



## A RESPONSIBLE, RESPECTABLE BUSINESS

Responsible businesses stand the test of time. It is important to Seth to achieve recognition through the quality and value of the projects developed in the community to which it belongs and the socioeconomic environment where it operates. The company continually seeks to attract and retain its clients through its prestigious history and reputation, built upon respect and based on competence, innovation and compliance.

Over its nine decades of operation, Seth has built a solid reputation, both in Portugal and abroad, by focusing on the following key principles:

- guaranteeing excellence in all works undertaken, fulfilling its commitments and ensuring efficient collaboration with its clients and business partners, such as to allow the achievement of common goals;
- building solid relationships with all employees, clients and business partners, based on loyalty, trust and respect;
- ensuring honest, open and transparent communication;
- safeguarding the solid financial reputation the company has earned.

To preserve this reputation is the main mission of Seth's management, which relies on the invaluable effort of its employees, i.e. all of us.

Our absolute and steadfast commitment to observing ethical principles and adopting a responsible social and environmental conduct is a key success factor for Seth.

Because we consistently act with the utmost integrity and honesty, we are able to build solid relationships, within the company and with other stakeholders – clients and business partners – , based on trust and mutual respect.

Because we all embrace a duty of respect for the environment, we adopt solutions, methods, technologies and procedures that minimise the impact of our operations.

This written Code of Conduct reflects who we are as a legal person, seeks to guide us in our ambition to become increasingly better; defines the grounds and requirements set by our company policies, guidelines and procedures; and constitutes a valuable guideline for our behaviours.

In this sense, Seth's Code of Conduct is a green book for responsible, correct action.

## SETH'S VALUES

### **Respect for all**

At Seth, we respect each and every individual, treat everyone with due consideration and do not tolerate any behaviours that may harm the honour or dignity of others.



Our internal relations and those we establish with our clients and business partners are underpinned by the principles of dignity, mutual respect and responsible behaviour.

We foster civil, respectful relations between ourselves and with others.

### **We look after ourselves and one another**

At Seth, we look after ourselves and one another. We are thus committed to preventing moral and sexual harassment and avoiding occupational accidents, in order to promote and safeguard the physical, moral and psychological safety and well-being of all, every single day.

### **We demand quality and respect the environment**

Our professional performance is based on the most stringent quality standards. We spare no effort to fulfil our obligations to our clients in a timely, complete, unexcelled manner, always with the utmost respect for the environment.

We use environmentally-friendly solutions, methods, techniques and technologies whenever we can.

### **We use Information Technologies in a responsible, adequate manner**

At Seth, we seek to use information and Information Technologies (IT) adequately. In this sense, we use information, equipment and systems securely and responsibly, with the utmost respect for the law.

### **We use our resources responsibly**

At Seth, we seek to use our material and financial resources in a responsible, attentive, conservative manner.

### **We repudiate corruption**

We follow strict rules of conduct and avoid engaging in any form of corruption, directly or through third parties.

### **We advocate sound, fair competition**

We strive to act with the outmost honesty and loyalty in the pursuit of economic advantages.

### **We are a valued business partner**

At Seth, we build respectful, responsible relationships with our clients and business partners.



## CODE OF CONDUCT RULES

### HUMAN RIGHTS AND SOCIAL RESPONSIBILITY

Our success depends on the way we behave.

#### **Human rights**

Seth expressly declares its intent to build business relationships exclusively with physical or legal persons that respect human rights, under the terms of the United Nations Universal Declaration of Human Rights.

Irrespective of where we operate, we do our utmost to observe the fundamental principles of justice, dignity and mutual respect, and seek to fulfil the unconditional obligations (moral and legal) to avoid and prohibit the exploitation of others and to avoid causing physical, moral or psychological harm to third parties as a result of our conduct, whether active or omissive.

#### **Social responsibility**

Seth takes the values it promotes and advocates to all places where it operates.

We conduct our business abroad in accordance with the values we hold dear, in compliance with local legislation and with the utmost respect for local habits.

When operating within disadvantaged communities, we are particularly attentive to local needs and seek to integrate ourselves and contribute to ensuring responsible socioeconomic development.

### OCCUPATIONAL HEALTH, SAFETY AND WELL-BEING

All of Seth's employees are entitled to a fair, dignified, healthy and safe working environment.

Our respect for one another drives us to create sound working conditions and ensure adequate relations, in compliance with the principles we advocate and the local, national and international legislation we are bound to observe.

#### **Well-being at work**

At Seth, we do not tolerate any conducts, active or omissive, that may result in physical, moral or psychological harm.

We all undertake the obligation to act in a dignified, honourable, respectable and respectful manner.

We do not condone any behaviours, including negligent, that might pose a risk to our dignity, well-being, health and safety, or to those of our colleagues, other individuals and third parties with which we collaborate.



We do not tolerate moral or sexual harassment, violence or the threat of physical or psychological violence, coercion or intimidation.

We deem as harassment each and every behaviour that harms the dignity, image or consideration of others, or creates an intimidating, hostile, degrading or humiliating environment, on moral, psychological or sexual grounds.

