



CORTICEIRA VIKING



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

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Aprovado:

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Pág. 1 de 11

Content

Content	1
Presentation	2
Introduction	3
Main purposes of the code	3
Reason for the existence of the code	3
Scope	3
Nature of rules	4
Rules of conduct	4
Respect for Law and Regulation	4
Relationship with Customers, Suppliers and Other Entities	4
Relationship with Partners	4
Relationship with Regulatory Entities	4
Corporate governance	5
Institutional Relationship with other Entities	5
Non-discriminatory behavior	5
Complaints of harassment in the workplace	6
Political and Union Activities	6
Recourse to Illegal and Illicit Activities	6
Use of Company Resources	6
Confidentiality and Professional Secrecy	6
External Activities	6
Prevention of Potential Conflicts of Interest	7
Anti-corruption and bribery	7
Relationship between Employees	8
Protection to denunciator and witness	9
Safety and Well-being at Work	9
Environmental Commitment	9
Social responsibility and sustainable development	10
Compliance with the code of conduct	11



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

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Pág. 2 de 11

PRESENTATION

Founded in 1995, Corticeira Viking was born as a result of a partnership between a Swedish distributor (of a wide range of products, including cork) and a national producer of cork products. The experience and knowledge of these two companies have contributed to sustainable growth over the years, with a very well-defined objective: customer satisfaction, seeking to respond positively to the most diverse needs of their customers.

The company is currently committed to increase production capacity, in order to ensure an effective response to market demands, both national and internationally. At present, Corticeira Viking exports to 50 different countries, which represents close to 90% of its sales volume. The product diversity, in areas such as household items, industrial items, sports, luggage and accessories, allow Corticeira Viking to play an important role in this highly competitive market.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 3 de 11

INTRODUCTION

Main purposes of the code

- ✓ To be a formal and institutional reference for the personal and professional conduct of all employees, becoming a standard for relationships both between employees and with **CORTICEIRA VIKING**'s external audiences;
- ✓ To establish in **CORTICEIRA VIKING** the existence and sharing of common values and standards of conduct, reinforcing a common culture;
- ✓ Promote relationships of trust between **CORTICEIRA VIKING** and its partners;
- ✓ Reduce the subjectivity of personal interpretations of moral and ethical principles;
- ✓ Respond to the civic challenge of grounding the society on ethical principles that respect the guidelines of supranational organizations.

Reason for the existence of the code

The dimension and dispersion of the markets in which **CORTICEIRA VIKING** operates justifies the clarification and formalization of the ethical principles that must be imposed on the collective conscience of all employees as a behavioral model. To meet this requirement, this code was drawn up, which contains the values and principles that underpin the corporate culture at **CORTICEIRA VIKING**, allowing for the improvement of the common awareness of employees, based on the principle that ethical behavior leads to the construction of ethical awareness.

The Code of Conduct and Ethics must be respected in the fulfillment of daily actions by all employees.

This code also provides for its need to be revised, in certain terms, and whenever the Management deems it appropriate.

Scope

"The entire theory of conduct has to be just a scheme, not an exact system, (...) the themes of conduct and behavior in themselves have nothing fixed and invariable, like the themes of health. And if this is true in the general theory of Ethics, exact precision is even less possible in particular cases of conduct; for these do not fall under any science or professional tradition, but the agents themselves have to consider what is convenient in the circumstances of each occasion, such as in the art of medicine or navigation"

Aristotle - Ethics to Nicomachus II, i (1104a.1-10)

All **CORTICEIRA VIKING** employees are committed to this Code.

The Code of Conduct and Ethics applies to all employees, regardless of their employment relationship, as well as their hierarchical position.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 4 de 11

Nature of rules

The Code of Conduct and Ethics aims to ensure the practice of professional conduct of a high moral standard by all employees, in addition to the legal and regulatory provisions that they must observe.

The rules contained in the Code of Conduct and Ethics are also a reference for the general public with regard to the standard of conduct required in relationships with third parties.

Violation of the Code of Conduct and Ethics constitutes a serious misconduct, subject to disciplinary or other applicable procedures.

RULES OF CONDUCT

Respect for Law and Regulation

The company and employees must respect all legal and regulatory standards applicable to the activity. No acts that violate the different normative provisions may be performed.

