

**NEOTALENT**

**CONCLUSION**

**Code of  
Conduct**





## **INDEX**

<b>1. Framework</b>	<b>3</b>
<b>2. Professional Conduct at Neotalent Conclusion</b>	<b>3</b>
2.1. <i>Professionals at Neotalent Conclusion and Customers</i>	3
2.1.1. <i>Our commitment</i>	4
2.1.2. <i>How we use information</i>	4
2.1.3. <i>How we classify documents</i>	4
2.1.4. <i>Intellectual Property Rights</i>	5
<b>3. Ethical conduct at Neotalent Conclusion</b>	<b>5</b>
3.1. <i>We have integrity</i>	5
3.2. <i>We are conscious</i>	6
3.2.1. <i>We deliver quality</i>	6
3.2.2. <i>We protect and promote the environment</i>	6
3.2.3. <i>We safeguard health and safety at work</i>	6
3.3. <i>We respect rights and equality</i>	6
3.3.1. <i>We reject harassment and intimidation</i>	6
3.3.2. <i>We promote Gender Equality, Diversity, and Inclusion</i>	7
<b>4. Data protection and information security</b>	<b>8</b>
4.1. <i>We are aware of the rights of data subjects</i>	8
4.2. <i>We protect our information and that of our Clients, Partners, and Suppliers</i>	8
4.3. <i>We care about the security of our information</i>	9
<b>5. Whistleblowing Channel</b>	<b>9</b>
<b>6. Final Provisions</b>	<b>9</b>
<b>7. Appendix I - Guide to making decisions</b>	<b>10</b>





## 1. Framework

Our Code of Conduct describes the behaviors, principles, and values that all of us must adopt when carrying out our professional duties, such as: acting with integrity, adopting ethical and correct behavior, repudiating any act of corruption or related infraction, making informed decisions, and complying with legal and regulatory obligations.

Our values are:

- **I give** everything, I give the maximum, I give the best of myself. For the client, for everyone, for colleagues, partners, and clients of clients. The first step to being simpler and happier is to give.
- **I listen**, I'm ready to learn. To listen, to see, to let speak, to recognize, to collaborate, to experiment, to do things differently, to ask for help. To have the humility of someone who wants to know more and the pride of always wanting to grow.
- **I connect** talent and happiness, my own and that of others. I connect people's sides and I connect all sides of myself, personally and professionally. Many people create an unstoppable chain of talent, empathy, and energy. I call, I praise, I applaud, I celebrate, I encourage. I want to be part of that chain.
- **I grow** and, when I grow, I make it grow. I want to jump into the challenge, show and discover who I am, I want to have fun as a team and learn how to grow better. I'm a creator: I make people's lives simpler and happier. What remains, at the end of what I do, is who I am.

Our Code of Conduct is intended for all those who work with or for Neotalent Conclusion, namely our Employees, Subcontractors, Suppliers and Partners.

## 2. Professional Conduct at Neotalent Conclusion

### 2.1. Professionals at Neotalent Conclusion and Customers

As Neotalent Conclusion employees, we know what is expected of us and we always strive to go beyond expectations.

We define the path we want to take and assume the inherent responsibilities, earning the autonomy and trust of all those who come across us.

Our success is based on our creativity and rigor, our ability to work as a team in a spirit of mutual support, our enthusiasm and, above all, our experience and knowledge.

At Neotalent Conclusion, we value initiative and accept mistakes, always seeking to learn from them, and we try to innovate responsibly. We conduct our business in accordance with the interests and objectives of the company and are committed to preserving what we have painstakingly built up - name, credibility, heritage. We are proud of the reputation we have built.

At Neotalent Conclusion, our main goal is to deliver value. To do this, we give what we are and what we have. We work with promptness, commitment, and enthusiasm and, through our





experience and knowledge, we meet our clients' requests, adapting to their reality without losing our identity.

We propose what we believe is appropriate and what we know we can deliver, always seeking to surprise with more and better. We strive to satisfy our clients.

### 2.1.1. Our commitment

- Achieving the company's objectives;
- Safeguarding the Company's interests;
- Complying with Policies and other internal requirements;
- Ensure the proper use of our resources;
- Not to speak on behalf of the Company without prior authorization;
- Use social media responsibly;
- Report privacy incidents or vulnerabilities that could jeopardize the security of our information;
- Report any irregular practices;
- Cooperate with the internal audit and compliance areas;
- Seek continuous improvement.

### 2.1.2. How we use information

We follow our internal Policies which define the Company's commitment to Information Security and Personal Data Protection, as well as compliance with legal and regulatory requirements. We do not share any internal information with third parties without prior authorization. We act in good faith and respect the privacy of our Clients. We use your information exclusively for the purposes for which we are authorized, and do not disclose any information to which we have access.

