

CODE OF ETHICS AND CONDUCT

OCTOBER 2025

SISQUAL®Workforce Management, Lda

Rua Carlos Dubini, 169
Porto - Portugal

1 Message from Management

At **SISQUAL® Workforce Management, Lda**, we believe that **integrity, respect and responsibility** are the cornerstones of our culture and the foundation of our success.

This **Code of Ethics and Conduct** expresses our commitment to the highest standards of professional and personal behaviour. We expect each employee to use it as a reference in their daily decisions, contributing to an **ethical, transparent and collaborative** work environment.

We count on everyone to strengthen and keep alive this culture of **trust and excellence** that sets us apart.

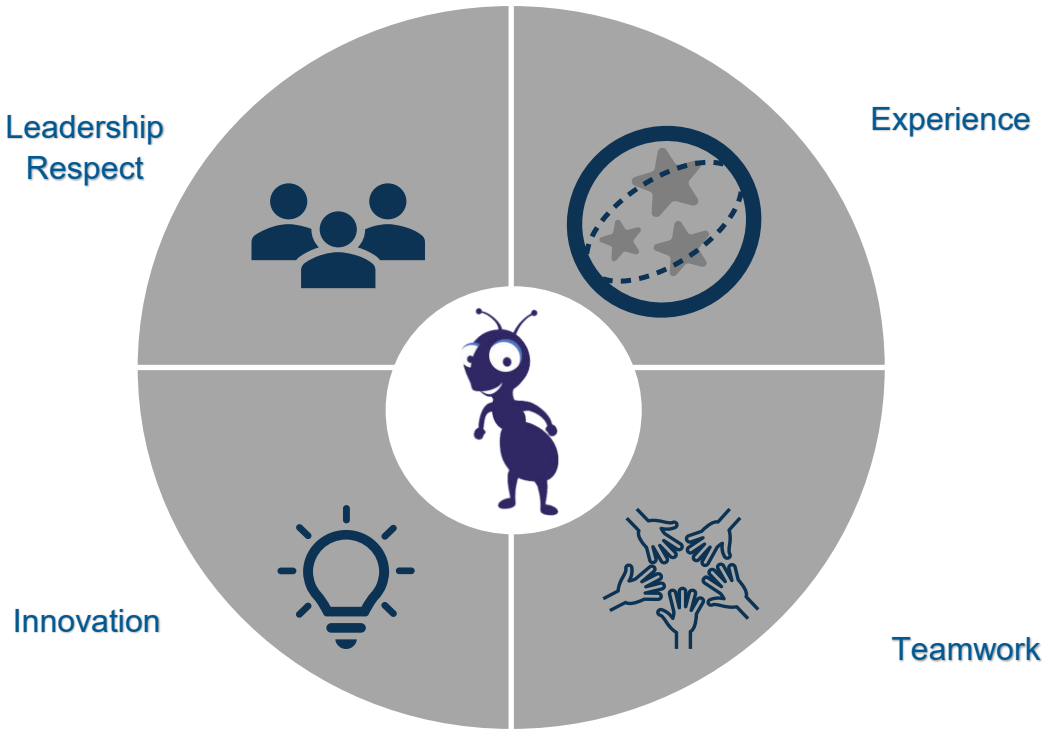


2 Mission, Vision and Values

The success and pride of **SISQUAL® Workforce Management, Lda.** (hereinafter **SISQUAL® WFM**) is based on the trust that its various stakeholders — customers, suppliers, employees and partners — place daily in the quality and excellence of the services provided.

Since 1992, it is this trust that has allowed **SISQUAL® WFM** to grow, consolidate its presence in the market and fulfil its **Mission**: to develop unique solutions that increase productivity by optimising the workforce, while contributing to improve the quality of life of employees. This mission is achieved through the provision of a **Software as a Service (SaaS)** platform, accessible via a local or mobile application.

At its core, **SISQUAL® WFM** is an organisation of integrity, guided by high ethical standards and principles of equality and sustainability. Its operation is based on five fundamental pillars: **Leadership, Respect, Experience, Innovation and Teamwork**.



