

Code of Ethics and Business Conduct

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Prepared

Verified

Approved

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1. MCA Group Code of Ethics and Business Conduct (“Code”)

1.1. Object

M. Couto Alves Holding BV, together with its subsidiaries, branches and affiliates (collectively, the "Group") undertakes to carry out its business activities and relationships with dedication, commitment, professionalism and integrity.

Our Group's business ethic is based on compliance with criteria that promote the Group's values, culture and management model and foster respect for individuals and their rights.

This Code's aim is to establish the principles and rules that guide our Group and constitute the basis of the behaviour that the Group expects from you. This Code comes into force in 2019 and may be updated periodically by the Group's Board of Directors ("Board").

The content of this Code is not new; the policies set out in this document are part of the Group's long tradition in what relates to our adoption on a day-to-day basis of ethical business standards.

1.2. Scope of implementation

The Code applies to all individuals working for the Group at any level and in any category. This means it applies to senior and middle management, directors, other employees (permanent, fixed-term and temporary), consultants, contractors, subcontractors, trainees, seconded personnel, casual, interim and home workers, volunteers, interns, agents, sponsors or any other person associated to our Group or with its management, directors and employees, irrespective of their location.

Our Group similarly hopes that its partners will be aware of the Code, and abide by the same standards in their relations with the Group and other representatives of the Group.

You should comply with this Code in the course of your day-to-day duties since it establishes the behavioural model coherent with our Group's business culture.

1.3. The Relation between the Code and other Group policies

This Code should be interpreted in conjunction with any other Group policies mentioned in it and with any additional policies, rules and procedures that the Group may adopt from time to time.

1.4. Monitoring and compliance

The Board is responsible for supervising the implementation of this Code and for carrying out the annual revision of the principles set forth in it, in order to ensure that it is effective and properly implemented.

As a Group, we are committed to complying with this Code and to applying the principles set forth in it to all of our dealings with shareholders, partners, customers, suppliers, employees and the community.

It is the duty of the Board, senior managers, and operational managers to set the example, guide and support their teams in complying with this Code.

2. MCA Group Vision / Mission / Values

2.1. MCA Group Mission

To adopt the best management practices, aiming at making shareholder value creation compatible with its main stakeholders: customers, employees, partners and local communities.

2.2. MCA Group Values

Relying on the accumulated experience of two decades, focusing on sustained organizational development and consistent with the market requirements, the Group is aligned with corporate values of **sustainability**, **social responsibility** and **corporate ethics**, which are translated into six areas:

2.2.1. Credibility

- Work in a precise, unbiased and objective manner;
- Improve stakeholder engagement mechanisms, with a view to gather and integrate their concerns, aiming the continuous improvement;
- Enabling and investing on the growth of others, contributing through social actions for the socio-economic development of the communities in which the Group operates;
- Objective and credible reporting of economic, social and environmental performance.

2.2.2. Rigour

- Rigorous in all our actions, reflecting on the activities carried out (design, planning, execution and management);
- Organized, producing our work more profitable;
- Compliance with the compliance obligations, legal, contractual and other applicable requirements;
- Increase productivity and efficiency of processes, to achieve operational performance levels in line with best international and market practices.

2.2.3. Dynamism

- Preventively intervene in the control of risks, including occupational safety and health;
- Commit to promote the prevention of injuries and occupational diseases;
- Minimize the environmental impacts of the activities, promoting the rational use of natural resources and preventing pollution;
- Communicate to employees and other stakeholders, obligations and information relevant to the activity.

2.2.4. Professionalism

- “Do well to serve better”, respecting all stakeholders;
- Involvement of all employees in the promotion of the Group's values, culture and management / governance model;

- Encourage stakeholders, such as customers, suppliers, subcontractors, and others to continually improve.

2.2.5. Innovation

- New markets prospection;
- Encourage the development of new products, processes and services;
- Engage employees in the development of the activity, providing them with conditions of learning, development and personal fulfilment compatible with the objectives set, in order to enhance employment and career progression.

2.2.6. Identity

- Translate the human dimension and respect for people into human resources management strategy and policies;
- Create motivating and compensatory working conditions through remuneration and incentive policies that promote excellence and merit;
- Adopt non-discriminatory recruitment and selection practices that promote equal opportunities;
- Actively support the transition from school to working life by promoting qualifying training;
- Stimulate “active aging” in order to achieve the generational balance of human resources within the framework of a responsible and socially sustainable labour policy;
- Promote and support social, educational, cultural and environmental initiatives with external entities;
- In each work, at each moment, "Go even further".

