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CODE OF ETHICS AND CONDUCT

JUNE 2022

2nd Edition

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1. MESSAGE FROM GENERAL DIRECTION

SISTRADÉ has a permanent concern to ensure collective behavior in accordance with the law, seeking to ethically conduct properly both in terms of relationships between company colleagues and external partners, such as customers, suppliers or others.

With this Code of Ethics and Conduct it is intended to systematize our principles and commitments that allow us to collectively have a better and reinforced position in the community in which we operate.

António de Sousa Ribeiro
CEO



2. CODE CONTROL

The Code of Ethics and Conduct was prepared by SISTRADE's Quality Management and its update is under its responsibility.

This Code is published on the SISTRADE's intranet and website, after approval of the original, being guaranteed to be updated with the latest versions. There is a controlled copy on paper, approved by the General Direction.

The following table allows the management of controlled copies, if necessary for external entities.

Created By: Quality Manager
Approved by: General Direction
Date: June 2nd, 2022
Edition:
Copy:

Copy N°: Controlled
Date: Uncontrolled

3. EDITION HISTORY

Edition	Date	Description
1	02-02-2022	Initial Edition
2	02-06-2022	Review of Rules of Conduct Introduction of Infringements and Reporting of Irregularities Chapter

4. PRESENTATION OF THE CODE OF ETHICS AND CONDUCT

SCOPE

The Code of Ethics and Conduct (Code) is the document which contains the values that guide the performance of SISTRADE, as well as the ethical principles and norms of conduct to which the SISTRADE and its employees are subjected to, and assume as intrinsically their own.

TO WHOM DOES THE ETHICS AND CONDUCT CODE APPLY

This Code applies to all SISTRADE employees, no matter their contract regime or hierarchical position, they must observe the principles and rules contained here, in the performance of their professional activity.

This Code applies equally to all customers, suppliers, partners and service providers.

MAIN OBJECTIVES

This Code defines the company we want to be, the values that govern and guide us and the ethical conduct we expect from all our stakeholders.

The general objective is to share with employees, customers, partners, suppliers and public entities, the principles and values by which SISTRADE regulates its activity, promoting reliable and lasting relationships.

The specific objective is to clarify, promote and encourage, among employees, the rules of conduct that they must observe and adopt, through their attitude, behavior and decisions.

CODE APPLICATION MONITORING

The Human Resources Manager will be the responsible entity for the implementation and monitoring of this Code, its interpretation and clarification; is also responsible for ensuring its enforcement and to address any issue regarding infringements, taking appropriate action whenever necessary.

5. MISSION, VISSION AND VALUES

MISSION

To supply and to implement IT solutions which allow the creation of value in companies.

We aim to establish partnerships with our clients in order to achieve tangible results, to innovate and to add value throughout joint decisions, in an increasingly competitive electronic market.

VISION

We intend to be recognized worldwide in the industrial sector as suppliers of solutions and services which allow us to optimize the performance of organizations.

Using innovative technologies, specialized personnel and present leadership, we want to assure the growth and fulfillment of the company, with a committed and valued work team.

VALUES

We work to meet the needs of our Clients, assuming as core values:

- Compromise;
- Leadership;
- Innovation;
- Experience;
- Integration;
- Teamwork;
- Sucess.

6. OUR PRINCIPLES

COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Full compliance with the laws and regulations applicable to SISTRADE's activities.

INTEGRITY

Act with integrity and loyalty in all activities, avoiding any behavior that would reflect corruption, conflicts of interest or impair professional performance.

COMPETITION

We are committed to promoting fair competition and healthy marketplaces, avoiding any action that might misrepresent or restrain competition in a significant way.

CONFIDENTIALITY AND PRIVACY

We strictly comply with the duty of professional secrecy, which consists of the obligation not to disclose information regarding the organization, work methods, business and activities of the company.

We assure the confidentiality, privacy and integrity of SISTRADE's information or that which the company has access in the course of its activity.

RESPECT FOR HUMAN

We are committed to value and acknowledge every human being.

