

# Code of Ethics and Conduct



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## 1. Introduction

We go back to a long tradition in leather processing. We now specialize in the manufacture of high quality leather components and goods. Several European brands of excellence already rely on our quality and accurate processing of high quality leather goods. We are not only known for our values, which include fundamental characteristics such as quality, accuracy and reliability; our work in production as well as collaboration with our customers is based on something that seems to have been forgotten these days: Honesty and connection to each other. Several customers, products and designs varied, but a common denominator: Simply good work. We maintain the tradition of a genuine and original craft.

Nosco Couture wants to develop to improve the lives of our customers, our suppliers and the society around it. Growing becomes essential to generate more wealth, more employment, enable continuity of investment in order to reach more customers and positively influence society and the local community. However, we will only be on this path if growth is sustainable and if our behavior reflects our values.

To this end, shareholders and each of the Company's Professionals and Collaborators must assume responsibility and commitment to establish a solid culture of compliance with each other. Of course, it is necessary that everyone carries out their activities with a firm commitment to comply with current legislation and regulations, our Code of Ethics and Conduct, internal policies and all procedures and controls established by the company. Under no circumstances can the conviction to act on behalf of Nosco Couture justify behavior on the part of its Professionals and Collaborators who are in disagreement with this commitment.

### 1.1 Purpose

The purpose of this Code of Ethics and Conduct is to provide an insuperable framework of reference through the establishment of some Standards of Conduct for all Professionals and Employees of the Company. The absolute responsibility of each Professional and Collaborator is to "do the right thing" and, therefore, Nosco Couture makes available to all its Professionals, Employees and third parties with a legitimate interest according to the circumstances of the case through which they may contact the Company to answer any questions about the interpretation and application of this Code of Ethics and Conduct and, in addition, they should report to through the Denunciations Channel the unlawful conduct or that, in some way, could constitute a breach of this Code and its development standards by other Professionals and Collaborators

### 2.1 Scope

This Code of Ethics and Conduct is mandatory in compliance and applies to Shareholders, Professionals and Employees, representatives, suppliers and stakeholders who provide services to Nosco Couture and who, in any way, act on behalf of Nosco Couture, such as agents,

intermediaries or subcontracted companies, regardless of where they develop their activity and whether the relationship that unites them is labor or commercial.

## 2. PRINCIPLES OF ACTION

### 2.1 COMPLIANCE WITH LEGISLATION

To exercise its activity with integrity and professionalism with the commitment to develop all its activities in accordance with the legislation in force in all areas of activity in which it carries out its activities, as well as other requirements that are subscribed by it.

Provide supervisory and supervisory authorities with all required collaboration or requested information within their scope.

### 2.2 CLIENTS

Must act in a professional and effective manner in order to provide quality services that contribute to the maintenance and strengthening of relationships with the Group's customers and optimize its strong image and reputation.

Provide products and services in order to meet the needs of customers, meeting the agreed conditions and commitments made according to the expectations placed.

Ensure equal treatment to all customers by not making any unjustified discrimination between them.

### 2.3 SUPPLIERS

Nosco Couture will independently and objectively select suppliers and service providers based on market conditions, quality of service and cost criteria, but also their ethical behavior as perceived by Nosco Couture.

Nosco Couture must negotiate on the basis of good faith and honor in its contractual commitments.

Honor the commitments made.

### 2.4 COLLABORATORS

Our soul is our collaborators, so we define human resources policies with respect for the dignity, diversity and rights of each person.

No forms of individual discrimination that are incompatible with the dignity of the human person are admissible, in particular on account of origin, ethnicity, sex, political conviction, religious confession, sexual orientation or physical disability, and no conduct configured as sexual harassment, bullying or abuse of power is admitted.

Treat each employee fairly and enhance equal opportunities for personal and professional development, including through a rigorous and constructive performance assessment, encouraging participation in non-professional activities.

## 2.5 INTEGRITY

Always ensure integrated conduct and maintain systems of prevention and control in relation to fraud and irregularities, in particular in financial matters, property, conflict of interest, appropriation or misuse of information. These systems take into account the guidelines contained in the anti-corruption prevention plans approved, in particular by the Corruption Prevention Council (<http://www.cpc.tcontas.pt>)

## 2.6 COMPETITION

Respect market rules by promoting fair competition, avoiding any practice that could impede, distort or restrict competition in a sensitive manner.

Relate to competitors in a healthy and cordial way and promote mutual respect.

## 2.7 RESPONSIBILITY TO SHAREHOLDERS

Act loyally towards shareholders, taking into account their interests with the fundamental objective of creating value and risk control.

Absolute compliance with the legal principles, the equal treatment of its shareholders, ensuring that the necessary information is made available, in an appropriate, true, transparent and rigorous manner.

## 2.8 WORK ENVIRONMENT, SAFETY AND HEALTH

Provide a good working environment in the most appropriate conditions of safety and health at work and promoting the spirit of team, union and of mutual help among employees.