3. Responsibilities at work

3.1. Compliance with laws, rules and regulations

As a starting point and inherent in the Values listed above, you are obligated to comply, defend and enforce the legislation, rules, regulations, and professional standards in force in the geographies where the Group operates, including any global agreements or sectoral and ethical rules specific to each professional, as well as any and all contractual commitments assumed by the Group.

3.2. Group governance

Our Group will be managed transparently and in compliance with the standards, guidelines and principles of good corporate governance, in accordance with our commitment to our shareholders, partners, customers, suppliers, employees and the community.

3.3. Conflict of interests

It is your responsibility to ensure that you act in the Group's best interests and that you do not act in any way that would jeopardise that responsibility.

A conflict of interests¹ occurs when your personal interests² interfere with those of the Group. A situation of conflict could occur if you undertake actions or have interests that make it

¹ A "conflict of interest" occurs when the direct or indirect personal interest of a given employee influences, or has the capacity to influence, the proper performance of his or her professional duties, and which causes, or has the capacity to cause, a conflict between the employee's personal interests and the rights and interests of the Group, with potentially harmful results for the Group's rights, interests, property and/or reputation.

² An employee's "personal interest" is understood to mean a situation where an employee may have the opportunity, in the course of his or her duties, to obtain personal gain (or to mitigate a potential personal loss). Such situations may involve monies, valuables or other goods or services and/or other property rights, whether for the employee, his or her family or third parties.

difficult for you to carry out your duties objectively and effectively. You must perform your duties in an honest and ethical manner, including the way in which you deal with real, apparent and potential conflicts of interest between your personal and business relationships. This includes fully disclosing any real, apparent or potential conflict of interests as defined herein.

If you believe that there might be a conflict of interests or that an activity or relationship in which you are involved could constitute a conflict of interest, you should inform the Group's Ethics Hotline (ethics@mca-grupo.com) and your line manager. You should be especially careful if you have a direct or indirect interest in a company or have the capacity to influence a company with which our Group has a business relationship or which is one of our competitors. This applies whether the interest in question is yours personally or is through another related person. For the purposes of this Code, a "related person" is understood to mean your spouse, partner or significant other, child, parent, sibling, cousin, close personal friend or any other person (including agents) who may be entitled to act on your behalf. For example, a conflict of interests may also occur when one family member is directly subordinate to another.

3.3.1. Relatives working in the sector

You may encounter a situation in which a close relative is a competitor, supplier, or customer of our Group, or is one of their employees. Such situations are not necessarily prohibited but they should be handled with greater sensitivity with regard to security, confidentiality, and conflicts of interest. You should take the nature of your own responsibilities as a Group employee into account, as well as the nature of the other person's responsibilities; and, similarly, the access each has to their employer's confidential information. Such a situation could raise suspicion among your colleagues and could affect your professional relationships and your reputation for ethical behaviour.

Consequently, you should inform the Group's Compliance Helpline of any such situation so that the nature and scope of any potential conflict can be assessed. In certain cases, the risk for our Group's interests may be sufficiently remote that the Group's Compliance Helpline does no more than to remind you of your duty not to reveal confidential Group information, and not to take part, on behalf of our Group, in decisions involving the other company. In other cases, stronger measures may be needed to address a potential conflict of interests.

3.3.2. Corporate opportunities

You must promote the Group's legitimate interests whenever the opportunity arises. If you become aware of a business or investment opportunity in which the Group could be interested, or which in some other way comes within the scope of our business activity, you must not attempt to profit from, or engage in, that opportunity without the prior written consent of the Group's Compliance Helpline. This includes opportunities involving the use of corporate property or information, or your position in the Group; for example, through one of the Group's competitors, customers, suppliers, or actual or potential business partners. You may not use corporate property or information, or your position in the Group, for undue personal gain. Similarly, you may not engage in any activity as a competitor of the Group.

3.4. Corruption and bribery

Our Group has a policy of zero tolerance with regard to both active and passive corruption and bribery and is committed to complying with the relevant anti-corruption and anti-bribery legislation in every jurisdiction where we operate.

Please refer to the Group's Anti-Corruption and Bribery Policy, which sets out your responsibilities in relation to ensuring compliance with applicable anti-bribery laws, rules and regulations. Please refer to that document for further details.

