



CODE OF **ETHICS** AND **CONDUCT**

jp.group

inspiring people

TO BE JP

JP Sá Couto, SA has more than 36 years of history. This journey has been an incredible adventure. We went from a Portuguese company that provided technical assistance to a group of companies - jp.group.

jp.group is a Portuguese business group with an international presence, operating mainly in the Information and Communication Technologies (ICT) sector.

On a global scale, we are leading a long-term technological revolution in education, democratising access to information and technology. We inspire equality and knowledge every day, transforming the lives of millions of students and hundreds of educational communities in dozens of countries.

Throughout this journey, the world has changed, and so have we. However, we have remained loyal to our identity, principles and core values.

The actions of jp.group are guided by a set of values - Ambition, Humility, Integrity and People - and ethical principles, best described in this Code of Ethics and Conduct (the “Code”), principles which our companies use to govern their activities and relationships with stakeholders.

The key to this success lies in our commitment and respect for the ethical values and principles that guide our companies. At jp.group, we are committed to creating economic value based on relationships of Ethics and Trust with all stakeholders.

More than an ideal, the Ethical action of jp.group should be recognised as an ongoing process that requires the constant attention of all parties involved/.

Our Code of Ethics and Conduct, which is now being revised, speaks to us, in a simple yet unequivocal manner, about all this: it reminds us of our values and a set of principles that govern the activities of the companies that make up the jp.group, along with a set of ethical and deontological rules to be observed by the employees, ensuring a standard of integrity, respect and transparency in their relationship with all Stakeholders.

It is also intended for third parties contracted or acting on behalf of jp.group companies, particularly in situations where the actions of the former could lead to accountability for the latter.

The Code also states that, if we suspect breaches of the principles defined therein, we must report such situations, ensuring confidentiality and protection against retaliation.

With Ambition and Humility, we invite everyone who works in companies owned by jp.group to read this Code, identify opportunities for improvement and forward their suggestions. This invitation is extended to all stakeholders.

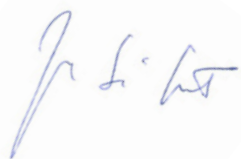
This Code should be regarded as a living document, open to continual improvement, it is our responsibility to bring ethics to life through our daily actions.

We have been “doing what we say”. With this Code, we are “saying how we intend to do it”, which requires our practices to align consistently with our words. By communicating the ethical principles that should guide our operations, we are undertaking a commitment that we intend to honour.

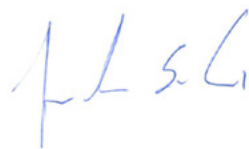
This is a challenge directed at everyone, starting with us who lead jp.group.

Life is filled with challenges. And the challenge of ensuring Ethical action is one of the most valuable. We believe it is worth embracing – not only because Ethics contributes to ensuring a good reputation, prosperity and healthy relationships, but first and foremost, because it is the right way to act.

The Administration



Jorge Sá Couto



João Paulo Sá Couto



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1.1 SCOPE OF APPLICATION

This Code applies to all jp.group / employees, irrespective of the respective employment contract or professional duties, as well as to all entities contracted by or acting on behalf of jp.group companies, particularly in situations where the actions of the former could lead to accountability for the latter. The term “employees” shall be understood as all members of the Group’s governing bodies, managers, workers and trainees.

1.2 OBJECT

This code establishes the set of principles, values, and rules of conduct for jp.group regarding professional ethics and behaviour, it serves as a reference for the standard of conduct expected from its employees in their dealings with third parties, taking into account criminal laws related to corruption and related offences, as well as the risks of exposure of jp.group to such crimes.

This code outlines the values and ethical principles of jp.group and how the latter should be translated into the Group’s relationship with its various stakeholders. Stakeholders are defined as any person or organisation that can affect, be affected by, or consider themselves to be affected by a decision or activity. This category includes, but is not limited to: employees, shareholders, customers, suppliers and service providers, counterparties, business partners, competitors, public and regulatory authorities, financial institutions, and local communities.

