



Code of Conduct

SMARTIDIOM Code of Conduct

1. Aim and scope of the Code of Conduct

The SMARTIDIOM Code of Conduct is a document that brings together the ethical and moral principles that guide the activity of SMARTIDIOM Group companies. These principles are inherent to all Employees and members of the Management, and govern their relationship with Customers, Suppliers, Vendors and other Stakeholders.

This Code reflects the purpose of everything we do at SMARTIDIOM and is also intended for third parties contracted by us who act on behalf of SMARTIDIOM, whenever it may be held responsible for their actions.

The SMARTIDIOM Code of Conduct aims to:

- Share the ethical and moral principles and rules that guide the activity of the SMARTIDIOM Group;
- Promote and encourage the adoption of ethical and moral principles and rules in the daily lives of Employees and company Management, in the relationship they have with each other and in their contact with all Stakeholders;
- Solidify SMARTIDIOM's institutional image.

2. Mission and values

Mission

SMARTIDIOM's mission is to help people and organisations communicate effectively anywhere in the world.

Values

These fundamentals are common to the entire SMARTIDIOM Group. We hope you identify with them.

Ethics and Transparency

Our presence in the market is based on establishing ethical and transparent relationships with all parties involved. Our processes and methods are clearly communicated to all Stakeholders, who are called on to actively participate in evaluating and giving feedback in order to create credible and lasting collaborations.

Quality and Excellence

Our value proposition focuses on the Quality of the services we provide. We have established high Quality standards and a rigorous management system that allows us to continuously evaluate and improve all the company's processes in order to maintain excellence in our contact with all types of public.

To guarantee high levels of quality, we are always committed to working to: try to respond, the best way possible, to the needs and expectations of our Stakeholders; create beneficial relationships with all types of public; implement mechanisms for monitoring and evaluating performance; practice responsible marketing; and only sell products of which we are proud.

People first

The well-being of the team is fundamental to SMARTIDIOM. Therefore, our priority is to maintain a healthy, collaborative work environment focused on the personal and professional fulfilment of all, where investment in the development of competences is a constant.

With a united and motivated team, we believe that we have assembled the necessary preconditions to guarantee the quality that we make a hallmark of our services.

Innovation

Innovation is the energy that motivates us. We work on the basis of taking risks and thinking outside the box, presenting solutions that add real value to SMARTIDIOM and its Stakeholders, and actively contributing to developing the industries in which we operate.

Corporate Responsibility

To be SMARTIDIOM is to be concerned about improving and actively participating in the environment around us. Our sense of Corporate Responsibility is based on three fundamentals: Employment, Social and Environmental Responsibility.

3. Relationships with Stakeholders

Customers

It is crucial for us to develop and maintain relationships of empathy and trust with our Customers and guarantee them high levels of satisfaction.

All Employees and Management members must carry out their activities in accordance with SMARTIDIOM's values, culture and strategies in order to provide an excellent experience at any point of contact with the Customer.

Employees

The rules contained in this Code must be assimilated, accepted and practised by all Employees, regardless of their hierarchical position or the functions they perform, whenever they act on behalf of SMARTIDIOM. SMARTIDIOM encourages the participation of its Employees, promoting effective processes of communication, consultation and sharing. It is the responsibility of all Employees to keep SMARTIDIOM prosperous.

Suppliers

Our people are our greatest asset. Regardless of their type of employment contract, all professionals working for SMARTIDIOM are considered a fundamental and integral part of the team and are treated as such.

SMARTIDIOM's relationship with its Suppliers is based on trust, transparency and mutual assistance, and it is in the company's best interest to make it durable and satisfactory for both parties.

SMARTIDIOM assumes its responsibility for providing Suppliers with the necessary support, feedback, instructions and tools to achieve the Quality goals and those to be found in this Code of Conduct.

Vendors

We act in good faith in our relationships with our business partners and establish a transparent relationship and an objective communication with them.

Competitors

SMARTIDIOM respects the market criteria and the legislation in force and promotes a healthy competition. Its relationship with the competition is based on mutual respect.

Communities

It is in the absolute interest of the company to positively contribute to the development of the Communities of which it is a part. SMARTIDIOM also promotes the conscious use of natural resources and the preservation of the environment, through the adoption of processes that minimise the environmental impact of its activities.

4. Conduct Standards at SMARTIDIOM

4.1 Security and Confidentiality

SMARTIDIOM undertakes to respect the confidentiality of the documents to which it has access in the course of relationships and partnerships established with its Stakeholders, and shall not disclose their content to third parties neither during nor after the end of the collaboration.

Likewise, any information belonging to the company that is made available to its Stakeholders and classified by SMARTIDIOM as protected or confidential, must be treated as confidential during and after any contractual relationship.

The Employees and the Management are obliged to protect the confidentiality of the information to which they have access in the exercise of their functions, and are not allowed to use it to obtain advantages for themselves or for third parties.

4.2 Protection of property and company assets

SMARTIDIOM's Stakeholders are obliged to protect and safeguard the image of the Group and of its Employees, Suppliers, Customers and Partners.

Property belonging to SMARTIDIOM is exclusively for professional use and must not be used for personal benefit of Employees or others. It is the responsibility of all Employees to ensure the protection and conservation of the company's physical, financial and intellectual assets.

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CONFIDENTIAL. Intellectual property of SMARTIDIOM.

Employees should adopt behaviours that do not jeopardize their own safety and the company's assets.

4.3 Relationship with the involved parties

- **Interpersonal relationships:** relationships between parties should be guided by mutual respect, loyalty, cooperation, honesty and objective communication.
Any form of moral or sexual harassment on the premises or in work context is prohibited.
- **Equal opportunities:** we advocate a form of management based on equal opportunities which encourages a healthy environment between the parties involved in all projects.
SMARTIDIOM does not tolerate discrimination or any other type of behaviour which goes against this commitment, encourages exclusion or creates a bad professional environment.
- **Leisure activities:** leisure activities between SMARTIDIOM's Employees and other Stakeholders are well viewed by the company, provided these activities do not create any climate of favouritism towards a particular Stakeholder. In practice, SMARTIDIOM promotes the sharing of ideas and networking between the involved parties but does not allow these activities to benefit a particular person/entity.
- **Gifts and other payments:** SMARTIDIOM's Employees are prohibited from receiving gifts from any external body, whenever they are clearly intended to influence an important decision directly linked to the performance of an Employee's duties.

4.4 Obligations and conformity

SMARTIDIOM is governed by the tax obligations of the countries in which it operates. In this regard, documents are often required to prove to the competent authorities that SMARTIDIOM fulfils its obligations. SMARTIDIOM's Stakeholders shall be required to provide the necessary documents for SMARTIDIOM to fulfil its objectives in this area.

5. Non-compliance reports

Compliance with this Code of Conduct is essential for the preservation of good relationships between the parties involved in all procedures. We hope that all SMARTIDIOM's Customers are informed and updated about the information contained therein, so that there is consensus and adherence to the best practices described in it.

Any questions regarding the interpretation or application of this Code should be reported in writing to SMARTIDIOM's Quality Department.

E-mail: quality@smartidiom.pt

Address: Rua Henrique Sommer, No. 2, 1.º DTO, 2410-107 Leiria, Portugal.

This Code is available for general consultation on the SMARTIDIOM site – www.smartidiom.pt – and internally, on the Group's server.