



## **CODE OF CONDUCT FOR CONCLUSION NEOTALENT S.A. PARTNERS AND SUPPLIERS**

### **Introduction**

This Code of Conduct for Partners and Suppliers applies to any organization that: (i) provides goods or services to Neotalent, (ii) is contracted to serve Neotalent's customers or (iii) establishes a business relationship with Neotalent, including partnership and reseller relationships.

### **General Principles**

Neotalent's partners and suppliers must support Neotalent's commitment to doing not only what is good for the business, but also what is good for the people of Neotalent, and for the communities in which they live and work.

Neotalent expects its partners and suppliers to have a solid understanding of the legislation in force in the regions where they operate or conduct business, and to implement the necessary processes to comply with them.

All partners and suppliers must adhere to these standards in their business operations. They must create and enforce policies that comply with the guidelines in this Code of Conduct for partners and suppliers, and must also implement similar standards in their own supply chains.

Violations of this Code of Conduct for Partners and Suppliers are considered serious and must be reported immediately. Such violations may result in actions such as audits of the organization or value chain, recommendation or requirement of correction plans, or even classification of the partner and/or supplier as non-preferred, and in extreme cases, termination of the contract.

### **Human Rights**

- Partners and suppliers must treat all their employees, partners and suppliers with dignity and respect, and not subject them to degrading conditions.
- Partners and suppliers must promote a culture that does not tolerate harassment in any form, or any retaliation for reporting harassment.
- Partners and suppliers must not use forced labor, threaten or coerce their employees. Work must be carried out based on freely agreed terms. Partners and suppliers may not withhold, destroy, conceal or confiscate workers' identification documents, or charge any recruitment, travel or migration fees to non-professional migrant workers.
- Partners and suppliers may not use child labor and must not employ any person under the age of 15 or the minimum legal working age, whichever is greater. For workers under the age of 18, employment must not be to the detriment of compulsory education and must not present risks to their health, safety or morals due to the nature of the work or the circumstances in which it is carried out.
- Partners and suppliers must promote a culture of equal opportunities for all, and must not tolerate discrimination based on sex, race, religion, age, disability, gender identity, sexual orientation, or any





other category protected by applicable law. All job applicants and employees must be assessed based on their ability to perform the job.

- Partners and suppliers must take into account the applicable standards regarding the working conditions of all their workers and must also promote safety and health in the workplace and take the necessary precautions to prevent accidents and injuries.
- Partners and suppliers must promote an environment where business standards are clearly perceived and where there are open channels for individuals to communicate openly with management without threats of retaliation, intimidation or harassment.
- Partners and suppliers must respect workers' legal rights to freedom of association and must not prevent them from legally organizing and joining associations.

## **Environment**

Partners and suppliers must promote resource efficiency and reduce consumption, including of raw materials, energy, water, and fuel. Neotalent expects its partners and suppliers to make reasonable efforts to reduce or eliminate the levels of waste they produce, both solid and liquid, preferring alternatives to landfill disposal such as reuse and recycling, and taking reasonable steps to minimize emissions of greenhouse gases and toxic and hazardous pollutants. In addition, partners and suppliers are encouraged to develop and implement environmentally friendly practices and innovations to minimize negative impacts on the environment.

## **Integrity, ethics, and anti-corruption**

Neotalent is aware of the centrality of its role in promoting and defending ethics in relations between the public sector and the private sector, as well as in commercial relations within the private sector, and is actively committed to fighting corruption, seeking to foster a corporate culture across the board based on the basic values of legality, loyalty, trust, and ethics.

To this end, we have adopted a zero-tolerance policy towards all forms of corruption and, consequently, we have approved a set of internal rules and procedures designed to prevent and detect behavior that may indicate acts of corruption or related infractions.

### **Integrity**

Partners and suppliers must not participate in illegal or unethical activities and must promote fair business standards and practices. They must also establish a confidential whistleblowing process so that their own employees, partners, and suppliers can report incidents of unethical behavior.

Our Partners and Suppliers must ensure that their accounting records are transparent and reflect all transactions they complete with or on behalf of Neotalent.

### **Corruption / bribery / financial crimes**

Partners and suppliers must not participate in illegal or unethical activities and must promote fair business standards and practices. They must also establish a confidential reporting process so that their own employees, partners and suppliers can report incidents of unethical behavior.

Partners and suppliers must have reasonable practices to prevent all forms of bribery and must support all anti-corruption efforts. Partners and suppliers must not undertake or support third parties in any money laundering, terrorist financing or other financial crime activity.





### Gifts, entertainment, and hospitality contrary to custom and practice

Partners and Suppliers must not offer, accept, or solicit any gift, entertainment, or invitation when there is reason to believe, or a reasonably informed third party could conclude, that there may be an intention to unduly influence business decisions or be perceived as having influenced decisions or that could harm the objectivity of the business.

### Conflicts of interest

Partners and suppliers must have mechanisms in place to identify, prevent, and manage conflict of interest situations. Partners and suppliers must ensure that they have mechanisms in place to prevent bias, conflicts of interest, or improper influences from influencing their professional decisions and responsibilities. Partners and suppliers must voluntarily report any conflict involving Neotalent employees.

### Due Diligence

If Partners and Suppliers use third-party intermediaries to carry out, even partially, the tasks entrusted by Neotalent, they must first conduct due diligence to ensure that such intermediaries provide legitimate services and respect the principles, rules, and procedures described in this Code of Conduct for Partners and Suppliers.

### Reporting Violations

To report questionable behavior or possible violations of this Supplier Code, you should contact your contract manager at Neotalent. If this is not possible or appropriate, you should report the incident on the Neotalent whistleblowing portal at [www.neotalent.pt](http://www.neotalent.pt).