



**Bem Vindo
Bienvenido
Welcome**

CÓDIGO DE CONDUTA

CODE OF CONDUCT

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Letter from the Global CEO

The Sugal Group was founded in 1957 in Azambuja by my father and grandfather, who, over several decades, endeavoured to build a solid and sustainable project, driven by the same principles, values, and ethics with which they raised their children and grandchildren.

These are the principles and values that unite us and make up our purpose of wanting To Be More Sugal Group: we aim to stand out through our positive example and our desire to continue a family-built project.

This project today extends beyond Portuguese borders, with our factories in Spain and Chile, without us losing sight of the culture of excellence, passion and commitment that is part of our DNA.

This culture and these principles have been enshrined in Sugal Group documents which we make available to everyone and ask that you consult and read alongside this Code of Conduct - in particular, the GPS (Sugal Group Guide of Principles), as well as the Whistleblower Channel Terms and Conditions and the Corruption and Related Offences Prevention Plan, which will be shared, published and made available to all Sugal Group employees in due course.



João Ortigão Costa

Chapter I

Introduction

Throughout its history, the Sugal Group has based its conduct on the highest principles of ethics, integrity and respect for the laws and regulations in force, prioritising quality, awareness and sustainable production.

To safeguard and protect our actions as Sugal Group, a set of internal regulations has been created, which everyone must follow. This includes this Code of Conduct, which complements and works in conjunction with other internal policies, especially our GPS – Sugal Group Guide of Principles.

This Code of Conduct is intended to serve as a benchmark for standards of conduct, helping to ensure that the Sugal Group is recognised as an example of excellence and integrity.

Sugal Group employees are its most valuable asset, and the way they interact with each other, with the Sugal Group, and with third parties is key to building the Group's image. It is therefore the duty of each Employee of the Sugal Group to:

- (i) Be familiar with and respect the principles, values and rules of conduct of the Sugal Group;
- (ii) Collaborate and promote the implementation of Sugal Group Policies, including this Code of Conduct.

Chapter II

Purpose and Scope

2.1 Purpose

This Code establishes a set of principles, values and rules that guide the work of all Sugal Group Employees, regardless of their position or role and aims to regulate the relationship between Employees and third parties with whom the Sugal Group interacts or relates, reflecting the corporate culture of the Sugal Group that we want everyone to welcome.

2.2 Scope

This Code applies to all Employees of Sugal Group companies in Portugal¹ ("Sugal") and, *mutatis mutandis*,² to all Employees of Sugal Group companies in Europe regardless of their contractual relationship and seniority, meaning everyone who works with the Sugal Group, including employees regardless of the contractual relationship and the position in the hierarchy they occupy, temporary workers, members of the governing bodies, trainees or volunteers and all persons acting on behalf of and/or representing the Sugal Group (referred to in this Code simply as "Employees").

The principles established in this Code of Conduct should also be communicated and recommended to other service providers, customers, business partners, producers and suppliers of the Sugal Group, within the scope of the relationships forged with them, who should be informed of and adhere to this Code.

The provisions of this Code do not exempt the application of the Sugal Group's other internal policies or of any legal or regulatory regimes applicable to all its Employees in the performance of their professional duties.

In the event of conflict, the most stringent regime should be followed.

Chapter III

General Principles, Values and Rules of Conduct

3.1 Sugal Group Guide of Principles

Our **GPS - Sugal Group Guide of Principles**, which should be read alongside this Code of Conduct, provides direction in our daily decisions and actions through a set of guiding coordinates. It is built on three pillars: The Sugal Treaty, Values and Rules of Conduct.

These principles, values, and rules of conduct embody our purpose as the Sugal Group, the principles we uphold internally, and those that should be adhered to by all.

3.2 Professional Diligence and Competence

Sugal Group Employees are expected to conduct themselves in compliance with all applicable laws and internal policies, observing good-faith practices and upholding high standards of diligence,

¹ SUGAL - ALIMENTOS, S.A.; CIFO-SOCIEDADE DE FMENTO AGRÍCOLA, LDA.; ORFRUTAL - COMÉRCIO E SERVIÇOS, S.A.; S AGRO, LDA.; AG-INNOV COE, A.C.E.

