

# **CODE OF ETHICS AND CONDUCT**

**HELIOTEXTIL - Etiquetas e Passamanarias, S.A.**

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# 1. Framework

Heliotextil is a private Portuguese company founded in 1964. It has a modern industrial unit installed in a covered area of over 10,000 m<sup>2</sup>, employing around 120 people.

It provides solutions in textile products, accessories and components, such as: Labels, Transfers, Emblems, Elastics and Tapes (simple and assembled), Personalized Products, as well as technologies related to its solutions. It creates, develops, produces, sells and provides services to personalize, decorate and functionalize the products of its clients, who are brand owners, industries and retailers, essentially in the Sports, Technical Textiles, Fashion, Packaging and Promotional sectors.

Heliotextil's Code of Ethics and Conduct is the document that establishes a set of principles and rules of an ethical nature that should govern compliance with the activities carried out by the organization. The purpose of this Code of Ethics and Conduct is to improve individual attitudes and team behavior, increase the climate of trust and improve internal and external relationships, with the aim of reinforcing applicable ethical standards and creating a working environment that promotes respect, integrity and fairness, thus reinforcing the mission and values enshrined and publicly disclosed in the available media.

## 1.1. Objectives and Scope

This Code of Ethics and Conduct, hereinafter referred to as the Code, establishes a set of guidelines, values, attitudes and ethical and professional principles that must be observed when carrying out the activities carried out by Heliotextil and its employees, in their professional relationships with each other and with their partners.




Without prejudice to other applicable legal, normative and regulatory provisions, namely those contained in the General Labor Law, Internal Regulations, as well as other rules to which all employees are subject under the law, this Code applies to all employees who work at Heliotextil, regardless of the type of employment relationship. Application of the Code is independent of the position, career and category in which they are integrated, without prejudice to compliance with other duties imposed on them by law.

All employees must commit themselves to complying with this Code, guiding their actions by ethically sound behavior, and must not neglect the impact that their decisions, ways of acting and behavior, by action or omission, may have on all those involved.

This Code also aims to:

- ✚ To make its employees, customers, public bodies, suppliers and, in general, the whole

community aware of the principles and values by which HelioTextil conducts its business, promoting growing relationships of trust between everyone, as well as promoting the culture of the HelioTextil group;

-  Sharing the principles and rules of transparency that govern HelioTextil's activity and guide the behavior of all Employees and Management, as well as promoting the adoption of ethical commitments and conduct towards all its Partners;
-  Encouraging behavior that maintains and promotes the company's integrity and institutional image in accordance with its values.
-  It also aims to be a document that complements the response to regulatory requirements regarding product certifications (OEKO-TEX, GOTS, GRS, OCS, FSC, PEFC), environmental, social and human rights.



## 2. General Principles of Action

### 2.1. Respect for the law

#### 2.1.1. Legal Compliance

HelioTextil undertakes to act in full compliance with current and applicable legislation and regulations, as well as to provide the authorities with all the collaboration that, within its knowledge and its sphere of activity and competence, is within its reach and is requested by them.

HelioTextil and all its employees undertake to:

-  always respect the applicable legislation and regulations in force and maintain and share an ethical approach with all its *Partners*.
-  respect good business practices and not to engage in or collaborate with conduct, behavior or practices that may be considered irregular, illegal, criminal, unethical or dishonest, in the development of their relationships with customers, suppliers, business partners, competitors, public authorities and *Partners* in general.

### 2.2. Transparency and Trust

#### 2.2.1. Transparency

The Organization and its Employees must be honest, transparent and reliable in all relationships, particularly commercial ones, looking after HelioTextil's interests, especially in their relationships with customers, suppliers, employees and other Partners, and must comply with the commitments made.

HelioTextil adopts a principle of transparent behavior in relation to the information transmitted to public and regulatory entities, assuming the commitment to transmit true and appropriate information, faithfully reflecting its economic, financial and patrimonial situation, in accordance with the applicable accounting principles.