The code is intended to serve as a tool to support decision-making processes concerning ethical and conduct issues that may arise from our relationships with stakeholders. Owing to their nature, such issues are difficult and often complex. In this sense, the code is expected to facilitate the aforementioned decision-making processes and strengthen the ethical culture that jp.group companies wish to embrace. Given the changes that characterise our activity sector and the diversity of contexts in which we operate, it is only natural for this code to be a living, evolving document. We should, therefore, revisit and revise it with the same enthusiasm and willingness to improve that has brought us this far.

02 OUR “WAY OF BEING”

We aspire to be a trustworthy Group that honours its commitments, uses the right means to achieve its goals and cares about people – not only those who work within jp.group, but also the people in the communities where we operate and all individuals who are, directly or indirectly, impacted by our activities, products and services. In order to be a trustworthy Group, we must ensure the pursuit of two objectives.

Firstly, we should act in accordance with essential principles of conduct:

- Ensuring respect for the law.
- Respect the privacy of individuals and entities, as well as the confidentiality and integrity of information.
- Managing and safeguarding assets and resources – our own and those entrusted to us by third parties – in a responsible manner.
- Providing truthful, accurate, objective and clear information.
- Avoiding conflicts of interest.
- Complying with the rules of hospitality and offerings/gifts.

Our core values

Secondly, these guiding principles should be supported by the four values embraced by jp.group:

Ambition, Humility, Integrity, People



Figure 1

These values are essential for jp.group, for the following reasons:

- **Ambition** helps us look to the future with determination. It enables us to identify the best ways to meet the needs of each customer, today and in the future. Ambition also drives us to continuously improve – not only our products and services, but also our processes. This increases our ability to act towards the fulfilment of our mission.

- **Humility** helps us to keep our feet firmly on the ground, not become dazzled by our accomplishments and learn from our mistakes, acknowledge our shortcomings and respect the strengths of other parties. Humility is what enables us to celebrate our successes wisely, without complacency.

- If our ambitions are to be a factor in sustainable progress and help us become what we want to be – a Group that can be trusted – we must act with **integrity** and respect, so that our other values are consistent with our mission and we earn the trust of all those we serve. If we are ambitious and humble, but fail to act with integrity and respect, we risk doing things correctly but not doing the right things.

- We create genuine, trusting relationships with our **people**, our customers and our partners.

Therefore, our “way of being” encompasses our identity (a trustworthy Group), our principles of action (how we act to deserve this trust) and the values that support these principles.



2.1 PRINCIPLES OF ACTION

2.1.1 COMPLIANCE WITH THE LEGISLATION

Technical competence to perform professional duties is crucial, but not sufficient. The Management of jp.group should consider the Group's five values when recruiting, selecting, training and promoting employees.

We act in accordance with the legislation and regulations in effect in the regions where jp.group operates. We cooperate with the authorities in investigations. We also believe that an ethical business conduct occasionally requires more than mere compliance with the law. And we know that some business actions may not be explicitly covered by the law. For these reasons, we believe that compliance with the law is only one of the many aspects we should consider when evaluating the correctness of our decisions.

