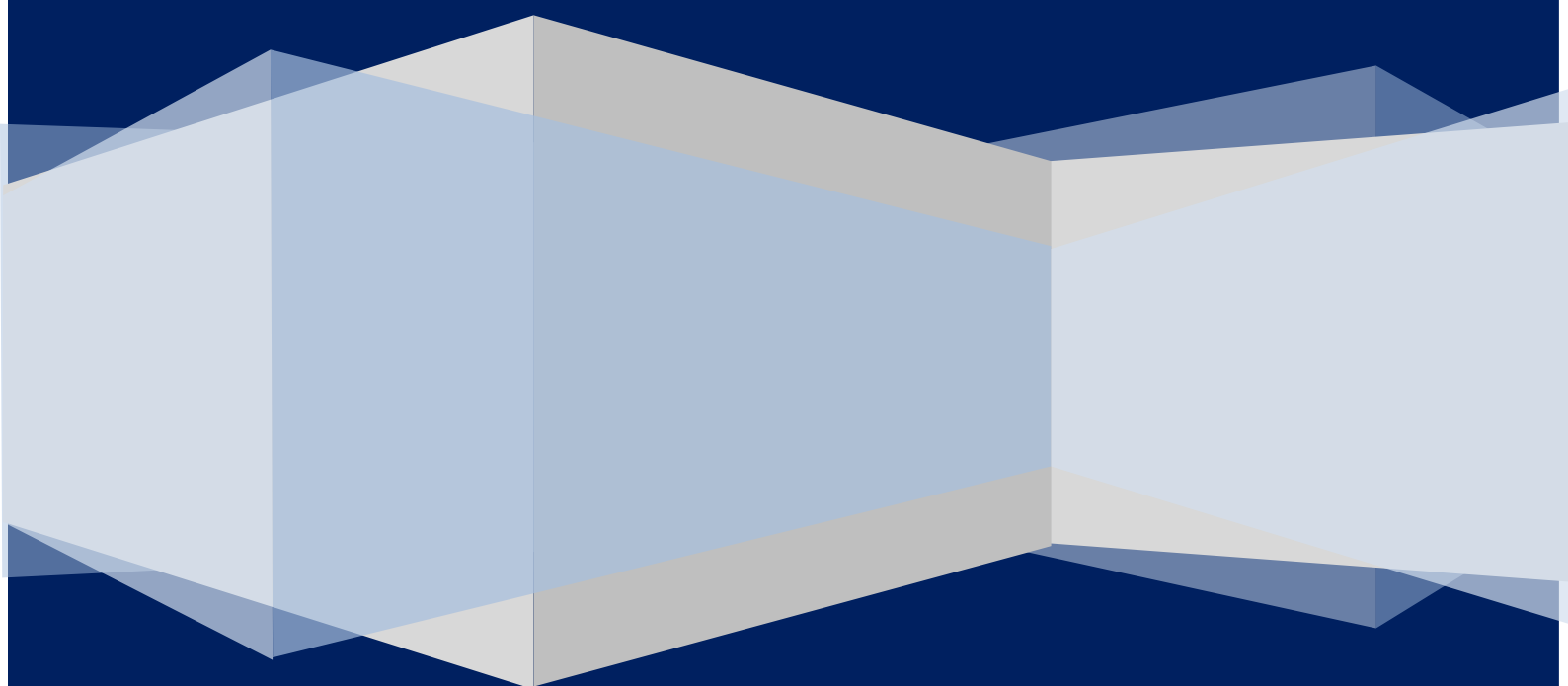


# CODE OF CONDUCT

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### ***Preamble***

Cin - Corporação Industrial do Norte, S.A. and all its subsidiaries and associates (collectively referred to as “CIN” or “the Company”) are guided by responsible, rigorous, demanding and egalitarian principles, values and standards of conduct. Thus, the Management has adopted this Code of Conduct, which establishes the rules, principles and criteria that guide the conduct of all Employees.

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### ***Article 1 (Aim)***

1. The Code of Conduct establishes and regulates the principles and rules of behaviour that must be observed at CIN, by its employees, its agents and other parties in the carrying out of its activities.