² This Code of Conduct has been drawn up in the light of Portuguese law, which in some cases transposes European legislation into its legal framework. However, the set of guiding principles, values and rules described here are applicable to other Sugal Group companies based in the European Union and should be interpreted in accordance with the national law of the respective country.

loyalty, transparency, integrity, professionalism, responsibility, competition, resource conservation, environmental awareness and confidentiality.

Sugal Group Employees should perform their roles conscientiously, focusing on the defined goals within the scope of their respective duties and aligning their efforts to further the objectives and interests of the Group, thus upholding the good name and reputation of the Sugal Group.

3.3 Equal Treatment, Diversity and Non-discrimination

Sugal Group Employees should also adhere to principles of equal treatment, mutual respect, and reject any discriminatory behaviour, including discrimination based on age, sex or sexual orientation, nationality, ethnicity, genetic heritage, marital status, family situation, reduced work capacity, disability, illness, religious, political, or ideological beliefs, or any other behaviour that may constitute harassment or abuse of power.

Chapter IV

External Relations

4.1 General Provisions

The Sugal Group adopts a zero-tolerance policy towards any illegal activities, particularly concerning corruption and related offenses, which aligns with the principles in this Code of Conduct (specifically Chapters VI and VII) and other Sugal Group Policies.

4.2 Relations with Customers, Business Partners, Producers, Suppliers and Service Providers (“Stakeholders”)

Employees must act with professionalism, respect, and tact when dealing with customers, business partners, producers, suppliers and service providers (“**Stakeholders**”).

Sugal Group employees must ensure that the commitments made by the Sugal Group are honoured and require Stakeholders to fully meet their obligations, as well as to observe Sugal Group Policies, best practices, rules, and values relevant to the activities involved, taking into account the smooth functioning of the market.

Employees must refrain from responding to enquiries from Stakeholders seeking to obtain confidential or sensitive information from the Sugal Group in an improper manner.

The selection of producers and suppliers should be based on impartial and transparent criteria, avoiding any form of privilege or favouritism, according to current procedures and policies, and, where possible, avoiding exclusive arrangements.

Consideration should be given not only to economic and financial indicators, commercial conditions

and product/service quality, but also to ethical behaviour, known or perceived by the general public.

Contracts concluded with the Stakeholders shall be clearly drafted, without ambiguity or omission.

4.3 Relationship with Shareholders/Stakeholders

The relationship with shareholders or stakeholders of any Group company must, *inter alia*, ensure equal treatment for all shareholders/stakeholders, avoiding any unjustified discrimination, and safeguarding the interests of shareholders/stakeholders.

4.4 Relations with Competitors

The laws and rules applicable to the normal functioning of the market must be respected, promoting fair competition, prohibiting any unfair competition and respecting the property rights, both material and intellectual, of the company and its competitors.

It is essential to foster cordial relations with competitors, prioritising honesty, mutual respect and confidentiality of information and trade secrets.

4.5 Relations with Public Entities and Regulatory and Supervisory Authorities

The Sugal Group is committed to establishing transparent and cordial relationships with any public entity or regulatory and supervisory authority, with which it will cooperate by providing requested or pertinent information.

4.6 Relations with the Community and the Environment

The Sugal Group should adopt a socially responsible attitude within the Community, maintaining open dialogue, and pursuing an environmentally sustainable policy that respects responsible resource use. This commitment is reflected in the Group's integrated Sustainability strategy.

4.7 Conflicts of Interest

Confidence in and from customers, producers, suppliers and service providers is crucial, and situations where there is a conflict of interest can negatively impact the reputation and credibility of the Sugal Group.

Employees must report any situation that constitutes or may constitute a potential conflict of interest to their immediate supervisor. In particular, Sugal Group Employees who, as part of their roles and responsibilities, may be required to intervene in processes or decisions involving financial or other personal interests, or interests of related persons or entities, must promptly disclose any such relationships to their supervisor and refrain from participating in the decision-making process for the matter in question.

In any case, the resolution of conflicts of interest should be in strict compliance with the applicable

laws, regulations and contractual provisions.

4.8 Information and Publicity

All information provided by the Sugal Group to external entities or persons, as well as its advertising, shall comply with the principles of legality, clarity, truthfulness and timeliness.

Any information provided to the media must be informative and truthful, and should contribute to disseminating an image of cohesion and credibility of the Sugal Group.