### **2.2.2. Confidentiality, Privacy and Personal Data Protection**

HelioTextil undertakes to manage information with the aim of ensuring the protection of its integrity and the confidentiality of the affairs of the organization, employees, customers or suppliers.

Personal information must never be processed for purposes other than those legally or contractually established. The Organization undertakes not to disclose the personal information of its employees, clients and third parties without their prior consent, except in cases of legal obligation or in compliance with legal or administrative resolutions.

Employees must maintain strict professional discretion and the confidentiality of information to which they have access in the course of their professional duties. For these purposes, confidential information is any information that may have been disclosed orally, in writing or by any other tangible or intangible means, which the employee may have gained access to in the course of their professional activity or obtained by any method, legal or illegal, including business plans, invoices, strategic plans, products or services, financial forecasts, sales agreements, customer data, employees and suppliers, patents, trademarks or any other copyrights or intellectual property rights or applications thereof (whether registered or not), passwords, source code, innovation projects, processes, graphic or non-graphic designs, advertising, budgets, know-how, as well as any other information indicated or designated by the Organization as confidential, whether owned by the Organization or by third parties.

### **2.2.3. Media and Information Transparency**

External communications are only made by authorized persons and in accordance with the internal rules on communication set out in HelioTextil's Internal Regulations.

In any corporate communication, we always establish professional and assertive communication, complying with the basic principles of transparency and objectivity.

Contact with the media will only be made by the General Management and/or Board of Directors, or by someone delegated by the Board of Directors.

Employees must always be careful when using social networks and other internet channels, especially when identifying themselves as HelioTextil employees; not reveal non-public company information in these media; not respond to comments about HelioTextil from third parties, but bring them to the attention of the General Management, as well as not use their position outside of work in acts not

approved by the company, nor false or misleading posts on social networks or in acts in which they represent the company, as established in Heliotextil's Internal Regulations.

The Organization assumes the obligation to be loyal to its customers, suppliers, stakeholders in general, always providing true, clear, useful and accurate information when marketing its products and services. It also guarantees that the products and services meet all the required and published specifications.

We do not carry out misleading advertising or promotional activities, nor do we pass on information that could mislead or damage the reputation of our business.

If customers are dissatisfied with the products or services provided, the appropriate channels are available for them to submit their complaints.

## **2.4. Honesty and Integrity**

All Heliotextil employees must act with integrity and honesty in any professional situation in order to protect their interests and those of the company. As well as fostering behaviour that maintains and promotes the integrity of the institutional image in accordance with the organizational values.

In the event of non-compliance with the Code, the Internal Regulations and other internal rules and regulations, we are obliged to report it immediately through the whistleblowing channel available on the company's website or through other means made available internally and included in the company's Internal Regulations.

### **2.4.1. Money Laundering and Terrorist Financing**

The Organization undertakes to be alert and not to collaborate with persons and/or entities suspected of practicing Money Laundering and Terrorist Financing.



According to article 368. According to Article 368-A of the Penal Code, money laundering is the process by which the perpetrators of criminal activities conceal the origin of assets and income (advantages) obtained from illicit acts, such as computer and communications fraud, extortion, passing counterfeit currency or similar securities, criminal association, offenses related to terrorist activities and terrorist financing, human trafficking, aiding illegal immigration or trafficking in human organs or tissues, sexual abuse of children or dependent minors, or pornography of minors, activities dangerous to the environment, imitation and illegal use of trademarks.

Heliotextil also undertakes to report any suspicious operations of this type to the competent authorities and to immediately terminate all activities with the same entity(ies).



### 2.4.2. Corruption and Bribery

Heliotextil undertakes not to allow the practice of corruption and bribery in active or passive form, whether in the private or public sector, including the receipt and undue offers of favor, advantage, embezzlement, economic participation in business, abuse of power, prevarication, influence peddling(s), laundering or fraud in obtaining or diverting subsidy(s).