Since the safety, health and well-being of employees is a priority of Nosco Couture, everyone should know, strictly comply with laws, regulations, internal instructions on this matter and enforce the standards, as well as report any verified non-conformities.

They must know and be committed to promoting good practices in the context of compliance with the Environmental Management System. They must be aware and act to minimize environmental impacts, in particular with regard to the consumption of natural resources, raw materials and energy, promoting reuse, conservation of biodiversity and ecosystems.

## 2.9 SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT

Nosco Couture's objective is to contribute to a quality economic or social development, based on respect for fundamental human rights and work and on the protection of the environment. Nosco Couture promotes a culture of sustainability in all its spheres of influence, particularly among its employees, customers and suppliers.

To achieve this objective, it acts in a logic of sustainable development in the economic, social and environmental aspects.

Take social responsibility with the community where you develop your business activity in order to contribute to your progress and well-being.

Mitigate and/or minimize the environmental impacts that arise from the environmental aspects associated with the activities and services developed.

Promote, disseminate, stimulate and influence employees, customers, suppliers and the community, in particular, with regard to the prevention of waste production, the correct segregation of waste, in order to enhance their recovery and their correct referral, the prevention of air, water and soil pollution, as well as the efficient use of the natural resources consumed.

## 3. STANDARDS OF CONDUCT

### 3.1 RESPONSIBILITIES

Nosco Couture employees must:

- Guide your conduct according to the responsibilities assigned to you, always with exemption competence, rigor, diligence and transparency, avoiding unnecessary expenses and taking care of the company's assets and assets.
- Use the power that has been delegated to them in a non-abusive way, oriented to achieve the objectives of the respective company and never to obtain personal advantages, continuously seeking the improvement and updating of their professional knowledge and skills.
- Respect the values of Nosco Couture and the principles based on this Code, both in internal and external relations.
- Report any irregularities that could jeopardize the development of the business or the good name of Nosco Couture.

- Assume an honest and dedicated behavior at all times of your activity, as well as respect your commitments to Nosco Couture, striving to safeguard your prestige and credibility and always acting in accordance with the law.

### 3.2 INTERPERSONAL RELATIONSHIPS

Observe the principles of loyalty, integrity, cooperation and respect for hierarchies, guiding their reciprocal relations on the basis of a cordial, respectful and professional treatment.

Promote the sharing of knowledge or information and interdisciplinary cooperation or between departments, focusing on team spirit. To have performances with a high sense of responsibility and cooperation, while focusing on the good environment and personal care with both colleagues and hierarchical superiors and those with subordinates

Respect the inherent value of each individual, regardless of their gender, marital status, physical or mental disability training, caste, nationality, race, religion, sexual orientation, conviction, political or union affiliation.

Do not involve Nosco Couture in its performances on a personal basis.

### 3.3 CONFLICT OF INTEREST

Avoid situations that may lead to conflicts of interest, intervening in decision-making processes involving directly or indirectly, organizations with which they collaborate or have collaborated, or persons with whom they are or have been linked by ties of kinship, friendship or affinity of any nature. In the absence of having to refrain from intervening in the above-mentioned proceedings, they shall inform the hierarchy of the existence of such links.

Refrain from participating in or performing any functions in organizations in which the activity to be developed may conflict with the performance of its duties at Nosco Couture or whose purposes may be contrary to those of Nosco Couture.

### 3.4 INTEGRITY

Do not accept or offer third parties offers payments or other benefits that may create in their interlocutors expectations of favoring in their relations with the company.

Gifts received from third parties that exceed mere courtesy or a symbolic and commercially disputing value, shall be communicated to the hierarchical responsible, and refused if indicative of expectations of obtaining special favor by the offerors.

### 3.5 NON HARASSMENT

Nosco Couture encourages respect and cooperation among all employees in a respectful and dignified work environment, repudiating any harassment practices. Any form of harassment, committed when accessing employment or employment or vocational training is prohibited.

Harassment means unwanted behaviour, in particular that based on discrimination, committed when accessing employment or employment itself, employment or vocational training, with the aim or effect of disturbing or embarrassing the person, affecting his dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.

The following behaviors by employees ("bullying") are thus prohibited:

- a) Use of offensive, coarse or obscene language;
- b) Degrading or vexatious comments or criticisms, in public or in private;
- c) Obscene gestures;
- d) Provocations, intimidation or threats;
- e) Display, display, assign, disclose or advertise, in any way or by any means, images or offensive objects depending on their discriminatory content;
- f) Use of pressure on other employees to resign or transfer.

Sexual harassment constitutes any and all unwanted sexual behavior, in verbal or non-verbal form, physical or otherwise, with the purpose or effect of disturbing or embarrassing people, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment. The following behavior is thus prohibited to the extent that they may constitute sexual harassment in accordance with this definition.