Relationship with Customers, Suppliers and Other Entities

Employees must actively fight against all forms of corruption, active or passive, paying special attention to any form of payments, favors and complicity that may induce the creation of illicit advantages, which constitute subtle forms of corruption, such as offers or receipts from customers or suppliers.

Thus, the deliberate refusal of offers whose estimated value exceeds €100 is declared as a norm, and may, in a higher case, be accepted if intended for the common use of employees, always recording this offer in the employees' data.

Relationship with Partners

CORTICEIRA VIKING's relations with its partners must be based on the loyalty and integrity of its practices, transparency in information, a spirit of collaboration and the achievement of mutual benefit.

Employees must behave towards the partners, respecting these principles.

Relationship with Regulatory Entities

The company is committed to cooperating with the regulatory, supervisory and inspection authorities, satisfying requests addressed to them and not taking any action that could impede the exercise of the powers attributed to these authorities.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 5 de 11

Corporate governance

The company's management must be exercised with rigor, zeal and transparency in management, in compliance with the highest standards of good corporate governance.

Institutional Relationship with other Entities

The company must maintain, in institutional relations with other entities or organizations, national and international, a cooperative and participative posture, supporting initiatives that fall within the scope of its activities and add value to the company and its employees.

Non-discriminatory behavior

CORTICEIRA VIKING condemns any form of discrimination, whether based on race, ethnicity, gender, age, physical disability, religious conviction, opinion or political affiliation, and condemns any form of sexual or psychological harassment, verbal or physical conduct of humiliation, of coercion or threat.

Whereas, under the terms of article 29 of the Labor Code, harassment is understood as "unwanted behavior, namely based on a factor of discrimination, practiced when accessing employment or in the job itself, work or professional training, with the purpose or effect to disturb or embarrass the person, affect their dignity, or create an intimidating, hostile, degrading, humiliating or destabilizing environment", the following behaviors that may be considered as harassment at work are expressly prohibited:

- Systematically devalue and disqualify the work that is done;
- Promote social isolation;
- Directly or indirectly ridicule a physical or psychological characteristic;
- Making recurrent threats of dismissal;
- Not assigning any professional functions (violation of the right to effective occupation of the job);
- Systematically establish goals and work goals that are impossible to achieve or deadlines that are not achievable;
- Systematically assign strange or inappropriate functions to the professional category;
- Systematically take ownership of ideas, proposals, projects and works, without identifying the author of the same;
- Systematically disclose malicious rumors and comments or repeated criticisms about workers;
- Systematically giving confusing and inaccurate work instructions;
- Systematically request urgent work, without need;
- Transfer the worker from the sector or workplace with the clear intention of promoting their isolation;
- Constantly talking loudly, in order to intimidate people;
- Systematically create objective situations of stress, in order to provoke a lack of control in the worker's conduct, such as: systematic changes or transfers of the workplace.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 6 de 11

Complaints of harassment in the workplace

Pursuant to its own regulations, the appropriate electronic addresses for receiving complaints of harassment in the workplace will be made available and disclosed by the Authority for Working Conditions;

The practice of harassment by the employer or by any representative of the same, reported to the Authority for Conditions at Work (ACT), will be among the examples of just cause for termination of the employment contract by the employee.

Political and Union Activities

When carrying out political party or union activities, employees must respect the constitutional principles and the applicable legal framework, acting with prudence and respect, in order to avoid conflicts and preserve the independence of their company.

Recourse to Illegal and Illicit Activities

The use of illegal or illicit means or activities by an employee, with or without the objective of withdrawing benefits on their own account or for third parties, is condemned by **CORTICEIRA VIKING**.

Use of Company Resources

The company's resources must be used efficiently, with a view to pursuing the defined objectives and not for personal or other purposes, and employees must ensure the protection and good state of conservation of the company's assets, always seeking to maximize their productivity.

Confidentiality and Professional Secrecy

CORTICEIRA VIKING has established an information security policy whose objective is to preserve its confidentiality, integrity and availability. **CORTICEIRA VIKING**'s information is property of the company and is essential for the development and success of its activity.