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### ***Article 2 (Scope)***

1. This Code of Conduct applies to all CIN employees, as well as to anyone who provides services on its behalf and to its partners.
2. The application of this Code of Conduct does not substitute the application of other codes, manuals or policies relating to specific themes, areas, roles and activities.

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### ***Article 3 (Principles)***

1. CIN respects all laws, regulations and professional standards.
2. CIN requires that, in the exercise of its activities, all Employees observe the following principles: Responsibility; Independence; Conflict of Interests; Competency, Quality and Efficiency; and Confidentiality.

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### ***Article 4 (Social and Environmental Responsibility)***

1. We are committed to actions and practices that sustain and increase CIN's eco-efficiency. Thus, CIN develops its action according to the principles of sustainable development, valuing the execution of its activities in accordance with environmental and public health needs and committing, therefore, to develop actions that value sustainability in the fields of Social Responsibility and Environmental Responsibility.



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**Article 5 (Safety in the Workplace)**

1. CIN ensures compliance with current health and safety at work regulations and guarantees its Employees safe working conditions to that end.
2. CIN provides a set of documents that provide guidance in matters of health and safety.
3. CIN impresses on its Employees, Agents and other third parties the importance of cooperation and a positive approach to Safety at Work, insisting on compliance with all safety standards.
4. CIN prohibits the consumption of alcohol and psychotropic substances in its workplaces and during hours of work, valuing the safety of its Employees at the same time informing and raising awareness of issues related to this matter.

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**Article 6 (Prevention)**

1. CIN adopts organizational and management procedures alongside prevention measures, anticipating possible risks and the corresponding procedures required in mitigation, as well as facilitating training and learning for its Employees, Agents and other third parties.
2. CIN comprises an organization to which functions and powers are delegated with the aim of ensuring that the tasks to be carried out are assigned to Employees with the necessary abilities and skills to carry them out correctly.
3. CIN performs audits and inspections with the purpose of establishing systematic procedures to ensure the implementation of the Quality, Environment, Health & Safety Management System described in the respective QEHSM – Quality, Environment, Health & Safety Management Manual.

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**Article 7 (Accounting Procedures)**

1. CIN establishes recording and verification procedures which render the decision process, authorisation and execution of all transactions and operations wholly transparent.
2. CIN insists that, for each operation, there must be adequate documentary evidence in order to enable, at any time, checks confirming the characteristics of and reasons for the operation and identify who authorized, performed, registered and validated it.
3. Employees must be aware of the importance of an appropriate and transparent



accounting record.

4. CIN respects the legal rules and accounting principles currently in force.
5. CIN's conduct in financial recording is governed by two fundamental principles: The Integrity Principle and the Competence Principle.

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#### **Article 8 (*Protection of the Company's Resources and Assets*)**

1. Employees may only use CIN's resources and assets, or those under its control, within the scope of their activity, and must ensure that these are kept in good order and contribute to their proper use and maintenance.

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#### **Article 9 (*Communication Systems and Use of Electronic Equipment*)**

1. CIN's communication systems, information technology and electronic equipment are intended for professional use, which must always take place in accordance with the appropriate legislation.
2. Personal information sent, received or consulted by Employees, through the use of the professional e-mail box provided by CIN and suchlike, is restricted and subject to confidential treatment.

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#### **Article 10 (*Customer and Other Third Party Relations*)**

1. Employees, regardless of their position within the Company, must maintain a transparent relationship with customers and other third parties with whom CIN interacts, guided by strict compliance with the duty of honesty, courtesy and integrity, as well as the principles of professionalism, respect, loyalty and good faith, not engaging in discriminatory acts or harassment and always ensuring customer satisfaction.
2. CIN respects the confidentiality and privacy of its customers' information.
3. CIN implements legal requirements regarding the manufacture, packaging, labelling and marketing of its products.
4. CIN guarantees conditions of hygiene, health and safety in its facilities.
5. CIN promotes responsible consumption by its customers, together with environmental awareness.

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#### **Article 11 (*Supplier Relations*)**

1. CIN builds relationships of professionalism, loyalty, honesty, respect, impartiality and

transparency and trust with its Suppliers, developing clear and direct communication with them. To this end, the Company provides its Suppliers with its Code of Conduct, as well as any other internal regulations that may provide for such relationships.

