

CODE OF CONDUCT

vectormais

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PREAMBLE

Through the introduction of this Code of Conduct, **VECTOR MAIS** establishes a set of principles regarding professional ethics to be observed by all employees.

In addition to international conventions, laws and internal rules, our actions are based on the values of rigour, superior performance, integrity, responsibility and sustainability, based on the principle of respect for individuality and trust.

This Code of Conduct reflects the desire to pursue a path of continual improvement for a Company that fully embraces the meaning of the word “Sustainability”, guiding its actions in the relentless pursuit of better performance regarding management, operating results, improvement of working conditions, investment in the training, safety and health of all employees, in the defence of high standards related to the protection of the environment and, in the development of and involvement with the different interested parties.

This Code of Conduct is thus a reference for the public with regard to the standard of conduct required at **VECTOR MAIS**, in its relationship with third parties, and is equally a framing and guiding element that should be understood as an assumed commitment, without exception, by all **VECTOR MAIS** employees and service providers.

1. SCOPE OF APPLICATION

This Code of Conduct applies to all **VECTOR MAIS** employees, regardless of their professional category and their hierarchical or functional context.

This Code of Conduct also applies to all suppliers and service providers, who must be made aware of it in order to accept it.

All employees, suppliers and service providers must undertake to report any behaviour that is not in line with the provisions of this Code.

The provisions of this Code do not affect the application of legal, general or special rules, as well as internal rules already in force or that enter into force at **VECTOR MAIS**.

2. GOALS

The present Code of Conduct essentially aims to:

- a) Ensure the affirmation of a corporate identity based on rigour, responsibility, competence, loyalty in competition and transparency;
- b) Preserve the highest standards of professional secrecy in the access, management and processing of all relevant information;
- c) Ensure the formalisation of transparent, responsible, judicious and prudent business management;
- d) Ensure the existence of a communication tool that harmonizes the **VECTOR MAIS** principles of Conduct, Ethics and Social Responsibility in a clear, complete and accessible way for all its employees, suppliers, service providers and other interested parties.

3. ETHICAL PRINCIPLES

VECTOR MAIS guides the development of its activity by ethical principles described below:

i. Integrity and compliance with the law

All **VECTOR MAIS** employees, suppliers and service providers must assume an honest attitude, such that their professional performance is guided by strict moral values such as honesty, respect for laws, regulations and conventions, including international Conventions and Human Rights Declarations. **VECTOR MAIS** employees must also guarantee absolute independence between their personal interests and those of the company, avoiding situations that may lead to conflicts of interest.

VECTOR MAIS is committed to healthy competition and transparency in all its actions, making all the necessary efforts to engage with official authorities in the fight against any and all crimes.

ii. Professionalism and Responsibility

VECTOR MAIS employees must always comply with the tasks and duties assigned to them in the exercise of their functions with zeal, efficiency and responsibility, as well as consistently improve and update their technical knowledge, with a view to the continuous improvement of their professional skills and the results obtained.

iii. Respect

All **VECTOR MAIS** employees must respect the work of their colleagues (regardless of the hierarchical position they occupy) and all external entities with which they engage within the scope of their functions (and vice versa). This general attitude should not take precedence over one's better judgement, and should be understood as a constructive vision with a view to creating value.

iv. Loyalty

All **VECTOR MAIS** employees owe loyalty to the company and their colleagues, regardless of the hierarchical position they occupy, striving to safeguard its credibility, prestige and image in all situations.

4. RULES OF CONDUCT

The rules of conduct should be understood as a guide for the general attitude of **VECTOR MAIS** employees, suppliers and service providers, between each other as well as with the outside world, in order to cement the adoption of ethical principles and the behaviours established in this Code of Conduct.

