



Ethics and loyalty.

CODE OF CONDUCT

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1. CEO message

We present our company's Code of Conduct with great satisfaction.

In the society we live in, it is paramount for the company to have in mind that the relationships we establish - both internally, among company's members, and externally, with our clients and suppliers - should be led by principles of respect, equity and ethics. It is our wish that SDT affirms itself, in the present and in the future, as an example of relationship development. We want those relationships to be healthy and protective of the differences between people.

Through the current document, we enunciate a set of principles which we want to follow and respect. Our final aim is for each and all of us to become good examples for society and for future generations.

Therefore, I would appreciate your cooperation in reading this Code. We will mind your improvement suggestions, as well as any other matter you would like to share with the company's management team.

2. The Code

a. What is it?

Our code of conduct aims at demonstrating our positioning before society by presenting our principles and responsibilities.

Through our code we intend to indicate what we expect from the business and from the people, communicating better ways to interact in accordance with the law and regulations.

b. To whom does it apply?

The Code of Conduct applies to all staff members, managers, directors and the Administrative Board of the SDT Group.

3. The four principles of the Code of Conduct

SDT has four principles as operational pillars to ensure added value to partners and clients. Those principles are:

a. Integrity

Staff members are governed by criteria of personal honesty and integrity of character. Honesty and uprightness in fulfilling the undertaken commitments, with coherence between speech and practice, rejecting any form of fraud or corruption, taking an active stance in face of situations which do not comply with the existing ethical principles.

b. Professionalism

Staff's professional performance shows integrity, responsibility, dedication and is based on social values, loyalty and mutual respect. It is committed to the search for operational excellence and to development.

c. Transparency

SDT presents the guiding criteria for the company's decisions and actions through a clear, precise, agile and accessible communication, while ensuring the right to confidentiality and secrecy with respect to SDT's privileged or strategic information.

d. Compliance

All actions performed by staff members should comply with the established procedures, the law and the current Code of Conduct. Staff members should seek to be familiarised with the rules and ask for support whenever necessary.

4. Your responsibilities and how to act

a. Staff Members

- i. Get to know the Code: read, understand e follow the Code of Conduct;

- ii. Act with common sense: decide and act in a manner that is coherent with SDT values and the Code of Conduct;
- iii. Enquire: if you know of possible non-compliances with the Code, the law or regulations, or if you have doubts, ask;
- iv. Get informed: take part in any training sessions given by SDT on subjects such as security, the procedures and the code;
- v. Notify: if you know of any possible non-compliance, you should report it and cooperate in the investigation or audit.

b. Hierarchical superiors

- i. Explain: Enlighten your team members about the code, the procedures and your expectations;
- ii. Be an example: make your decisions and act according to the principles of the current code, motivating and helping the team to do the same;
- iii. Inclusive environment: build and promote an environment of respect, openness, and transparency, and encourage communication;
- iv. Listen and act: listen and clarify any question that is posed to you.

c. Ask for Guidance

The Code of Conduct provides guidelines. Nonetheless, it does not give definite answers to all the questions. In case you have questions about the contents of the Code of Conduct, you should ask for support to your immediate superior or to other management members.

Whenever a Hierarchical Superior faces a possible non-compliance, he or she should listen carefully and ask for clarifications if necessary. He or she should answer whenever possible, trying not to be hasty; and, if necessary, should seek help.

d. Report a non-compliance

In face of unethical or harmful situations, we all have the duty to report them to a hierarchical superior.

In case you notice non-compliance situations with the Code of Conduct, you should report them. All non-compliance situations will be dealt with respecting confidentiality and, if requested, anonymously.

You can use as means of communication:

- Your Hierarchical Superior
- The Managers
- The Managing Director

The hierarchical superiors, the managers or the directors will also be responsible for communicating the handling status of the occurrence and its conclusions, as well as for ensuring the confidentiality of the process.

e. Without reprisals

The staff members who report non-compliance situations in good faith and with honesty will not suffer any kind of disciplinary action or retaliation by the company.

Any kind of reprisal by co-workers is considered to be a non-compliance with the Code of Conduct.

f. False accusations

All staff members should ensure they are behaving with integrity towards their co-workers, the company, the commercial partners and the community in general. Thus, SDT will protect all staff members who honestly report any non-compliance situation. But in case the staff member knows in advance he/she is presenting a false accusation, that behaviour is considered to be a violation of the Code.

5. Conduct principles amongst co-workers

a. Respect each other

All staff members should take the initiative of demonstrating tolerance and respect towards their co-workers, ensuring a good work environment. They should distance themselves from any situation that can be considered disrespectful, discriminatory, intimidating, offensive, violent or involving harassment.

