# CODE OF CONDUCT

RESPOL GROUP




RESPOL GROUP
SGPS, S.A.

www.respol.pt

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RESPOL GROUP SGPS, S.A.

# 1 INTRODUCTION

The mission of Respol Resinas, SA (hereinafter Respol) is to create value for its customers, suppliers and employees, operating in the markets in which it is present with ambition, innovation and competitiveness, while promoting, first and foremost, respect for the principles of ethics and sustainability.

The Code of Conduct applies throughout the entire Respol organisation, including its employees and business partners, and aims, among other things, to encourage them to follow and respect similar ethical principles.





# RESPECT FOR HUMAN RIGHTS

# 2 COMPLIANCE WITH LAWS AND RESPECT FOR HUMAN RIGHTS

## 2.1 Compliance with laws and regulations

Respol is committed to complying fully with national and international legislation, closely monitoring any and all legislative changes.

Accordingly, it does not carry out business transactions with individuals, organisations or countries subject to restrictions, sanctions or embargoes, or that for any reason fail to comply with the provisions of the legislation in force.

## 2.2 Human rights and discrimination

Respol fully respects internationally recognised human rights, ensuring adequate working conditions in accordance with the legislation in force.

In its operations, Respol will not engage in any form of discrimination based on race, colour, age, sex, sexual orientation, nationality, ethnicity, language, disability, pregnancy, religion, political opinion or any other characteristic, and does not tolerate any form of workplace harassment.

Furthermore, it does not use forced or child labour, nor does it under any circumstances contract with third parties that do not comply with this principle.

# 3 DEALING WITH CONFLICTS OF INTEREST, MONEY LAUNDERING AND CORRUPTION

**3.1 Conflict of interest**

Respol employees perform their work on behalf of the company and must avoid situations of conflict of interest with third parties.

Respol employees may not, by virtue of the position or role they hold, obtain for themselves or for third parties any personal benefits contrary to the interests of Respol.

**3.2 Anti-corruption**

Respol has a zero-tolerance policy towards corruption and related offences.

All Employees must comply with the Anti-Corruption Policy approved by RESPOL, which sets out the principles of conduct and the duties of loyalty, integrity and transparency applicable to relations with public and private entities, whether suppliers, customers or third parties, establishing rules of conduct that safeguard against potential conflicts of interest and prevent any unlawful conduct that may amount to acts of corruption or related offences.

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**3.3 Combating Money laundering**

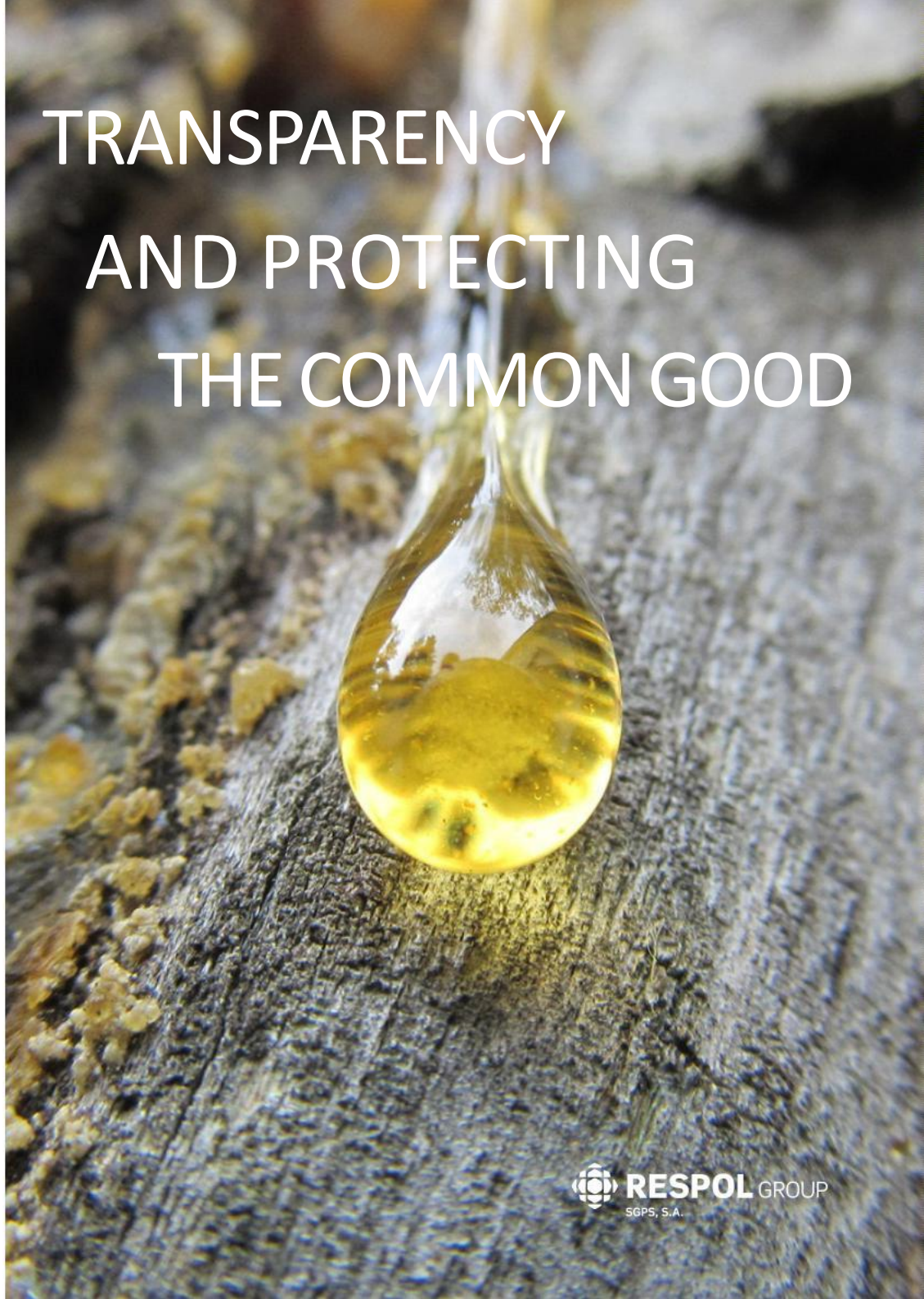
Respol closely monitors its financial operations and maintains appropriate protocols to prevent fraud and money laundering.