Employees undertake to:

-  Refuse to receive, do not make and do not solicit from third parties any offers, gifts, invitations, benefits, gratuities, remuneration, commissions, advantages, favors, privileges or any other type of incentive that could be considered as an attempt to influence, unduly obtain a corporate decision or an illegitimate advantage;
-  Not to make monetary or other contributions to political parties on behalf of the Organization.

They are beyond the scope of this chapter:



-  Gifts that do not exceed the limits considered reasonable by social custom (i.e. if their value does not exceed 100 euros and there are no signs of unclear intentions or with the aim of affecting impartiality on the part of the giver) and are given on the occasion of festive or recreational situations. All such gifts must be reported to the respective hierarchies;
-  Gifts of goods or services, such as travel, meals, accommodation, which are provided by third parties or to third parties and which are exclusively as a result of representation duties or the need to establish development contacts within the scope of Heliotextil's commercial and/or industrial activities.




### 2.4.3. Conflicts of Interest and Accumulation of Functions

A conflict of interest is understood as a situation in which the personal interest of the Collaborator (or individuals associated with them) and the interest of the Organization may be directly or indirectly at odds.

Collaborators must refrain from any conflict of interest that could put personal priorities before those of the Organization, and must behave with honesty, transparency and integrity, not seeking personal or third-party benefits under any circumstances through the misuse of their position or contacts in the Organization.

Employees undertake to:

-  not to affect or implicate the Organization in their performances/activities in a **personal** capacity;
-  report to their superiors any situations that could lead to conflicts between their personal interests and their duty of loyalty to the Organization, such as:
  - family or similar relationships in direct hierarchical or functional dependence;

-  refrain from carrying out any other professional activities outside the Organization, academic, scientific or otherwise, whether paid or not, whenever they jeopardize the fulfillment of their functional and professional duties in the Organization or generate conflicts of interest.
-  refrain from performing duties in an extra-professional context that conflict or interfere with the Organization's activity or negatively affect its reputation;
-  inform Human Resources of any external activities they intend to carry out in order to check whether there is a conflict of interest or any incompatibilities, particularly in terms of nature and working hours.

The Organization will respect the participation of Collaborators in other entrepreneurial, business or other activities, outside working hours, provided that there is no conflict with any internal regulations of the Organization applicable to them, and that these activities are legal and do not compete or are a source of possible conflict of interest with their responsibilities as a Collaborator of the Organization.

#### **2.4.4. Information Management**

We have adopted the relevant and legally appropriate security means and tools to protect the information from any internal or external risk of unauthorized access, manipulation or destruction, whether intentional or accidental, and we undertake to implement the necessary measures to safeguard the information.



Information that is not necessary will be deleted in accordance with the requirements of current data protection regulations.




We guarantee the protection and appropriate use of personal data, both for employees and our stakeholders, in compliance with the legal regulations in force.

##### **2.4.4.1. Use of Inside Information**

Anyone who has access to inside information in any capacity is expressly forbidden from passing it on, using it or facilitating its use for their own benefit.

Employees also undertake to:

-  Use the information to which they have access only within the scope of the purpose for which it was obtained, respecting the interests of the Organization and of third parties who are legitimate holders of it;
-  Obligated to protect and preserve, in a responsible manner, the confidentiality of Heliotextil information to which they have access in the performance of their duties, treating it responsibly with a view to its control and protection;

-  Be discreet and maintain due diligence when speaking, writing, printing or sharing any information related to Heliotextil with unauthorized persons, especially in public spaces;
-  Non-disclosure of Heliotextil's inside information to third parties, with the exception of legal situations or duly substantiated professional disclosure.
-  Report to the hierarchies and duty of loyalty to the Organization, when under any circumstances they are approached by people outside Heliotextil who have no contractual business relationship or who are not part of the partnerships approved by Heliotextil and who seek information on the development of the Organization's various activities;

### 2.4.5. Asset Control and Cybersecurity

The Organization undertakes to manage its own assets and those of third parties entrusted to it, with the aim of safeguarding their value.




We undertake to provide our employees with the necessary and appropriate resources and means to carry out their professional activity.