Information is one of our company's most important and valuable assets. We ensure its confidentiality, privacy, and integrity, guaranteeing the preservation of confidential information, respecting the established rules of Document Classification.

### 2.1.3. How we classify documents

Documents are classified according to their nature to ensure that they are properly protected during handling. The classification of documents is the responsibility of those who prepare and maintain them. We ensure the correct classification of our information and its periodic review, as well as respecting the classification assigned to documents shared by our Clients.



#### **2.1.4. Intellectual Property Rights**

We help solve the most demanding challenges. To do this, we use our own software engineering solutions or third-party technology. Our success is essentially based on the technological competence we demonstrate and our constant search for innovation, which is why our Intellectual Property is an asset of great value to the Company.

To protect our ideas, products, and technological development, we have agreements in place with our Partners, Customers and Suppliers, however, it is the responsibility of all those who work with and for Neotalent to adequately safeguard our Intellectual Property Rights.

We also undertake to respect the Intellectual Property Rights of third parties.

### **3. Ethical conduct at Neotalent Conclusion**

#### **3.1. We have integrity**

Neotalent Conclusion is aware of and acts in accordance with the principles and values contained in national and international legislation on human and social rights.

We foster a culture of responsibility, respect, and loyalty. We are honest and respect what others have built and what belongs to them. We do not appropriate what is not ours and we are open to cooperation, acting with rigor and loyalty.

We comply with the law, regardless of the geography in which we operate, relying on specialist bodies.

We despise ambiguous attitudes, we have integrity, we do not get entangled in conflicts of interest and we do not accept or offer bribes of any kind, we do not receive or offer gifts, entertainment, or hospitality which, in the relevant geography(ies), are not permitted by law and socially appropriate or which are intended to unduly influence decision-making by Neotalent Conclusion or third parties.

Neotalent Conclusion employees must refuse all offers from third parties whenever they have an economic value that exceeds the limits considered reasonable by social custom.

We have adopted an Irregular Practices Reporting System (referred to as "IPS"). According to the system in place, Employees and other stakeholders of Neotalent Conclusion have a direct and confidential channel available to them to report any irregular practices (as defined therein), particularly regarding the prevention of money laundering and terrorist financing and the prevention of corruption and related offenses.

At Neotalent Conclusion we adopt a proactive stance of rejecting all forms of corruption in the various sectors in which we operate. To achieve this goal, we have an Anti-Corruption Policy, which plays a key role in preventing behavior that may violate the law or Neotalent Conclusion's principles of conduct, either directly or through third parties.

We are aware that violations of the rules of conduct set out here may result in disciplinary sanctions and that violations of the legal rules on corruption and related offenses in force in the Portuguese legal system or in the other jurisdictions in which we operate may result in criminal sanctions.

Neotalent Conclusion respects the private lives of its employees and there is no interference in their activities or conduct outside the relationship with Neotalent Conclusion, as long as they preserve



the image and legitimate interests of Neotalent Conclusion. Neotalent Conclusion will not tolerate situations that may involve personal benefit from opportunities related to Neotalent Conclusion and its image or activity and must refrain from using confidential information for personal benefit or for the benefit of third parties and comply with internal rules to avoid conflicts of interest in various areas.

### 3.2. We are conscious

We are aware of and concerned about all our stakeholders, which is why we have implemented a Certified Integrated Management System in Quality, Environment, Safety and Health at Work and are governed by the IMS Policy which is in line with Neotalent Conclusion's Vision and Values and aligned with the needs of our stakeholders.

#### 3.2.1. We deliver quality

We establish and improve our processes and systems dynamically and continuously, ensuring organizational coherence and integrity in line with the expectations of the various stakeholders.

We promote an attitude and culture of constant rigor, professionalism, and innovation, geared towards action, results and accountability. We encourage professional development, the enrichment of skills and team spirit and we manage the requirements and expectations of our Clients, adding value within the scope of their strategic objectives in order to achieve high levels of satisfaction.

#### 3.2.2. We protect and promote the environment

We contribute to a sustainable environment by preventing pollution and promoting the sustainable use of resources. We monitor the defined Sustainability Metrics and act on the results obtained by implementing actions aimed at continuous improvement.

#### 3.2.3. We safeguard health and safety at work

We ensure a safe and healthy working environment, preventing all types of work-related injuries and health problems and striving for continuous improvement. Our aim is to eliminate hazards and minimize risks to health and safety at work by adopting effective prevention and protection measures, promoting training and information for our employees and service providers.

### 3.3. We respect rights and equality

#### 3.3.1. We reject harassment and intimidation

At Neotalent Conclusion, we are clear, we know what harassment is:

- It is a process, not a phenomenon or an isolated fact;
- It always presupposes a chain of acts and behaviors that occur repeatedly;



- It is unwanted behavior, perceived as abusive, of a psychological or physical nature;
- It is practiced with the aim of affecting dignity or creating an intimidating, humiliating or destabilizing environment;
- It takes advantage of the victim's vulnerability.

