

CODE OF ETHICS AND CONDUCT

Code	POL.06	Revision	02
Prepared by	Margarida Costa	Date	02/09/2025
Classification	Public	Approved by	Miguel Ferreira / CEO

1. Introduction

The NewNote Code of Ethics and Conduct is a foundational document of our collective and individual identity. It reflects the principles and guidelines that steer our actions, decisions and relationships, and gives concrete form to the purpose that guides us as an organisation committed to integrity, responsibility and respect for all stakeholders.

We encourage all stakeholders to draw inspiration from these values and commitments, promoting conduct aligned with them, strengthening relationships of trust and building a more sustainable future.

The conduct of our people, whenever they represent NewNote, has a direct impact on the organisation's external reputation and on the building of its internal culture. It is therefore essential that everyone reads, understands and complies with the provisions set out herein.

The main objectives of this Code are to:

- ❖ Define the corporate commitments that guide our activities;
- ❖ Establish the ethical and conduct principles governing our relationships with employees, customers, partners, suppliers and other stakeholders;
- ❖ Promote compliance with rules and practices that ensure transparency, fair competition and respect for fundamental rights;
- ❖ Guide responsible decision-making and the adoption of appropriate behaviour, including mechanisms for identifying and reporting any deviations.

More than a set of rules, this Code is a tool and a collective commitment to the highest standards of ethical conduct. It is this high standard that strengthens the trust of our stakeholders and reinforces NewNote's position as an ethical, inclusive and sustainable organisation.

NewNote operates on the basis of the principles of ethics, integrity, transparency and sustainability.

2. Scope and Applicability

This Code applies to all employees and members of the management of NewNote. It will also be made publicly available, allowing external service providers, suppliers and partners to understand and engage with our guiding principles, practices and standards.

Service providers, suppliers and partners are subject to the Code of Conduct for Partners and Suppliers.

3. Ethical Standards

- ❖ **Integrity and Honesty** - Act with integrity and honesty in all professional, business and institutional relationships.
- ❖ **Legality** - Strictly comply with applicable laws, regulations and standards, as well as relevant internal policies.

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- ❖ **Sustainability** - Take individual and collective responsibility for promoting a sustainable, safe and inclusive environment, integrating social, environmental and governance considerations into strategy and day-to-day practice. Business decisions must take into account sustainability-related risks and opportunities.
 - ❖ **Transparency** - Practise transparency in all our operations and communications, both internal and external, ensuring clarity and openness.
 - ❖ **Respect and Dignity** - Foster an inclusive and respectful environment in which everyone is treated with dignity, regardless of their personal characteristics.
 - ❖ **Accountability** - Take responsibility for one's own actions and decisions, contributing to a safe and efficient professional environment aligned with the policies and standards in force. Everyone involved must act with diligence, professionalism and ethics, actively contributing to an environment that is safe, efficient, transparent and compliant with applicable legal and regulatory requirements and internal or contractual policies. Everyone is also expected to identify, report and help mitigate risks, irregularities or improper conduct, demonstrating a commitment to continuous improvement and to the values of integrity and good governance.
 - ❖ **Conduct in the Workplace** - Act in a spirit of cooperation, openness to dialogue and mutual respect, maintaining a healthy and safe working environment and taking measures to prevent accidents and promote well-being.
 - ❖ **Prevention of Harassment and Discrimination** - Firmly condemn any form of harassment or discrimination, promoting a working environment free from intimidation, prejudice or exclusion. Enable inappropriate conduct to be reported through the appropriate channels, preserving anonymity and committing to a rigorous and confidential investigation.
 - ❖ **Use of Company Resources** - Use available resources responsibly and efficiently. Misuse of company resources for personal purposes is prohibited. The rules for using equipment, systems and services are set out in the Acceptable Use of Information Assets Policy.
 - ❖ **Confidentiality and Information Security** - Protect sensitive information, including personal data, strategic information and intellectual property, respecting the privacy and security of the information of all parties involved. Disclosure of sensitive information without appropriate authorisation is strictly prohibited. This duty is fulfilled through compliance with the Information Security Policy and the policies deriving from it, namely the Information Classification and Handling, Acceptable Use of Information Assets, Use of Artificial Intelligence and Personal Data Protection policies, and includes the duty to report immediately any security incident one becomes aware of.

4. Anti-Corruption and Anti-Bribery Policy

NewNote has a zero-tolerance policy towards corruption, including bribery in any form. Our commitment is to conduct business ethically and in compliance with all applicable laws in the various markets and geographies in which we operate, combating all forms of corruption.

