering procedures in which Normática is involved;
- vi) The professional offer may not appear or signify any form of pressure or incentive on commercial or business relations, nor may it have the purpose of obtaining its own or improper and/or illegal advantages.

Professional gifts may never be offered or promised to employees (national or foreign) or to employees of international organizations or entities, holders of management positions, politicians, or holders of high public office, nor to family members or friends of Normática employees.

No employee may be subject to retaliation or be harmed or penalized due to delays or failure

to conclude business resulting from refusal to allow, agree to or participate in prohibited conduct.

b) Criteria for allocating professional offers

Professional offers must be made in an appropriate and convenient manner and in accordance with the criteria of occasionality and social acceptability.

To this end, Normática employees must ensure that the professional gifts to be accepted or offered are for legitimate business purposes, with the aim of:

- i) Informing about Normática's activities, products and services;
- ii) Promote marketing activities with customers, with low-value products;
- iii) Improve or maintain Normática's good name and reputation;
- iv) Building relationships at festive times;
- v) Celebrating successes with clients, suppliers or service providers.

c) Acceptance of professional offers

Acceptance of professional offers will invariably depend on compliance with all the criteria described above. If in doubt, employees should consult their superiors and/or the Human Resources Department, which will respond in good time.

Unauthorized job offers must be returned or refunded.

d) Political Entities

It is expressly forbidden to contribute to any political party, political movement or electoral groups that support them, regardless of the form it takes, namely in cash or through the delivery of goods, gifts or the provision of services.

7.1. Relations with suppliers, service providers, consultants, agents, partners, intermediaries or third parties

Normática, in its relations with suppliers, service providers, consultants, agents, intermediaries or other persons with whom it has business relations, must ensure that they share the same ethical principles established in its Code of Conduct, Organizational Ethics and Anti-Corruption and that they also comply with the applicable national and international provisions on the prevention of corruption.

7.2. Rules for contracting third parties

Normática adheres to the following principles when contracting third parties:

- i) There must be a proven need for the goods and services to be purchased for any of the company's departments;
- ii) The price charged for the services provided must correspond to the market price, except in situations where this is not possible or the application of a different price is justified;
- iii) The third party must be assessed and considered to be suitable and compliant with anti-corruption standards, verifying its exposure to the risk of corruption;
- iv) A copy of this Code must be given or be accessible to any supplier and/or service provider.

At the time of contracting, Normática must assess the third party's exposure to the risk of corruption, applying the following guiding criteria:

- i) The transaction/business involves any country known for corrupt behavior and payments;
- ii) The third party has a close personal or professional relationship with national, foreign or international organization or entity officials who hold political office or high public office;
- iii) The third party opposes the introduction of anti-corruption clauses in contracts with Normática;
- iv) The third party requests the introduction of commercial conditions or unusual contractual clauses or payment agreements that may raise doubts under national legislation, such as payments in cash, payments in foreign currency or in countries considered to be high risk;
- v) The third party is recommended or suggested by a public official with the power to make a decision (or who can influence the decision-making) on which the violability or execution of the transaction/business depends.
- vi) The third party's commission or remuneration significantly and unjustifiably exceeds the fair and adequate compensation for the service performed or rendered.

All payments made to third parties must be made in accordance with the internal policies and procedures in force at Normática, in accordance with the payment systems established and contracted, and in accordance with the contractual conditions agreed between the parties.

7.3. Conflicts of interest

Normática's employees may not negotiate on their own behalf or in competition with Normática, nor may they obtain personal benefits, advantages or favors by virtue of the position held or the duties performed.

It is understood that a conflict of interest exists when:

- i) A Normática employee or a member of their family simultaneously acts as a member of the administrative or management body of any Normática client, supplier, service provider or partner;
- ii) A Normática employee or their family member has a direct or indirect interest in establishing a contractual relationship with any Normática customer, supplier, service provider or partner;
- iii) A Normática employee pays, hires or contributes to any action that entails an economic benefit for any of his or her family members who is a supplier, contractor, service provider, partner or customer of Normática;
- iv) A Normática employee supervises, analyzes or influences the professional or work evaluation of any family member who provides services to Normática.

7.4. Communication/reporting and measures to be applied

All employees who are in an apparent or real position of conflict of interest with Normática must immediately report the conflict situation and refrain from performing any acts or making any decisions in relation to which the conflict manifests itself.

At the beginning of any role in the commercial area, employees must also notify the Human Resources Department of the existence of potential conflicts of interest.

Once the existence of a conflict of interest has been established, Normática may determine the application and execution of one of the following measures:

- i) Order the employee to refrain from carrying out the activity affected by the conflict of interest;
- ii) Order that the activity affected by a conflict of interest situation be supervised by the employee's hierarchical superior;
- iii) Order that the activity affected by a conflict of interest situation be carried out by another employee.

Family or kinship relationships must be analyzed by Normática on an individual basis in order to mitigate, avoid or exclude possible conflicts of interest.

In case of doubt, the Human Resources Department should be consulted.

8. ENVIRONMENTAL RESPONSIBILITY

Normática recognizes that sustainability to protect the environment is essential for the development of quality services and inevitably involves digital transformation.

Normática is therefore committed to orienting its business towards environmentally conscious and respectful action, making efforts to ensure that the exercise of its activity generates the least possible adverse impact on the environment.

To this end, Normática adopts measures on a daily basis, such as the reduction of resources and waste, namely raw materials, energy and water, by its employees, and the acquisition and maintenance of any licenses, administrative authorizations and environmental records that may be necessary for the pursuit of Normática's professional activity.

Normática also makes every effort to avoid the unnecessary use of paper, applying internal procedures to organize and structure all forms of communication and archiving digitally and promoting policies and professional training to innovate and encourage the development of good environmental practices.

9. REPORTING IRREGULARITIES

Normática is concerned with promoting compliance with this Code, so it pays attention to any reports of violations or potential violations of the rules established herein, in the Law or in other internal policy instruments and guarantees that no retaliatory actions or reprisals of any kind are taken against anyone who, in good faith, has reported irregular situations.

Normática guarantees, through its Human Resources Department, that any incidence or irregularity will be dealt with impartially and rigorously and that information will be provided on the status and follow-up of the process, under the terms of the applicable national legislation.

10. DISCIPLINARY SANCTIONS

Violation of the principles and rules set out in this Code or any other internal rules may constitute a disciplinary offence and/or a punishable criminal offence, provided that the legal conditions set out in the Labor Code are met and that the appropriate disciplinary and/or criminal proceedings are initiated against the offending Employee, service provider, client or third party.

Depending on the seriousness of the infraction and the culpability of the offending employee, the following disciplinary sanctions may be applied:

- (a) Reprimand;
- (b) Registered reprimand;
- (c) Financial penalty;
- (d) Loss of vacation days;
- (e) Suspension from work with loss of pay and seniority;
- (f) Dismissal without compensation.

11. FINAL PROVISIONS

This Code will be reviewed periodically to ensure that it remains relevant and effective. It is a shared responsibility to keep our ethical standards up to date and adjusted to changes in our business environment and society in general.

We thank all employees, partners, suppliers and customers for their commitment to following and ensuring compliance with this Code of Conduct, Organizational Ethics and Anti-Corruption to build an ethical, innovative and successful company.