Harassment can be either moral or sexual, always referring to an unwanted behaviour (gesture, word, attitude, etc.) which occurs systematically or with some degree of repetition and which involves some form of taking advantage or which intends to affect the person's dignity and/or to create an intimidating, hostile, degrading, humiliating or destabilising environment.

Examples of actions and behaviours prone to be defined as moral or sexual harassment in the workplace:

- Promoting the social isolation of co-workers or subordinates;
- Systematically making fun, directly or indirectly, of a physical or psychological characteristic of co-workers or subordinates;
- Frequently threatening with dismissal;
- Systematically repeating suggestive remarks, jokes or comments about the appearance or sexual condition;
- Promoting intentional and unsolicited or excessive physical contact, or instigating unnecessary physical approaches;
- Inviting or asking for sexual favours associated to the promise of obtaining a job position or improving work conditions.

In case you believe you were intimidated or harassed by a person during your working hours at SDT, we advise you to report it to your immediate superior. A prompt investigation of the situation should follow, to assess the facts and to take adequate measures.

b. Equity

Equity consists in treating others as we would like to be treated.

This requires impartiality, intellectual honesty and informing of any conflict of interest. It also involves self-control of our own feelings, prejudices and desires in order to achieve a proper balance with the interests.

We should seek to establish a work environment where everyone is acknowledged and rewarded for their actions and efforts. If you have to recruit or manage someone, your decisions on recruitment, reward, benefits and performance promotions should

be based on the competencies and the company's needs. Do not make any decisions based on gender, race, ethnicity, religion, age, medical condition or pregnancy.

c. Diversity and inclusion

Discrimination or harassment on the grounds of race, colour, religion, nationality, descent, pregnancy, sex, age, marital status, mental or physical disability, medical condition and sexual orientation is strictly forbidden.

At SDT, hiring procedures are solely based on individual merit and on the qualifications related to professional competency.

While establishing commercial relationships with various countries, we must be especially careful regarding the culture, codes and laws of each country.

d. Wellbeing and safety

Staff's wellbeing and safety is paramount for SDT, ensuring sustainable productivity levels and the quality of the services provided.

All staff members are annually informed of the strategic goals in order to keep a good work-life balance, therefore contributing to successful services.

e. Labour Rights and Human Rights

SDT is very much engaged in supporting and respecting human rights. In our commercial relationships we seek i) to ensure the non-use of child labour or forced labour and to condemn such practices by third parties, ii) to respect all the laws and regulations, iii) to ensure good work conditions and iv) to promote fair payment and training for the staff members.

All SDT's staff members commit themselves to work in compliance with the human rights and the labour principles and rights.

6. Conduct at SDT

a. Expenses

Staff members should be reasonable when incurring expenses on behalf of the company. The submission of the expenses for reimbursement must be done according to the procedures established in the SGQ. Those reported expenses should be directly related to SDT business.

If you have doubts on whether to incur an expense or about submitting it for reimbursement, you should ask your superior for clarification.

b. Protection of SDT's assets

SDT's assets should not be used by staff members for personal benefit. Staff members should behave in a manner that protects the assets.

All data produced and kept in SDT equipment and information systems, namely in SDT's electronic equipment and email accounts, are considered to be an asset of the company and its exclusive property. Every staff member should be aware that SDT can access or analyse them at any given moment, in compliance with the principles, rights and individual guarantees established by the law and the applicable regulations. Internet and telephone access, as well as the use of e-mails, software, hardware, equipment and other SDT assets should be restricted to the professional activity of the staff member.

Stealing or inappropriately using SDT equipment can lead to sanctions.

Assets of the company:

- Computer systems and software;
- Telephones and other wireless communication devices;
- Copying machines;
- Vehicles;
- Hours of work;
- The outcome of any work done at SDT;
- Confidential information;
- Brands registered by SDT.

c. Information management and Contracts

Each person should ensure the maintenance, with SDT clients and partners, of the commercial and financial data of the contracts. A proper maintenance of the archives and reports grants SDT greater credibility and good repute. A correct maintenance includes not only financial information but also non-financial data, such as:

- Quality reports;
- Sales/activity reports;
- Expenditure archive;
- Among others.

The rules apply to all SDT staff members and not only to the financial or commercial areas of the company.

Staff members should display precision in the information they prepare. In case of mistakes, staff is encouraged to correct them promptly.

d. Brands and Copyrights

SDT name and the logo or names of products and services (registered/commercial brands) are identity of the company.

All marketing and advertising materials should convey honest and truthful messages, presenting reality in a clear and enlightening way.

Staff members cannot use or copy in the company any software, music, videos or other registered contents. Also, they cannot use or store copies of illegal materials in SDT's devices.

e. Confidential Information

Confidentiality consists in information which is only available for people who are authorised to access the data.

