



POLYHEDRON

SGPS

Code of conduct



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Version control

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1. Introduction

This code of conduct governs the general commitment by Polyhedron SGPS to conduct its activities in the highest conduct, integrity and transparency, and to place stakeholders interests first.

Polyhedron SGPS's reputation is one of its most important assets and is instrumental to its success.

This code does not cover every issue that may arise in the course of Polyhedron SGPS's many activities. Rather, it sets out basic principles designed to guide Polyhedron SGPS's people.

Polyhedron SGPS's people, whatever its position, are expected to comply with the principles of this code and policies applicable to their location, function, and status.

Every Polyhedron SGPS's stakeholder is responsible for upholding high conduct and professional standards and must avoid any improper behavior.

Any violation of this code may result in labor, civil and/or criminal liability, to the extent permitted by applicable law.

2. Services

Polyhedron SGPS aspires to excellence, and consistently strive for exceptional performance and achieving outstanding results for our clients and stakeholders.

3. Work and life balance

Based on the values of Polyhedron SGPS, and the high demands of our functions, we believe that sustainable competitiveness is only possible through a strong balance between professional and personal life. In this way, our working week is based on flexible working days and hours.

Polyhedron SGPS seeks to promote the physical and mental health of its people by providing the conditions and the support necessary to maintain a healthy lifestyle.

4. Diversity

Polyhedron SGPS prioritizes collaboration and teamwork in the pursuit of professional and personal excellence.

Polyhedron SGPS develops a diverse workplace in which everyone is welcome regardless of age, race, ethnicity, place of birth or nationality, religious belief, gender identity, sexual orientation, marital status, age, cultural background, ideological or political orientation social or economic background.

Polyhedron SGPS promotes an environment that encourages new ways of thinking and working, values the contributions and perspectives of all, fosters practices which recognize individual contribution and performance, develops each individual's capability, and provide everyone an equal opportunity to use their talent and fulfil their potential, so that we can excel together.

5. Gender equality

Gender equality is a core value of Polyhedron SGPS, that actively promotes gender equality, not accepting any type of discrimination, positive or negative.

In all its activities, Polyhedron SGPS aims to eliminate inequalities, and to promote equality, between all gender identities.

6. Cultural environment

Polyhedron SGPS actively promotes respect for and integration of the cultural specificities of the different geographies in which it operates, safeguarding that those do not conflict with fundamental principles.

The integration of the cultural specificities in Polyhedron SGPS day-to-day practices, contributes to the promotion of an active knowledge of that culture and allows the acceptance and integration of others, contributing to experiences outside the comfort zone and to the development of soft skills.

7. Harassment and discrimination

Polyhedron SGPS is committed to providing a workplace free of any kind of harassment or discrimination.

This applies to all interactions, including interactions with Polyhedron SGPS clients, suppliers, people, and all other stakeholders.

8. Social media and the press

Polyhedron SGPS people are expected to present themselves professionally on social media. Even in the use of private social media accounts, are expected to be mindful of the perceptions that can be created.

9. Competition and fair dealing

Polyhedron SGPS seeks to outperform its competition fairly and honestly by seeking competitive advantage through superior performance. Polyhedron SGPS does not engage in illegal or unethical business practices, and its people should endeavor to respect the rights of, and deal fairly with, Polyhedron SGPS's clients, vendors, and competitors.

10. Conflicts of interest

Conflicts of interest may arise when private interests interfere, or appear to interfere, with the interests of Polyhedron SGPS, or where the interests of an employee or other stakeholder are inconsistent with those of the group, resulting in the risk of damage to the interests of Polyhedron SGPS.

A conflict may arise, if an employee or any other stakeholder takes an action or has an interest that could make it difficult for such employee to conduct their or the stakeholder's responsibilities to Polyhedron SGPS objectively and effectively. A conflict may also arise if such employee or any person associated with the employee, receives an improper personal benefit, as a result of the individual's position at Polyhedron SGPS.

Employees and stakeholders are required to comply with this code of conduct and other related policies, procedures, and controls and to help mitigate potential conflicts of interest by adhering to the following standards of conduct:

1. Act solely in the best interests of Polyhedron SGPS;
2. Uphold high professional standards;
3. Make full and fair disclosure of any conflicts of interests; and
4. Identify, report, and manage actual, apparent, or potential conflicts of interest.

11. Gifts and entertainment

Polyhedron SGPS people must act in the best interest of our clients and consider the reputation of Polyhedron SGPS when providing or receiving any gift or entertainment.

Polyhedron SGPS people are prohibited from offering, promising, giving or receiving, or authorizing others to offer, promise, give or receive anything of value, either directly or

indirectly, to any party in order to improperly obtain or retain business, or to otherwise gain an improper business advantage.

12. Bribery and corruption

Polyhedron SGPS people are strictly prohibited from making payments or offering or giving anything of value, directly or indirectly, to public officials of any country, or to persons in the private sector, if the intent is to influence such persons to perform or reward them for performing a relevant function or activity improperly or to obtain or retain business or an advantage in the course of business conduct.

Anything of value includes improper payments, such as cash bribes or kickbacks, and also may include other direct or indirect benefits and advantages, such as inappropriate gifts, meals, travel, entertainment, charitable and political contributions, and offers of employment or internships.

Polyhedron SGPS also prohibits the use of third parties or intermediaries to route any inappropriate payments.

13. Insider trading

Polyhedron SGPS people who have access to confidential information about Polyhedrons SGPS and any of its stakeholders, are prohibited from using or sharing that information for any other purpose except in the proper conduct of our business.

All non-public information should be considered confidential information. Use of non-public information in connection with any other purpose could result in labor, civil and/or criminal penalties.

14. Anti-money laundering

Polyhedron SGPS is committed to ensuring that its people and services are not used to facilitate the flow of, or conceal the origin of, criminally-derived funds, the financing of terrorism or the proliferation.

Our practices strictly comply with all applicable anti-money laundering and regulations.

15. Sanctions

Polyhedron SGPS is committed to adhering to all applicable United Nations and European Union sanctions, including economic and trade sanctions.

16. Compliance with laws and regulations

Polyhedron SGPS's activities are subject to laws and regulations, and it is critical that Polyhedron SGPS and its people comply with applicable laws and regulations.

17. Privacy and data protection

Our people are required to comply with applicable data protection and privacy laws, keep personal data secure; and escalate incidents involving the potential misuse of personal data.

18. Recordkeeping and reporting

Polyhedron SGPS requires accurate recording and reporting of information in order to conduct its business and to make responsible business decisions, and should be subject to regulations regarding maintenance and retention of books and records.

All Polyhedron SGPS people involved in maintaining records or reporting of information must not knowingly misrepresent or omit material facts.

Polyhedron SGPS books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect Polyhedron SGPS business, and must conform to applicable legal requirements.



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