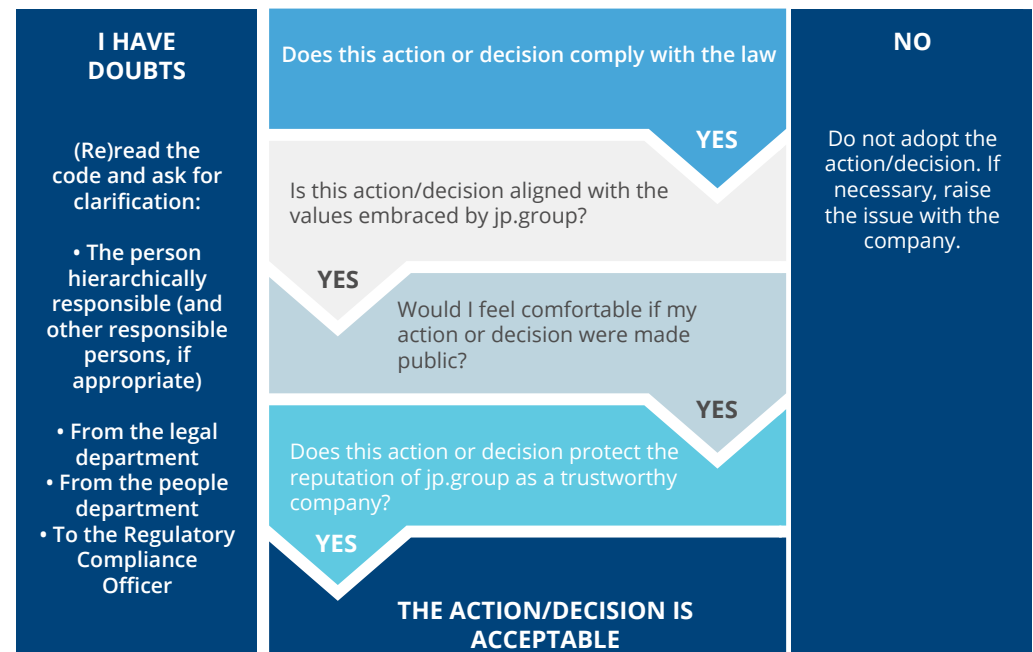


Figure 2: How to proceed with decisions that require a legal and/or ethical judgement?

2.1.2 INFORMATION PRIVACY, CONFIDENTIALITY AND INTEGRITY

Information privacy, confidentiality and integrity matters are covered in the jp.group Policy for the Prevention of Corruption and Related Offences, which can be consulted [HERE](#), as well as the Group's Privacy Policy, which can be consulted [HERE](#). Please also refer to the section 3.6, on breaches of the duty of secrecy.

2.1.3 COMMUNICATION

In the context of relationships based on trust, we seek to provide truthful, accurate, objective and clear information to our customers, suppliers, service providers, shareholders/partners and employees. We do not conceal relevant information on the economic, social or environmental performance of jp.group in our accounting documents. All Group information disclosed to the media, social networks or any other external medium or channel should only be provided by authorised persons – or after authorisation is obtained from the Administration or an adequate entity within jp.group.

Figure 3 | Before expressing our opinion on any issue involving jp.group on social media, we should answer the following questions:

- 01** Am I sure that the information in my possession is truthful and accurate?
- 02** Could my opinion negatively and untruthfully affect the reputation of jp.group?
- 03** When expressing my views on jp.group, am I fulfilling my duty of confidentiality?
- 04** When speaking out about jp.group, am I upholding my duty of loyalty to the company?



In case of doubt, please contact: comunicacao@groupjp.com



2.1.4 MANAGEMENT AND PROTECTION OF ASSETS AND OTHER RESOURCES

We respect the integrity and safeguard the value of all resources and assets under our management (our own and those of third parties, whether tangible or intangible). For this purpose, we need to ensure the protection and preservation of the assets and resources entrusted to us for the performance of our duties (or to which we have access in connection therewith), by safeguarding them against fraud, theft, alteration or loss resulting from the actions of third parties. We also need to ensure the rational, efficient use of resources, namely by refraining from using company resources for personal purposes.

Some examples of what is understood by assets and other resources include money, buildings and equipment, furniture, hardware and software, information, working time and electronic resources (i.e. email, networks, systems).



2.2 OUR RELATIONSHIPS

The relationships we cultivate among ourselves, as employees of jp.group, as well as our relationships with other stakeholders, are guided by the values and principles of action set out in this code.

2.2.1 WITHIN THE GROUP

jp.group engages in continuous efforts to ensure high levels of employee satisfaction and professional fulfilment. For this purpose, the Group provides employees with training and personal and professional development opportunities, in addition to promoting equal opportunities; respecting diversity; ensuring adequate health, hygiene and safety conditions; recognising and rewarding merit; adhering to fairness and justice in all procedures and relationships between the Management and the employees; and promoting an adequate balance between professional responsibilities and personal/family life.

In summary, the Group seeks to create and maintain a respectful, fair, healthy and inclusive working environment, devoid of prejudice and unjustified discrimination, where employees are able to safely express their opinions.

