



Corporate Responsibility Policy of the Celoplás Group

Third Party Code of Conduct



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PREAMBLE

The Celoplás Group is committed to defending internationally known human rights and social standards. The content of this Code of Conduct also fully applies to suppliers and other third parties used by our business partners to fulfil any contracts with the Celoplás Group.

The Code is intended to help us recognize and deal with ethical issues, prevent wrongdoing, provide mechanisms for reporting any concerns, promote honest and ethical conduct, provide full, accurate and timely disclosures in Company reports and communications, comply with laws, applicable state rules and regulations and foster a culture of honesty and accountability.

No code or policy can anticipate every situation that may arise. This Code is intended to serve as a guide in making ethical decisions that are not always easy. In complex situations, we should take the time to carefully consider our options.

THE CELOPLÁS GROUP'S CORPORATE AND SOCIAL RESPONSIBILITY POLICY considers the impact of its activities on the environment, society, and economy. This corporate responsibility policy applies to all operations carried out within the Celoplás group. It also defines how internal and external relations between its employees and between them and customers, suppliers and other interested parties are expected. The Celoplás Group's corporate responsibility is based on conformity to comply with legal requirements and other values, and on proactivity through initiatives to promote human rights, contribute to society and protect the environment.

In these perspectives, the Celoplás Group undertakes to:

- Comply with and respect the laws; honour its internal policies; ensure that all business operations are legitimate; keep all commercial or collaborative partnerships open and transparent; safe and fair dealings; develop sustainable businesses and ideas; respect for the customer; comply with anti-bribery and anti-corruption practices and operate in accordance with the 10 corporate citizenship principles emanating from the United Nations;
- Protect the environment by implementing the best environmental practices such as recycling, selective waste collection, water and energy savings, and the use of environmentally friendly technologies to reduce carbon footprint;
- Protect people and human rights; guarantee health and safety conditions for its employees and society; develop local partnerships; support diversity and inclusion; ensure gender equality; ensure that its activities do not directly or indirectly violate human rights in any country (e.g., slave labour);

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- Support, whenever possible, social solidarity institutions and other social causes; support and invest in education programs;
- Support its Research and Development, valuing its employees' ideas to improve and maximize the potential of the organisation.

The Celoplás Group develops its activity in accordance with other policies that define its commitment to quality, environment, and innovation, as well as codes of conduct, namely for preventing and combating harassment at work and corruption, preparing support manuals for employees aligned with vectors and strategic objectives.

THE TEN PRINCIPLES OF CORPORATE CITIZENSHIP EMANATED FROM THE UNITED NATIONS

The Celoplás Group intends to apply and respect the Ten UN Principles of corporate citizenship:

1. Support and respect the protection of internationally proclaimed human rights.
2. Guarantee its non-participation in human rights violations.
3. Support the freedom of association and the effective recognition of the right to collective bargaining.
4. The elimination of all forms of forced and compulsory labour.
5. Abolish child labour.
6. The elimination of discrimination in respect of employment.
7. Support a precautionary approach to environmental challenges.
8. Carry out initiatives to promote environmental responsibility.
9. Encourage the development and diffusion of environmentally friendly technologies.
10. Work against corruption in all its forms, including extortion and bribery.

CONFLICTS OF INTEREST

The Celoplás Group respects the principle of legality and expects the same from its partners. We have a duty to act solely in the best interests of the Company and to offer the Company our individual loyalty. We avoid conflicts of interest and never use our position or company assets for personal gain. A “conflict of interest” occurs when our individual personal interests interfere, or appear to interfere, in any way with the interests of the Company. We all must act with integrity and avoid any relationship or activity that could impair our ability to make objective and correct decisions in fulfilling our professional responsibilities.

A business partner who becomes aware of a potential conflict of interest must take internal measures to remedy these conflicts and notify the Celoplás Group.

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COMBATING BRIBERY AND CORRUPTION

At the Celoplás Group there is zero tolerance for any situation of bribery or corruption, encouraging respect and clarity in relationships with customers, suppliers, partners, other entities or between employees. Our business partners must commit to complying with anti-corruption laws.