We do not tolerate any form of physical or psychological violence.

These principles underpin the relationships we build between ourselves and with others.

We should all be attentive to the signs of stress or lack of motivation that may result from occupational, environmental or social issues.

We are all duty-bound to report any situations that may potentially cause physical or psychological harm to our hierarchical superiors.

We are responsible for reporting any facts that do or may potentially cause physical or psychological harm through the internal communication channels specifically created for this purpose or through any other available means.

### **Safety at work**

To ensure safety at work is the responsibility of all Seth employees. Therefore, we do not tolerate any behaviours, including negligent, that may pose a risk to our health and safety, or to those of others.

We all have the obligation to be familiar with all occupational health and safety rules, participate in training sessions and use adequate collective and personal protective equipment, in order to ensure adequate safety conditions and create a sound working environment.

We are responsible for participating in training sessions and informing our hierarchical superiors of our needs concerning the acquisition of health and safety knowledge.

Seth's management is responsible for creating a healthy, safe working environment, as well as ensuring that adequate reporting channels are in place, such as to allow effective employee engagement in this area.

It is our duty to contribute to the continuous improvement of occupational health and safety measures.

For this purpose, we should undertake the following responsibilities:

- Participating in the identification of errors that may cause occupational accidents and in the implementation of preventive measures;
- Doing our utmost to eliminate any activities that may originate hazards to ourselves or others, by reporting such situations to our hierarchical superiors.

At Seth, we are all responsible for ensuring the safety of all individuals and entities with which we collaborate.



### **Crisis management**

We may occasionally experience of become aware of situations that cause distress to one or more colleagues or business partners.

In these circumstances, we should seek the most technically capable individuals in our organisation, such as to ensure the best possible help.

Therefore, we are all duty-bound to report any situations that may come to our knowledge to our hierarchical superiors.

### **Working conditions**

All of Seth's employees, as well as the employees of all entities that collaborate with Seth, are entitled to adequate working hours and commensurate remunerations, in accordance with the qualitative and quantitative requirements and amounts set by the applicable legislation and labour regulations.

We are all entitled to a fair salary and to working hours that allow for an adequate work-life balance.

We are all responsible for complying with the established working hours, including the rest periods stipulated in accordance with the applicable legislation or regulations.

We should ensure that all entities with which we collaborate comply with the applicable legislation in all matters pertaining to their employees.

We all have the obligation to report any violations of the applicable legislation or regulations to our hierarchical superiors.

## **EMPLOYEE RIGHTS**

Seth seeks to offer equal opportunities and strives to ensure equal access to employment and fair labour relations, observing the supreme principles of dignity and justice.

Seth spares no effort to fight discrimination, foster individual talent and reward performance.

### **Employee status**

At Seth, the status of each employee is as established in the respective employment contract, in accordance with the applicable legislation, the regulatory instrument that governs labour relations – the Collective Bargaining Agreement (CBA) for the Civil Construction and Public Works Sector – and internal regulations.

The employee status of each of Seth's employees is set out in a written document, namely the respective employment contract.

We are all responsible for ensuring that the employers with which we collaborate comply with the applicable labour legislation.



## **Non-discrimination**

Seth does not tolerate any type of discrimination, namely based on any of the following aspects:

- origin, nationality, ethnicity, language;
- religion, political beliefs, social or financial status;
- physical condition, gender, age or sexual orientation.

We all have the obligation to report discriminatory behaviours to our hierarchical superiors.

## **Forced or compulsory labour**

Seth does not tolerate any type of forced or compulsory labour (or any similar practices), as defined by international law and the Portuguese legal system.

We abominate human trafficking.

It is our duty (moral and legal) to report any occurrence that may constitute any of these situations.

## **Freedom of assembly and association and the right to collective bargaining**

At Seth, we respect freedom of assembly and association and do not discriminate any employees choosing to engage in legitimate union activities.

We help establish and have the utmost respect for the rules dictated by collective labour regulations.

## **QUALITY AND ENVIRONMENT**

At Seth, we do not tolerate any violation or disrespect for environmental protection regulations.

### **Quality**

Because we comply with strict quality standards, we are responsible for:

- Fulfilling our obligations in a rigorous, timely manner, ensuring that we complete every awarded contract within the agreed timeline, under the agreed price conditions, in accordance with the technical specifications required by the client and in full compliance with the applicable legislation and good practice;
- Collaborating with our clients regarding the quality standards required, by clarifying and ensuring a good understanding of the respective requirements and technical specifications;
- Reporting any difficulties and problems that may occasionally compromise the timely fulfilment of our obligations in a timely, clear manner.



### **Environmental responsibility (prevention)**

At Seth, we adopt adequate procedures to prevent or minimise the impact of our operations on the environment and the climate, thus undertaking the following responsibilities:

- Implementing environment-friendly solutions and technologies, whenever feasible;
- Actively identifying the risks and environmental impact of our specific activities and analysing opportunities to minimise or eliminate such risks and impact;
- Advising our business partners and clients on matters pertaining to the adoption of sustainable building solutions and techniques;
- Observing our duty to protect the environment and the climate.

