

portugal shoes

CODE OF ETHICS AND CONDUCT



ARTICLE 1

Objectives and Scope of the Code of Ethics and Conduct

The Code of Ethics and Conduct of Portugal Shoes is a document that integrates a set of principles governing the company's activities and a set of ethical and deontological rules to be observed by the management members and all employees in their relationships with clients, suppliers and other stakeholders.

The Code was created with the fundamental purpose of:

- Sharing the principles that guide the company's activities and the ethical and deontological rules that must guide the behavior of all employees and management.
- Promoting and encouraging the adoption of the principles of action and behavioral rules defined in this Code, specifically the company's values in relationships among employees, management, Portugal Shoes, and other stakeholders.
- Consolidating Portugal Shoes's institutional and corporate image, which is characterized by determination, dynamism, enthusiasm, honesty, creativity, and openness.

ARTICLE 2

Mission and Values

Portugal Shoes's mission is to create long-term economic and social value, bringing the benefits of progress and its activities to an increasing number of people. Its values represent the principles guiding the company's activities and relationships with all partners: ethics, trust, ambition, innovation, social responsibility and efficiency.

Portugal Shoes is concerned with the sustainability of all operations involving its business and aims to reduce and minimize its impact on the planet and future generations.

ARTICLE 3

Relationships with the Stakeholders

1. Clients

All Portugal Shoes Employees and Management, regardless of their hierarchical level, must focus their actions on fostering empathy and trust with clients to ensure their satisfaction. In interactions with Clients, Employees must perform their duties in alignment with the commitments made by the company:

- Earning the Client's trust.
- Providing transparent and truthful information.
- Treating Clients with professionalism, respect, and loyalty.
- Delivering excellent products and services.
- Providing Clients with the necessary information for informed decision-making and ensuring the strict fulfillment of agreed-upon conditions.
- Respecting Client information privacy and complying with applicable laws.

2. Employees

The rules outlined in this Code must be accepted, understood, and practiced by all employees, regardless of where they carry out their activities, their hierarchical position, or their specific roles and responsibilities.

2.1. Conduct Standards

- **Personal development and career progression:** Portugal Shoes places a high value on the professional and personal development of its Employees, promoting continuous training as a means to enhance their performance and motivation. The company is always open to proposals and suggestions for specific training opportunities that align with each Employee's interests. Selection, remuneration and career development policies are based on merit and market best practice.

- **Protection of rights:** Portugal Shoes supports the principles and values outlined in national and international legislation on human and social rights. Discriminatory behaviour based on gender, race, ethnicity, religious beliefs, political affiliation or any other reason will not be tolerated. The company promotes equal opportunities and ensures integrity and dignity in the workplace.
- **Bribery or Corruption:** Portugal Shoes condemns any acts involving the offering or acceptance of compensation or benefits to influence others' behavior to gain advantages for oneself or the company.
- **Health and Safety:** Portugal Shoes provides a healthy, safe, and pleasant work environment that promotes employee well-being and productivity.
- **Participation:** Portugal Shoes values and encourages employee participation by fostering effective communication, consultation, and sharing processes. In this regard, Portugal Shoes respects and appreciates employees' online presence and participation as a means of personal and professional development aligned with the company's mission and values.
- **Respect for Human Rights:** The company is committed to identifying, preventing, and mitigating negative impacts on human rights resulting from its business activities or caused by them, should they occur.
- **Employment will be freely chosen:** There will be no human trafficking, involuntary, forced or slave labour, including prison labour, throughout the supply chain. Workers will not be required to provide security or identification to employers, and will be free to leave employment upon reasonable notice.
- **Freedom of association and the right to collective bargaining will be respected:** All workers, without distinction, will have the right to join or form trade unions of their choice and engage in collective bargaining. The company will adopt an open attitude toward union activities and their organizational efforts. Worker representatives will not face discrimination and will have access to perform their representative duties in the workplace.
- **Child Labor will not be used:** There shall be no hiring of child labor. Companies must develop or participate in policies and programs that provide a transition foundation for children found working, giving them conditions to attend and maintain quality education until reaching adulthood. Children and young people under 18 years old shall not be employed for night work or in dangerous conditions. This policy and procedures must be followed in accordance with ILO standards.
- **Fair wages will be paid:** Wages and benefits corresponding to the month of work must at minimum be paid according to the national legal base or the industrial sector base, whichever is higher.

Wages must always be sufficient to meet basic needs. Before starting work, all employees will receive written and understandable information regarding working conditions related to wages as well as details of wages during each pay period. Wage deductions due to disciplinary measures will not be permitted, nor deductions that are not constituted in national laws without the authorization of the worker.

