



# PRESENT TECHNOLOGIES

## CODE OF ETHICS

2024/11/18



## PREAMBLE

This Code of Ethics and Conduct (the “Code of Ethics” or, more simply, the “Code”) has been drafted by Present Technologies, Serviços Informáticos, LDA (“Present Technologies”) and is intended to apply to all employees of Present Technologies, regardless of their employment status, job functions, or hierarchical position.

In the course of its activities, Present Technologies adheres to standards of integrity, transparency, honesty, professional ethics, and respect for others, the environment, and compliance with the law.

This Code of Ethics and Conduct constitutes an organized system of principles and rules that guide the conduct of employees and management executives of Present Technologies, with the aim of promoting and disseminating the company's ethical culture, thereby contributing to the affirmation of a competent, rigorous, and efficient image.

## 1. Purpose

This Code of Ethics and Conduct, hereinafter referred to as the Code, establishes a set of values and ethical-professional principles to be observed in the performance of activities by the employees and executives of Present Technologies, in their professional relationships with each other and with third parties.

## 2. Scope

This Code applies to all employees and collaborators of Present Technologies, regardless of their employment status, job functions, or hierarchical position.

## 3. General Principles and Duties

In the exercise of their duties, employees of Present Technologies, must adhere to high standards of professional ethics and avoid situations that could lead to conflicts of interest.

They must ensure, in particular, strict compliance with the following principles and duties:

- **Legality:** Within the limits of the powers granted to them and in accordance with their designated purposes, employees must act in accordance with constitutional principles, laws, and regulations, as well as in compliance with internal guidelines and legitimate directives from their superiors.
- **Equality:** Employees must not favor or harm any individual or entity based on their ancestry, gender, race, language, political, ideological, or religious beliefs, economic situation, social status, or any other factor that could lead to inequality of opportunity or treatment. Any conduct that constitutes sexual harassment, moral harassment, bullying, abuse of power, or any behavior that compromises the dignity of individuals is not tolerated.
- **Collaboration and Good Faith:** Employees must act with diligence and a spirit of cooperation and responsibility, providing information and clarification in a respectful, clear, and straightforward manner. They should encourage initiatives and suggestions while upholding the values of transparency and openness in personal relationships, regardless of their hierarchical position.
- **Loyalty:** Employees must act in a loyal, supportive, and cooperative manner, both with each other and with individuals and entities, whether public or private, with whom they interact in the context of their duties.
- **Impartiality:** Employees must act with impartiality and fairness, refraining from arbitrary practices or decisions and behaviors that result in harm to third parties or illegitimate benefits.
- **Integrity:** Employees must act with honesty and integrity in the interest of the public they represent. They should avoid situations that could lead to conflicts of interest or doubts about the ethics of their behavior, ensuring the accuracy and trustworthiness of the work performed and safeguarding the prestige of the company, its clients, and their respective brands.

- **Civility:** Employees must treat everyone they interact with in a courteous, respectful, and thoughtful manner, fostering a healthy working environment and good relationships with other people and entities.
- **Proportionality:** Employees should base their conduct on the adequacy and proportionality of their actions to the objectives of their activities.
- **Provision of Quality Information:** Employees should maintain a sense of accuracy, clarity, and courtesy in providing information or clarification, which should be provided promptly and in a timely manner, avoiding actions that hinder their processing.
- **Competence and Responsibility:** Employees must act responsibly, competently, and with dedication, striving to enhance their professional value and exhibiting a behavior of integrity and high professionalism.
- **Professionalism and Punctuality:** Employees should be committed to carrying out tasks within the scope of their professional duties with the utmost precision, diligence, and competence, acting in the best interests of the Company. A fundamental rule is punctuality and respect for the working hours practiced.

#### **4. Organizational Environment and Interpersonal Relationships**

Employees and management executives of Present Technologies, in their interactions with each other, should promote a positive working environment, comply with space utilization rules, encourage mutual assistance and teamwork, and exhibit behavior guided by mutual respect, professionalism, cordiality, and honesty.

Inappropriate behaviors, including actions that disrupt or compromise the dignity of employees, or that promote an intimidating or destabilizing atmosphere, will be investigated and may lead to disciplinary proceedings.

The management executives of Present Technologies should set an example with their behavior, leading, motivating, and engaging employees in collective efforts to enhance the performance and image of the service.

#### **5. External Relations**

In their interactions with citizens and public and private entities, employees and executives of Present Technologies should handle all matters professionally, making every effort to maximize satisfaction of the rights and legitimate interests and claims presented.

In their relationships with citizens and public and private entities, employees and executives of Present Technologies should engage in close cooperation, without prejudice to the necessary confidentiality when appropriate, refraining from engaging in activities that directly or indirectly compete with those carried out by the Company.