These values give rise to the **guiding principles** of our actions:

- Acting in a **professional, responsible, respectful, honest and dedicated** manner, for the benefit of customers, employees, suppliers and partners, always aiming for **excellence in performance**;
- **Comply fully** with all regulatory instruments applicable to professional activity, including international conventions and treaties, laws, regulations and other normative acts;
- **Honour the commitments we have made**;
- **Taking responsibility** for our actions.

Thus, all **SISQUAL® WFM** activities are based on the code of conduct defined in this **Code of Ethics and Conduct**, whose fundamental values and principles are detailed throughout this document.



3 Objective and Scope of Application

The consolidation in this **Code of Ethics and Conduct** (hereinafter referred to as **the "Code**") of the standards resulting from the values and principles that guide our actions reinforces **SISQUAL® WFM**'s commitment to creating economic and social value in a sustainable manner and in line with the highest ethical standards.

This **Code** reflects our **values, mission and vision**, as well as how **SISQUAL® WFM** fulfils its ethical commitments to all its internal and external stakeholders.

Its **dissemination and promotion**, both internally and externally, aim to add social value and develop the company's activity in an ethical, transparent and responsible manner.

The **Code** should be understood as a **reference and a practical tool**, designed to support decision-making processes and ensure consistency in individual and collective actions.

Its application is **direct** to all representatives of the members who are part of the Governing Bodies (hereinafter, **"Managers**"), as well as to all **SISQUAL® WFM** employees. It also applies, **reflexively**, to interns, suppliers and service providers directly related to the organisation, who must be aware of and comply with its provisions.

This **Code** comes into force on the **2nd of October 2025**. However, like any regulatory instrument, it should not be understood as a finished work. On the contrary, it is a **work in constant evolution**, subject to periodic revisions, in order to ensure its suitability to the demands of a constantly changing reality.

4 Responsibilities

Considering the role and responsibility inherent in the functions of **SISQUAL® WFM's senior management** with regard to compliance with the values and commitments set out in this **Code**, it is incumbent upon them to ensure:

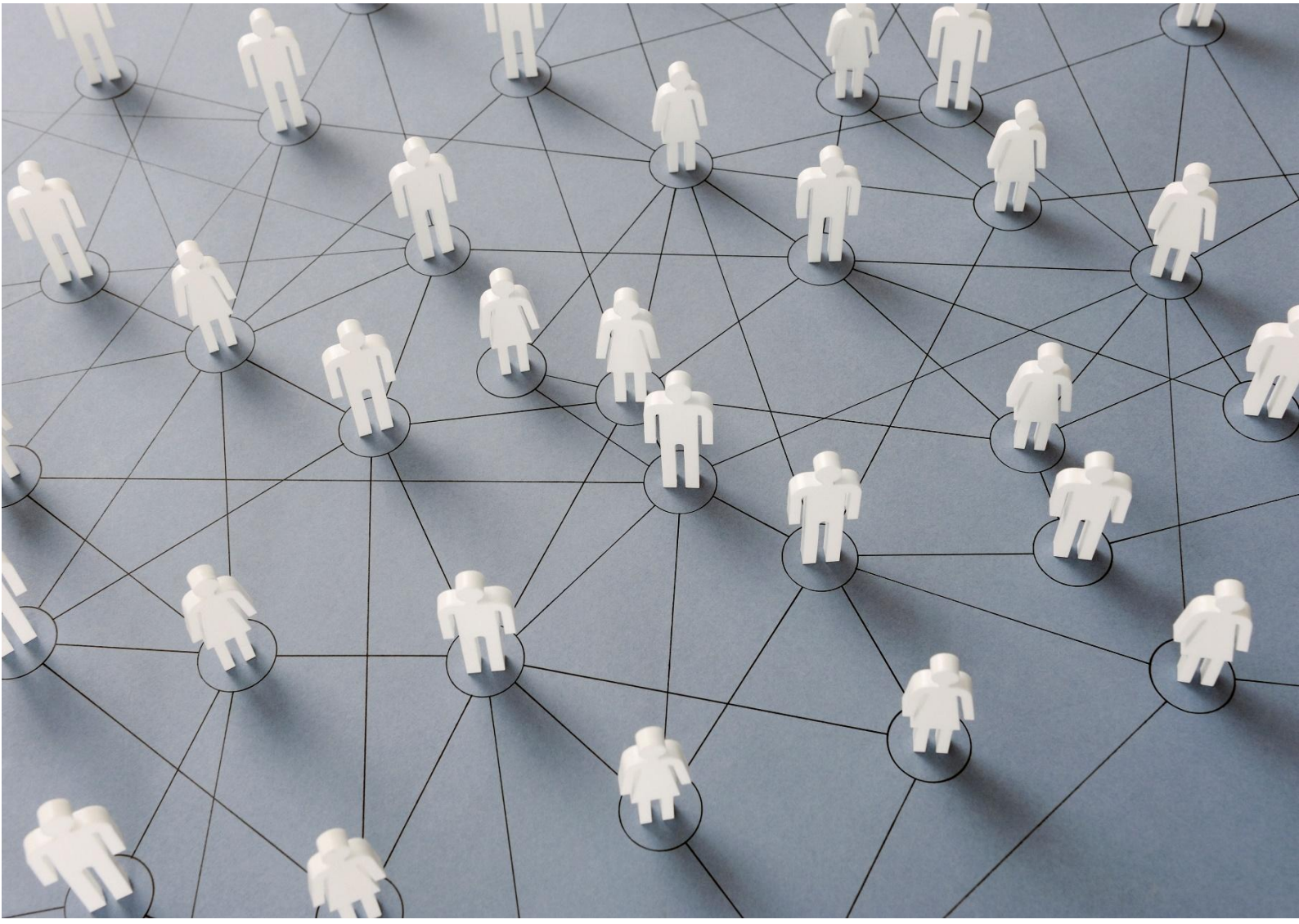
- The implementation of the necessary measures and efforts to ensure the **effective dissemination** of the Code, so that all employees and other stakeholders are aware of it and fully apply its values and commitments;
- Acting as **an example of conduct** in all its dimensions — management, commitment to internal and external policies, and promotion of ethics and good conduct, both internally and externally;
- That this document **is not used, at any time, for personal promotion or business solicitation purposes**;
- Exercise due **diligence in managing issues and questions** related to the content of the Code, its applicability or interpretation;
- **Ensuring the effective application** of the Code;
- The existence of **mechanisms for detecting and reporting** situations that may constitute violations of this Code.

All those covered by this **Code** must **read, understand, respect, comply with and ensure compliance with it**, recognising the relevance of its content and the seriousness of the consequences of non-compliance.

Similarly, everyone has a duty to **report any practices of non-compliance** of which they are aware, through the specific channel maintained for this purpose.

5 Principles and Rules of Conduct

In accordance with the principles enshrined in **the Universal Declaration of Human Rights**, the **Conventions of the International Labour Organisation** and the **United Nations Global Compact**, and in line with the values and principles of **SISQUAL® WFM**, the following **Principles and Rules of Conduct** are established, which together constitute this **Code of Ethics and Conduct**.



I. Principle of Ethics and Compliance

Ethical conduct presupposes **conscious choices**. Being ethical is a choice, not an imposition. Similarly, **not following the principles established in this Code**, as well as the internal and external policies and procedures applicable to **SISQUAL® WFM**, is also a choice.

Like all choices, these are **voluntary** and have consequences, whether positive or negative. It is essential that the recipients of this Code recognise **the responsibility inherent in their choices**, as well as the potential impacts of inappropriate conduct or disregard for ethical principles. Each individual action affects not only the person who performs it, but also the **corporate and social environment** in which they operate.

In this context, it is a personal duty to consider, cumulatively, the following questions when making individual or corporate decisions:

- **Does** this action or decision **respect the dignity, truth and commitments/obligations assumed by the company**?
- **Does** this action or decision **comply with applicable legislation**?
- Is this action or decision **aligned with SISQUAL® WFM's values**?
- Would I feel **comfortable if this action were made public**?
- **Does** this action or decision **impact the reputation of SISQUAL® WFM**?