3.4.1. Offers, gifts and hospitality

You must not give, promise to give, offer or accept any payment, gift or hospitality in the expectation or hope of being granted or achieving a business advantage or to reward someone for a commercial advantage already granted.

Please refer to our Group's Anti-Corruption and Bribery Policy for further details.

3.4.2. Relations with the Government and authorities

Concerning public politics, the Group does not usually adopt any position, directly or indirectly, or contribute in any way to political organisations.

Our Group is obliged to comply with all national and international legislation in force in any country where it operates. You must not give, promise to give or offer payments, gifts, or hospitality to a public official in order to facilitate or expedite any business activity.

Please refer to our Group's Anti-Corruption and Bribery Policy for further details.

3.5. Relations with Customers, Suppliers and Service Providers

You should take measures that will help ensure that the Group only maintains business relationships with companies and individuals who acknowledge this code and have the same standards of compliance and integrity that we do.

You must refuse any business relationship and must not provide any assistance to anyone who adopts illegal practices. You must report any violation of this principle to the Group's Ethics Hotline

Please refer to the specific requirements of third-party due diligence procedures, namely the "Third Party Procedures" internal standard in our Group's Anti-Corruption and Bribery Policy.

3.5.1. Relations with customers

You must act professionally and efficiently in order to supply high-quality services that will help maintain and strengthen our Group's relationships with its customers and enhance our strong image and reputation.

3.5.2. Relations with suppliers and service providers

Our Group will choose its suppliers and service providers independently and objectively, on the basis of market conditions, service quality, technical and cost criteria.

Our Group's negotiations must be conducted on the basis of good faith and honour in respect of the contractual obligations to which we have committed, repudiating any possible criteria that privilege personal or diffuse interests, as well as any actions constituting power or position abuse.

3.6. Relations with the Media

If you are not one of our Group's official spokespeople, you may not speak to the press, financial analysts, other members of the financial community, shareholders, or groups or organisations, either as a representative of the Group or about the Group activity, except when you have been specifically authorised to do so by a member of the Executive Board. Requests for financial or other information about the Group from the media, press, financial community, shareholders, or the public must be addressed to the Head of the "Institutional Relations, Investors and Communication" Corporate Center.

Any information given to the media and publicly disseminated must be informative and true.

Any public information generated and communicated by the Group must comply with all the applicable legislation and regulations in force. Any public financial information about the Group must present its financial circumstances for a given date or period in a complete, precise and trustworthy manner, and must have been prepared within the applicable time period.

3.7. Relations with the community

3.7.1. Human Rights

Our Group recognizes Human Rights in all cultural, socioeconomic, and geographic contexts where it operates, respecting the respective traditions and cultures and promoting support for local communities in accordance with the specific interests of each region.

3.7.2. Child labour

Our Group prohibits any situations which involve or may be related to child or forced labour.

3.7.3. Social responsibility

Our Group is strongly committed to pursuing and strengthening its strategy of ethical, social, and environmentally responsible management. Our corporate social responsibility programme includes internal and external objectives, acting transversally within the Group's business units and within the following defined pillars:

- Rebuild;
- Prevent;
- Involve;
- Develop; and
- Educate.

Our Group is committed to pursuit the motto “Great fruit, great seed”. In that sense, we are committed to:

- Developing projects, leaving in each relevant work project a social seed for the communities where we are inserted.
- Contribute with determination in the promotion of a more just and balanced society, acting in the social scope, in formation, health and environment.
- Develop good management practices, respect for applicable legal requirements, ethically, socially and environmentally sustainable.

You shall commit yourself to continue the Group's social responsibility policy, promoting involvement and discussion with the communities in the places where you carry out your activity, in order to ensure, within their scope of work, the protection, development and sustainability of these communities.

3.7.4. Respect for the Environment

Our Group is strongly committed to pursuing and strengthening its strategy of ethical, social, and environmentally responsible management. Our corporate social responsibility programme includes internal and external objectives, acting transversally within the Group's business units and within the following defined pillars:

Our Group is strongly committed in the preservation and respect for the environment. This must be an essential principle in your work, highlighting, in this context, the obligation to

comply with applicable legal requirements and other requirements associated with the environmental aspects, as well as minimising the environmental impacts resulting from the Group activity in the various business areas, in order to guarantee the Group's sustained development.