- **Working hours will not be excessive:** Working hours must comply with national laws and the industrial sector base or whichever offers greater protection. At no time shall workers regularly exceed 48 hours weekly and must have at least an average of one day off every 7 (seven) days. Overtime will be voluntary and cannot exceed 12 hours weekly, and also not be required regularly. Our company operates in full compliance with applicable wage, working hours, and overtime laws.
- **Inhumane and severe treatment:** Physical abuse or discipline, threats of physical abuse, sexual or other types of harassment and verbal abuse or other forms of intimidation are prohibited.
- **Social Commitment:** The company does not accept child labor or any contractual/legal irregularities in its production chain under any circumstances. The occurrence of any of the above-mentioned situations will lead to joint work to develop a responsible solution, evaluating the situation to apply appropriate corrective measures, always considering the best interest of the affected party. The company reserves the right to terminate relationships with any organization that does not comply with these policies.
- **Value creation:** Portugal Shoes conducts its business with a long-term value creation vision, respecting the principles of sustainability and corporate social and environmental responsibility.
- **Migrant Workers:** Equal treatment must be provided in relation to existing workers. This includes remuneration, social security, access to training, and other provisions of GOTS social criteria. Migrant workers must have access to their travel documents. In addition to other standard requirements, the written employment contract must be in a language that the worker understands and must provide clear information on terms and conditions, duration and working hours, deductions, benefits (such as leave and insurance), accommodation, food, transport and other applicable provisions. If food, accommodation, transport, or other services are provided, they will be provided at a rate no higher than the market rate.

2.2. Norms for Employee Conduct

- **Training duty:** Employees commit to update their knowledge and skills by participating in training opportunities provided and recommended by the company, or suggested by them.

- **Innovation and initiative:** To achieve collective objectives, a committed and proactive individual attitude should be used, implementing innovative solutions that surpass the value created by applying traditional solutions.
- **Interpersonal relationships:** The relationship between all Employees and Management must be guided by mutual respect, loyalty, cooperation, honesty, and clear communication, in the joint pursuit of excellence in collective results.
- **Responsibility:** Employees and Management should perform their duties in a responsible and professional manner, protecting company assets through sensible and rational use of resources.
- **Confidentiality:** Employees and Management are required to protect the confidentiality of information they have access to in the performance of their duties, and may not use it to obtain advantages for themselves or third parties.
- **Privileged information and information abuse:** Employees and Management who have access to privileged information in any capacity are expressly prohibited from sharing, using or facilitating the use of privileged information by third parties for personal gain.
- **Sustainability and Environment:** Sustainability is viewed as a responsibility shared by all Employees and in constant evolution. Protect the environment by adopting good environmental management practices, such as waste separation and good resource conservation practices, like water and energy, complying with applicable legal and regulatory requirements.
- **Conflict of interest:** Employees and management should not intervene in decision-making processes that involve, directly or indirectly, organizations with which they collaborate or have collaborated, or people with whom they are or have been connected by ties of kinship or friendship. If it is impossible to abstain from intervening in the aforementioned processes, all employees must inform their respective hierarchical superior about the existence of these connections.
- **Non-competition:** Employees and Management cannot engage in activities that compete with those developed by Portugal Shoes.

2.3. Gifts and Commercial Offers

Portugal Shoes does not encourage the practice of giving or receiving gifts and commercial offers.

Employees and Management must not accept goods, services or other benefits with an individual value of more than €100 (including Christmas gifts) for personal use from clients, suppliers, service providers, etc.

individual or legal entity that has, had or intends to have a business relationship with Portugal Shoes. The offering or acceptance of money, checks, and other goods subject to legal restrictions is strictly prohibited under any circumstances and regardless of value.

2.4. Asset Protection

Portugal Shoes's assets are for professional use only and must not be used for personal benefit or the benefit of others. Portugal Shoes' assets include all tangible and intangible items acquired by the company, such as hardware, software, computers, mobile phones, tablets, vehicles, websites, emails, and other resources made available to employees for the performance of their duties.

All Portugal Shoes Employees are responsible for ensuring the protection, proper use, and maintenance of the company's assets. Resources must be used responsibly and efficiently, and the company reserves the right to monitor and access them at any time.

Employees must comply with safety standards to prevent accidents and to avoid putting the company's assets at risk. They are expected to handle company resources with care and protect them from loss, theft or misuse.

Employees are prohibited from taking advantage of Portugal Shoes know-how or business-related information for themselves or a third party.

3. Suppliers

- **Responsibility in selection:** Portugal Shoes selects service providers and Suppliers based on clear and impartial criteria, with one of the selection criteria being their observance of standards of conduct that do not conflict with those contained in this Code.
- **Integrity:** Portugal Shoes operates with loyalty and good faith in its relationships with business partners, establishing clear and objective communication to foster a long-term trust-based relationship.
- **Transparency:** Portugal Shoes adopts procedures guided by principles of economic rationality and effectiveness. Its business practice is transparent and equitable, with no tolerance for any form of abuse and bribery, corruption, or money laundering of goods or capital.

ARTICLE 4

Application of this Code

To ensure compliance with the Code of Ethics and Conduct, Portugal Shoes acts as follows:

- Promotes the dissemination of the Code of Ethics and Conduct to its intended recipients.
- Reviews and responds to questions submitted by employees, partners, or third parties.
- Verifies the existence of internal mechanisms for reporting irregularities, ensuring they comply with legal standards, particularly regarding confidentiality and the information handling process.
- Issues clarifications, either proactively or at the request of management members or employees, regarding the interpretation of any provision of the Code of Ethics and Conduct.
- Receives and evaluates reported irregularities whenever they indicate a potential violation of the rules outlined in this Code of Ethics and Conduct.
- Regulates its own operations.