Professional secrecy applies to all employees, especially in situations where, due to their importance or existing legislation, they should not be known to the general public.

Employees must always act with discretion in relation to facts and information that they have accessed during the exercise of their functions.

External Activities

CORTICEIRA VIKING considers that among its most important assets are its brand, its image and its corporate reputation.

All employees must ensure that their use does not harm the image and reputation of **CORTICEIRA VIKING**, nor may they use the name and brand **CORTICEIRA VIKING** for purposes other than those permitted by the company.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 7 de 11

Employees must be committed to defending the interests of **CORTICEIRA VIKING**, and the results of their work, including those of an intellectual nature, belong to their company.

Employees, respecting the legal framework and regulations defined by the company, may not perform activities that are incompatible and/or susceptible to conflicts of interest.

Professional activities that do not compete with the time to be dedicated to the company to which the employee belongs, and that do not generate a conflict of interest, do not offer an objection on the part of the company, but must be made known.

Voluntary work activities are supported by **CORTICEIRA VIKING**.

Prevention of Potential Conflicts of Interest

CORTICEIRA VIKING considers loyalty as an essential value, which is compatible with the possibility that employees have to carry out other business or professional activities, whenever these are legal and/or contractually possible, and does not conflict with their responsibilities while employees of **CORTICEIRA VIKING**.

Employees are responsible for avoiding any situation that may directly or indirectly give rise to a conflict of interest.

Collaborators must act with loyalty and in defense of the company's interests.

Employees must refrain from participating in any professional or personal activity that could give rise to a conflict of interest with their work at **CORTICEIRA VIKING**. In addition, they shall refrain from representing the company, intervening or influencing decision-making on matters in which, directly or indirectly, they are relatives or related in 1st degree, or companies or other collective entities in which they directly or indirectly participate.

A conflict of interest is understood whenever an employee has, directly or indirectly, a personal interest that may take potential advantage for himself, a family member, friends or acquaintances and that may influence his performance in the exercise of his functions.

Whenever the occurrence of such situations is foreseeable, the employee must inform their hierarchical superior of their suspicion, in order to ensure impartial, objective and transparent performance.

Employees may not use any privileged information that they obtain by virtue of their duties.

Anti-corruption and bribery

CORTICEIRA VIKING is against unethical practices aimed at inappropriately influencing people's actions and willingness to obtain advantages. As a result, no employee shall admit, nor practice, bribes, nor offer benefits for the benefit of third parties who are at the service of any organization (public or private) to obtain advantages or conduct business, whatever their nature, denouncing by the established means all corrupt practices that come to their attention.





MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 8 de 11

Relationship between Employees

CORTICEIRA VIKING is committed to the defense, respect and protection of individual rights and the human rights and public liberties recognized in the Universal Declaration of Human Rights.

In such a way that **CORTICEIRA VIKING** does not employ, either directly or indirectly, child labor or people who carry out forced labor and guarantees the freedom of association, opinion and expression of its employees. Consequently, **CORTICEIRA VIKING's** respect for the individual rights of its employees must be reflected in all their professional activities.

CORTICEIRA VIKING provides a work environment in which its employees participate in the company's objectives and can develop personally and professionally.

CORTICEIRA VIKING considers that respect for others must be a basic element of the conduct of its employees. Therefore, it rejects any manifestation of harassment at work, as well as any behavior that is violent or offensive to people's rights and dignity; whenever these situations occur, they contaminate the work environment, have negative effects on people's health, well-being, confidence, dignity and income.

CORTICEIRA VIKING is committed to providing an adequate work environment so that no discrimination occurs on grounds of sex, race, ideology, religion, sexual orientation, age, nationality, disability or any other personal, physical or social conditions, and in which diversity is respected and evaluated.

CORTICEIRA VIKING considers that the integral development of its employees is as much more positive for them as for the company, and for this reason it encourages measures aimed at achieving a balance between the family/personal and professional responsibilities of its employees.

In the exercise of their functions, employees must be responsible and cooperative, favoring a good environment, respect and good personal treatment, both with colleagues and hierarchical superiors, and the latter with their subordinates.

In their professional relationship, employees must promote the exchange of information and cooperation and foster team spirit.