The **Principle of Ethics and Compliance** assumes that, **before any decision is made on behalf of SISQUAL® WFM**, the answer to all these questions is affirmative and true.



II. Respect for the Law

We operate in **full compliance with the laws and regulations in force** in all countries where we operate, providing the authorities **with all necessary cooperation** to ensure transparency and compliance.

III. Social Responsibility

We respect **the customs and traditions** of the countries in which we operate, thereby contributing to the **socially responsible development** of communities.

In addition, we respect **internationally recognised human rights** and are committed to their protection, **refraining from participating in businesses or practices that violate them**.

IV. Sustainable Development

Although its application is limited, given that we are a software development company, **we act in accordance with the principles of sustainable development whenever possible**, considering the economic, social and environmental dimensions.

We promote and encourage all stakeholders to **adopt best environmental practices**, striving to **minimise any environmental impacts** resulting from our professional activity.



V. Good Governance

SISQUAL® WFM guides its management by the principles of **ethical leadership** and **good governance**, adopting high standards of professionalism in the strategies it implements. It believes that these practices reflect the most demanding criteria of conduct and transparency, promoting **open, constructive and continuous dialogue with all stakeholders**.

With the same commitment, the company values the **continuous improvement of its management processes and practices**, encouraging respect for and promotion of the values enshrined in this Code. It also undertakes to **communicate** relevant information about its performance **regularly, clearly and transparently**, reinforcing trust and responsibility towards its stakeholders.

VI. Work

SISQUAL® WFM is firmly committed to ethics, integrity and respect for human rights, ensuring that:

- **There is no form of discrimination, intimidation, retaliation or disrespect** against workers, promoting a safe, fair and inclusive working environment;
- **Freedom of association is fully respected**, ensuring that employee representatives are not subject to discrimination, intimidation or retaliation;
- **Child labour and forced labour are rejected and not used**, nor is there any collaboration with entities that engage in such practices;
- **Decisions regarding hiring, dismissal, bonuses or penalties, as well as the signing of contracts**, are made based on objective and professional criteria, excluding favouritism, bribery or any other form of undue influence;
- **Promotes equal opportunities**, not allowing any type of discrimination based on gender, race, geographical or social origin, ethnicity, age, religion, disability, nationality, ideology, sexual orientation, family responsibilities or participation in worker representative structures;
- **It does not tolerate any form of harassment**, whether sexual, moral or otherwise, nor acts of verbal or physical violence, ensuring a dignified and respectful working environment for all.

VII. Trust and Transparency

At SISQUAL® WFM, trust and transparency are fundamental pillars that guide our conduct and reflect our commitment to integrity. These values are present in all our corporate relationships, both internal and external.

We believe that **trust breeds trust** and that **transparency promotes transparency**. Therefore, we cultivate open and honest relationships based on mutual respect, loyalty and good faith. We trust our partners, honour our commitments and seek, through our individual and collective actions, **to build a solid, ethical and reliable organisational environment**.

VIII. Principle of Promoting Dialogue

At SISQUAL® WFM, **dialogue is valued as an essential tool for understanding, persuasion and conflict resolution**. We believe that active listening and mutual respect are fundamental to overcoming differences and building sustainable solutions.

We recognise the **right of stakeholders to be heard**, and we are committed to seriously considering their legitimate interests and concerns. This approach reinforces our culture of transparency, inclusion and accountability, promoting lasting relationships of trust and cooperation.

IX. Anti-corruption and Anti-bribery

SISQUAL® WFM adopts a **zero-tolerance** policy **towards any form of corruption or bribery**. It is **strictly prohibited to offer, solicit or accept any type of bribe**, whether financial or otherwise.

The company **actively repudiates and denounces all corrupt practices**, reaffirming its commitment to integrity, legality and transparency in all its internal and external relationships.

X. Health, Safety and Hygiene at Work

At SISQUAL® WFM, we promote a **healthy, safe and collaborative working environment**, appropriate to the nature of our professional activities. We value **respect for safety, health and hygiene conditions**, with special attention to the needs of **pregnant, postpartum or breastfeeding workers**, encouraging team spirit, unity and mutual support.