- a) All employees should guide their professional conduct in the exercise of their functions by high standards of professional ethics;
- b) All employees should contribute to continued good general conditions at work;
- c) All employees should ensure the protection and general good state of preservation of **VECTOR MAIS** assets;
- d) All employees should favour of the quality of the service, through the permanent adaptation to change;
- e) All employees should comply with the Law in general, all rules, procedures and applicable internal regulations;
- f) All employees should treat all colleagues with respect and dignity, refraining from any act or omission that may compromise this objective;
- g) All employees should use the assigned powers in a non-abusive manner, in line with the objectives of **VECTOR MAIS** and not to obtain personal patrimonial or non-patrimonial advantages;
- h) **VECTOR MAIS** does not support discrimination of any kind. Therefore, discriminatory behaviour should not be adopted, especially on the basis of ancestry, gender, sexual orientation, marital

status, family situation, economic situation, physical disability mental or mental health, race, religion, political or ideological beliefs and trade union membership. **VECTOR MAIS** will also fight other behaviours that are considered illegal by law;

- i) Any instances of harassment, moral, sexual or otherwise, are strictly prohibited, subject to disciplinary proceedings, in particular unwanted behaviour, namely that based on a factor of discrimination, practiced within or outside the scope of work, access to work or professional training, with the aim of disturbing or embarrassing the employee, affecting his dignity, or creating an intimidating, hostile, degrading, humiliating and destabilizing environment;
- j) **VECTOR MAIS** does not employ or support any form of resort to child labour, directly or indirectly, namely through service providers or suppliers;
- k) The use of forced labour or any form of work that may directly or indirectly constitute slavery or result from the practice of any other crime is prohibited. Any form of severe punishment, abusive behaviour, corporal punishment, physical coercion or psychological coercion, verbal abuse, as well as any other form of inhuman, cruel or degrading treatment is not permitted;
- l) **VECTOR MAIS** employees must be remunerated in accordance with the legislation established and/or ratified by collective regulation instruments;
- m) Appropriate measures must be provided to ensure a safe and healthy work environment, adopting all measures to detect, prevent and stop accidents or threats to the health and safety of employees. Goods and service providers identify the Occupational Health and Safety legislation that is applicable to them, establishing the necessary measures to comply with said legislation;
- n) All employees must use the resources of **VECTOR MAIS** efficiently, thus contributing to environmental protection and increased sustainability;
- o) All employees should assume a behaviour based on respect for the principles of legality, good faith, responsibility, transparency, loyalty, integrity, professionalism and confidentiality, taking into account the mission and Integrated Policy on Quality, Safety and the Environment, and the Prevention of Serious Accidents in force at **VECTOR MAIS**;
- p) All employees should act independently, impartially and equitably in relations with all external entities, and not act on the basis of personal influences, but taking into account objective criteria;
- q) All employees must abstain from accepting undue patrimonial or non-patrimonial advantage for themselves or third parties as consideration for any action, through an act or omission contrary to the principles and legal norms or rules of conduct applicable to the exercise of their functions, where all corrupt practices in any of their forms are prohibited and sanctionable;
- r) **VECTOR MAIS** employees must sensitize suppliers and service providers to the compliance with ethical principles in line with those found in this Code of Conduct;

- s) **VECTOR MAIS** employees must demonstrate high professionalism, respect and tact in dealing with all entities with which the company relates, establishing a relationship based on respect and mutual trust;
- t) **VECTOR MAIS** employees must guide their actions by observing the best principles of respect for integrity and dignity in their relationships with each other, and **VECTOR MAIS** must promote correctness and courtesy in relations between its employees;
- u) **VECTOR MAIS** must assume a socially responsible attitude in the Community, adopting a consistent social, economic and environmental sustainability policy.

5. CONFLICTS OF INTEREST AND TRANSACTIONS WITH RELATED PARTIES

- a) Employees may not intervene in assessment or decision-making processes whenever operations, contracts or other acts are at stake in which the interested parties directly or indirectly include their spouses, kin and relatives in a direct line or collateral relatives up to the fourth degree¹, or people who live with them in de facto union or common economy, persons with whom they have a close relationship, companies or other collective entities in which they directly or indirectly have any interest, or even organizations which they collaborate or have collaborated with.
- b) In the event of any situation that is likely to jeopardize the normal fulfilment of an employee's duties or the objective and effective performance of their functions, in the interest of **VECTOR MAIS** or its counterparties, the employee will immediately inform the hierarchical structure of such a fact.