TRADING WITH INSIDER INFORMATION

A person who has access to material, non-public information about the Company, a customer, a competitor, a supplier, or another third party (“inside information”) is not authorized to use or share such information for trading purposes (“Insider Trading”) or for any purpose other than conducting the Company's business until such Insider Trading is made publicly available. Insider trading includes disclosing such information to others to buy or sell securities based on it (“advice”). Examples of inside information include, among others: potential mergers, acquisitions or divestitures, financial forecasts and results, new products or services, changes in board of directors, changes in senior management, winning or losing significant contracts and internal financial information.

FAIR WORKING CONDITIONS

The Celoplás group is committed to maintaining a work environment that promotes individual dignity and mutual respect. A respectful workplace requires collaboration and support from all employees. We must comply with all applicable labour and human rights laws and regulations.

Our business partners are committed to enforcing the right to fair working conditions in accordance with applicable ILO (International Labour Organisation) conventions. This includes fair wages and social benefits equal to or above rates prescribed by national or regional authorities, legal standards, or other collective agreements. The legal provisions on minimum wages in the respective countries must be observed together with the applicable regulations on working hours, breaks and holiday entitlement.

GLOBAL DIVERSITY AND INCLUSION

We seek to foster a diverse and inclusive work environment. We believe that diversity of opinion and ideas makes us a stronger organisation to encourage the innovative and creative solutions we provide to our clients. Our policy reflects the Celoplás group's commitment to protecting the employment rights of qualified applicants and collaborators, regardless of race, colour, age, marital status, ex-combatant status, religion, nationality, genetic information, sexual orientation, gender, gender identity/expression, disability, pregnancy and/or other personal categories protected by applicable law. The Celoplás Group provides equal opportunities based on

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skills and abilities, striving to create a workforce that reflects the diversity of the communities in which we operate. Any type of discrimination or harassment will not be tolerated.

OCCUPATIONAL HEALTH AND SAFETY

We strive to ensure a safe and secure workplace and working conditions that promote the health and well-being of all our employees. We apply a zero-tolerance policy towards violence in the workplace. It is mandatory to immediately report incidents of violence, threats, harassment, or intimidation. If you have concerns about your immediate safety or the safety of others, contact local authorities before reporting the situation internally. Our commitment to maintaining a safe workplace requires that everyone maintains the highest safety standards. We are responsible for paying close attention to our surroundings, complying with all safety rules and procedures, and reporting any unsafe conditions or work-related illnesses or injuries.

Accordingly, our business partners must comply with national workplace safety and hygiene standards and take appropriate steps to meet occupational health and safety requirements to ensure healthy working conditions.

COMBATING TRAFFICKING IN HUMAN BEINGS AND SLAVERY

The Celoplás Group applies a zero-tolerance policy to human traffic. This includes, among others, the following trafficking-related activities:

- Involvement in any form of trafficking in human beings in which the movement of any person is arranged or facilitated for the purpose of exploitation;
- Acquisition of commercial sexual services in the performance of any work;
- Use of forced labour in the performance of any work or coercion of any person to perform work or activities under threat of punishment;
- Destruction, concealment, confiscation or any other form of denial of access by an employee to his or her identity or emigration documents, such as passports or driving licenses, regardless of the issuing authority;
- Use of deceptive or fraudulent practices when recruiting candidates/employees or when offering employment;
- Hire recruiters who do not comply with labour legislation;
- Collecting recruitment fees to tenderers/candidates/employees;
- If required by law or contracts, failure to provide a work contract, recruitment agreement or other required written employment document and in a language the employee understands.

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The Celoplás Group does not and will not allow its partners to engage in any form of human trafficking and in the activities listed above. The Celoplás group prohibits retaliation against anyone who files a complaint or reports a suspected violation of this policy. Any suspected violation must be immediately communicated through the Reporting Channel.

PREVENTION AND COMBATING WORKPLACE HARASSMENT

The Celoplás Group encourages respect and cooperation among all, in a respectful and dignified work environment, whereby any practices of harassment are not tolerated or admissible.

Moral and sexual harassment is prohibited. Harassment is an unwanted behaviour (gesture, word, attitude) namely based on some discriminatory factor (e.g., gender, nationality, disability, etc.) and practiced with some degree of repetition with the aim or effect of affecting the person's dignity or creating an intimidating, hostile, degrading, humiliating or disruptive environment. The reports of harassment episodes in the workplace must be carried out through the Reporting Channel.