Do not access, download, store, use or send inappropriate, unauthorized or illegal content on the company's computer or mobile devices, exercising the utmost caution with regard to suspicious emails or links

Do not participate in, influence or allow situations or actions that are linked to the theft, robbery, misuse, fraud, destruction, lending, sale or disposal of assets in an unauthorized manner.

Be careful not to share access to facilities or passwords for accessing systems.

Employees undertake to:

-  take care of the tangible or intangible assets of the Organization or third parties entrusted to them, including Information Technology (IT) resources and intellectual and industrial property, even if produced by them, using them only in the execution of professional processes and ensuring their efficient use;
-  use IT resources and any electronic devices made available to them to carry out their work and operations (e-mail, intranet, internet, telephone, servers, social networks, etc.) only to carry out their professional activities and in conditions that reflect the functions and work in question, avoiding any abnormal use;
-  ensure the protection of Heliotextil's IT resources and information in compliance with the Cybersecurity principles adopted by the Organization;



In all circumstances, all information contained in the IT resources that the Organization makes available to Employees will be considered part of the job and never private or personal, and the

Organization will have the right to access this information to carry out controls, as necessary, in a proportionate and convenient manner, to ensure that it is being used appropriately and in accordance with current legislation and good cybersecurity practices.

Theft, misappropriation or misuse of the Organization's tangible or intangible assets shall be subject to criminal prosecution.

#### **2.4.6. Intellectual and Industrial Property**

Heliotextil and its employees must:

-  proactively guarantee the intellectual/industrial property rights of the Organization or third parties, the inherent rights of use relating to computer programs and systems;
-  Make correct use of the Organization's logos, brands, logos, internet domains and commercial names for the purposes determined by the Organization;

The following are owned by the Organization:

- (i) Intellectual/industrial property rights over any activity within the scope of the innovation process that Employees carry out under their relationship with the Organization, or;
- (ii) which has been developed using resources made available by the Organization, or on the Organization's premises during the term of the employment contract and/or within the Organization's business relations. In these cases, the Organization will have every right to register all the respective industrial property rights (patents, utility models or others) that are the property of the Organization, with the moral right of the inventor or creator being safeguarded under the legal terms.

#### **2.4.7. Relations with Governments and Public Administrations**

We declare our company's political neutrality. Any lobbying activity must respond to legitimate reasons and meet the strictest ethical criteria.

Whenever requested by authorities, regulatory and supervisory bodies and public administrations, Heliotextil and its employees must provide all the collaboration within their reach, complying with requests made to them and not adopting any behavior that could impede the exercise of powers by these same authorities.

Heliotextil prohibits making gifts or favors, paying attention, making cash payments or providing any other type of benefit to civil servants, politicians, as well as any person who performs public functions, i.e. people who are trusted by the above and who, directly or indirectly, can be considered to influence any business decision in order to obtain an undue benefit.

### 2.4.8. Artificial Intelligence Technology

We intend to make responsible and ethical use of artificial intelligence, respecting regulations and seeing it as an opportunity for progress.

We are committed to using new technologies rigorously, transparently and safely to help us make better decisions and in line with our principles and values.







To be responsible in the application of new technologies, such as artificial intelligence, in the operational and administrative areas that are part of Heliotextil's business.

Ensure that ethical and reliability criteria are introduced in the application of artificial intelligence, without tendencies or operating criteria that infringe our principles of conduct.

## 2.5. Customers

The Organization considers customer satisfaction to be a priority, which is why product quality and innovation are considered fundamental. Consequently, efficiency in processes, transparency and integrity in actions and treatment, guaranteeing quality and innovative products and services for customers, must be goals for all the Organization's Employees.