We also know what harassment is not:

- Occasional conflict;
- Decisions resulting from the organization of work, provided they comply with the employment contract;
- The exercise of hierarchical and disciplinary power;
- Occasional pressure;
- Occasional compliments;
- Reciprocal romantic closeness that is not unwanted and repelled.

We have defined a procedure so that any situations of harassment can be investigated while preserving the identity of all those involved, whether they are complainants, victims, witnesses, or aggressors.

### **3.3.2. We promote Gender Equality, Diversity, and Inclusion**

At Neotalent Conclusion we have created a Gender Equality and Diversity Plan, because we believe that differences tend to improve the quality of decision-making processes through the multiplicity of perspectives, greater intellectual and cultural richness, and also better representation of reality and stakeholders.

At Neotalent Conclusion we therefore promote:

- Equal opportunities and mutual respect, regardless of ethnicity, gender, religion, ideology, social origin or sexual orientation;
- The dignity, integrity and right to equality and diversity of our employees;
- Equality and inclusion in access to employment;
- The growth of all;
- Access to training and skills development;
- Progression;
- Continuous, courageous feedback;
- A culture of merit and recognition;
- Reconciling professional, family and personal life;



- Respect, freedom and space to be unique in any gender.

## 4. Data protection and information security

### 4.1. We are aware of the rights of data subjects

Neotalent Conclusion guarantees:

- **Right to Information:** data subjects can request information about their personal data and know what type of processing they are subject to;
- **Right of Access:** data subjects can find out whether or not our data is being processed by Neotalent Conclusion, in particular the purpose of the processing, the categories of personal data in question, the recipients or categories of recipients to whom the data is, has been or will be disclosed, the planned data retention period or, if this is not possible, the criteria for setting this period;
- **Right to Rectification:** data subjects can rectify incorrect data, complete information and know that communication will be made to those entitled;
- **Right to be forgotten:** data subjects can request the deletion of personal data when it is no longer necessary for the purpose for which it was collected or processed;
- **Right to Restriction of Processing:** where deletion is not possible, data subjects may request that the processing of their personal data be restricted;
- **Right to Portability:** data subjects have the right to receive their personal data and transmit it to others;
- **Right to Object:** data subjects may object at any time to the processing of their personal data;
- **Right not to be subject to automated decisions:** data subjects are not subject to decisions taken solely on the basis of automated processing of their personal data.

### 4.2. We protect our information and that of our Clients, Partners, and Suppliers

Whether as Data Controller or as Processor, at Neotalent Conclusion we recognize the importance of ensuring adequate protection of our information and that of our Customers, Partners, and Suppliers, including personal data, throughout its life cycle.

We ensure that all information is processed in accordance with applicable regulatory and contractual obligations, including compliance with the requirements imposed by the General Data Protection Regulation (GDPR).

To achieve this goal, we undertake to:

- Make a commitment to the GDPR;
- Ensure compliance with regulatory, legal and contractual privacy requirements;





- Ensure the integration of privacy requirements into our business processes;
- Guarantee the protection of personal data;
- Establishing a privacy culture consistent with the size and importance of the Company.

### 4.3. We care about the security of our information

Our employees, regardless of their specific roles, are responsible for the information they process and communicate. Therefore, we take care of Information Security and ensure that it is not disclosed for purposes for which we are not authorized. To this end, we undertake to:

- Comply with the Information Security Policy and other relevant regulations;
- Inform our Partners, service providers and other entities of their responsibilities and obligations with regard to Information Privacy and Security;
- Report any security incidents in good time, using the mechanisms provided for this purpose;
- Not disclose authentication information;
- Not disclose sensitive information to third parties without express authorization, in any form of communication.

## 5. Whistleblowing Channel

To facilitate compliance with this Code, Neotalent Conclusion has a Whistleblowing Channel, through which it is possible to report possible irregularities that may constitute infringements.

Reports will be managed through a rigorous, transparent and objective procedure, safeguarding in any case the confidentiality of the people concerned and involved in the facts and conduct being reported.

We will not tolerate any reprisals against anyone who, in good faith, reports facts or situations that could be considered prohibited conduct under this Code. In this context, Neotalent Conclusion works continuously to improve and align all communication channels in accordance with the best market practices at any given time.

Information on the Whistleblowing Channel is accessible to all Employees via the Neotalent Conclusion intranet, and to any interested party via the corporate website.

## 6. Final Provisions

This Code is implemented across the board by Neotalent Conclusion and will be duly publicized for the knowledge of all Neotalent Conclusion Employees, through the intranet and the corporate website.