As jp.group employees, at all levels, we undertake the following commitments:

- Collaborating and working as a team, in an open, transparent, constructive and respectful manner, such as to ensure that the result of our collective efforts is greater than the sum of individual contributions;
- Contributing to ensuring collaboration between teams;
- Managing conflicts of ideas and opinions without resorting to personal attacks;
- Expressing our opinions in a free, respectful and responsible manner;
- Respecting the opinions of others, particularly when holding management positions;
- Acknowledging and learning from our mistakes and failures;
- Focusing on professional development and the continuous improvement of our knowledge and skills, as well as making the most of the training and development opportunities offered by the company;
- Acting in a professional, responsible and loyal manner towards jp.group, seeking to comply with the policies defined and safeguard the company's reputation at all times;

- Reporting conducts that conflict with the values of respect and dignity emphasised in this code and specifically detailed in this section (e.g. health, hygiene and safety hazards, discrimination and offensive behaviour, among others).

The Board of Directors, Departments and Area Managers have a fundamental and additional role in the pursuit of an ethical culture, demonstrating it in the performance of their own responsibilities and functions and in supporting any employees in accordance with our principles, values and rules of conduct.

The Board of Directors, Departments and Area Managers commit to:

- Create conditions for ethical issues to arise and be discussed;
- Being available to listen to the concerns of employees;
- Recognising and valuing ethical behaviour.



2.2.2 WITH SUPPLIERS, SERVICE PROVIDERS AND BUSINESS PARTNERS

Our relationships with suppliers, service providers and other business partners should comply with the provisions included in this Code, as well as the Policy for the Prevention of Corruption and Related Offences of jp.group, which can be consulted [HERE](#).

2.2.3 WITH COMPETITORS

jp.group engages in strict and fair competitive practices. For this purpose, we observe the market rules and criteria in effect; respect the material and intellectual property rights of our competitors; refrain from developing any activities or programs that may be construed as an abuse of a potential strong market position; and seek not to enable other forms of unfair competition, namely (a) market-sharing agreements, (b) price-fixing agreements, and (c) obtaining commercial information through illegal means. In addition, we respected all the products and services of each competitor.

2.2.4 WITH CUSTOMERS

Each client is unique; however, there is a common trait among all: they allow our products and services to reach the population and help us fulfil our mission. With a view to being a foundation of quality and trust, we are committed to guaranteeing that each customer has access to all information on the products, services and prices, in order to support their decision-making. Our motto is: each client has the right to make an informed purchase, and we have the corresponding duty. We are aware that the satisfaction of each customer is a fundamental prerequisite for the fulfilment of our mission.



As jp.group employees, at all levels, we undertake the following commitments:

- We relate to each customer with integrity, rigor, professionalism, commitment, respect, frankness and courtesy;
- Providing all information needed by our clients to make informed purchases;
- Delivering efficient client service and support;
- Providing safe and reliable services and products;
- Fulfilling the agreed terms and conditions impeccably and conscientiously, ensuring excellence in business execution and product and service quality;
- Remaining vigilant at all times and reporting any issues related to our products and services that come to our knowledge, promptly and responsibly.

2.2.5 WITH GOVERNMENTS, PUBLIC ENTITIES, REGULATORY OR SUPERVISORY AUTHORITIES AND POLITICAL PARTIES (LOBBYING)

In its relationships with governments and regulatory or supervisory authorities, national or regional, and in response to the respective requests, jp.group commits to providing timely, transparent and adequate manner responses, as well as information, comments or insights on matters relevant to the communities where the Group operates. The Group also commits to collaborating with supervisory and inspection authorities, to the necessary extent, by fulfilling their requests in a rigorous, transparent and timely manner.

jp.group adopts a stance of independence from political parties, without prejudice to commercial or professional relationships. jp.group does not finance any political parties or organisations primarily engaged in political missions, under any circumstances, nor does it attempt to influence any political and/or legislative decisions.

As individuals and citizens, we have the right to support political parties or associations and freely express our political opinions. However, this should be done unilaterally, on a personal basis – never on behalf of jp.group.