The Organization sets customer satisfaction as its main objective, committing itself to:

-  ensuring the sale of products and the provision of services in strict compliance with internal procedures and applicable legal and regulatory standards;
-  respect the rights of customers and the contractual commitments made with them, both in terms of the quality of the product or service provided and the guarantees defined;
-  provide complete, relevant, truthful and accurate information, in accessible language and adapted to needs, responding to requests, queries and complaints within reasonable timeframes;
-  **continuously improve its performance and the quality of its products and services in an effort to meet and exceed your expectations;**
-  formulate proposals tailored to the client's needs, providing personalized advice when requested by the client.
-  Ensure scrupulous compliance with the agreed contractual conditions.

Employees undertake to deal with clients in a correct, affable and professional manner, respecting their rights, sensitivities and diversity.

## **2.6. Suppliers and Subcontractors**

### **2.6.1. Guiding Principles**

The purchase of goods and services and relationships with suppliers and partners in the Organization's value chain are governed by principles of economy, efficiency and operability, ensuring transparency, equal opportunities and fairness. The Organization adopts instruments, namely contracts, which demonstrate the commitment of suppliers and subcontractors to the ethical principles and good business practices it observes.

Heliotextil's suppliers and subcontractors must maintain adherence and compliance with internationally recognized human rights and must not allow any violation of these rights within their industrial and/or commercial operations. Each supplier and subcontractor must treat each of its employees with dignity and respect, rejecting any discriminatory conduct, physical or psychological punishment, nor harassment of any kind or abuse of power, always respecting the basic labor rights of its employees.

Heliotextil will not accept suppliers and subcontractors who use forms of child labor (i.e. minors under the age of 16), any form of forced or compulsory labor, do not respect all workers' rights established by law or collective regulation, do not guarantee health and safety conditions, or do not respect employees' rights to associate and unionize.

The Organization's suppliers and subcontractors must not participate in any kind of corruption, extortion or bribery activities that could affect the principles of fair trade or result in public scandals in which the Organization could be affected.

Heliotextil's suppliers and subcontractors must maintain a preventive approach to environmental protection, adopt methods that benefit greater environmental responsibility and encourage the development and dissemination of environmentally friendly technologies.




The Organization invites its suppliers and subcontractors to adhere to the ethical, environmental and social values set out in this Code, insofar as they may be applicable to them, incorporating the same, whenever possible, into the contractual requirements entered into.

In the event that a supplier does not comply with the principles of this Code with regard to fundamental human rights laws, practices that create damage to the environment, or the commission of any act of corruption or attempted corruption, Heliotextil is entitled to immediately terminate its contractual relationship with the supplier.

### **2.6.2. Selection Policy**

The Organization has implemented a procedure for selecting and evaluating suppliers based on economic and environmental criteria. The aim is to get to know suppliers' behavior and practices, preferably selecting those that offer the best negotiating conditions and share the Organization's principles and commitments, as described in this Code.

The Organization undertakes to:

-  To relate to suppliers of goods and services in an ethical and legal manner, selecting suppliers whose employment practices respect human dignity, do not violate the law or put the Organization's reputation at risk;
-  maintain clear, impartial and predetermined supplier selection criteria - technical, economic, social, environmental and ethical;
-  whenever possible, promote compliance by suppliers with safety standards and practices, the labor legislation in force and the environmental, social and human rights principles described in this code.

## 2.7. Competition

Competition is a fundamental element that contributes to a fairer and more balanced industrial and commercial society, guaranteeing opportunities for all. This market dynamic boosts the economy and the well-being of society, which is why we are committed to respecting competition rules.

A possible breach of competition rules would seriously damage our reputation and could have serious consequences for the company (sanctions, prohibition from participating in public contracts, claims for damages) and for individuals (economic sanctions and even possible criminal liability).

Heliotextil respects legal rules and market criteria, promoting a fair and healthy dynamic competitive practice. Relations with Competitors are governed by rules of cordiality and mutual respect.

Heliotextil and its employees undertake to respect competing companies and their representatives, refraining from any practice that encourages unfair competition and, in particular, to respect the confidentiality of information and the intellectual property of the entities with which Heliotextil has dealings.

Employees may not exchange information with competitors regarding costs, prices, terms and conditions and offers of products and services, choice of suppliers, future market shares and any other information considered confidential to Heliotextil.

