

# CODE<sub>OF</sub> CONDUCT

RESPOL GROUP, S.A.

[www.respol.pt](http://www.respol.pt)

 **RESPOL** GROUP  
SGPS, S.A.



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**RESPOL** GROUP  
SGPS, S.A.



# 1 INTRODUCTION

Respol Resinas, SA (“Respol”) is dedicated to conducting business in an ethical, responsible, and sustainable way, maintaining our reputation as a profitable, reliable, and efficient producer of rosin derivatives.

This Code of Conduct has been approved by the Chairman of the Board of Respol on 16.12.2020. The Code of Conduct applies within the entire Respol organisation and to all our employees and business activities. We expect and encourage our suppliers and other business partners to follow a similar code of conduct and to abide by similar ethical principles.



# RESPECT FOR THE PRINCIPLES OF ETHICS AND SUSTAINABILITY



# RESPECT FOR HUMAN RIGHTS

## 2 COMPLIANCE WITH LAWS AND RESPECT FOR HUMAN RIGHTS

### **2.1 Compliance with laws and regulations**

We are committed to complying with all applicable national and international laws and regulations. We do not conduct transactions with individuals, organizations, or countries subject to restriction, sanctions, or embargoes. We follow closely any changes in applicable laws and regulations.

### **2.2 Human rights and discrimination**

Respol respects and is fully committed to internationally acknowledged human rights. We provide appropriate working conditions in accordance with applicable laws and regulations. Respol shall in its operations avoid any kind of discrimination based on race, colour, age, gender, sexual orientation, nationality, ethnicity, language, disability, pregnancy, religion, political opinion, or any other characteristic. Any kind of harassment within the work environment will not be tolerated. We will not employ compulsory labour or child labour. We do not, under any circumstances, contract with parties using such labour.



# 3

## CONFLICTS OF INTEREST, ANTI-BRIBERY AND ANTI-MONEY LAUNDERING

### 3.1 Conflicts of interest

Respol employees work on the company's behalf. Respol employees shall avoid situations with a conflict of interest as well as situations giving the appearance of a possible conflict of interest. Respol employees may not seek to gain personal benefit by taking advantage of their position or the company's property.

### 3.2 Anti-bribery

Bribery in all possible forms is prohibited. It is prohibited to offer or accept any kind of bribe or other financial benefit that could wrongly affect the course of business. It is prohibited to offer or accept hospitalities, entertainment or gifts that exceed 100 € (one hundred euros).

### 3.3 Anti-money laundering

Respol closely follows its financial transactions and maintains appropriate protocols to prevent money laundering and fraud in all forms.

### 3.4 Fair Competition

Respol Resinas avoids deals or actions that illegally will restrain trade, restrict competition, or violate antitrust and competition laws.

### 3.5 Confidentiality and Information Protection

We protect confidential business information from misuse, theft or improper disclosure and we do not support or engage with inside trading. Our business record system complies with laws and directives relating to protection, transfer, access, and storage of personal and trade information.



# TRANSPARENCY AND PROTECTION OF THE COMMON GOOD





# SAFETY AND LIBERTY

## 4 EMPLOYEES AND SAFETY

### **4.1 Terms of employment**

We follow local applicable labour laws and regulations, including those relating to minimum salaries, overtime hours and legally mandated benefits. Respol has a remuneration policy that supports the implementation of the goals set by the company strategy as well as its long-term results.

### **4.2 Freedom of association**

Respol respects the right of all its employees to be represented collectively, to establish or join trade unions and other representative organisations. Respol encourages and offers its employees the possibility to openly communicate with the management of the company regarding employment related issues.

### **4.3 Working safety**

We maintain a safe and healthy working environment for all our employees. Our production facilities and products comply with legal safety standard requirements, reliable and safe for the user. Good structural safety solutions can be found on our working premises. We provide appropriate protective equipment and safety training for our employees as circumstances may require.



# 5

## ENVIRONMENT

In all our endeavours, we develop our operations in a way that takes into account the environmental principles of sustainable development. The company, and each employee, is responsible for the environment. We pay attention to, and aim to continuously reduce, the environmental impact of the company's operations. The integrated management and operating systems implemented by Respol comply with the environmental ISO 14001 standard. We comply with all laws and regulations concerning environmental protection.

We obtain and keep current all required environmental permits and registrations and follow the standards set forth in such permits and registrations.

May, 14<sup>th</sup>, 2021

# ENVIRONMENT PROTECTION