2.2.6 WITH THE COMMUNITY

jp.group believes that strong companies make communities stronger and vice-versa. We act with a sense of responsible citizenship in the communities where we operate and seek to be agents of economic and social development, according to the scale of our activity. We aspire to be recognised as a trustworthy Group in our relationships with the communities.

Our business has the potential to be a positive driver of societal transformation (particularly among children and youngsters). We are committed to making good use of this potential to earn the trust of our stakeholders. In line with our duty to the broader community, we also seek to respect the environment by complying with the applicable laws and regulations. We strive to minimise the environmental footprint generated by our business activities and follow sensible practices in the management of water, energy consumption and waste treatment.





As jp.group employees, at all levels, we undertake the following commitments:

- Supporting the community-oriented initiatives developed by jp.group, whenever possible;
- Submitting suggestions whenever we identify opportunities for improvement related to the management of environmental resources.

Relationships with people and entities from other countries and geographical areas

In our relationships with people and entities from other countries and geographical areas, we believe it is important to understand their cultural specificities.

When interacting with people and entities from different cultures, it is imperative to undertake prior efforts to understand cultural differences. Moreover, we should also have the humility to accept and value those differences. We must inform ourselves about the cultural specificities of the parties we interact with, through information obtained from credible sources, ideally, from more than one source.

03 CORRUPTION AND RELATED OFFENCES

Corruption and related offences are understood as the crimes of corruption, undue receipt and offering of advantages, misappropriation, economic participation in business, extortion, abuse of power, misconduct, influence peddling, money laundering or fraud in obtaining or diverting subsidies, grants or credit.

The jp.group repudiates the types of behaviours that follow and requires that collaborators, representatives, and third parties with whom it associates refrain from this practice.



3.1.

Corruption is defined as the practice by an individual of any act (by commission or omission), whether lawful or unlawful, that involves the receipt of an undue advantage, or promise thereof, for themselves or a third party.

It concerns the offering, promising, giving, accepting or soliciting a non-due advantage of any value (financial or non-financial), directly or indirectly, regardless of the place(s) where it occurs and in violation of applicable laws, intended to incite or reward a person for an action or omission within the framework of the functions or responsibilities performed or assumed by that person.

Corruption can be active or passive, depending on whether the action or omission involves the offering or receipt of an undue advantage.

3.2.

Gifts and Offerings can be part of business relationships. However, certain rules should be adhered to, in order to avoid ethical concerns. Gifts and offerings should correspond to tokens of courtesy, have symbolic value and respect the local culture, values and customs. In our relationships with customers, suppliers, governments, other public entities and political parties, we should refuse any payments or any other favours that may be construed as attempts at corruption, bribery or any kind of preferential treatment.

Figure 4 || **As employees of jp.group, before accepting, requesting, promising or offering professional courtesies, we must reflect on three essential questions:**

- 01** Could this offering influence the impartiality and judgment of the decision-maker?
- 02** If it were public knowledge, would this offering make me feel uncomfortable?
- 03** If it were public knowledge, would this offering harm the reputation of jp.group?

Should the answer to any of the questions be affirmative, the employee should refrain from offering or receiving the gift.

You can find further information on this topic in our Policy for the Prevention of Corruption and Related Offences, which can be consulted [HERE](#).

3.3.

Bribery is an unlawful act consisting of persuading or attempting to persuade an individual to engage in specific actions in exchange for material advantages (money, material goods or other personal benefits) or non-material advantages, or the promise thereof.

3.4.

Any individual who coerces another person, by means of violence or threat, to dispose of property resulting in losses to themselves or others, for the purpose of obtaining unlawful enrichment for themselves or a third party, is deemed to commit the crime of **Extortion**.



3.5.

Influence Peddling consists of the unlawful request or acceptance by an individual, directly or through an intermediary, with their consent or acceptance, of material or non-material advantages, or the promise thereof, for themselves or a third party, in exchange for the abuse of their actual or supposed influence.

3.6.

A **Breach of the Duty of Secrecy** consists of the unlawful act of disclosing, without consent, a secret of a third party obtained by an individual in connection with the respective status, trade, employment, profession or art. In addition to being a criminal offence, this practice is considered unfair competition.

3.7.