Employees should not make public statements that could harm the image and reputation of the Sugal Group.

In instances of external communication opportunities, they must be validated by the relevant management line if undertaken by an employee not authorised to act as an official representative or spokesperson of the Sugal Group. External communications should follow the Communication Policy and Social Media Best Practices.

Chapter V

Internal Relations

5.1 General Provisions

Sugal Group Employees should foster cordial, healthy relationships and a positive, trusting atmosphere in their interpersonal conduct. They are encouraged to respect others and the organisational hierarchy, protect and enhance mental health and physical and psychological well-being, and focus on motivation, productivity, engagement, and participation. This includes collaborating proactively, sharing knowledge and information, and nurturing team spirit and a sense of belonging.

Employees are expected to uphold high standards of respect for integrity and dignity in their interactions, promoting professionalism, cordiality and courtesy in interpersonal relationships.

5.2 Equal Treatment

The Sugal Group should ensure equal treatment for all Employees in all situations where there is no legal and/or contractual reason for differential treatment.

No discriminatory acts based on any social characteristic, such as race, sexual orientation, religion, politics, age, disability, or origin, will be tolerated by Sugal Group or its employees.

These principles also apply to recruitment and selection practices, as well as to the terms and conditions of employment, work assignments, training, remuneration, benefits, promotion, discipline and treatment of Group Employees.

5.3 Harassment and Misconduct

The Sugal Group does not tolerate any form of harassment in the workplace, including sexual harassment, violence, threats or retaliation. Any inappropriate conduct should be reported immediately to the line manager, the Human Resources Department, the Compliance Officer or via the Whistleblowing Channel.

5.4 Further Training and Professional Merit

Employees must continuously seek to improve and update their knowledge, with a view to maintaining or improving their professional skills.

Participation in training actions promoted or financed by the Sugal Group is mandatory, unless expressly stated otherwise.

Employee performance will be evaluated based on demonstrated merit and contributions toward achieving set goals.

Employees are encouraged to seek feedback from their supervisor regarding their performance at any time, particularly during regular performance evaluations.

5.5 Use of Resources and Equipment

Each Employee is responsible for the proper use of resources and equipment provided to them, in accordance with applicable Policies³, and for ensuring their good maintenance.

Any equipment malfunction or anomaly should be immediately reported to a supervisor, who is responsible for providing instructions for rectifying the issue or arranging maintenance, repair, or replacement, as necessary.

Chapter VI

Anti-Corruption Measures

6.1. General Principles

Any and all acts of corruption and related offences are strictly prohibited⁴. The Sugal Group's

³ These Policies can be found on the Sugal Group intranet.

⁴ Corruption and related offences include crimes such as bribery, improper receipt or offering of advantages, embezzlement, economic involvement in a business, extortion, abuse of power, misconduct, influence peddling, money laundering or fraud in obtaining or misappropriating subsidies, grants, or credit, as outlined in the Penal Code (approved in the annex of Decree-Law

reputation is one of its most important assets. Therefore, any inappropriate conduct contrary to the law or standards set out in this Code of Conduct and in the Corruption Risk Prevention Plan and related offenses will not be tolerated.

6.2. Gifts and Other Benefits or Rewards

Under no circumstances should Employees request, accept, give, or promise the following to public officials⁵ or political office holders⁶:

- (i) pecuniary or non-pecuniary advantages in the exercise of the functions performed by them or because of them;
- (ii) pecuniary or non-pecuniary advantages with a view to the practice of any act or omission constituting a violation of the duties of the office;
- (iii) pecuniary or non-pecuniary advantages that are not due to them, even if there is no violation of the duties of the office.

In any interactions with public officials and political office holders, no privileges or payments intended to corrupt, secure, or retain a business, contract or any form of undue or unjustified advantage, or that could be perceived as such, will be tolerated.

Similarly, Employees must not, in any instance, directly or indirectly request, accept, give, or promise undue property or non-property advantages to private sector workers⁷ as a quid pro quo for any act or omission that constitutes a breach of professional duties.

No. 48/95, of 15 March 1995, as amended); Law No. 34/87, of 16 July 1987, as amended; the Military Justice Code (approved in the annex of Law No. 100/2003, of 15 November 2003); Law No. 50/2007, of 31 August 2007, as amended; Law No. 20/2008, of 21 April 2008, as amended and Decree-Law No. 28/84, of 20 January 1984, as amended. For more details, please refer to the Corruption and Related Offenses Risk Prevention Plan.