2. CIN selects its Suppliers impartially.
3. CIN requires its Suppliers to comply with relevant laws and regulations as well as ethical and sustainable practices.
4. CIN undertakes to comply with the conditions agreed with Suppliers, respecting the commitments agreed between both parties.
5. CIN determines that Supplier contracts must be governed by a clear and objective rationale, without omissions or ambiguities, and respect current law.
6. CIN guarantees to respect its Suppliers' privacy.

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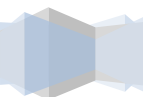
#### **Article 12 (*Relations with Business Partners*)**

1. CIN conducts itself with its Business Partners based on the principles of loyalty, respect, professionalism and transparency and good faith, expecting the same from them in return. To this end, CIN provides its Business Partners with its Code of Conduct, as well as any other internal regulations that may provide for such relationships. Likewise, it shares clear, current and authentic Reports & Accounts and documents relating to the Company's accounting, which truly reflect the Company's financial status.
2. CIN requires its Business Partners to comply with relevant laws and regulations.
3. CIN undertakes to respect the commitments made between itself and its Business Partners.
4. CIN respects its Business Partners' rights to confidentiality and privacy.
5. CIN promotes dialogue with its Business Partners on the equitable development of their activities and cooperation to preserve their mutual interests.

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#### **Article 13 (*Human Resources, Interpersonal Relationships and Prevention of Harassment*)**

1. CIN is guided by a human resources policy based on ensuring compliance with ethical behaviour, namely, but not exclusively, with regard to guaranteeing gender equality at work, as well as the prohibition of any type of discriminatory practices and harassment. In this regard, Employees must in general conduct themselves with



courtesy and honesty within the Company, refraining from any practice of discrimination or harassment and, when possible, preventing or stopping such acts, and may not, neither the reporting Employee, nor the witnesses, be disciplined or prejudiced in their work status or exercise of labour rights (unless the accusation is known to be false), and CIN is responsible for ensuring the anonymity of the complainants and witnesses, whenever it is justified. Moreover, CIN will develop policies that guarantee the dignity of the individual, prohibiting discriminatory practices and harassment.

2. CIN undertakes to establish fair relationships with its Employees, namely with regard to performance assessment.
3. CIN recognises the importance of its Employees' professional development, constantly and actively developing employees' individual skills through the Skills Management System.
4. CIN provides its Employees with motivational levels, together with involvement in the organization and business strategy. At the same time, CIN recognises the importance of a good working environment for the well-being of its Employees and consequent productivity.
5. CIN ensures decent wages, which are governed by national regulations.
6. With a view to the transparency of its relations with its Employees, CIN makes its Code of Conduct available, as well as the other internal rules and instructions in force.

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#### **Article 14 (*Private Life Clause*)**

1. CIN undertakes to respect the personal rights of individual Employees, preserving their right to the confidentiality of a private life.

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#### **Article 15 (*Employees' Liability*)**

1. Employees are obliged to comply with this Code of Conduct, as well as with the other internal rules and instructions in force at all times at CIN, and may be disciplined in case of non-compliance.

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#### **Article 16 (*Reporting Non-compliance*)**

1. Employees must report situations of non-compliance with the provisions of this Code of Conduct, of which they are aware, to their line managers or, if this option is not



viable, they should direct their complaints to the e-mail address: [compliance@cin.com](mailto:compliance@cin.com).

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### **Article 17 (*Dissemination and Publication*)**

1. This Code of Conduct is delivered to all CIN Employees, and it is everyone's responsibility to strive for compliance with its rules, as well as to find out about their interpretation whenever any doubts arise.
  2. The updated and current version of the Code of Conduct is published on [www.cin.com](http://www.cin.com), as well as on CIN's internal portal.
  3. The Code of Conduct is revised from time to time and, if necessary, is updated accordingly.
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### **Article 18 (*Effective Date*)**

1. This Code of Conduct comes into force on 1st October 2017.

**Edition:** 02

**Date:** 20/12/2021

