

CODE OF ETHICS AND PROFESSIONAL CONDUCT

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OBJECTIVE AND SCOPE



The Code of Ethics and Professional Conduct is a document that includes a set of rules and principles of an ethical and deontological nature that reflect the cultural identity of ITSector and should underpin the personal and professional relationship of the respective members of the Governing Bodies and its Employees, in their relationship with Customers, Suppliers and other Stakeholders.

It also applies to third parties, acting on behalf of ITSector, where they can be held accountable for their activities and actions.

The Code of Ethics and Professional Conduct aims to promote the Mission, Vision and Values of ITSector in its business activity and with its People.



Mission

Building the "Next Digital" era for the banking industry by combining technology, innovation and experience and enabling users around the world to easily interact with their banking solutions.

Vision

To be a national and international reference company in consultancy and software development for the banking sector, due to the quality of our technical services and specialised knowledge.

Values

Our values reflect our organisational culture, our identity, our purpose and guide the way we act internally, with the different stakeholders in the community.



Integrity: We promote relationships of trust, transparency and honesty with our employees, customers and stakeholders, making long-term sustainable commitments.



Innovation: Innovation is part of our DNA. The technological vanguard and the development of new and creative solutions are our focus. We break paradigms in the development of solutions that simplify and transform the lives of thousands of people.



Commitment: We are naturally dedicated and committed to the excellence of our business and to constantly promoting the development and satisfaction of our employees.



Ambition: The excellence of our deliveries, results and employees' mind-set is our way of being. We take on bold goals with determination, in order to create value and be a benchmark reference.



Dynamism: Agility and rhythm are part of our essence and make our environment incredibly energetic and stimulating to our vitality. Our energy is driven towards the achievement of our goals and mission.



Responsibility: We fully assume our duties, opportunities for improvement and successes, acting based on sustainable principles, and as a reference with our employees, customers and the community in general.

The driving force behind all our values is our...



Passion: The pride, enthusiasm and intensity with which we dedicate ourselves to causes, goals and overcoming are our daily engine for excellence.



2 STANDARDS OF CONDUCT

2.1. Collaborators

The rules and principles of this Code must be known, accepted and lived by all ITSector Employees, regardless of their function and hierarchical level.

Thus, we assure as pillars of our organisational culture, those listed below:

2.1.1. Respect for the Law

ITSector and its employees are obliged to respect the Law, regulations and internal practices applicable to them.

2.1.2. Respect for the Environment

ITSector and its collaborators are committed to implement internal actions and practices that promote the continuous protection of the environment.

2.1.3. Health and Safety Promotion at Work

ITSector continuously promotes active policies and methods of prevention and protection of risks at work, which provide a safe and healthy environment, promoting well-being and productivity in the work context.

2.1.4. Freedom of expression and dialogue

ITSector fosters its employees' active participation in the most different internal communication processes, valuing the individual proximity of each employee as a Person. Mutual respect, honesty and clarity in communication must be the basis that sustains the interpersonal relationship between all employees.

2.1.5. Equal treatment and non-discrimination

When recruiting and managing career opportunities, ITSector undertakes not to incur in any discrimination, namely on the basis of age, gender, colour, nationality, religion, health condition, disability, sexual orientation, political or philosophical beliefs.

ITSector does not restrict the hiring of family members, spouses, partners or ex-employees, and the Recruitment and Selection Process occurs in the same way as the others.

Dignity, integrity, mutual respect, inclusion in access to employment and diversity are inalienable maxims of our culture.

2.1.6. Harassment

At ITSector we do not accept offensive or abusive behaviour or treatment that induces an intimidating or hostile environment. Harassment is defined as unwanted behaviour, namely that which is based on a discriminatory factor, occurring at the moment of access to employment or at the moment of employment, work or professional training, with the purpose or effect of disturbing or constraining a person, affecting his/her dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.

2.1.7. Personal development and career progression

ITSector promotes the permanent training of its collaborators as a motivational factor and a booster for professional growth. The internal hiring, compensation, benefits, and career development policies are based on criteria sustained by individual performance and internal and market benchmark practice.

Employees must attend diligently and responsibly the training sessions for

which they are identified or recommended in order to improve their knowledge and skills.

2.1.8. Conflicts of Interest

Solely the interests of the company must guide the performance of any employee's duties. The employee may not engage in any professional activity competing with ITSector's activity and must not be involved in any activity that jeopardises the fulfilment of his/her duties or compromises the criteria or the ability to decide for the interests of the company.