We are committed to **strictly complying with all applicable legal and regulatory standards** regarding safety, health, hygiene and well-being in the workplace.

We guarantee and preserve the **physical and emotional integrity of people**, as well as the **safety of facilities and processes**, reinforcing an organisational culture based on prevention, care and responsibility.



6 SISQUAL® WFM's commitment to employees and stakeholders

Relationships between SISQUAL® WFM, its employees and all Stakeholders are guided by the values defined in this Code of Ethics and Conduct. To ensure its effective implementation, SISQUAL® WFM is committed to **involving Stakeholders whenever necessary**, integrating their concerns into decision-making and governance and management practices. To this end, it maintains **accessible, effective and transparent channels of communication,** promoting dialogue and active listening.

SISQUAL® WFM proactively manages all situations involving the following commitments:

I. Commitment to the Prevention of Conflicts of Interest

SISQUAL® WFM is committed to **safeguarding impartiality and integrity in decisions**, preventing situations of conflict of interest — real, potential or perceived — that could compromise the organisation's objectivity, loyalty or reputation.

A conflict of interest occurs when personal interests overlap or collide with the values or objectives of SISQUAL® WFM, which may negatively influence professional performance. Therefore, **situations involving organisations or individuals with whom there is or has been a personal or professional connection** must be **identified and avoided**. If participation is necessary, it is mandatory to notify management for evaluation and guidance.

Employees with family or equivalent relationships with each other, or with managers, **should not perform duties in a direct hierarchical or functional relationship** without prior assessment by the Ethics and Sustainability Committee, collaborating with Management in defining appropriate measures.

II. Commitment to Confidentiality and Secrecy

All SISQUAL® WFM employees and managers must **protect and keep confidential the information obtained in the performance of their duties**, complying with internal policies and applicable legislation, especially with regard **to personal data protection and information security**.

III. Commitment to responsible resource management and use of technological means

SISQUAL® WFM promotes the **responsible use of its physical and technological resources**, ensuring information security and compliance with internal policies.

It is strictly prohibited, even with your own resources, on SISQUAL® WFM premises:

- Accessing websites with inappropriate content, such as online games or pornography;
- Transmitting messages with discriminatory, offensive, defamatory content or that promote political, social, racial or religious intolerance;
- Using unauthorised software or accessing content that violates intellectual property rights.

SISQUAL® WFM is also committed to **preserving the environment** by promoting sustainable practices and reducing the environmental impact and climate change resulting from its activities.

IV. Commitment to Political Independence

SISQUAL® WFM maintains **complete independence from political parties and their representatives**, not supporting any political force. Collaboration with public entities occurs exclusively within the scope of its institutional mission, whenever requested by government agencies or public entities.

V. Commitment to the Prevention of Money Laundering

SISQUAL® WFM **repudiates any practice of money laundering**, acting in accordance with current legislation and international best practices. The company is committed to **verifying the origin of all funds received**, ensuring the legality and transparency of its financial operations.

VI. Commitment to Individual and Corporate Reputation

SISQUAL® WFM employees must **present themselves in a manner appropriate to the performance of their duties**, respecting internal guidelines on dress and professional behaviour. Good presentation, combined with ethical and diligent conduct, contributes to a healthy working environment and the reputation of the organisation.

SISQUAL® WFM adopts a **strict communication policy**, guided by ethics, integrity and transparency, including in interactions with the media. The disclosure of information must be authorised in advance.

On social media, employees must **act with ethical responsibility**, reinforcing the institutional image and contributing to the dignity of SISQUAL® WFM.

7 Reporting Bad Practices

This Code is an **essential tool for promoting ethical conduct**, preventing misconduct and supporting conflict resolution. Therefore, all SISQUAL® WFM employees and representatives have a duty to **read, understand and apply** the principles defined herein, clarifying any doubts with management or the responsible areas.

I. Why is it important to report bad practices?

Reporting bad practices or non-compliance with this Code is essential to ensure a healthy working environment and protect the reputation of SISQUAL® WFM. **Behaviour that violates the values and commitments established herein**, as well as any conduct that directly or indirectly may **harm the dignity of any Stakeholder or compromise the organisation's activity**, must be reported through the appropriate channels.