⁵ The term "**public official**" encompasses: **1. National officials**, i.e., (i) civil or military officials; (ii) those holding public office through a special link; (iii) individuals, whether temporarily or permanently, paid or unpaid, voluntary or mandatory, engaged in performing or participating in administrative or judicial public functions; (iv) judges of the Constitutional Court, Court of Auditors, judicial magistrates, Public Prosecutors, the Attorney General, the Ombudsman, members of the High Council of the Judiciary, the High Council of Administrative and Tax Courts, and the High Council of the Public Prosecutor's Office; (v) arbitrators, jurors, experts, technical assistants to the court during judicial inspection, translators, interpreters, and mediators; (vi) notaries; (vii) individuals, whether temporarily or permanently, paid or unpaid, voluntarily or obligatorily, performing public administrative functions or holding authority in public utility corporations, including private social solidarity institutions; (viii) individuals performing or participating in public functions within a public association; (ix) management, administrative, or supervisory board members and employees of public companies, nationalised entities, publicly owned or majority publicly funded companies, and concessionaires of public services; in cases where companies are partially or minority publicly funded, board members designated by the State or other public entity are considered public officials. **2. Foreign officials**, i.e., a person who, in the service of a foreign country, as an official, agent or in any other capacity, even provisionally or temporarily, for remuneration or free of charge, voluntarily or compulsorily, has been called upon to perform or participate in the performance of an activity included in the administrative or judicial public service or, under the same circumstances, performs functions in or participates in bodies of public benefit, or is a manager, supervisory board member or employee of a public, nationalised or publicly owned company, or a company with a majority public shareholding, or a public service concessionaire, as well as any person who assumes and performs a public service function in a private company under a public contract; **3. International organisation officials**, i.e., any person working for an international public law organisation, as an official, agent, or any other capacity, even temporarily, paid or unpaid, voluntarily or obligatorily, engaged in performing or participating in public functions.

⁶ The concept of a **political office holder** covers (i) the President of the Republic; (ii) the President of the Assembly of the Republic; (iii) the Member of the Assembly of the Republic; (iv) the Member of the Government; (v) the Member of the European Parliament; (vi) the Representative of the Republic in the autonomous regions; (vii) the member of the autonomous region's own governing body; and (viii) the member of the representative body of local self-government. Also included are political offices holders from organisations governed by public international law, as well as political office-holders from other states.

⁷ Any person who performs functions, including management or oversight roles, under an individual employment contract, service agreement, or in any other capacity, even if temporary or provisional, whether paid or unpaid, in the service of a private sector entity.

Facilitation payments⁸ are therefore strictly prohibited. No Employee will be harmed, retaliated against, or penalised for any delay or failure to close business due to their refusal to engage in or support such conduct.

These rules must also be observed vis-à-vis any third parties and are prohibited even if carried out through an intermediary.

Employees must avoid using their position to favour their interests or those of third parties in dealings with external entities, including public officials, political office holders, customers or suppliers.

6.3. Offering and Accepting Gifts

Personal gifts are not permitted. Any offers or gifts must always be made in the name of the Sugal Group at appropriate times and according to the criteria set by the Group, while respecting the provisions of this chapter, particularly:

- (i) Offering or accepting gifts should be sporadic, proportional and socially appropriate;
- (ii) The economic value of the gifts shall not exceed EUR 100.00 (one hundred euros);
- (iii) The offer or acceptance of gifts must not imply or appear to exert any form of pressure or influence on business relationships, nor should it aim to obtain improper or unjustified advantages or to influence an entity's decision.
- (iv) Gifts may only be offered and accepted for legitimate commercial purposes, such as:
 - Promoting awareness of the Sugal Group's activities and services (e.g. through the distribution of products or presentation of services to evaluators or influential individuals who may use or promote them).
 - For marketing to customers and potential customers (e.g. with low-value brand products);
 - Building relationships (e.g. small gifts during specific times of the year like Christmas);
 - Celebrating achievements with customers or suppliers (e.g., a small gift to mark the completion of a project or to thank a supplier).