Money Laundering consists of concealing the origin or real owner of funds, capital, goods or products obtained as a result of illicit activities, by transforming them into capital that can be reused under the terms of the law, thus giving them the appearance of legality.

3.8.

Fraud in the Acquisition or Misappropriation of Subsidy or Grant consists of obtaining a subsidy or grant by providing the competent authorities or entities with inaccurate or incomplete information about oneself or third parties and regarding facts that are important for the granting of the subsidy or grant, by omitting, contrary to the provisions of the legal regime of the subsidy or grant, information on facts that are important for its granting, or by using a document justifying the right to the subsidy or grant or facts that are important for its granting, obtained through inaccurate or incomplete information.

All information provided to the competent authorities with a view to obtaining any subsidy or grant will be based on accuracy.



04 CONFLICTS OF INTEREST

A conflict of interest arises when an individual has an economic or personal interest in an interaction involving any jp.group company.

Conflicts of interest can compromise our objective judgment, impartiality and loyalty as members of jp.group, leading us to engage in actions and make decisions that could harm jp.group and damage its reputation, should they come to light. As a matter of principle, we should refrain from intervening in decision-making processes that involve, directly or indirectly, organisations with which we collaborate or have collaborated, as well as individuals and entities with whom we are, or have been, in contact by ties of kinship or affinity.

If our participation in such processes is necessary for the benefit of jp.group, it is our duty to inform the hierarchically responsible person.

05 FINANCIAL RESPONSIBILITY, TRANSPARENCY AND DISCLOSURE OF INFORMATION

jp.group promotes the disclosure of information concerning the Group's financial situation, performance, and investments made by the Group's companies, in a transparent manner. Only in this way can we maintain the trust of the general public, shareholders, and business partners.

We scrupulously comply with all legal obligations to which we are subject, ensuring their ongoing fulfilment through the regular conduct of statutory financial audits and a second tier of external audits.

Any irregularities found may entail serious consequences for the companies.



06 PREVENTING AND COMBATING WORKPLACE HARASSMENT

According to Article 127, paragraph 1, subparagraphs k) and l), of the Labour Code, employers are obligated to adopt codes of good conduct in order to prevent and combat workplace harassment. Additionally, employers are required to initiate disciplinary proceedings whenever they become aware of any incidents of this nature.

These obligations not only seek to ensure compliance with this legal imperative, but, above all, underscore the commitment of jp.group to preventing and combating any behaviour that affects the dignity of women and men in the workplace, through the establishment of guiding principles that form the basis for a zero-tolerance policy towards such conduct.

6.1 GENERAL PRINCIPLES

jp.group considers workplace harassment a violation of the concept of dignified work and is strongly committed to preventing all forms of harassment and guaranteeing that, in the event of such situations, adequate measures will be applied to prevent their recurrence, such as to ensure the protection of human dignity, equality and non-discrimination.

In the exercise of their activities, roles and responsibilities, jp.group and its employees should seek to advance the interests of the company, by respecting the principles of non-discrimination and combating workplace harassment.

jp.group employees must refrain from engaging in discriminatory behaviours towards other individuals or third parties based on race, gender, sexual orientation, age, physical disability, political views, opinions and/or religion.



6.2 CONCEPT OF HARASSMENT

Harassment is understood as the practice of unwanted, repeated behaviours, namely based on discrimination, during access or in employment, work or professional training, for the purpose or with the effect of disturbing or constraining any individual, affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilising environment.

Moral Harassment is defined as any verbal attack of an offensive or humiliating nature and/or physical attack, including physical and/or psychological violence.

Sexual Harassment is defined as any unwanted behaviour of a sexual nature, whether verbal, non-verbal or physical, or any other behaviour related to sex, or with a sexual connotation, that disturbs or constrains any individual, affects the dignity of women and men at the workplace, or creates an intimidating, hostile, degrading, humiliating or destabilising environment.

6.3 STAKEHOLDERS

Any person and/or third parties that interact with jp.group can be the perpetrators or victims of harassment (moral and/or sexual).

If an employee, supplier, or client has reasonable grounds to suspect the occurrence of any form of harassment should report the situation through the internal whistleblowing channel.