Formal or informal contacts with citizens and other entities should reflect the position of Present Technologies if it has already been defined. In the absence of prior definition, if they express personal opinions, they should clarify this circumstance to preserve the Company's image.

## **6. Relationships with Clients**

Employees should demonstrate professionalism, respect, and cordiality in their interactions with clients, striving to ensure equal treatment and providing a quality service.

Employees should also ensure compliance with the agreed-upon conditions regarding service quality and guarantees, and they should diligently handle received complaints.

Complaints made by clients of Present Technologies will be forwarded to the Customer/Project Manager and should be analyzed and responded to as soon as possible.

## **7. Relationship with Suppliers**

Employees should demonstrate professionalism, respect, and cordiality in their interactions with suppliers, striving to ensure equal treatment.

Present Technologies, and its employees should honor the commitments made with suppliers or service providers and verify compliance by suppliers with the requirements defined in contracts.

Contracts should be drafted clearly, without ambiguities, and in strict compliance with rules regarding the confidentiality of information.

## **8. Relationships with Competitors**

Present Technologies encourages the active, competent, and ethical development of its activities, based on merit and the quality of its offerings.

Present Technologies, and its employees, should not enter into any agreements that could restrict competition, including sharing or fixing prices, and they should respect both material and intellectual property rights.

Employees should compete in an open market as vigorously and constructively as possible, renouncing activities that distort competition, abusive conditions, and discriminatory practices.

## **9. Responsible Use of Resources**

Employees and management executives of Present Technologies, within the scope of their responsibilities, must ensure the protection, conservation, and rationalization of material, technological, and financial resources. They should use these resources efficiently, solely for the defined purposes, and not for personal gain or the benefit of third parties unless authorized by their superiors.

The use of equipment and materials, especially computers and phones, for personal purposes should also adhere to the principles of good faith and proportionality. It should be cautious and reasonable and should not interfere with the normal functioning of Present Technologies, or the diligent performance of work.

All employees, in the performance of their duties, should make efforts to minimize the consumption of natural resources, contributing to mitigating the environmental impact of the company's activities.

## **10. Training**

Present Technologies commits to providing appropriate training for the professional performance and development of its employees, enhancing their skills and ensuring their safety.

Employees should continuously seek to update their knowledge and skills, aiming to maintain or improve their professional abilities and enhance their job functions by attending training sessions proposed by the company.

## **11. Conflict of Interest**

For the purposes of this Code, a conflict of interest exists whenever an employee of Present Technologies, has a personal or private interest in a matter that may influence or appear to influence the impartial and objective performance of their duties.

Personal or private interests include potential advantages for themselves, their spouse or person with whom they cohabit as if married, relatives, or individuals within their circle of friends and acquaintances.

Employees of Present Technologies who find themselves in a situation that may constitute a conflict of interest, particularly when they are involved in decision-making processes that directly or indirectly involve entities with which they collaborate or have collaborated or individuals to whom they are connected by family ties, should inform their respective superiors.

Likewise, employees who have family or equivalent relationships with each other should not, without prior authorization from higher authorities, exercise their activities within a hierarchical or direct functional dependence.

## **12. Confidentiality and Secrecy**

Employees and management executives of Present Technologies are subject to confidentiality and secrecy obligations in the performance of their duties, in accordance with the information security management system policies of Present Technologies, and legal requirements. They should maintain absolute secrecy regarding any information, including:

- Personal data or other privileged information.
- Information about business opportunities or ongoing business.
- Information about technical skills, work methods, and project management methods developed by Present Technologies.

- Information related to projects or products created or under development, access to which is limited to employees of Present Technologies, in the performance of their duties.

The duty of confidentiality continues after the termination of the employment of employees of Present Technologies. They should not disclose any information to which they have had access and should not use it for their own benefit or that of third parties.

### **13. Protection of Personal Data**

Present Technologies, processes the personal data of its employees, clients, and other stakeholders, implementing the best technical and organizational measures to ensure data security and compliance with applicable legislation, including GDPR.

Employees who process personal data as part of their duties should comply with the implemented procedures.

### **14. Non-Compliance**

Failure to comply with the provisions of this Code may, subject to legal prerequisites, result in disciplinary or criminal liability.

### **15. Monitoring and Review**

This Code is subject to monitoring, particularly by assessing its level of adherence among employees within the scope of the annual evaluation of internal control procedures in various areas.

This Code should be reviewed every four years or whenever there are supervening facts that justify its revision, particularly due to developments in the business of Present Technologies, or any changes in applicable legal norms.

### **16. Publication and Disclosure**

This Code is disseminated to all employees of Present Technologies and should also be made available on the company's website.

### **17. Effective Date**

This Code is effective immediately upon approval by the Board of Management of Present Technologies.