6. PROHIBITION OF THE ILLEGITIMATE USE OF PRIVILEGED INFORMATION

- a) Employees must refrain from abusive use of confidential information to which they have access in the performance of their duties or as a result of such performance, even after the termination of their duties.
- b) The relationship of **VECTOR MAIS** with its counterparties is ruled by the observance of strict confidentiality, in compliance with the legal duties established on matters of secrecy and data protection that are incumbent upon it.
- c) Employees must keep, protect and preserve under strict secrecy all information about facts or elements concerning **VECTOR MAIS** or its relations with its counterparties which they become aware of in the exercise of their functions or through the provision of their services.
- d) The duty of secrecy imposed on employees does not cease with the termination of the functions or services provided.

¹ Kinship is the bond that unites two people as a result of one of them descending from the other (direct) or both of them having an ancestor in common (collateral). Direct kinship connects father and son (1st degree), grandfather and grandson (2nd degree), great-grandfather and great-grandson (3rd degree), and so on. Collateral kinship is what links brothers (2nd degree), uncle and nephew (3rd degree), first cousins (4th degree), etc. Affinity is the bond that connects each spouse to the other spouse's relatives, and can be direct, linking in-laws and daughters-in-law/sons-in-law, stepfather/stepmother and stepchildren, grandparents or great-grandparents and grandchildren or great-grandchildren, or collateral, linking brothers-in-law, uncles and further nephews, cousins by affinity.

- e) The provisions of the previous paragraphs are in force until the information becomes public knowledge.

7. FREEDOMS, OFFERS AND BENEFITS

- a) Employees must not accept any advantages, including offers or other financial or non-economic benefits from people with whom they have a relationship by force and in the exercise of their professional activity.
- b) The acceptance of offers and benefits is expressly prohibited, particularly if the interests of **VECTOR MAIS** may be affected or if the professional independence of its employees may be called into question.
- c) Without prejudice to the provisions of the previous paragraphs, the acceptance of offers and other benefits will be exceptionally permitted within the following circumstances:
- i. The value of the offers does not exceed the amount of EUR 100.00 (one hundred euros);
 - ii. This value includes all gifts, invitations or benefits received from the same client, supplier or third party during the calendar year;
 - iii. Offers exceeding this amount, and which cannot be refused in the context of the business relationship, should be given to charities;
 - iv. Invitations to business lunches and dinners can generally be accepted;
 - v. Any and all offers, whatever their value, must be communicated to the hierarchical superior, whether or not they are accepted.
- d) Regarding invitations to events of a non-business nature (such as, for example, invitations to concerts, theatre plays or sports events) the following rules must be observed: in general, employees must check that their participation in such an event is in accordance with current practices; normally this means that the host will also be present, that events don't occur frequently and that the associated cost (of travel, accommodation or other) is not provided by the inviting party.
- e) In order to ensure that employees do not accidentally find themselves in a dubious or reprehensible position in relation to the exercise of their functions at **VECTOR MAIS**, they should consult the Person Responsible for regulatory compliance at VECTOR MAIS regarding offers, invitations or any other approach by clients, suppliers or third parties outside the situations referred to in paragraphs 3, subparagraphs a) and c), whenever such situations present themselves.

8. PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

- a) For the purposes of preventing money laundering and the financing of terrorism, **VECTOR MAIS** has adequate internal regulations, which contain all the duties set out in the current legal system, as well as the internal measures and procedures for the fulfilment of the aforementioned duties.²

² Know Your Customer (KYC) and Know Your Service Provider (KYSP) policies

- b) **VECTOR MAIS** employees are strictly bound to comply with such duties, namely the duty of diligence regarding knowledge of the business relationships established with its counterparties, the conservation of documents and the timely communication of operations suspected of being related to a crime of money laundering or financing of terrorism.