07 SUSTAINABILITY

The United Nations defines sustainability as meeting the needs of the present without compromising the ability of future generations to meet their own needs. According to the United Nations Brundtland report (1987), the concept of sustainability encompasses three fundamental pillars: environmental, social and economic.

Sustainability management is one of the fundamental pillars of jp.group.

7.1 ENVIRONMENTAL SUSTAINABILITY

Representing both our present and future, environmental sustainability stands as a crucial aspect for jp.group. It is our way of being. We work daily to improve the environmental performance of our company, ensure compliance with environmental legislation, and control and monitor significant environmental aspects.

The jp.group works to drive technological progress without compromising the environment: mitigating the impacts of climate change, reducing pollution, and adopting a circular economy in technological solutions.



- JP Sá Couto, SA, a jp.group company is ISO 14001:2015 certified with Environmental Certification and ISO 50001 - Energy Management;
- Our products are certified as environmentally safe and sustainable, which allows us to contribute to fostering a better, cleaner ecosystem;
- We manage resources and waste efficiently, integrating circular economy practices that allow us to minimise material consumption and waste production, increase reuse and recycling rates and choose the most sustainable solutions, minimising the impact of our activities on the environment;
- We use packaging materials certified by the Forest Stewardship Council (FSC), which means that our devices are packaged using the least possible quantities of materials, sourced from certified producers and manufactured in accordance with forest management standards that ensure the protection of water quality, old-growth forests and forest cover, in addition to preventing the use of hazardous chemicals;

- jp.group has adapted its vehicle fleet by opting for hybrid and electric vehicles;
- jp.group has implemented a maintenance plan to control and monitor water losses through the identification of leakage points;
- The hand paper used in our companies is 100% recycled and biodegradable;
- Environmental criteria are taken into account in our supplier selection processes;
- Our printing systems are equipped with a system designed to reduce paper and toner waste;
- All materials used in the packaging of equipment and batteries are managed by accredited partners that undertake responsibility for the adequate disposal and treatment of this waste.



7.2 SOCIAL SUSTAINABILITY

The jp.group views people as the foundation of the company's success, ensuring that they have the best working conditions in a healthy and safe environment.

Meeting the needs of customers and communities contributes to a technologically advanced society, and thus, a more inclusive one.

JP Sá Couto, SA, a jp.group company, is certified to ISO 45001 - Health and Safety at Work;

jp.group:

- It endeavours to be an excellent place to work by fostering the satisfaction, motivation, and, consequently, the productivity of its people.
- Contributes to the sustainable development of local, national and international communities, by improving the quality of life of the populations and promoting equity and social justice through donations and investment;
- Supports social and educational initiatives in the communities where it operates;
- Fosters socio-economic development in the communities where it operates, through philanthropic actions.





7.3 ECONOMIC SUSTAINABILITY

jp.group is deeply concerned about the social impact of its policies and the transparency of its principles and corporate governance regulations. It has adopted robust principles of ethical management and compliance in the conduct of its economic activities, in order to ensure responsible business practices, communicate in a responsible and transparent manner, and continue to innovate, always promoting a culture of integrity.

jp.group has implemented the following programmes:

- Data protection;
- Ethics and Conduct;
- Equality, Diversity and Inclusion.

It also implemented:

- an anti-corruption management system implemented in accordance with NP ISO 37001;
- a Regulatory Compliance Programme” (“PCN”) implemented in accordance with the General Regime for the Prevention of Corruption.

The background of the page is white and features several colorful chalk sticks (purple, yellow, orange, blue, green) scattered across the top and sides. At the bottom, there are five stylized wooden figures in white, red, blue, yellow, and green, arranged in a row.

08 EQUALITY, DIVERSITY AND INCLUSION

jp.group acts and manages its people with the utmost respect for difference, individual rights and non-discrimination. All individuals are respected and treated fairly, irrespective of what makes them unique or different from others, namely age, gender, sexual orientation, gender identity, race, ethnicity, social origin, economic and family situation, religion, physical or mental condition, political views or ideological convictions.