EQUALITY AD NON-DISCRIMINATION

The Celoplás Group repudiates any form of discrimination in hiring, remuneration, access to training, promotion, termination of contract or retirement, based on race, social class, nationality, religion, disability, illness, gender, age, marital status, family responsibilities, sexual orientation, union membership, or political opinion. Any interference with constitutionally protected rights, freedoms and guarantees is also considered unacceptable.

The Celoplás Group supports the right to equal opportunities and treatment in employment, training, career promotion and working conditions.

FREEDOM OF ASSOCIATION

The Celoplás Group supports freedom of association and the effective recognition of the right to collective bargaining. Furthermore, it does not accept any interference in the exercise of the right of all workers to associate and bargain collectively, nor does it accept any type of discrimination or retaliation from its legitimate representatives.

THE ELIMINATION OF ALL FORCES OR COMPULSORY LABOUR

The Celoplás Group repudiates any use of child labour, demanding that if a child is found working, that child is entitled by his or her employer to all the necessary support so that he/she can remain in school until he or she

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reaches child age. The Group repudiates when a child has not yet completed compulsory education in Portugal, he or she works within school hours, or at night, or for more than 8 hours a day, or if the sum of class, transport and work time exceeds 10 hours a day. Under no circumstances does the Group accept that children or young workers are exposed to situations that are dangerous, unsafe for their health and physical and mental development.

PRIVACY POLICY

The Celoplás Group is committed to ensuring the protection of the security of your data. To this end, several security technical and organisational measures were adopted to protect the personal data provided by its holder against loss, misuse, alteration, processing or unauthorized access, as well as against any other form of unlawful processing. In this regard also, the Celoplás Group requires its subcontractors to adopt security measures equivalent to those practiced internally. However, the Celoplás group may transmit data to third parties in cases of judicial and/or administrative proceedings, if this is duly ordered.

Each Celoplás Group company is responsible for collecting and processing personal data on its website. For any questions related to this Privacy Policy or if you wish to exercise any of your aforementioned rights, please contact the Celoplás Group at: rgpd@celoplas.pt. For more information, consult the Privacy Policy available on the company's website.

COMPLAINTS CHANNEL

The Celoplás Group has a reporting channel under Law 93/2021 (General Regime for the Protection of Whistleblowers). This channel allows any personal or collective entity related to the Celoplás Group (including customers, suppliers, employees, shareholders, and other interested parties or stakeholders) to directly and confidentially report any unlawful practice or alleged irregularity that occurred as previously presented and in the organisation in terms of: financial, accounting and auditing data; Business Integrity; Environment; Health; Food; capital Human; Use or misappropriation of corporate assets: other. Whenever possible any report must contain a detailed description of the offense, such as persons, dates, places, and other evidence.

The Celoplás Group encourages whistleblowers to provide at least one means through which they can be contacted if necessary. However, the confidentiality of the complainant is guaranteed throughout the process until such information is required to safeguard the rights of defence of those affected by the complaint, in the case of investigations or subsequent legal proceedings.

All complaints must be made and based on justifiable, verifiable reasons and in good faith. The Celoplás Group's whistleblowing channel is available at: [grupoceloplas - Inicio \(integrityline.com\)](http://grupoceloplas - Inicio (integrityline.com))

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COMPLIANCE WITH THE POLICY

The Celoplás Group reserves the right to take reasonable steps to verify compliance with the Code of Conduct. Business partners must actively support all required compliance checks.

CORRECTIVE ACTIONS

Violations must cease immediately. If this is not possible in the foreseeable future, the Business Partner must immediately prepare and execute a plan to stop or minimize such violations. This plan must include a specific timeline. Actions taken should be documented and reviewed for effectiveness. In the event of a suspected violation, the Business Partner must immediately investigate possible violations and report on the measures taken to resolve the issue.

CONSEQUENCES OF VIOLATIONS

Any failure to comply with the obligations described in this Code of Conduct constitutes a breach of contract with the Celoplás Group. The business partner must, within a reasonable time, report on the internal corporate measures taken to prevent future abandonments. In the event that the business partner does not comply with these obligations or take appropriate corrective measures within a reasonable time, or if the violation of the Code of Conduct is so serious that it is unreasonable to expect that the Celoplás Group continues the business relationship, we reserve the right – without prejudice to any other rights – to terminate the relationship without prior notice and terminate any associated contracts or agreements.