9. PREVENTING CORRUPTION

- a) All acts performed or omitted with the purpose of obtaining an undue patrimonial or non-patrimonial advantage or compensation are considered corruption and **VECTOR MAIS** aims to control and combat this type of acts:
- i. **Passive Corruption (including solicitation or acceptance of a bribe):**
The solicitation or acceptance by an employee, directly or through third parties with the consent or ratification thereof, of any value or undue advantage or promise thereof, for themselves or for third parties, as consideration for an act or omission that violates their functions and duties.
 - ii. **Active Corruption (including offering or paying a bribe):**
The offer or promise made to a third party by an employee, directly or through a third party with the consent or ratification thereof, of any undue value or advantage as consideration for an act or omission, which violates the recipient's functions and duties.
 - iii. **Other Related Offences (equivalent to corruption):**
Any similar infractions contrary to the proper functioning of **VECTOR MAIS'** activity and the market and against its ethical relationship with interested parties, including bribery, improper offer or receipt of advantage, embezzlement and prevarication, influence peddling and receipt of economic advantages in business (such as commissions).
- b) Employees may not intervene in assessment or decision-making processes whenever operations, contracts or other acts are at stake in which the interested parties directly or indirectly include their spouses, kin and relatives in a direct line or collateral relatives up to the fourth degree³, or people who live with them in de facto union or common economy, persons with whom they have a close relationship, companies or other collective entities in which they directly or indirectly have any interest, or even organizations which they collaborate or have collaborated with.

10. REPORTING IRREGULARITIES

- a) **VECTOR MAIS** has specific, independent and anonymous channels for reporting irregularities.⁴

³ Kinship is the bond that unites two people as a result of one of them descending from the other (direct) or both of them having an ancestor in common (collateral). Direct kinship connects father and son (1st degree), grandfather and grandson (2nd degree), great-grandfather and great-grandson (3rd degree), and so on. Collateral kinship is what links brothers (2nd degree), uncle and nephew (3rd degree), first cousins (4th degree), etc. Affinity is the bond that connects each spouse to the other spouse's relatives, and can be direct, linking in-laws and daughters-in-law/sons-in-law, stepfather/stepmother and stepchildren, grandparents or great-grandparents and grandchildren or great-grandchildren, or collateral, linking brothers-in-law, uncles and further nephews, cousins by affinity.

⁴ See Internal Reporting Channel Regulation.

- b) Employees who, by virtue of the function they perform, become aware of any irregularity, must report this fact through the reporting channels made available for this purpose.

11. IRREGULARITY MANAGEMENT

- a) Reported irregularities received under the terms of Article 10 paragraph 2 should be sent to the body indicated for this purpose in the Internal Regulations in force.
- b) It is incumbent upon the body responsible for handling reports of irregularities to take whatever measures it deems appropriate so that they are assessed and that the appropriate response is transmitted to the reportee.

12. SANCTIONS AND DISCIPLINARY REGIME

- a) The violation of the rules that are part of this Code by **VECTOR MAIS** employees constitutes an infraction subject to a disciplinary procedure and is subject to the regime provided for in this Article, without prejudice to the application of civil and criminal provisions.
- b) A report is prepared for each infraction and contains the identification of the rules violated, the sanctions to be applied, as well as the measures adopted or to be adopted within the scope of the internal control system.
- c) Violation of the duties set out in this Code will be punished, depending on the severity of the violation, the degree of fault of the offender and the consequences of the act, by the application of a sanction that will be graduated on a case-by-case basis pursuant to the General Law.

13. APPROVAL, REVIEW AND PUBLICATION

- a) This Code of Conduct has been approved by the Board of Directors of **VECTOR MAIS - PROYECTOS E OBRAS DE INTERIORES, S.A.**
- b) It will be reviewed at least every 3 (three) years, without prejudice to earlier review as deemed necessary by the Bodies responsible for its creation, implementation and approval and/or whenever there are changes in the legislation and regulations that justify said review.
- c) The Code of Conduct will be published on the website of **VECTOR MAIS - PROYECTOS E OBRAS DE INTERIORES, S.A.** and must be disclosed to all employees, suppliers and service providers.

ANNEX I

DECLARATION OF ACKNOWLEDGEMENT

Identification of the Declarant

Name: _

Service / role: _

Telephone:

Email: _

Statement

I declare that I have read and understood the Code of Conduct of VECTOR MAIS -
PROJECTOS E OBRAS DE INTERIORES, S.A.

I certify, on my honour, the veracity of the information provided above. I further declare that I
undertake to conduct my actions in accordance with the principles and values identified in the
Code of Conduct of VECTOR MAIS - PROJECTOS E OBRAS DE INTERIORES, S.A.

Date and signature: ____ / ____ / ____ -