When the above conditions are met, the following gifts may be considered in line with customary practice:

- (i) Occasional offer of meals;
- (ii) Sporadic offer of tickets to artistic or sporting events;
- (iii) One-off travel costs of business partners;
- (iv) Low-value gifts such as merchandising or small promotional items.

⁸ Facilitation payments involve awarding low-value financial advantages to public officials (usually lower-level officials) with the intention of ensuring or speeding up the execution of a routine or necessary administrative action, non-discretionary in nature, to which the paying party would otherwise be entitled.

It is forbidden to solicit gifts. It is also forbidden to offer or accept gifts when:

- (i) Gifts are accepted or offered in cash or equivalent (i.e. vouchers, credit instruments, among others);
- (ii) The economic value of gifts exceeds the limits considered reasonable by social uses, and, in any case, exceeds EUR 100.00 (one hundred euros);
- (iii) The gifts are offered or accepted in the context of a negotiation or revision of contracts or in tender procedures in which the Sugal Group companies are involved;
- (iv) The gifts have been solicited by the recipient;
- (v) The gifts are accepted or offered on a reciprocal basis;
- (vi) The gifts involve entertainment of a sexual nature or similar.
- (vii) The gifts are destined for or originate from employees, holders of political office, or close family members of the latter.

If the above conditions are not met, employees must refuse or return the gifts and report the situation to their superior.

If there is any doubt regarding compliance with the conditions outlined above, Sugal Group employees should consult the Compliance Officer before making a decision regarding the gift and adhere to the instructions provided.

All gifts or benefits referred to in the above paragraphs, including refusals, must be reported and recorded internally.

The records must be submitted to the Sugal Group Compliance Officer and archived. Invoices, receipts and delivery or acceptance notes related to the acceptance or offer of gifts must also be archived.

6.4. Sponsorships and Donations

Sponsorships and donations must not constitute undue or unjustified advantages, nor be used as a means to exert influence or pressure on any decisions made by the beneficiary.

The granting of sponsorships and donations should always be transparent, rigorous, consistent and kept within reasonable and socially accepted limits, and should only be made for legitimate charitable or supportive purposes.

All benefits should be analysed from the point of view of integrity and should only be granted to reputable entities, provided the necessary due diligence has been conducted to verify their integrity.

Sponsorships of entities with which the Sugal Group has business relations should be avoided, and initiatives clearly associated with the respective activity should be prioritised.

All sponsorships and donations awarded by the Sugal Group must comply with the rules set out in this Code of Conduct, be recorded by the team responsible for granting them, and communicated to the Compliance Officer.

This Code of Conduct should be disclosed to entities benefiting from sponsorship and donations by the Sugal Group.

6.5. Contribution to Political Parties

Sugal Group employees may not make any contributions, whether monetary or in kind, to political parties on behalf of the Group or in any other manner associated with their role, nor allocate resources for this purpose.

Chapter VII

Measures to Combat Money Laundering and the Financing of Terrorism

7.1. General Principles

Although the companies of the Sugal Group in Portugal are not obliged entities under Law No 83/2017 of 18 August 2017⁹ (also known as the Law on the Prevention of Money Laundering and Financing of Terrorism (“LCBCFT”)), they are committed to preventing and combating money laundering¹⁰ and the¹¹ financing of terrorism and have adopted a zero tolerance policy for any situation that may be related to the commission of such offences.

Accordingly:

- (i) The Sugal Group actively cooperates with the competent authorities in the prevention and combat of money laundering and the financing of terrorism, specifically by informing the Central Department of Criminal Investigation and Prosecution of the Attorney General’s Office (“DCIAP”) and the Financial Intelligence Unit (“FIU”) through the Compliance Officer whenever there is knowledge, suspicion, or sufficient grounds to suspect that certain funds or other assets, regardless of the amount or value

⁹ The Sugal Group companies and their employees do not accept or receive cash payments in transactions of any kind; they do not provide services related to representation, management, or administration for companies, other legal entities, or collective interest groups without legal personality; nor do they engage in any other type of activity that would fall under Articles 3 to 5 of the Law on Prevention and Combat of Money Laundering and the Financing of Terrorism (LCMLTF).