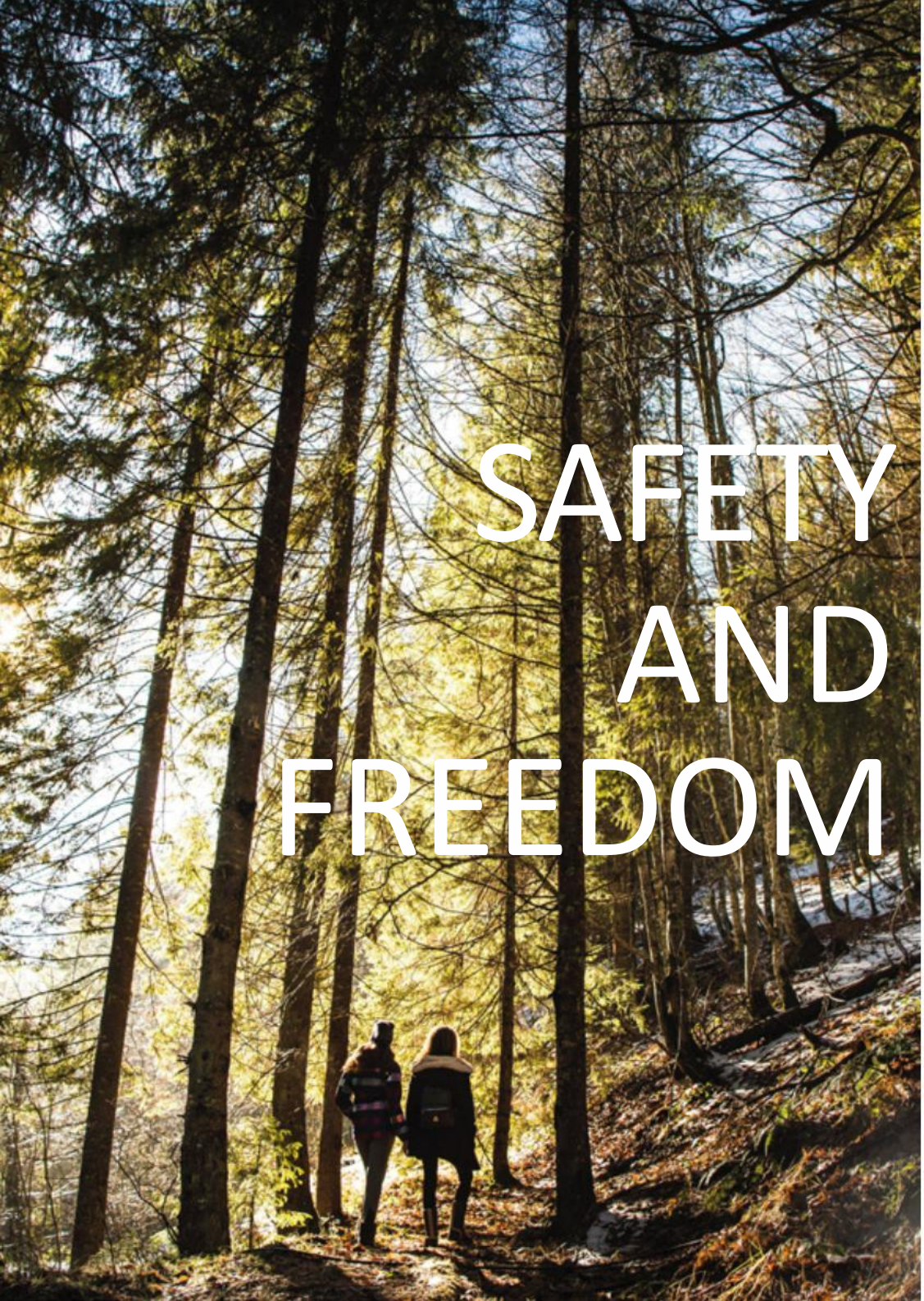
**3.4 Fair Competition**

Respol Resinas does not enter into agreements or take actions that may unlawfully restrict or condition trade or competition, or that breach the rules on competitive practices.

**3.5 Confidentiality and Protection of Information**

We protect confidential information in order to prevent its improper disclosure. Our business records system complies with the laws and directives