4. Protection of the Group's resources and information

4.1. Group assets

This Code requires that we protect our Group's assets³ and ensure that they are used efficiently for legitimate business purposes. Theft, negligence and waste, all have a direct impact on the Group's profitability. You should take measures to prevent against damage, theft, or improper use of Group property. You should use equipment and goods with great responsibility, whether they belong to the Group or are borrowed. If you leave our Group, we must return any and all of its property that may be in your possession. Unless specific authorisation has been given otherwise, Group assets, including equipment, materials, resources and proprietary information, must only be used for the Group's business purposes. You will look after Group funds and property as if they were your own, safeguarding them against improper use, loss, fraud or theft.

4.2. Group accounting records

Our Group must record all of its financial activities in accordance with all the applicable laws and accounting practices. All transactions must be duly authorised and recorded fully and precisely. It is strictly forbidden to record or document false or misleading information. You must never create false or misleading reports, or make payments or create accounts in the

³ "Assets" are understood to be property, funds, information or intellectual property held by our Group, as well as equipment used individually, such as mobile phones and computers.

Group's name on the understanding that part of the payment or account will be used for a purpose other than the one described in the corroborating documents.

If you become aware, or suspect, that someone has falsified Group accounts, you must report it immediately to your line manager or to the Group's Ethics Hotline. Concealing information from the management or from internal or external auditors could seriously prejudice our Group.

4.3. Record keeping

Our Group is committed to complying with the laws and regulations applicable to record keeping. All records shall be kept for no less than the minimum period of time established in those laws and regulations. All records that are irreplaceable and critical to the continuation of our Group's business must be identified and stored in a safe place on the Group's premises. This would include such items as: accounts receivable and accounts payable, lists of active customers, bonds, notes, shares, company statutes, minutes and associated records, internal memoranda, company approvals and resolutions, mortgages, originals of signed contracts, payroll records, and discs and cassettes containing back-up copies of data. These records and documents, which bear the signatures of the top-level directors of the Group, must never be destroyed.

Other Group records will only be disposed of or destroyed when they become clearly obsolete, have no further business use and are no longer subject to any legal or regulatory requirement governing how long they will be kept for. Whole groups or categories of records may only be routinely destroyed if such destruction is carried out in line with the current practice and does not contravene the guidelines shown above, or if it has been specifically approved by the Legal Corporate Center and by the Group's Compliance Helpline.

If you become aware of a summons, pending or potential legal proceedings, or a government investigation, we must retain and preserve all records that may be called for in the summons, or that may be relevant to the legal proceedings, or that may be related to the investigation, until such time as the Legal Corporate Center tells you how you should proceed. Any physical destruction of documents must be authorised by the Legal Corporate Center and by the Group's Compliance Helpline.

4.4. Confidential information

In the course of your work at our Group, you may become aware of facts about its activity, plans, operations, or trade secrets that are not known to the public or to our competitors. Confidential information includes all written or verbal information that has not been made public and which becomes known to you, directly or indirectly, through any form of communication or observation, and which, if disclosed, could be used by competitors or be prejudicial to the Group or its customers. In particular, it includes all non-public financial, technical, operational, commercial, and personnel-related and management information, as well as other information, data and expertise.

You must not disclose any information entrusted to you by our Group or its suppliers or customers, except if the Group has authorised you to do so, or you are required to do so by law. If you believe you may have disclosed confidential information, for example, by sending an e-mail to the wrong person or by leaving documents in a public place, you must immediately inform your line manager or the Group's Ethics Hotline.

Your obligation to treat information as confidential does not end when you leave the Group. When your employment contract ends, you must return everything in your possession that belongs to the Group, including all documents and other materials containing confidential information belonging to the Group and its customers or suppliers. You may not disclose confidential information to a new employer or to anyone else when you cease to be an employee of the Group.

All non-public resources and assets made available to you by our Group are Group property and you may not use them for your personal benefit or private use.

5. Fair practices

5.1. Ban on unfair practices

You must commit to acting fairly in your dealings with the Group's customers, suppliers, competitors, and employees. You must never take unfair advantage of a third party by means of manipulation, concealment, use of insider information, imprecise presentation of material facts or any other unfair practice.