Employees who, in any way, contribute to the generation of a decision must be supportive with the decision maker, assume their responsibilities and remain supportive in the execution of the same.

CORTICEIRA VIKING makes available to its employees its facilities, means and tools necessary for the performance of their professional function, which is why they must not be used for other purposes.

CORTICEIRA VIKING does not withhold part of the salary, benefits, property or documents as a way to force workers to continue working.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 9 de 11

Protection to denunciator and witness

A specific protection regime will be guaranteed for the denunciator and witnesses in proceedings related to harassment situations.

Dismissal or other sanction allegedly applied to punish an infraction is presumed to be abusive, up to one year after the complaint or other form of exercising rights related to equality, non-discrimination and harassment.

The attribution of special protection to denunciator and witnesses in judicial or administrative proceedings triggered by harassment is guaranteed, and they cannot be disciplinary sanctioned except when they act with intent.

Employees of the Institution who denounce the commission of violations of this Code, which they become aware of in the exercise of their functions or because of them, may not, in any way, be harmed, being guaranteed anonymity until the deduction of the accusation.

The impossibility of exemption from the additional sanction of publicity of the condemnatory decision is guaranteed when the practice of harassment is at stake, which constitutes a very serious infraction and may generate criminal liability.

Safety and Well-being at Work

CORTICEIRA VIKING guarantees compliance with safety, health, hygiene and well-being standards in the workplace.

Compliance with safety rules is everyone's obligation, and it is the duty of employees to timely inform their hierarchical superiors or the responsible services of the occurrence of any irregular situation that could compromise the safety of people, facilities or equipment in their company.

The Employer is responsible for repairing damages arising from occupational diseases resulting from the practice of harassment, which will be established in its own regulations, this compensation being subrogated to the employee's rights.

Environmental Commitment

CORTICEIRA VIKING systematically seeks to contribute, through its business activities, to sustainable development and to the preservation of the environment, favoring, among others, the application of non-polluting techniques, environmental monitoring and energy rationality.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 10 de 11

Social responsibility and sustainable development

CORTICEIRA VIKING adopts practices that contribute to the progress and well-being of communities, improving the quality of life of citizens and making a decisive contribution to environmental, economic and social sustainability.

When faced with complicated situations, in which we do not know how to act, we must stop and analyze all the information we hold, and consult more references, in order to consider the best decision to take.

We must also answer the following questions:

- Are my doubts based on verifiable facts, or just guesswork and rumours?
- Where or from whom did I receive this information?
- Do I feel this information is correct and exposes my company to some risk?
- If this information were reported by the media, would I feel embarrassed?

Direct leadership is usually a good starting point if you are faced with an ethical problem.



MAN.003.03
02-11-2021

Código de Conduta Manual

Elaborado:

Renato Espírito Santo

Aprovado:

Américo Espírito Santo

Pág. 11 de 11

COMPLIANCE WITH THE CODE OF CONDUCT

The principles and performance criteria contained in this Code of Conduct are mandatory. Any employee who has doubts about the application of the Code, or who observes and/or verifies a situation that may imply a non-compliance or a violation of any of the principles and rules of conduct established in this Code, must inform the Management Representative (*resanto@corticeiraviking.pt*), which will act within the scope of its functions, reporting to Management and/or resolving any complaints that may arise for non-compliance with this Code.

The Management Representative will act in each intervention with complete independence and with full respect for the affected people, guaranteeing at all times the confidentiality in the handling of the complaints and queries that he transmits. All employees have a duty to cooperate in investigations into possible breaches of the Code. **CORTICEIRA VIKING** guarantees that there will be no reprisals for any report of non-compliance with the Code of Conduct, nor for any participation in any research procedure. Failure to comply with any of the performance criteria contained in this Code of Conduct will be sanctioned in accordance with the current disciplinary regime, without prejudice to any other liabilities that the offender may incur.

Whenever the employer becomes aware of the violation of the provisions contained in this Code of Conduct, it will open a disciplinary procedure, within a maximum period of one year, without prejudice to civil, administrative or criminal liability that may arise.

The Management and its employees will denounce any irregular practices of which they are aware, providing due collaboration in any disciplinary or criminal investigation proceedings by the respective competent authorities.