- a) Sexual advances, requests or pressure for the realization of sexual favors;
- b) Inappropriate and unwanted physical contacts;
- c) Displays, presentations, compromises, disclosures or publicity, in any way or by any means, of sexually suggestive images, messages or objects;
- d) Comments, observations, jokes or reference of a sexual nature.

Whenever he has knowledge or well-founded suspicion of any violation of the rules set out, especially of any occurrence in the company that may embody moral or sexual harassment, the employee must communicate the knowledge of the occurrence through the channel of complaints.

The whistleblower of harassment and the witnesses indicated by him/her may not be sanctioned disciplinarily unless they act with deceit, on the basis of statements or facts contained in the file of the case, judicial or counter-ordenacional, triggered by harassment until the final decision, final, without prejudice to the exercise of the right to contradictory.

### 3.6 CONFIDENTIALITY AND PROFESSIONAL SECRECY

Nosco Couture employees, even after they have ceased their duties in the company, are subject to professional secrecy, in articulating in matters that, due to their objective importance, by virtue of internal decision or by virtue of the legislation in force, should not be known.

Use, in Nosco Couture or outside of it, reservation and description of the facts and information that they are aware of in the performance of their duties and comply with the rules established as to the confidentiality of the information.

All personal data collected must be processed impartially, legally, carefully, in order to protect the privacy of each employee, and in strict compliance with applicable legal regulations.

### 3.7 ALLEGIANCE

Assume a behavior of loyalty to Nosco Couture, striving to safeguard its credibility and good image in all situations, as well as promote and ensure its prestige.

### 3.8 ASSET PROTECTION

Ensure the completeness, protection and conservation of the financial and intellectual physical assets of the respective companies, and the available resources must be used efficiently, with a view to the achievement of the objectives defined in the company, not using them, directly or indirectly, for their personal or third party benefit.

### 3.9 MONEY LAUNDERING AND TERRORIST FINANCING

Nosco Couture expresses its firm commitment not to carry out practices that may be regarded as irregular in the development of its relationships with customers, suppliers, competitors or authorities, including those relating to money laundering from illegal or criminal activities.

In addition, Nosco Couture undertakes to comply with all national and international rules and provisions in force in the fight against money laundering and terrorist financing that apply to it.

### 3.10 PRIVATE TRANSACTIONS

Refrain from participating in or maintaining any contracts or transactions under conditions other than normal market conditions with entities with which Nosco Couture maintains commercial relations or controlled by its officers, including in the negotiation of loans, obtaining discounts, negotiating loans, obtaining discounts, negotiating payment terms or selling goods or services that may interfere with institutional or commercial relations between the entities and Nosco Couture or among Employees of Nosco Couture beneficiaries of transactions and these entities.

### 3.11 GOOD GOVERNANCE

Manage Nosco Couture with diligence, transparency, creating conditions for dialogue within management bodies on objectives, strategy, risk analysis and performance evaluation and in compliance with the highest standards of corporate governance.

### 3.12 FINANCIAL INFORMATION

Providing complete and accurate financial information is a key means of enabling stakeholders to make decisions based on their relationships with Nosco Couture.

Financial reports must be true, clear, complete, and in strict compliance with local accounting standards and Nosco Couture.

Employees must treat financial data honestly and accurately, maintaining detailed and undistorted financial information, in a recoverable format, during the period established for data retention. Any fraudulent change or falsification of records or documents is prohibited and unjustifiable.

Those responsible should promote a culture of internal control over financial reporting.

Financial statements and other information addressed to shareholders, regulators and the public shall be understandable and publicly available in accordance with applicable local law.

### 3.13 CORRUPTION AND BRIBERY

Nosco Couture has adopted a zero-tolerance policy regarding corruption (active and passive) and bribery and is committed to compliance with anti-corruption and bribery legislation.

It does not allow any practice of bribery or corruption, in an active or passive form, including facilitation payments or for the creation, maintenance or promise of irregular situations or favor.

In particular, do not offer, make or authorize an undue payment (in cash or otherwise) to any person, including any local or foreign authority anywhere in the world.

You must not give, promise to give, offer or accept any payment, gift or hospitality in expectation or hope of being granted or achieved a business advantage or to reward someone with a view to obtaining or providing a level of service that would normally not be entitled

### 3.14 RELATIONS WITH SOCIAL COMMUNICATION AND SOCIAL NETWORKS

Nosco Couture employees act diligently in their communications on social media and do not make misleading statements about company information.

Employees know that Nosco Couture's confidentiality policy also replicates with any media.

No representations or comments shall be made on behalf of Nosco Couture as the right to make a statement on behalf of the company belongs only to management or employees to do so.

Employees in the use of social networks must comply with the rules of conduct set out in this Code of Ethics and Conduct. Do not publish information about Nosco Couture that is confidential in nature or internal, limiting information that is public and always considering the implications that may arise from the publication of content that may be considered unlawful, offensive, defamatory or threatening or from which may result damage to the image and reputation of Nosco Couture.