5.2. Economic sanctions and embargoes

Our Group complies with national and international embargoes applicable to its activity. To this end, our Group performs an evaluation of all new and current entities and individuals with which it does business, using the applicable sanctions lists, including the List of Specially Designated Nationals (*Lista de Cidadãos Nacionais Especialmente Identificados*) and the Blocked Persons and the Sectoral Sanctions Identification List (*Lista de Pessoas Bloqueadas e Sanções Setoriais*) issued by the US Department of the Treasury's Office of Foreign Assets Control, OFAC (*Gabinete de Controlo de Ativos Estrangeiros*) and the EU list of specially designated persons.

5.3. Anti-Money Laundering and Terrorism Funding

Our Group is committed to complying with the laws and regulations applicable to anti-money laundering and terrorism funding. You must act in a manner that actively combats possible attempts at money laundering, refusing to participate in any act that as such may be considered, under current legal and regulatory standards, as well as in any attempt, complicity, facilitation or advice to carry it out.

Likewise, you must act in a way that prevents the Group's activity in any way from providing, collecting or holding funds or goods that may be used for the financing and support of criminal activities, namely terrorists.

5.4. Competition laws

Our Group strictly complies with all applicable competition laws. These laws are highly complex and matters related to competition should not be addressed without consulting the Legal Corporate Center. Any violation of the competition laws could lead to both the Group and yourself being held liable. It would be impossible to include all of the relevant legislation here in this Code, but we have provided below a general overview of the types of conduct that should be avoided. If you are involved or become involved in activities similar to those identified in this Code or if you detect situations which, in your opinion, could raise questions of competition, you must immediately consult the Group's Compliance Helpline for further guidance.

5.4.1. Conspiracies and collaboration between competitors

Competition laws promote and preserve the independence of each competitor in their decision-making on prices, production and other competitively sensitive factors. Competition laws are infringed when competitors enter into agreements which limit the independence of decision-making and restrict market operations. Such agreements could include price-fixing, restriction of production or quality control of the products or the division of the market by customers, territories, products or purchases. You must never enter into any agreement with any competitor about any of these topics in view of the fact that such agreements could potentially be illegal.

Illegal agreements do not necessarily have to be set down in writing nor even express mutual commitments or guarantees. They may be based on casual conversations, informal discussions or merely exchanges of information between competitors that could lead to price-fixing or some other adjustment. Any communication with a competitor's representative, however harmless it may appear at the time, may later be subject to legal scrutiny and constitute the basis of charges of improper or illegal conduct.

Coalitions between competitors, trade associations and/or organisations that set standards may create concerns about fair competition, even when such coalitions serve legitimate goals. Exchanging sensitive information with competitors about topics such as prices, profit margins, production levels, invoicing or advertising practices could potentially violate competition laws, as well as establishing a standard behaviour with the aim and effect of prejudicing the competition. If you are present at a meeting where potentially sensitive topics are being discussed and there is no lawyer present on behalf of the competition, you should protest, leave the meeting and immediately notify the Legal Corporate Center.

In order to avoid improper agreements, our Group forbids:

- Conversations and contacts with competitors about prices, costs or terms and conditions of sale;
- Conversations and contacts with suppliers and customers that unfairly restrict market operations or exclude competitors from the market;
- Agreements with competitors relating to the allocation of markets or customers;
- Agreements with others with the aim of boycotting customers or suppliers; and
- Any unfair use of our Group's position in the market.

5.4.2. Gathering of information about the Group's competitors

It is entirely legitimate for our Group to gather information about the market, including information about our competitors and their products and services. However, there are limits to the ways in which such information may be obtained and used. When gathering information about competitors, you must follow these guidelines:

- Gather information about our Group's competitors from sources such as published articles, advertisements, brochures, other non-proprietary materials, consultancy surveys and conversations with our Group's customers, as long as such methods cannot suggest that our Group is attempting to: (a) conspire with the competitors and use the customers as messengers, or (b) gather information in violation of the agreement of non-disclosure that a customer may have entered into with a competitor or by other unfair means. You must be able to identify the source of any information about the competitor.
- Never try to obtain a competitor's trade secrets or any other proprietary information using illegal means such as theft, espionage, bribery or violation of a competitor's non-disclosure agreement.
- If there is the slightest indication that the person/entity who has the information in their possession did not obtain it legally, you must refuse it. If you receive any information about competitors from an anonymous source or which has been flagged as confidential, you should not examine it and you must contact the Group's Ethics Hotline immediately.