on the protection of personal and commercial information.






# 4 EMPLOYEES AND SAFETY

## 4.1 Terms of employment

Respol fully complies with the labour legislation in force, namely with regard to minimum wages, overtime and legally required benefits.

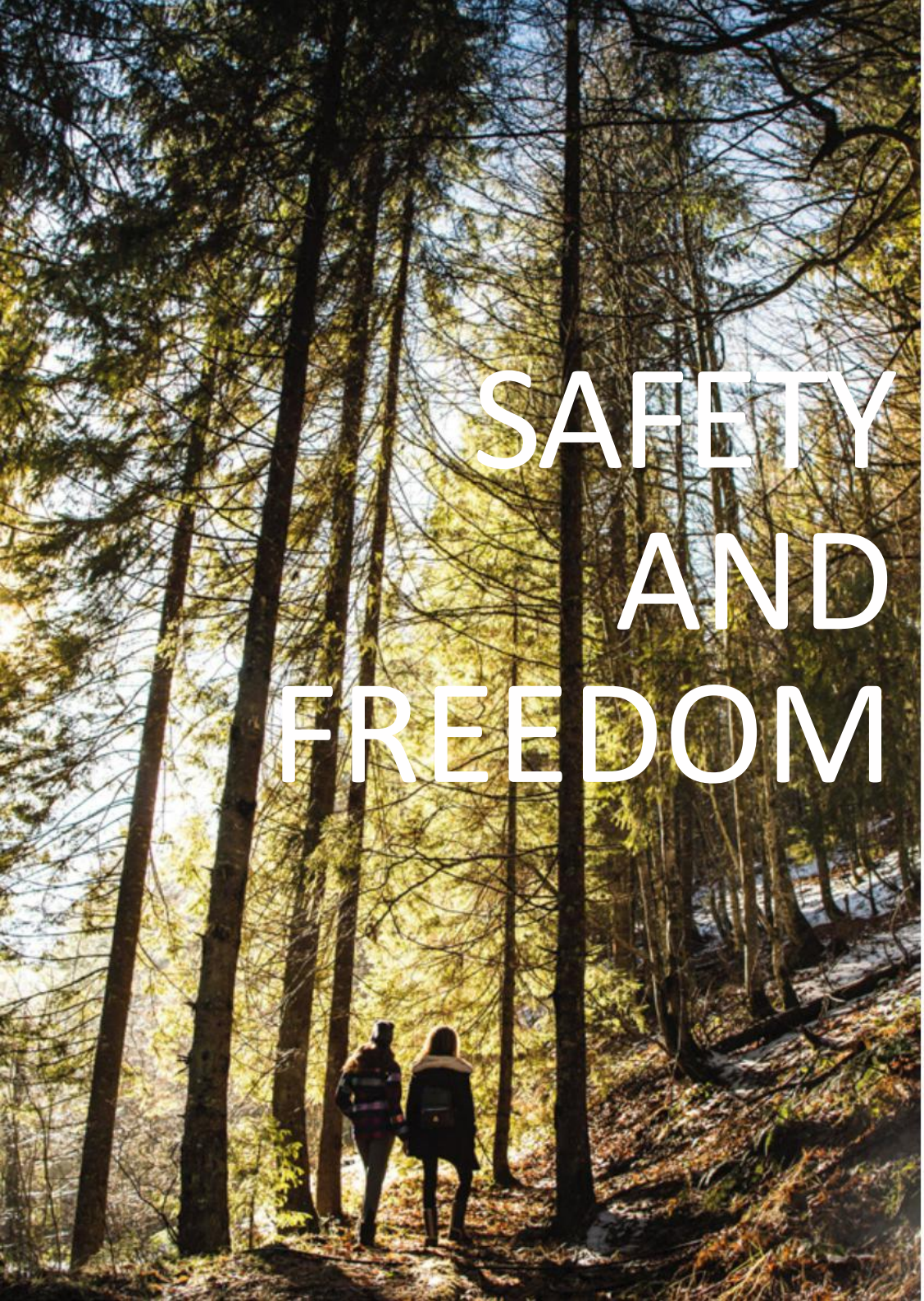
Respol has a remuneration policy that supports the achievement of the goals set by the company's strategy, as well as its long-term results.