RESPECT FOR THE ENVIRONMENT

Committed to environmental protection, adopting a logic of sustainable development, through, the efficient use of natural resources consumed and recovery of waste.

7. RELATIONSHIP WITH STAKEHOLDERS

EMPLOYEES

SISTRADE treats each employee with fairness and respect, promoting equal opportunities for personal and professional development, namely through rigorous and constructive performance evaluation, and training sessions.

We promote the balance between the professional and personal lives of our employees.

CUSTOMERS

SISTRADE's activities focus on its customers in order to satisfy their needs and exceed their expectations. Thus, we develop a relationship of empathy and trust in order to add value to our clients.

The treatment of all customers must comply with the equality and non-discrimination principles. Customer's information to which we have access must be treated and protected, preserving its confidentiality and integrity.

SUPPLIERS

The suppliers selection must be based on impartial and transparent criteria, without privileges or favoritism and avoiding, whenever is possible, situations of exclusivity.

SISTRADE builds partnerships with its suppliers, honoring the commitments assumed. We avoid any form of abuse and bribery, corruption or money laundering.

SHAREHOLDERS

SISTRADE is committed to maximize, in a sustainable manner, the creation of value for its shareholders, in strict compliance with the SISTRADE's values. The accuracy, veracity and timeliness of the information provided to shareholders must be ensured.

PUBLIC AUTHORITIES

SISTRADE provide the supervisory and inspection authorities with all the required collaboration or information within its reach, not adopting any behaviors that may prevent their activities.

COMPETITORS

SISTRADE respects legal rules and market criteria, promoting fair and healthy competition. The relationship with the competitors follows the principles of cordiality promoting mutual respect.

COMMUNITIES

SISTRADE ensures the legitimacy of its business, strengthening relationships with the communities where it operates.

8. RULES OF CONDUCT

RESPECT FOR HUMAN AND LABOUR RIGHTS

Respect for Human and Labor Rights is an integral and fundamental part of SISTRADE, both within the company and with its suppliers and business partners.

SISTRADE is committed and dedicated to building and fostering a framework of respect for the fundamental values of human rights (as proclaimed by the United Nations Universal Declaration of Human Rights) and labour rights (as proclaimed by the International Labour Organization).

WORKING CONDITIONS

SISTRADE is committed to observing and promoting the respect due to employees, ensuring their right to working conditions that are decent, safe, healthy, and physically, socially and psychologically balanced, providing personal and professional development.

We also commit ourselves to take the necessary steps to ensure that each employee is treated with respect and dignity.

WORKING HOURS AND REMUNERATION

Working time and respective remuneration comply with current legislation. The remuneration of SISTRADE's employees is fair and adequate in accordance with the terms of the contract and the rules that govern it.

At the time of hiring, all employees are informed and made aware of contractual issues, including working time, remuneration arrangements and payment frequency.

SISTRADE does not allow, any form of extra work that is not useful for reasonable reasons, when employee expressly asks for dismissal.

PREJUDICE AND DISCRIMINATION

SISTRADE does not discriminate or support any form of discrimination in hiring, remuneration, access to training, promotion or retirement due to racial, national, religious, disability, gender, sexual orientation, political or age factors.

Do not allow discrimination or prejudice of any nature, gestures, language or physical contact that indicates sexual coercion, threat, abuse or exploitation.

EQUALITY OF OPPORTUNITY AND TREATMENT

The principle of equal treatment and opportunities for employees is based on the commitments of Human Resources, being applied in hiring, training, career opportunities, benefits and salaries.

HARASSMENT

SISTRADE encourages respect and cooperation between all employees, rejecting any behavior that could be considered harassment.

Harassment is considered to be undesired behavior, namely based on a factor of discrimination, practiced when accessing employment or in the job itself, work or professional training, and also as sexual harassment, unwanted behavior of a sexual nature, in the verbal form, not verbal or physical, with the aim or effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment (article 29 of Work Code, Portugal).