Confidential information is any information or data related to SDT's and its clients' commercial activity, namely but not exclusively, referring to projects, technology used, know-how, performance, organisation, production or service providing methods, business model, property, names of clients, business deals, inventions, ideas, concepts, techniques, designs, specifications, brands and models, computer

programmes, marketing plans and strategy and any other technical, financial, commercial or intellectual property information, regardless of whether the access has been obtained in writing or orally, through a tangible or intangible means, and/or disclosed directly or indirectly by the company, by any staff member, agent or auxiliary, or third party.

This information must follow the data protection and privacy regulation according to the procedures established by the company.

Example of confidential information:

- Data reflecting the relationship with business partners, such as purchasing prices and margins associated with the sale of the equipment to clients.

Example of misconduct:

- Exposing information of a specific business deal to external entities.

f. Insider Trading

Obtaining shares or securities through information gathered internally or passing information to external entities which allows transactions is illegal and punishable.

Example of misconduct:

- Notifying an external entity about the possibility of share acquisition through information you have obtained internally.

g. Behaviour

During work, staff members should abstain from consuming illegal drugs or an excessive amount of alcohol. Whenever the staff member exhibits poor conduct while representing SDT or using its assets, he or she is subject to a disciplinary process.

They should also avoid using social websites during working hours, except for those job positions which require such use.

7. Conduct towards Business Partners

a. Suppliers and Service Providers

Commercial relationships with suppliers are essential for SDT and they need to be preserved and constantly stimulated. All suppliers should be treated equally and fairly: providing the same treatment for the same circumstances, acting with loyalty and respect, and ensuring the commitment to the predetermined agreements.

There should be no privileges or bias. The principle of equity must be respected when dealing with several suppliers or service providers. All staff needs to exhibit loyalty, ensure impartiality and transparency, and not to give in to conflicts of interest.

All staff members should ensure good communication channels with the suppliers or service providers. They should provide adequate information and keep the confidentiality of sensitive information. Whenever required, the staff member needs to present to his/her superiors the selection criteria used.

Example of misconduct:

- During a selection process, the staff member gives access to information of another bidder, therefore allowing the partner to carry out adjustments on the previously presented proposal.

b. Clients

SDT's mission is adding value to our clients' business. Thus, SDT staff members' goal is to provide the best solutions according to the clients' requests.

Staff members need to show integrity, to create value in the information provided, in a clear, precise and accessible way, always responding to the client's needs within the established deadlines.

All staff members should ensure client satisfaction in the process of meeting their needs, avoiding any non-conformities or gaps in the services provided.

c. Public Administration

Some of our business deals require interaction with public bodies. The methodologies for responding to public bodies are different from the negotiation with private entities since the former demands following predetermined rules.

Just as with any private entity, bribery is forbidden and one cannot offer gifts intending to obtain privileged treatment.

Public bodies often publish their calls for tender through platforms. It is always necessary to check the predetermined requirements before bidding any business deals to public bodies, hence ensuring compliance with all requisites.

d. Gifts, Meals and Entertainment

You must not accept gifts, meals, entertainment events or any other favour which could undermine your decision-making judgement in projects regarding suppliers, service providers or clients.

Any monetary reward must be rejected, regardless of the amount of money.

Only modest gifts are acceptable, such as t-shirts, pins with logos, small gift baskets on festive seasons, among others, or symbolic gifts such as trophies with business inscriptions.

In case you are invited for an event that involves additional money, such as the Olympic Games or the World Cup, you should speak to your immediate superior to check if the business ratio justifies your presence.

e. Bribery and Corruption

All staff members should ensure optimum treatment to all our clients, suppliers and public bodies, behaving with transparency and according to anti-corruption international standards.

It is strictly forbidden to offer or accept bribery or commissions in any form that interferes with company business.

f. Conflict of Interest

All staff members should refrain from developing personal business deals which may interfere with SDT's business deals. This applies to buying products, sales, investments, hiring and Human Resources' or suppliers' selection or any other business relationships.

g. Competition

All commercial relationships should be built fairly, operating with respect for all competitors.

Staff members cannot establish contact with competitors regarding prices, policy, connections, marketing plans, stocks or costs, nor share internal information or intentions, or agree on any sales splitting.

Staff members are encouraged to gather information concerning competition, but always legally and fairly. This information gathering can be done through public data, through asking to or accepting it from third parties, as long as that third party is not under contractual or legal non-disclosure obligation.

8. Conduct towards Community

a. Environment

SDT promotes conscious environment preservation practices by monitoring all operations, carrying out a sustainable management of natural resources and an actual protection of the environment, ensuring a sustainable economic growth for all society. Operations should make sure to adopt measures for environmental protection and to comply with the local and European environmental legislation.

b. Community

SDT together with its staff members seeks to have an active role in community development and encourages social activities or charity support.

Any charity donation involving SDT's assets needs to be previously approved by SDT's Administration.