Always seek the opinion of the General Management to avoid including contractual clauses that could infringe competition regulations in contracts with clients and/or suppliers.

## 3. Social Responsibility

The Organization undertakes to act in a socially responsible manner, in compliance with applicable laws and regulations, and especially to respect the cultural diversity, customs and principles prevailing among the people and communities affected by its activities.

Our commitment is firm and solid to all human rights, particularly those linked to business activity, child labor, non-use of forced labor, precarious employment, the right to free trade union association, political affiliation or respect for people, equal opportunities and non-discrimination on the grounds of ethnicity, social class, nationality, religion, gender, physical or mental disability, sexual orientation, marital status, age or any other condition that may give rise to discrimination.

Heliotextil considers its employees essential to achieving its business objectives, its future sustainability, as well as the creation of quality jobs, in an environment committed to training and professional development, encouraging innovation and the development of the Organization.

Heliotextil strives to contribute to the well-being of the wider community in which it operates and to develop ethical and socially responsible behavior, and is fully committed to its firm responsibility to contribute to good practices in tax and social security matters.

### 3.1. Participation and Personal Development

Heliotextil encourages the participation of its employees in the decision-making process and in the development of innovative ideas, promoting effective communication, consultation and sharing processes.

Heliotextil consistently promotes training plans for employees to update their knowledge and skills. Employees must be committed and participate diligently in the professional training opportunities made available to them and recommended by the company.

### 3.2. Health and Safety at Work

The company promotes actions aimed at providing a safe and healthy environment for its employees, demonstrating diligence when it comes to taking care of the health and safety aspects related to its activities, providing the necessary personal protective equipment and training for its proper use in order to prevent accidents and damage to the health of its employees.

Ensure the health and safety of employees at all times, applying the principle that all accidents are preventable, by using the necessary and appropriate resources.

Ensure that Heliotextil's employees are properly informed, trained and made aware of safety issues, encouraging mechanisms for consultation and participation of workers, investing

resources in the creation and dissemination of knowledge, providing good performance for the Organization.

Recognize, anticipate and assess risks relating to safety and health at work before taking any decision to adopt the necessary measures to prevent accidents at work.

Keep workplaces free of alcohol and licit or illicit psychoactive substances.

The consumption of alcohol and the use, possession or distribution of illegal substances are totally prohibited in the workplace and during working hours, as is reporting to work under their influence. Such behavior will be considered serious misconduct and dealt with in accordance with the law and internal regulations.

Workers have access to health care, including fire prevention training and evacuation drills.

### **3.3. Prevention of Harassment, Respect, Gender Equality and Opportunities**

Our commitment leads us to work even harder for equal opportunities, promoting diversity without discriminating against anyone when it comes to hiring, promoting or remunerating our employees.

The company will not agree to discriminatory practices of any kind or any other condition that could give rise to discrimination. We condemn any form of violence, harassment or physical, sexual, psychological or verbal abuse between employees, as well as any conduct that could lead to an intimidating, offensive, humiliating or hostile working environment.

The company provides information about the channels available for reporting and will treat all incidents seriously, promptly investigating all allegations of discrimination.

### **3.4. Forced labor**

Heliotextil rejects any act of forced, slave or involuntary labor.

Heliotextil undertakes to observe its suppliers and subcontractors and if it detects that they use any form of forced labor, carried out under threat of coercion, it immediately terminates any contractual relationship with them.

Heliotextil undertakes, where applicable, to hire staff whose immigration status is regular and whose age allows them to be hired. No form of illegal labor trafficking or fraudulent immigration will be permitted, and the legislation on foreigners and their entry and transit will always be respected.

In cases where technical and regulatory certifications on products require tighter controls for suppliers and subcontractors, Heliotextil provides for the signing of an agreement (Conditions of Purchase) which identifies the suppliers' commitment not to use such practices.

### **3.5. Child Labor**

Heliotextil undertakes not to employ child labor or any other form of exploitation of children and adolescents, and does not accept the work of minors under the age of 16.