In order to prevent or avoid harassment at work, SISTRADE is committed to:

- i. Inform employees about harassment by making this Code available;
- ii. Encourage the participation of employees in the life of the company, with a view to building an organization with a strong work ethic;
- iii. Encourage good relationships in the work environment, avoiding climates of animosity;
- iv. Ensure every employee is treated equally and respectfully;
- v. Ensure the absence of any abusive conduct, manifested by words, acts, gestures that may harm the personality, dignity or physical or psychological integrity of employees.

The employee who consider that they have been subjected to any type of harassment at work must:

- i. Make it clear to the harasser that this type of conduct is unacceptable and that it must stop, and you will inform the Human Resources which will report to the General Direction;
- ii. Communicate in writing what happened (date, time, place, situation, witnesses) and report contact to the Human Resources.

HEALTH AND SAFETY AT THE WORKPLACE

SISTRADE provides a safe and healthy work environment, adopting all appropriate measures to identify hazards, assess and control the risks to which its employees are exposed.

SISTRADE has a preventive approach to the health and safety of its employees, providing them with regular training on health and safety in the workplace. Regarding to environmental challenges in its operations and business decisions, we continuously focus to reduce energy consumption and developing greater social and environmental responsibility.

CONFIDENTIALITY AND PROFESSIONAL SECRECY

All employees are obliged to maintain absolute secrecy about any information or knowledge of a technical business or other nature, acquired necessary or involuntarily in the exercise of their functions, referring to SISTRADE and/or any other individuals or legal entities, which have relation with the organization, during the term of the employment contract or during the period of twenty years after termination of said contract.

The company and all those who work in it, respect the privacy of information, in particular that relating to personal data of employees or customers in accordance with the provisions of Regulation (EU), 2016/679 of the European Parliament and of the Council, of 27th April 2016, on the protection of individuals with regard to the processing of personal data and the free movement of such data and which repeals Directive 95/46/EC (General Regulation on Data Protection).

CONFLICTS OF INTEREST

A Conflict of Interest occurs when personal interests of an employee or the interests of a third party compete with the interests of SISTRADE.

Employees cannot have any conflict of interest that may place personal priorities before SISTRADE's priorities, and must behave with honesty and integrity, not seeking personal or third-party benefits, under any circumstances through the misuse of their position or contacts.

MONEY LAUNDERING

We are committed to combat money laundering and terrorist financing, being aware that the introduction in the financial circuit and/or conscious or grossly negligent use of a licit transaction of funds derived, as well as the use of funds to support criminal activities, including acts of terrorism, constitutes the practice of money laundering.

ANTI-CORRUPTION AND ANTI-BRIBERY

SISTRADE has zero tolerance policy for any form of corruption or bribery.

SISTRADE does not allow any practice of corruption or bribery, either actively or passively, whether in the private or public sector, including payment facilitation or the creation, maintenance or promise of irregular or favoured situations.

In order to prevent and avoid corruption or bribery, SISTRADE is committed to:

- i. Not offer or authorize an undue payment (in cash or otherwise) to any person, including any local or foreign authority in any part of the world;
- ii. Not offer or accept money or anything of value, such as gifts, tips or commissions, related to businesses or to the award of a contract, or with the objective of obtaining or rendering a level of service that the third party would normally not be entitled to.

Preventing, detecting and reporting bribery and other forms of corruption is everyone's responsibility.

9. INFRINGEMENTS AND COMMUNICATION OF IRREGULARITIES

All individuals bound by the Code of Business Ethics and Conduct will comply with and contribute to compliance with this Code and its associated Regulations, Policies and Principles.

Infractions to this Code will be sanctioned in accordance with labor laws and regulations, as well as other legal provisions that must apply. Under the law, disciplinary sanctions may include termination of employment.

We have established a Policy for Reporting Irregularities that allows both employees bound by the Code and other interested parties to anonymously or confidentially report any violation of the principles contained in this Code, without fear of reprisal.

The communication of irregularities by any interested party can be made through any of the following channels:

- Sending an e-mail to: channel.compliance@sistrade.com
- Send a letter to Quality Manager of SISTRADE, to the following address:
SISTRADE – Software Consulting, S.A.
Travessa da Prelada, 511
4250-380 Porto
- Telephone: +351 226 153 600