6. MCA Group working relations

6.1. Respect, integrity, loyalty and team spirit

The relation between employees must be based on mutual respect, loyalty and rectitude, in observance with the principles of ethics and cooperation, contributing to a good working and team environment. Everyone who works for our Group must contribute towards the creation and maintenance of an environment in which we can all feel respected and valued. Supervisors

and managers, in particular, are responsible for promoting a working environment that promotes honesty, integrity, respect and trust.

You should be tolerant and respectful of cultures, opinions and lifestyles that are different from your own, always taking into consideration the effect your behaviour may have on your colleagues and other parties.

Discriminatory behaviour, intimidation, harassment and physical aggression are strictly forbidden in the workplace. Intimidation in the workplace is the unacceptable singling out of a particular employee from among his or her colleagues that could result in a limitation of that employee's rights or cause him or her to feel intimidated.

6.2. Protection of employees' personal data and privacy

Our Group collects and stores personal data related to the employment relationship between the Group and its employees. Only the personal data required by law and necessary to ensure the effectiveness of the Group's operations is collected and stored. The Group assures the employees' entitlement to review and correct their personal data, in strict adherence to applicable laws and regulations.

The personnel responsible for maintaining personal data (whether it is employees' personal data or any other counterparties' personal data which our Group has operations with) and those who have been granted access to this information must not disclose and must not utilize it to any purpose different from the ones defined by the Group; to do so could constitute a violation of the applicable legislation or a breach of the Group's personal data protection policy. Access to personnel records must be restricted to those who have appropriate authorisation and a clear work-related reason for accessing them.

6.3. Equal opportunities and non-discrimination

As an employer, the Group follows a policy of equal opportunities with regard to hiring and promotion practices, benefits and salaries. The Group will not tolerate any discrimination whatsoever against any person on the basis of their ethnicity, religion, colour, gender, age, marital status, nationality, sexual orientation, citizenship or disability (when the applicant or employee is qualified to perform the essential duties required for their position, with or without reasonable conditions) or for any other reason prohibited by law. The above applies to

recruitment, contracting, assignment, promotion and any other condition of employment. You are entitled to equal opportunities and fair treatment based on merit.

The Group will not tolerate the use of discriminatory reprimands, nor any other remarks, jokes or conduct liable to cause or foster an offensive or hostile working environment.

6.4. Sexual and other types of harassment

It is strictly forbidden any type of harassment, carried out when accessing to the job or executing the employment contract or during professional training, whether it is in the workplace itself or outside it.

It is considered harassment any type of undesirable behaviour - gesture, word, active or ommissive attitude, etc. - regardless of illegitimate discrimination factors, having as objective or result:

- Affecting the person's dignity or creating an intimidating, hostile, degrading, humiliating or destabilizing environment for the individual;
- Unreasonable disturbance in the employee's working performance;
- The conditioning of the decision to hire an individual, or his/her acceptance by it.

Sexual harassment constitutes any and all undesirable conduct of a sexual nature, whether it is in a verbal or nonverbal, physical or other type of form, with the objectives or effects described in the previous paragraph.

Without prejudice to the compensatory, direct or return-related consequences, the Group shall institute the appropriate disciplinary procedure whenever it becomes aware of alleged harassment situations in a labour context.

The Complainant of the harassment and the witnesses indicated by him / her cannot be sanctioned disciplinarily (unless they do so by knowing the falsehood of the allegation and exclusively with the intention to harm the Denounced and / or the Group), nor in any way be prejudiced in their status or in their exercise of labour or civil rights.

6.5. Safety in the workplace

The health, safety and protection of our employees are paramount for our Group. The Group complies with all the rules relating to occupational hygiene and safety in the workplace, with the aim of fostering a responsible work culture in which everyone is concerned with health, safety and the prevention of occupational risks. You are personally responsible for keeping the facilities free of recognised risks and for obeying the hygiene and safety rules. Work areas must be kept clean and tidy in order to encourage operational efficiency and promote good safety practices. You must abide by the workplace safety requirements and the fire safety rules in accordance with the applicable legislation and the Group's internal procedures.

If you detect any circumstance that could be dangerous to health or safety, you must report it to the People Management Corporate Center or to the SIG-QAS Department.

6.5.1. Drugs and alcohol

Except for approved Group events, you are not allowed to have alcohol in your possession or be under the influence of alcohol while you are on Group premises.