4.1 General Principles

- ❖ **Zero Tolerance for Corruption** - Any act of corruption, whether active or passive, is strictly prohibited and will not be tolerated. This includes bribery, extortion, fraud, money laundering and undue favouritism. It is prohibited to offer, promise, solicit or accept any undue advantage, including money, gifts, favours or benefits.
- ❖ **Compliance with Laws** - All employees must fully observe the anti-corruption laws in force in their jurisdiction, as well as this Code.
- ❖ **Transparency in Transactions** - All operations and financial records must be carried out in a clear, accurate and reliable manner.

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- ❖ **Compliance and Reporting** - The company fully complies with all anti-corruption rules and reports any suspicious activity to the competent authorities.
 - ❖ **Integrity in Relationships** - Interactions with customers, suppliers, partners and authorities must take place with full transparency and ethics, avoiding any practice that could be construed as corrupt.
 - ❖ **Gifts and Hospitality** - The offering or acceptance of gifts and hospitality must mitigate significant integrity, impartiality and reputational risks for NewNote. To avoid conflicts of interest or the appearance of favouritism, the giving or acceptance of any offer must always be preceded by a compliance review, regardless of its value or context. This review will be carried out by the Human Resources Department, where applicable. Gifts in cash, vouchers or monetary equivalents are not permitted under any circumstances.

The commitments in this chapter are developed further in the NewNote Anti-Corruption Policy.

5. Procedures

5.1 Questions, Misconduct and Disciplinary Action

In the event of questions or concerns regarding compliance with this Code, employees should contact the Human Resources Department.

Breach of the principles set out in this Code, of internal policies, namely those on information security and personal data protection, or of any applicable legal provision may result in disciplinary proceedings and, in more serious cases, in civil and/or criminal liability. Disciplinary proceedings follow the NewNote Disciplinary Procedure, in accordance with the Portuguese Labour Code.

Conduct subject to sanctions includes:

- ❖ Breach of the legislation in force or of the rules of this Code;
- ❖ Breach of the information security and personal data protection policies;
- ❖ Collaborating with third parties to commit such breaches;
- ❖ Intentional disclosure of false or misleading information;
- ❖ Retaliation against colleagues who have reported illegal or unethical conduct;
- ❖ Deliberately false accusations of illegal or unethical behaviour.

5.2 Whistleblowing Channel

Any reports concerning the application of the principles of this Code may be submitted through the internal Trustline channel, which ensures:

- ❖ Confidentiality in the review of reports;
- ❖ Protection against retaliation for those who report in good faith, under Law No. 93/2021;
- ❖ The possibility of reporting anonymously.

Channel available at: <https://trustline.newnote.pt/>

5.3 Due Diligence

Before formalising relevant partnerships, contracts or business relationships, an integrity review (due diligence) is carried out to identify potential risks related to bribery, corruption or conflicts of interest. This assessment applies to suppliers, consultants, service providers, business partners and other third parties.

6. Implementation and Training

- ❖ The implementation of the Code of Ethics and Conduct is part of the organisation's annual training plan and is mandatory for all employees.
- ❖ The Code applies across the entire organisational structure, with no exceptions as to hierarchical level or functional area.
- ❖ All employees receive the Code and the Disciplinary Procedure as part of the onboarding process when they join the organisation, and are required to formally acknowledge them by signing a statement of commitment.
- ❖ Awareness-raising activities focusing on ethical and legal risks are carried out, covering topics such as corruption, conflicts of interest, harassment, discrimination, sustainability and information security, strengthening everyone's ability to identify risk situations and act ethically.

7. Conclusion

NewNote reaffirms its commitment to ethics, integrity and transparency in all its activities. All employees are required to follow these guidelines and help promote a corporate culture based on sound principles and ethical values.

8. Review

This Code is reviewed annually and whenever legal, organisational or contextual changes so warrant.

9. References

- ❖ NewNote Anti-Corruption Policy.
- ❖ Code of Conduct for Partners and Suppliers.
- ❖ Information Security Policy (POL.05) and the policies deriving from it: Information Classification and Handling (POL.03), Acceptable Use of Information Assets (POL.04), Internal Use of Artificial Intelligence (POL.02) and Personal Data Protection.
- ❖ Disciplinary Procedure (PRC-20).
- ❖ Portuguese Labour Code, approved by Law No. 7/2009 of 12 February.
- ❖ Law No. 93/2021 of 20 December, establishing the general regime for the protection of whistleblowers.

Revision History

Revision	Date	Description of change	Owner
00	03/01/2024	First version (version 1.0).	Miguel Gomes
01	23/07/2025	Second version (version 2.0).	Margarida Costa
02	02/09/2025	Update of the Introduction (version 2.1).	Margarida Costa