¹⁰ The act of converting, transferring, assisting, or facilitating any operation involving the conversion or transfer of assets, obtained for oneself or a third party, directly or indirectly, with the intent to disguise their illicit origin or to prevent the author or participant of these offenses from being criminally prosecuted or subjected to a criminal response, is also considered money laundering. Other actions that constitute money laundering include: (i) Concealing or disguising the true nature, origin, location, disposition, movement, or ownership of assets, or the rights related to them; (ii) Acquiring, holding, or using assets with knowledge, at the time of acquisition or initial possession or use, that they derive from criminal activity or participation in such activity; (iii) Participating in any of the aforementioned acts, forming an association to carry out the act, attempting or aiding in its commission, as well as facilitating its execution or advising someone else to commit it.

¹¹ The act of providing, collecting or holding by any means, directly or indirectly, funds or property of any kind, as well as products or rights which could be transformed into funds, with the intent or knowledge that they may be used, in whole or in part, for planning, preparing, or carrying out terrorist acts, is also considered as financing of terrorism.

involved, originate from activities related to crimes of corruption or related offences, money laundering or the financing of terrorism;

- (ii) Sugal Group employees must refrain from carrying out any transaction or set of transactions, present or future, which they know or suspect to be associated with funds or other assets originating from or related to criminal activities or the financing of terrorism. They must immediately report such situations to the Sugal Group Compliance Officer, who will then notify the DCIAP and FIU of the abstention.

Chapter VIII

Personal Data Protection, Confidentiality and Use of IT Resources

8.1. Principles of the Processing of Personal Data

Personal data shall be processed pursuant to the principles set forth in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – “GDPR”).

In particular, Sugal Group employees must ensure:

- (i) That personal data processing is carried out solely within the scope of the purposes for which the data was collected (purpose limitation principle);
- (ii) That there is a legal basis for processing personal data and that processing is conducted fairly and transparently with regard to the data subject (lawfulness, fairness and transparency principles);
- (iii) That the collection, use and retention of personal data are limited to the minimum necessary for the intended purpose (principle of data minimisation).
- (iv) That personal data is accurate and up to date when necessary (accuracy principle).
- (v) That personal data is retained only for the period necessary to fulfil the purpose of the processing that originated it (storage limitation principle).
- (vi) That the data is processed securely, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage, by adopting appropriate technical or organisational measures (principle of integrity and confidentiality).

8.2. Transparency in the Processing of Personal Data

At the time of collection of personal data, the Sugal Group informs data subjects about the processing of their personal data. Without prejudice to the information contained in the Sugal Group Privacy Policy, data subjects may, *inter alia*, request information about the following aspects of the processing of their personal data:

- (i) The purpose for which the personal data will be used;

- (ii) The legal basis for processing their personal data;
- (iii) The duration of the processing of their personal data;
- (iv) The category of recipients of personal data, i.e. the entities with whom the Sugal Group may share personal data;
- (v) The personal data protection rights of the data subjects;
- (vi) How data subjects may withdraw consent, if consent is the legal basis for a particular processing activity;
- (vii) The Data Protection Team contact details (privacidade@sugal-group.com).

Whenever personal data is used for purposes other than those for which it was initially collected, the proposed data processing must be evaluated in accordance with the legality criteria established in the GDPR, and data subjects must be informed in advance.

8.3. Rights of Data Subjects

Subject to the specific circumstances of each case, data subjects may, at any time, exercise their right to be informed of and to access their personal data, as well as their rights of rectification, objection, erasure, restriction of processing and portability of their data, or object to their processing.

Where the legal basis for the processing of personal data is consent, data subjects also have the right to withdraw their consent at any time, with any such withdrawal not affecting the lawfulness of processing based on consent previously provided.

Data subjects may contact the Sugal Group's Data Protection Team whenever they wish to exercise their GDPR rights. When requested by data subjects, the Sugal Group, in the course of its activities, uses appropriate security technologies and procedures to protect their data.

8.4. Security of Personal Data Processing

The Sugal Group employs a range of security technologies and procedures to protect personal data, aiming to prevent unauthorised access or disclosure and to ensure data confidentiality, integrity and availability. These measures include:

- (i) Physical security measures such as physical access control for employees and visitors to facilities (headquarters and factories), restricted access mechanisms for data storage and intrusion prevention, fire safety measures, equipment hosting off-site with 24/7 monitoring, and access control in line with the Access Control Policy;
- (ii) Logical security measures for system and workstation access, including identity management, authentication, and privilege management; network components including firewalls, intrusion detection systems, network segregation (internal, external, and guest), and application environments, as well as encrypted communication through secure channels.