We act in accordance with the guidelines of the Commission for Equality in Labour and Employment (CELE):

- Equal access to employment;
- Initial and continuous training;
- Equal working conditions;
- Adequate balance between professional activity and family and personal life;
- Prevention of workplace harassment;
- Protection in parenthood.

We ensure equal opportunities, irrespective of gender, throughout the entire professional relationship established with our employees.

We are committed to pursuing a policy of non-discrimination and gender equality in employee recruitment, contracting, training and promotion processes. We seek to promote equity in leadership and encourage a culture of inclusion, respect for diversity and recognition of the equal dignity of women and men within the Group.

We have implemented measures that foster equal opportunities at work, complemented by good practices aimed at balancing personal and professional life.

We ensure that all employees are treated equally and assess their performance based on individual merit, such as to foster professional careers according to fair, equitable criteria. We are committed to treating each employee fairly, through rigorous, transparent and constructive performance assessments, based on merit, and seek to remunerate employees according to their skills, levels of responsibility and demonstrated performance.

By upholding our commitment to inclusive principles and policies, we promote a culture of inclusivity that deters discriminatory actions and encourages good inclusion practices.

09 NON-COMPLIANCE

The disciplinary sanctions that, under the law, may be applied in the event of non-compliance with the rules set out in this Code, in the Policy for the Prevention of Corruption and Related Offences and/or any other policy, regulation, work instruction, and other internal regulations of jp.group, and/or any law and legally binding regulation, as well as the criminal sanctions associated with acts of corruption and related offences, are provided for in the Policy for the Prevention of Corruption and Related Offences of jp.group, which can be consulted [HERE](#).



10 WHISTLEBLOWING MECHANISMS AND ANTI-RETALIATION MEASURES

jp.group provides internal Whistleblowing Channels and follows up on reports of acts of corruption and related offences, under the terms of the law. Any individual who becomes aware of a breach of this Code of Ethics and Conduct, the Policy for the Prevention of Corruption and Related Offences, and/or any other jp.group policy, regulation, work instruction, internal rule, or any legally binding law or regulation, may submit a confidential report through the following channels:

- Contact the person hierarchically responsible within the organisation;
- Contact the Compliance Officer;
- Sending an anonymous or confidential message via the internal whistleblowing channel, accessible [HERE](#).
- Reporting to the external channel provided by the competent authority.

Complaints are recorded and, if admissible, investigated and dealt with in accordance with applicable laws, regulations, policies and procedures.

At the conclusion of the investigation process, the complaint may either be upheld or dismissed, this decision, along with any measures taken where applicable, will be communicated to the complainant. The receipt, registration and processing of complaints must comply with the provisions of this code, as well as the Whistleblowing Policy, which can be consulted [HERE](#).

jp.group ensures the confidentiality of all reports regarding malpractice and unlawful behaviour submitted in good faith through the internal whistleblowing channel, and pledges not to engage in any form of retaliation against whistleblowers.

An act of retaliation is defined as any act or omission occurring in a professional context, motivated by an internal or external report or public disclosure, that causes or may cause, directly or indirectly, unjustified material or non-material losses to the whistleblower.

If an employee has reasonable grounds to believe that the reported issue cannot be resolved internally, or has a well-founded fear of suffering any form of retaliation, they may resort to external reporting or public disclosure, under the terms of Law no. 93/2021, of December 20th.

11 FINAL PROVISIONS

This Code is an integral part of the anti-corruption management system implemented in accordance with NP ISO 37001, associated with the “Regulatory Compliance Program” implemented in accordance with the General Regime for the Prevention of Corruption. Compliance therewith does not exempt any individuals from their duty of strict compliance with all policies, regulations, work instructions and other internal regulations of jp.group.

This Code shall come into effect immediately after its publication and will be reviewed every 3 years, or whenever justified. The Code will be published on jp.hub and on the official website of jp.group within 10 (ten) days of the respective implementation and/or revision.



The Code of Ethics and Conduct is periodically updated in accordance with new regulatory requirements, improvements resulting from compliance reviews and best practices. Visit our website (www.groupjp.com) or jp.hub to consult the latest version.

REG-JPSC-PAC-001-rev00