You must be conscious of the fact that you are representing our Group when you attend Group events, travel for work-related reasons or attend other business-related events. Unacceptable behaviour resulting from the excessive consumption of alcohol may be treated as disciplinary offences, when appropriate.

You may not report to work under the influence of drugs or alcohol. During your working hours at the Group, or when operating or driving Group machinery or vehicles, or when you are on Group premises during your breaks, you may never use, transfer, sell, manufacture or have in your possession drugs or associated paraphernalia, alcohol or other substances which produce a similar effect. If you are taking any medication that could pose a risk to safety, you must immediately inform your line manager of this fact.

6.6. Training

Our Group has implemented a training plan that is intended to provide you with orientated, continuous technical and behavioural training that will allow you to maximise your skills and

standards of excellence. Employees will receive specific training on compliance, which you must attend.

You should continually strive to improve your knowledge and develop your skills in order to achieve an excellent level of performance in your duties and help us provide our customers with the best possible service.

You should encourage the development, training (including informal training), personal and professional achievement of other employees, especially those who depend on you hierarchically.

6.7. Communication

Our Group seeks to facilitate communication and dialogue between employees and managers by encouraging active involvement, initiatives and consultations.

6.8. Innovation

Our Group promotes the use of technology and innovation in its business areas with the aim of maximizing the returns on its activity, promoting and encouraging the development of new ideas that bring added value.

You shall take the initiative and use both your skills and the human and technical resources that the Group makes available to you, in order to promote efficiency, innovation, increase productivity and improve the organization and operation of work teams. It is the performance of each one that will define the Group's overall performance.

7. Infringement of the Code

7.1. Responsibilities

You are personally responsible for complying with the obligations of this Code. Your conduct must be governed, in all circumstances, by the principles and values set out here. Our Group

has a series of resources and people at your disposal to answer your questions and assist you with difficult decisions. Failure to comply with this Code may result in financial losses, damage to our Group's reputation, or lead to you or the Group suffering criminal or civil sanctions or being held liable.

Furthermore, you are obliged to report any information that constitutes misconduct, including those that constitute possible illegal or illicit practices in financial and accounting matters, fraud, corruption and money laundering, as well as any actions related, directly or indirectly, to terrorist entities or those that may target or support terrorist practices.

Copies of this Code are available on the Group's webpage.

7.2. Compliance Helpline and anti-retaliation policies

7.2.1. Group's Ethics Hotline

You may report alleged irregularities of a general, operational or financial nature and/or infringements of this Code or Group's policies at any time by contacting your line manager or the Ethics Hotline, unless applicable laws and regulations demand you report to other entities (this provision does not exempt the local/regional entity from forwarding the reported event do the Group's Ethic Hotline). You do not have to be afraid of retaliation if, and provided you have acted in good faith when reporting.

The Group guarantees the confidentiality of communications received, the absence of any reprisals by whistle-blower complainants in good faith and the protection of the reporter's and the suspected offender's personal data. Retaliation against the complainants is frowned upon by the Group and may give rise to disciplinary proceedings against its perpetrators and the persons who have allowed such retaliation.

All irregularity/infringement reports must be submitted by email or written letter, to one of the following addresses:

- ethics@mca-grupo.com
- Etica – Rua João Oliveira Salgado - N° 385, 4810-015 - Costa - Guimarães | PORTUGAL

For more information, please consult the published Whistleblowing Policy and Procedure.

7.2.2. Group's Compliance Helpline

Our Group provides a Helpline that you may use to seek guidance or raise any issues related to this Code or the Group's policies. When you contact the Helpline to ask questions, you may do so anonymously; however, by identifying yourself, you may help the Group to reply faster.

You can contact the Compliance Helpline by sending an e-mail to the following address: compliance@mca-grupo.com.

7.3. Disciplinary proceedings due to infringement

It is our Group's aim to make every reasonable effort to guard against the occurrence of conduct contrary to this Code and our policies and in the event that any such conduct is detected, to put a stop to it as soon as is reasonably possible.

Employees who violate this Code or any other Group policy may be subject to appropriate disciplinary action, including additional training, demotion, reduction of salary, warning, suspension or dismissal.

Without prejudice to having specific complementary training over civil or criminal liability arising from the behaviour in question, employees who violate this Code or any other Group policy will be subject to a disciplinary proceeding in order to apply a sanction previewed in law, appropriated in type and measure, taking into account its adequacy, effectiveness and proportionality, in the light of the gravity, fault and consequences associated with the fact practised.