Heliotextil will not agree to such practices on the part of its suppliers and subcontractors, who must respect the minimum age limit established by law.

Heliotextil undertakes to observe its suppliers and subcontractors and if it detects that they use child labor, Heliotextil will immediately terminate any contractual relationship with them.

### **3.6. Freedom of Association**

The company respects the right and freedom of employees to join or be involved in trade union activities without any reprisals (dismissal, intimidation, discrimination or harassment). The company allows its workers to freely elect the employee representative(s) with whom they can discuss related issues and does not hinder the development of independent and free association and negotiation.

### **3.7. Employment Contracts**

Contractual relationships are recognized and defined in accordance with the applicable legislation and collective bargaining instruments.

When they are hired, all employees are informed and clear about contractual issues, including working hours, details of remuneration and payment frequency.

### **3.8. Working Time and Payment**

Working time and respective remuneration are in accordance with the international rules on working time established by the International Labor Organization and current national legislation.

Employees are paid fairly, in accordance with applicable legislation and balanced management policies and practices.

Employees' salaries will not be reduced, except in cases provided for in the Labor Code.

In the event of a temporary increase in workload and the need for overtime, overtime will be used responsibly, taking into account factors such as the length, frequency, rest time and working hours of each employee.

### 3.9. Relations between employees

Employees must behave politely and respectfully in their working relationships, promoting human dignity in order to create a harmonious, pleasant, comfortable, stable and dignified working environment.

Relationships between employees must develop in an environment:

- of urbanity, solidarity and respect of the hierarchy for the Employees and of the Employees for the hierarchy, striving to achieve the objectives and fulfill their tasks within the Organization with particular attention to the rules and indications defined by Heliotextil;
- rigor, discretion, responsibility, collaboration and trust;
- free from discrimination of any kind with regard to gender or sexual orientation, ethnic origin, race, territory of origin or language, age, religion, political or ideological conviction or trade union membership;
- concern for working conditions, contributing to a healthy and safe working environment, promoting prevention, health and safety, both in working conditions and in everyone's day-to-day behavior

## 4. Sustainability and Environment

The Organization aims to grow in a sustainable way, creating constant value over the long term, carrying out work with high standards of quality and innovation, guaranteeing its economic, environmental and social sustainability.

The Organization assumes its responsibility and intends to contribute to sustainable development, promoting responsible consumption and ensuring proactive management of the economic, environmental and social impacts resulting from its decisions and activities. In this way, the Organization is committed to integrating sustainability into the decision-making process.

### 4.1. Environmental Protection and Energy Transition

Heliotextil adopts and promotes the responsible use of natural resources and the protection of the environment, namely by developing ecologically efficient management that minimizes the environmental impact of the company's activities.

Ensuring that employees are properly informed, trained and made aware of environmental protection, investing resources in the creation and dissemination of knowledge and providing the organization's performance.

Environmental awareness in the efficient use of resources, ensuring that the value of products and materials remains in the economy for as long as possible, minimizing the creation of waste and optimizing waste management, supporting the circular economy and helping to reduce the impact of climate change.

To promote sustainable and effective management systems by planning review, analysis, correction and continuous improvement activities, in line with the company's context and strategy.

Promote research and innovation, environmental protection and sustainable consumption.

Mitigate the adverse environmental impacts associated with the company's activities, whether in its production facilities or in its product portfolio, in line with its ambition to reduce its climate impact and aim for sustainability by reducing costs, waste and wherever possible reusing materials.

Know, understand and comply with applicable environmental laws and regulations.

Incorporate sustainability into all the activities it carries out and demonstrate the necessary diligence to try to minimize environmental aspects.

Use available resources reasonably and appropriately, contributing to their quality and advocating a reduction in the associated carbon footprint.

Being alert to what is happening around them and reporting any accident, incident or concern regarding the environment.

Promote behavior that is sensitive to the impacts of climate change and adopt the best management practices based on certification systems and the Environmental Management process.