## 4.2 Freedom of association

We respect the right of all employees to be collectively represented and to form or join trade unions and other representative organisations.

Respol encourages and offers its employees the opportunity to communicate openly with the company's management on employment-related matters.

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# 4 EMPLOYEES AND SAFETY

## 4.3 Occupational safety

We maintain a safe and healthy working environment for all our employees. Our industrial facilities, as well as our products, fully comply with legal safety requirements. Respol provides appropriate protective equipment and regularly delivers safety training to its employees.

## 4.5 Workplace Harassment

We do not tolerate any conduct that may constitute harassment inside or outside the workplace, namely sexual harassment or harassment of a sexual nature; discriminatory moral harassment, in which the unwanted and hostile behaviour is based on a discriminatory factor; and non-discriminatory moral harassment, in which the unwanted behaviour is not based on a discriminatory factor but, by its nature and insidiousness, has the same effects and is aimed at driving an employee out of the Company.

Harassment is not only just cause for disciplinary proceedings, but also constitutes a serious administrative offence, without prejudice to any criminal liability, and the victim is also entitled to compensation for pecuniary and non-pecuniary damage.

# 5 ENVIRONMENT

Respol strives to carry out its operations in line with environmental and sustainability principles, with the aim of continuously reducing its environmental impact. The company, and every employee, is responsible for the environment. The integrated management and operating systems implemented by Respol comply with the ISO 14001 environmental standard, ensuring full compliance with environmental protection legislation. We currently hold and maintain all necessary environmental permits and registrations and follow the rules set out in those permits and registrations.



# 6 Whistleblowing Policy

Employees must report possible breaches of this Code, as well as suspected offences. Reports must be made through the whistleblowing channel provided by Respol at the following link, with protection against retaliation and confidentiality of the report guaranteed:

https://respol.whistlelink.com

When a report is made, Respol ensures:

i. Confidentiality with regard to the report submitted;
ii. Compliance with Law no. 93/2021 of 20 December, which approves the General Regime for the Protection of Whistleblowers;
iii. Analysis of the report and the initiation of disciplinary proceedings whenever justified and where there is proven knowledge of alleged non-compliance;
iv. Protection of the whistleblower and witnesses against any retaliation or reprisal following the report.



# 7 NON-COMPLIANCE

Each employee is responsible for knowing and complying with the rules set out in this Code.

Any behaviour that breaches the rules set out in this Code may have serious adverse consequences for Respol, including reputational damage.

Such behaviour will result in any and all corrective actions deemed appropriate, as well as the disciplinary actions applicable to such offences under the legislation in force, and must therefore be promptly reported by any employees who become aware of it.



# 7 NON-COMPLIANCE

## DISCIPLINARY SANCTIONS

Any employee who breaches this Code of Conduct or Respol's Policies may incur:

- Criminal liability, under general terms, where the conduct constitutes an offence defined by law
- Civil liability, under the generally applicable legal terms
- Disciplinary liability, which may include dismissal for just cause, provided that the respective legal requirements are met.

Under the legal terms in force, in the exercise of its disciplinary powers, Respol may apply the following sanctions:

- Reprimand
- Registered reprimand
- Financial penalty
- Loss of holiday days
- Suspension from work with loss of pay and seniority
- Dismissal for just cause (dismissal without entitlement to severance or compensation).

The disciplinary sanction may be aggravated by its disclosure within the company.



# 7 NON-COMPLIANCE

### Criminal sanctions

Failure to comply with the rules set out in this Code may constitute criminal offences, punishable under the terms set out in **Annex I** to the Code of Conduct. Reading and knowledge of this annex are also mandatory for all Employees.



# 8 APPROVAL AND REVIEW

The approval of this Code is the responsibility of the highest management bodies of Respol.

Respol is responsible for updating and disseminating this Code.

This Code of Conduct must be reviewed in accordance with the rules set out in the Internal Control Procedures and Mechanisms Manual.

Leiria,
October, 2025