8.5. Data Protection Team

The Sugal Group has determined that the Portuguese companies within the Group, when acting as data controllers, do not fall within the scenarios outlined in the GDPR that mandate the appointment of a Data Protection Officer (DPO). Nevertheless, the Sugal Group has voluntarily chosen to appoint an internal DPO Team to carry out the following tasks.

In particular, the DPO Team shall be responsible for (i) providing, in an independent and impartial manner, advice and guidance whenever requested to do so by Sugal Group employees, and (ii) monitoring the compliance of processing operations under the GDPR with other data protection provisions and with the policies of the Sugal Group or its processor(s) on the protection of personal data, including the allocation of responsibilities, awareness and training of the staff involved in data processing operations and the related audits.

The DPO Team can be contacted by email at privacidade@sugal-group.com.

8.6. Urgent Reporting of Data Breaches to the DPO Team

In the event of a personal data breach, the Sugal Group must initiate an internal investigation process, following the Incident Reporting Procedures, to determine the cause of the breach. If the Sugal Group becomes aware of a personal data breach that could potentially pose a risk to the rights and freedoms of individuals, it is required to report the breach to the supervisory authority without undue delay and, whenever possible, within 72 hours of becoming aware of the incident.

It is therefore the responsibility of all employees who become aware of any situation that may involve a data breach to report it urgently to the DPO Team, either via the above-mentioned email address or through any other more expedient means.

8.7. Rules on the Use of the Sugal Group's IT Resources

Employees are to use the materials and IT resources provided by the Sugal Group solely for necessary professional purposes and are responsible for safeguarding, maintaining and ensuring the good condition of such resources.

The exchange of accessories or peripherals, as well as the opening or dismantling of computer equipment without express authorisation from the IT Department, is not permitted.

The Sugal Group operates a central directory system for managing user accounts and workstations, providing each employee with a user account and password to access the available IT resources according to their access profile.

It is the responsibility of each user to keep their passwords secure, in accordance with the Sugal Group's Access Control Policy.

The digital platforms managed or administered by the Sugal Group include secure authentication mechanisms, allowing employees to authenticate themselves via an available authentication certificate.

8.7.1 Specific Rules on the Use of Software

As regards the use of software, the Sugal Group has established the following guidelines:

- (i) The default workstation configuration provided by the Sugal Group includes a standard suite of productivity applications common to all users.
- (ii) Software updates and changes are managed centrally and automatically distributed via group policies;
- (iii) Additional software needs for the performance of the specific functions should be reported to the IT Department and their installation is subject to authorisation;
- (iv) Any software malfunction detected or suspected malware should be reported immediately to the IT Department.

8.7.2 Specific Rules on the Use of the Internet

As regards internet use, the Sugal Group has established the following guidelines:

- (i) Access to internet sites containing sexually explicit content, obscenities, or other content deemed unnecessary for professional duties is not permitted;
- (ii) The Sugal Group reserves the right to block access to certain internet sites, with these rules published on the intranet.

8.7.3 Specific Rules on the Use of Email

As regards the use of e-mail, the Sugal Group has established the following guidelines:

- (i) Each employee assigned a computer is provided with an email address;
- (ii) The email address provided by the Sugal Group should always be used for professional purposes. If it is used for personal matters, a specific folder labelled "Personal" should be created, in which all non-professional email messages should be archived.
- (iii) The use of email is prohibited for the following purposes:
 - a. Storing or sending material considered illegal, such as content that infringes copyright or contains obscene or offensive material;
 - b. Chain emails or similar.

8.8. Confidentiality and Professional Secrecy

In the Sugal Group, all information is subject to the Information Classification and Management Policy, and employees are required to strictly comply with the rules outlined therein.

Employees are prohibited from using privileged information acquired in the course of their duties and are obligated to maintain confidentiality regarding facts, documents, designs, and know-how they come across in their roles.

All employees with access to personal data of customers, suppliers or other employees are required to maintain confidentiality over such data, and not to disclose or use it, except in cases of legal obligation or judicial decision.

The obligation of confidentiality and the duty to withhold any information related to the Sugal Group obtained in the performance of duties persists throughout the employment relationship, including during any suspension thereof, and even after the employment contract is terminated for any reason.