## 5. What we do in the event of evidence of non-compliance

The responsibility we have as Heliotextil employees requires us to report any suspicion of or actual non-compliance with the current regulations of this code, our internal regulations and other standards adopted by the company. By doing so, we help to identify and eliminate inappropriate and improper conduct, protecting ourselves and the company from the damage and harm that may result.

Employees can report any evidence of corruption and related offenses, non-compliance with this Code or Internal Regulations, through the whistleblowing channel on the company's website.

As a company, we do not tolerate any form of reprisal against anyone who, in good faith, makes a complaint or collaborates in an investigation. Violation of this prohibition will be sanctioned as a breach, as will reports made in bad faith. For this reason, we guarantee the confidentiality of the data of the person making the report, as required by the regulation on the protection of personal data and the regulation on the protection of persons who report regulatory and anti-corruption

violations.

## 5.1. Violations of the Code of Ethics and Conduct

Stakeholders must act with integrity and transparency in any professional situation, adopting behavior consistent with the highest ethical standards, acting as an example in the application of the Code of Ethics and Conduct in each of their professional activities, fostering behavior that maintains and promotes integrity and institutional image in accordance with the values contained in this Code.

Failure to comply with the Code of Ethics and Conduct and other normative and legal regulations must be reported immediately through the whistleblowing channel available on the company's website.

Failure to comply with the rules contained in Heliotextil's code of conduct implies that the offender will be held responsible for disciplinary action, applying the applicable legal provisions and internal procedures in force at any given time, and may culminate in the initiation of a disciplinary procedure, if an employee is involved, to investigate and prove the infraction in question. The disciplinary sanctions applicable by the employer may be of the following nature:

- Reprimand;
- Registered reprimand;
- Financial penalty;
- Loss of vacation days;
- Suspension from work with loss of pay and seniority;
- Dismissal without severance pay or compensation;

In addition, depending on the infraction committed, crimes may also be committed and the respective criminal sanctions associated with acts of corruption and related infractions may be applied, in accordance with the General Regime for the Prevention of Corruption, to be designated:

- Undue receipt or offer of an advantage (punishable by imprisonment of up to 3 years or a fine of up to 360 days);
- Active corruption (punishable by imprisonment of 1 to 5 years, or up to 3 years, or a fine of up to 360 days, depending on the crime committed);
- Influence peddling (punishable by imprisonment of 1 to 5 years, or up to 3 years or a fine, or up to 2 years or a fine of up to 240 days)
- Laundering (punishable by up to 12 years in prison);
- Abuse of power (punishable by up to 3 years in prison or a fine);
- Prevarication (punishable by imprisonment of up to 2 years or a fine of up to 120 days).

## 6. Drafting, Approval, Dissemination and Review

### 6.1. Drafting

This code of conduct has been drawn up under the terms of chapter III no. 1, article 2, article 5 and article 7 of the General Regime for the Prevention of Corruption (RGPC), annexed to Decree-Law no. 109-E/2021, of December 9.

### 6.2. Approval

The content of this Code is approved by HelioTextil's General Management and Administration and takes effect from the moment it is approved.

### 6.3. Dissemination

Once this code has been duly approved, it will be published on HelioTextil's official website within 10 days of its implementation and respective revisions. HelioTextil will take the necessary measures to ensure that all employees are aware of the content of this code and understand its scope.

In order for HelioTextil to be able to show that employees were aware of the code when they were hired, it is disseminated in two ways: It is sent digitally by email, if they have an available email address, and delivered in paper format with the employee's signature in the comments field on the attendance registration form and on the respective Integration Plan.

### 6.4. Review

The Code is revised every 3 years or whenever there is a change that justifies its revision.

**We count on your cooperation in complying with and enforcing all the rules and principles set out in this Code.**

## Version History

Version	Date	Summary of changes
0		1st version of the Code of Conduct
1.0	12/09/2022	Review
2.0	19/04/2023	Comprehensive Code Review
3.0	15/10/2024	Comprehensive Code Review