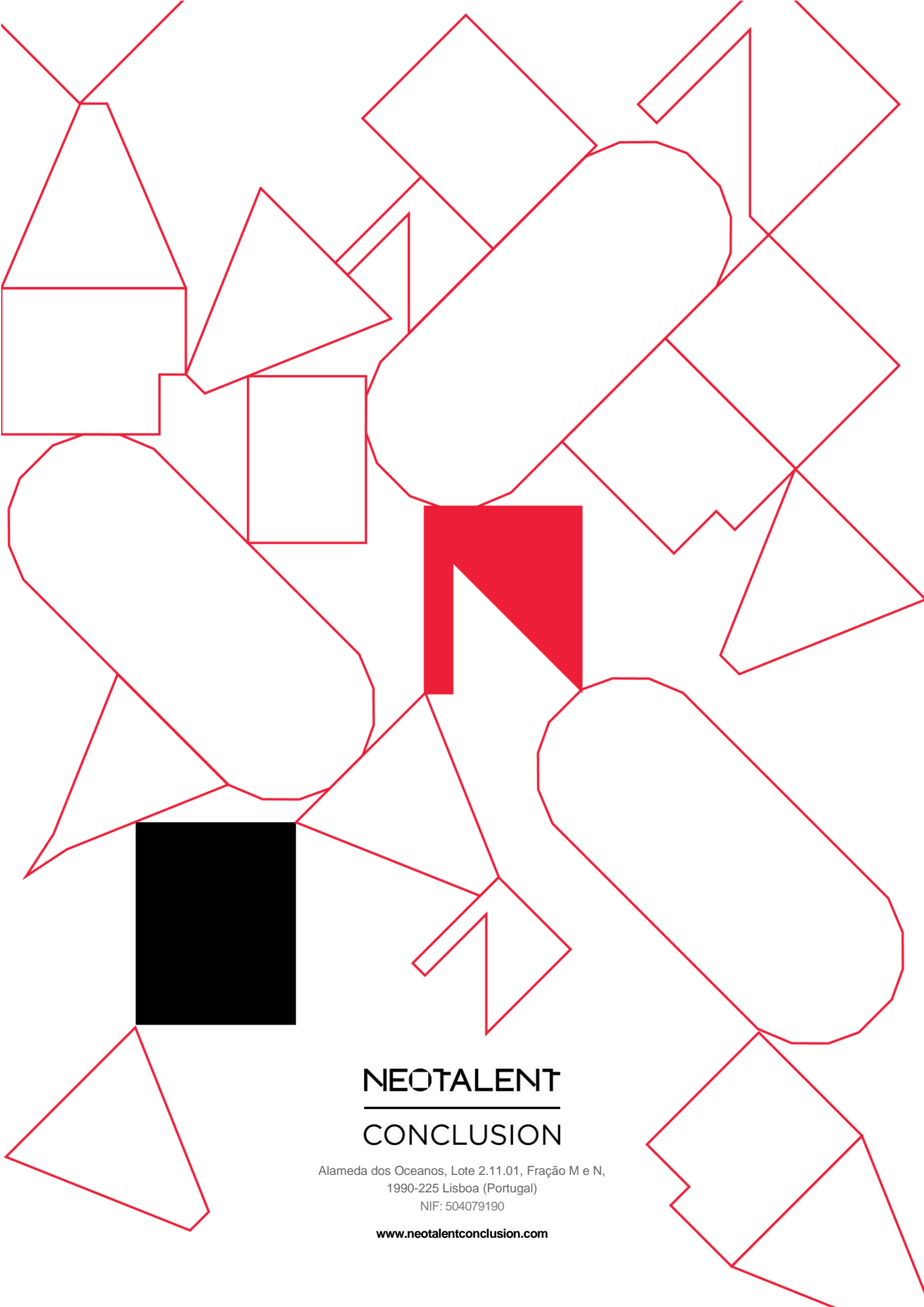
## 7. Appendix I - Guide to making decisions

If, in the course of their professional activity, a Neotalent Conclusion employee is faced with a dilemma on which they have to make a decision, they should consider the following set of questions:

- Is the decision/action/omission **legal**?
- Would you feel comfortable explaining this decision/action/omission to co-workers, superiors, family, or friends?
- Have you taken into account the interests of all those who may be harmed by this decision/action/omission?
- Are you sure you are doing the right thing?
- If your behavior were made public, would it be considered appropriate and professional?

**When in doubt... reflect and consult!**

If the answer to any of the questions is "NO", the situation should be reported or submitted for consultation.



**NEOTALENT**  

---

**CONCLUSION**

Alameda dos Oceanos, Lote 2.11.01, Fração M e N,  
1990-225 Lisboa (Portugal)  
NIF: 504079190

[www.neotalentconclusion.com](http://www.neotalentconclusion.com)