Breaches of these obligations and any unlawful disclosure of personal data accessed in the performance of duties shall result in disciplinary action and appropriate legal and judicial measures.

Suppliers, subcontractors and service providers are liable under the terms established by contract and by law.

Chapter IX

Implementation of the Code of Conduct

9.1. General Provisions

This Code of Conduct will be publicly available both internally and externally within 10 days of its implementation and any subsequent revisions. It will be accessible for all recipients on the Sugal Group's digital platforms (internet and intranet) and in printed form at the Sugal Group's Human Resources offices.

This Code of Conduct shall have immediate effect. For current Employees of the Sugal Group companies, their adherence to this GPS is presumed unless they express opposition in writing within 21 (twenty-one) days from the date of its disclosure.

The principles established in this Code should also be communicated and recommended to other Stakeholders in relevant interactions, with an invitation for them to read and adhere to the Code.

The implementation of this Code of Conduct is overseen by the Sugal Group Compliance Officer, in accordance with the law and relevant provisions, who may be contacted at compliance@sugal-group.com.

9.2. Training

The Sugal Group will provide regular training to all its Employees on the issues addressed in this Code of Conduct.

9.3. Clarifications

Requests for clarification regarding the interpretation or application of this Code should be addressed to the Compliance Officer, who will respond or refer them to the appropriate department for resolution.

9.4. Non-compliance

Compliance with the rules, principles and values set out in this Code is binding on all Employees of the Sugal Group companies in Portugal and on all Employees of the Sugal Group companies in Europe, *mutatis mutandis*.

Failure to comply with this Code will result in disciplinary measures (including termination of the contractual relationship) and criminal, administrative or civil liability, which may result in the imposition of penalties, fines, damages, as well as the application of ancillary sanctions.

9.4.1. Criminal liability

The companies of the Sugal Group may be held criminally liable for crimes committed by a person in a leadership position or by a person acting under the authority of that person due to a failure in supervisory or control duties.

The criminal liability of Sugal Group companies may be excluded when Employees have acted against explicit orders or instructions from those in authority, and this Code of Conduct should be construed by all employees as non-derogable instructions.

The following penalties may be applicable to the Sugal Group: (i) fines; (ii) dissolution penalties; (iii) substitute penalties of admonition; (iv) security for good behaviour and judicial surveillance; (v) ancillary penalties of judicial injunction; (vi) prohibition from exercising an activity; (vii) prohibition from entering into certain contracts or contracts with certain entities; (viii) deprivation of the right to subsidies, grants, or incentives; or even (ix) closure of an establishment and publication of the conviction.

Persons holding a leadership position in the Sugal Group bear secondary responsibility for fines and damages for which such companies are convicted, in relation to crimes (i) committed during the period of exercise of their office, without their express opposition; (ii) committed previously, when it was due to their fault that the company's assets became insufficient for the respective payment; or (iii) committed previously, when the final decision to impose them was notified during the period of exercise of their office and the failure to pay is attributable to them.

Sugal Group Employees can also be held criminally liable. Corporate liability does not exclude individual accountability of employees nor depend on their liability.

Employees who commit prohibited actions under this Code may face penalties such as imprisonment, fines, professional or activity prohibitions, required workdays, community service or reprimands. Additional penalties may include suspension or prohibition from holding certain roles.

9.4.2. Disciplinary Liability

In the event of a breach of the provisions of this Code of Conduct, employees shall be subject to disciplinary action in accordance with applicable law, particularly as outlined in the Labour Code and any current collective bargaining agreements in force at any given time, and shall be subject, at least, to the following disciplinary sanctions: (i) reprimand; (ii) recorded reprimand; (iii) pecuniary sanction; (iv) loss of annual leave days; (v) suspension of work with loss of remuneration and seniority; (vi) dismissal without compensation.

9.5. Reporting of Infringements or Breaches

Any suspected infringements or breaches of this Code of Conduct should be reported through the Sugal Group's Whistleblower Channel (available on the internet and intranet), in accordance with the Whistleblower Channel Terms and Conditions.

9.6. Revisions

The Sugal Group reserves the right to update this Code of Conduct periodically. Whenever changes are made, they shall be communicated in due time to all employees and third parties as appropriate.