In order to avoid the occurrence of potential conflicts of interest, the employee who has direct or indirect participation in another company that is a supplier or partner of goods or services with ITSector, must give prior notice to the Human Resources Department.

Additionally, any family relationship with an ITSector employee(s) must be made known to the same Board.

2.1.9. Confidentiality and Privacy

All employees are obliged to protect the confidentiality to which they have access in the course of their duties, in accordance with the legislation and internal procedures in force, and may not use it to obtain advantage for themselves or third parties, failing which they will be subject to the appropriate disciplinary measures.

Information regarding employees' personal life shall not be collected, apart from that necessary for human resources management or other legitimate purpose as long as within the limits imposed by the laws in force, namely the National Law on Personal Data Protection (GDPR).

All technical data that employees have access to concerning ITSector's proposals and projects, financial data and other sensitive data, being highly relevant for the company's competitive advantage and constituting exclusive property of ITSector, will be necessarily returned at the end of the labour or commercial relationship. It cannot be copied, transmitted to outside or third parties without due authorization, maintaining this obligation after the end of the contractual relationship.

2.1.10. Anti-corruption

ITSector adopts a zero tolerance approach to corruption and bribery and will comply with all laws in force to combat corruption in all jurisdictions in which it operates.

ITSector strictly forbids its Employees and any third parties with whom it does business, to offer, promise, provide, accept or authorise, either directly or through third parties, any Bribes, offered or received, or hospitality with the expectation or hope or that it will influence the decision-making of a third party or that a business advantage will be received (e.g. to obtain business), or to reward a business advantage already granted (e.g. to retain business).

The Anti-Corruption Policy can be **consulted here**.



2.2. Customers

ITSector's activity is always focused on the total satisfaction of its Customers, which is why it is fundamental when interacting with them to guarantee the principles that sustain our organisational culture, namely:

- Act with total transparency and good faith in the commercial and operational relationship, ensuring absolute trust, proximity and confidentiality;
- Act with professionalism, respect and loyalty throughout the whole business relationship;
- Always aspire to deliver products and services of excellence;
- Always be accessible and available to resolve any issues that may arise;
- Respect and comply with the stipulated contracts and the respective applicable legislation.

2.3. Suppliers

ITSector selects its suppliers and service providers based on transparent and unequivocal criteria, sustained by quality, need, performance, cost and equally important, their guarantee of compliance with the principles and rules of this Code.

The relationship with suppliers is guided by the principles of respect, honesty and transparency, always looking after the interests of the company and the fulfilment of the contractually established with them.

During negotiations with suppliers and service providers, each employee who takes this role is responsible for taking advantage of the best business opportunities in the interest of ITSector within the legal framework, without resorting to favouritism resulting from friendship/knowledge relations.

2.4. Relationship with Stakeholders

The employees/directors must ensure absolute cooperation and provide clear, timely, accurate information to the shareholders, allowing the monitoring of the company's activities and performance.

2.5. Relation with Public Authorities

ITSector is independent from public institutions and political parties, without prejudice to professional relationships. It does not finance, under any circumstances, political parties, holders or candidates to public positions.

2.6. Relation with the Community

ITSector promotes a Social Responsibility-oriented policy promoting initiatives of a family nature, protecting the underprivileged, volunteering and training society in general.





REPORTING – WHISTLEBLOWING



All employees and also Third Parties, Service Providers, Suppliers and Subcontractors and former employees, who come across the existence or even suspicion of violations of these Standards of Conduct, policies, standards or applicable laws, whether they themselves or a colleague, must immediately report the same so that the situation can be signalled and resolved, through the following Channels:

1 - As preferred channel: directly to the holder responsible for the **Legal** area, Ana Regueiro or the **Human Resources Dept.**, Gabriela Santos.

E-mail: ana.regueiro@itsector.pt or gabriela.santos@itsector.pt

Telephone: (+351) 222 058 272;

Address: Av. Sidónio Pais, no.153, 6th Floor, 4100-467 Porto;

Or in person, at the head office in Porto.