II. Who can report misconduct?

Reports can be made by **any SISQUAL® WFM employee or manager**, as well as by **other Stakeholders** — including partners, suppliers, customers, or anyone who is aware of conduct that violates this Code.

III. How is the reporting of malpractice handled?

SISQUAL® WFM guarantees the **confidentiality of the identity of the person making the report**, **no retaliation** against the author of the report and **fair treatment** of the person concerned, ensuring their right of access to information concerning them, provided that such access does not compromise the investigation of the truth.

A secure and anonymous channel is available for this purpose:

https://whistleblowersoftware.com/secure/sisqual_wfm

IV. What are the consequences of violations of the Code?

All SISQUAL® WFM employees and managers are **held accountable for their behaviour** in accordance with this Code. Violations may result in:

- Educational or training measures;
- Review of procedures;
- Disciplinary action, including dismissal, in accordance with legislation and internal regulations.

The decision will be made based on **the severity and recurrence of the offence**, the **degree of guilt**, and the **tangible or intangible consequences** of the act committed.

8 Commitment to Ethics, Sustainability, and Social Responsibility

SISQUAL® WFM takes its commitment to **ethics, responsible conduct, social responsibility, and sustainability** very seriously, recognising before all its employees and other stakeholders that these are **fundamental pillars of its organisational identity**.

In this regard, SISQUAL® WFM is committed to ensuring that **issues related to ethics, compliance and sustainability are treated with impartiality, rigour and transparency**, in direct coordination with the Board of Directors and the areas responsible for their implementation.

Among the responsibilities assumed by the organisation, the following stand out:

- **Monitoring and ensuring the correct interpretation and application of** the SISQUAL® WFM **compliance system**;
- **Preventing, identifying and addressing behaviour that violates this Code**, other codes adopted by the organisation or the regulations that complement them;
- **Receiving and analysing reports of violations** of the rules and principles defined by SISQUAL® WFM, ensuring the appropriate and fair handling of each situation.

SISQUAL® WFM provides the email address **dpo@sisqual.com** as the official channel for:

- Request clarification on specific situations;
- Report irregularities that may violate this Code;
- Share suggestions or proposals for improvement.

The organisation undertakes to **treat all information received as confidential**, ensuring the **anonymity of whistleblowers** and ensuring that all communications are treated with seriousness, respect and impartiality.



9 Disclosure

This Code of Ethics and Conduct is **publicly disclosed on the official SISQUAL® WFM website**:

https://www.sisqualwfm.com/pt-pt/

In addition, **each employee is individually informed** through the supplementary document entitled **"PL 014 - Code of Ethics and Conduct"**, for **internal use**, which must be **signed** by each employee, **attesting to their personal commitment to comply with the principles and standards established herein**.

Approved by SISQUAL® WFM on the 2nd of October 2025

Effective as of 2nd of October 2025.



10 Appendix

This Code, entitled **"PL 014 – Code of Ethics and Conduct"**, is a document for **internal use**, made available individually to all SISQUAL® WFM employees. Each employee must **sign the document**, formalising their **personal commitment to comply with the principles and rules set forth herein**.

This Code provides **clear and detailed guidance** on the topics covered, organised into the following chapters:

I. Prevention of Harassment

(In accordance with **Law No. 73/2017, of 16 August**)

II. General Protection Regime for Whistleblowers

(In accordance with **Law No. 93/2021, of 20 December**)

III. Duties and Rights of Workers

- **Chapter I** – Gifts, Offers and Invitations
- **Chapter II** – Transaction of Values
- **Chapter III** – Transactions with Private Individuals
- **Chapter IV** – Interpersonal Relations and Harassment
- **Chapter V** – Procedures
- **Chapter VI** – Consequences and Sanctions
- **Chapter VII** – Disclosure



CERTIFICAÇÃO apcer QUALIDADE ISO 9001

CERTIFICAÇÃO apcer ISO/IEC 20000-1

CERTIFICAÇÃO apcer ISO/IEC 27001

CONFORMIDADE apcer ISO/IEC 27018

CERTIFICAÇÃO apcer ISO/IEC 27701

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