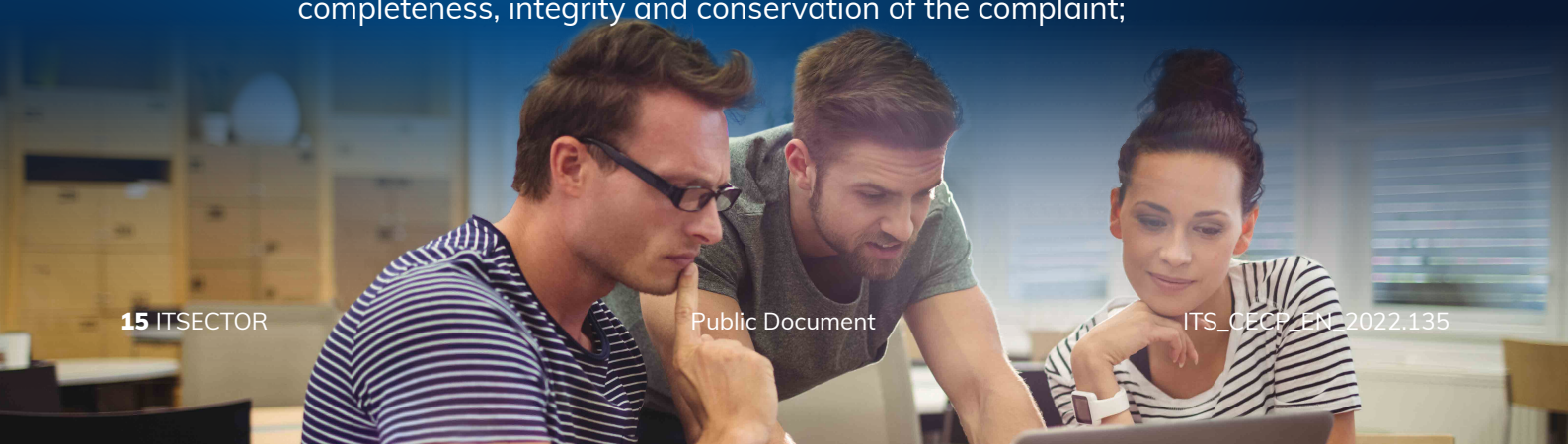
For situations deemed impossible to manage, we have created an alternative channel. This route will be exclusive to serious violations of the law (such as corruption, harassment, and accounting irregularities, among others) that, due to their importance, threat and seriousness, must follow this path:

2 – **Using the platform:** <http://speakup.itsector.pt>

To ensure that everyone is fully aware of and accountable for upholding all of the stated standards and principles, we ask that you carefully read the documents you have been directed to.

Note: The internal alert system safeguards:

- The secure submission and tracking of complaints in order to ensure completeness, integrity and conservation of the complaint;



- Ensures the confidentiality of the identity or anonymity of the complainants and the confidentiality of the identity of any third party named in the complaint;
- Prevents access by unauthorised persons.

3.1. Guarantees for Whistle-blowers

No Retaliation: ITSector is committed to protecting any whistle-blowers who, in good faith, report any incidents they become aware of in the course of their duties that are unlawful or contrary to this Code and/or the public interest, protecting them from any kind of retaliation.

Confidentiality and Privacy: ITSector undertakes to maintain confidentiality unless compelled to do so for the purposes of an investigation by a competent Authority or as a result of a legal obligation or a court order. Equally, ITSector commits itself to protect Personal Data against unauthorised access. Such data is used for the strict purpose of complying with the present Rules and applicable legislation.

Anonymity: The Whistleblower may remain anonymous throughout the process.

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RESPONSIBILITY



Employees shall be held personally liable for failure to comply with the rules set out in this code and may be subject to appropriate disciplinary sanctions, without prejudice to any criminal or administrative sanctions, depending on the law applicable to the particular case.



5 AWARENESS RAISING AND TRAINING



ITSector develops initiatives to ensure that all Employees have adequate knowledge and understanding of the provisions and obligations set out in this Code of Ethics and Professional Conduct.





DISCLOSURE AND AMENDMENTS



CODE OF ETHICS

The present Code is disseminated on ITSector's website, in the internal management system - ITLOG, as well as through other internal means.

It is the responsibility of the Human Resources Department to disseminate this Code among Employees, namely in the on boarding process for new admissions.

Updates to this document are the responsibility of the Legal Department and will be made whenever justified.

When formalising the employment contract, each employee certifies that he/she is aware of this Code, ensuring compliance with it.

Any doubts regarding the interpretation or application of this Code should be clarified with the Human Resources Department.



VERSION CONTROL

AMENDMENTS DESCRIPTION	AUTHOR (S)	DATE	APPROVER	DATE
Creation	Ana Regueiro	Mar/20	Renato Oliveira	Mar/20
Content Review	Ana Regueiro Teresa Oliveira Teresa Cruz	Dec/22	Jorge Bravo	Dec/22