### **Pollution control and reduction**

We undertake the following responsibilities within the scope of our operations:

- Reporting any damages, harm or risks to the environment to our hierarchical superiors;
- Optimising the use of vehicles, machinery and equipment that allow us to minimise environmental impact, whenever possible, such as to mitigate the adverse effects of our operations.

## **BUSINESS ACTIVITY**

We observe the principles of mutual respect, collaboration and protection in our business activity and in our professional relations with third parties, namely clients, suppliers, service providers and business partners, and firmly repudiate corruption and unfair or illicit competition.

### **Clients and Business Partners**

We observe the principles of mutual respect and collaboration in our relations with clients and business partners. In this sense, we undertake the following responsibilities:

- Ensuring productive cooperation, by facing the difficulties and challenges encountered in a responsible manner;
- Rejecting non-collaborative behaviours that may compromise the professional relations established.

### **Suppliers and Service Providers**

Seth requires its suppliers and service providers to observe similar values and comply with equivalent conduct standards as those implemented across the company.

In this sense, the agreements we sign include the conduct standards to which the parties will be bound.



## **Information and IT (Information Technology)**

Seth does not allow the unauthorised disclosure or use of confidential or proprietary information or personal data pertaining to their employees, shareholders, clients and business partners.

The unauthorised disclosure or use of the information listed below is particularly disallowed:

- undisclosed financial information, under the terms of the law, as well as know-how and methodological, technical or technological information of the property of Seth;
- ongoing negotiation or contracting procedures and all items included therein, namely financial and technological documents;
- personal information pertaining to employees, with the exceptions established in the personal data protection legislation.

Should we receive any confidential information whose disclosure has not been authorised, we shall be required to inform the sender, directly or through the internal services established for this purpose, and refrain from using the information received, through any means.

## **Personal data protection**

Personal data processing entails a wide range of manual and automated operations, namely collection; recording; organisation; structuring; preservation; adaptation and alteration; recovery; consultation; use; disclosure by transmission, communication or any other means; comparison or interconnection; limitation, and elimination or destruction of personal data.

Personal data must be treated in compliance with the applicable legislation.

## **Communication**

We communicate between ourselves and with others in a respectful, civil manner.

At Seth, we do not tolerate offensive or deliberately misleading actions or statements.

We should not issue any statements (verbal or written) to third parties (including through the media) concerning issues related to the company and business activities without the prior authorisation of the management.

## **Property of SETH**

At Seth, we are all required to safeguard the company's assets and do not tolerate the undue, fraudulent or illicit use of the material or financial resources of the company or of any third parties.

In this sense, we undertake the following responsibilities:

- Protecting resources from fraud, theft or loss, amongst other occurrences;
- Refraining from using the assets of Seth (or of any third parties) for personal purposes;
- Refraining from moving the assets of Seth (or of any third parties) from their usual locations, except when this is expressly authorised by our hierarchical superiors;



- Ensuring that institutional documents and company information are produced and treated in compliance with the applicable legislation and internal regulations.

### **Gifts**

At Seth, we only gift or receive material items of symbolic value, as related to the celebration of holiday seasons or special occasions, provided that the beneficiaries are not required to undertake any obligation in connection therewith.

We do not authorise the gifting or receiving of money or any items of a similar nature within the scope of our professional activity.

We do not allow any form of bribery or illegitimate benefits to ourselves or to any third parties.

We all undertake the obligation to report any occurrences that constitute corruption to our hierarchical superiors.

### **Fair competition**

Seth strives to ensure fair, loyal competition, by complying with the following rules:

- We all have the duty to know and understand the contents, meaning and scope of the competition protection legislation;
- We do not tolerate any violation of the legal regulations set out for the purpose of protecting and ensuring fair, sound competition;
- We do not allow any practices that may affect our competitors, namely agreements pertaining to prices or market shares.

We are honest and prudent in our relations with our competitors. Therefore, we observe the following procedures:

- We document all statements made in every meeting we attend;
- We should seek legal advice should a given behaviour constitute a violation of competition law.

### **Loyalty**

At Seth, we act with loyalty in the defence of the objectives and interests of the company.

We require loyalty from our clients and business partners.

We do not tolerate any actions that may compromise or harm the image and reputation of Seth in the markets where we operate and within the scope of our business and relationships.

### **Conflicts of interest**

We are all required to act correctly and sensibly, such as to ensure the absence of conflicts between our personal interests and those of Seth.

In this sense, we observe the following procedures:



- We should seek legal advice whenever we intend to undertake, directly or indirectly, any activities that may potentially constitute a form of competition with Seth;
- We are required to act cautiously should we engage in any activities that may involve a conflict of interest with Seth;
- We should refrain from contracting any of Seth's suppliers or service providers whenever the agreements involved may cause any harm to Seth.

## **REPORTING OF CODE OF CONDUCT VIOLATIONS**

In this document, REPORTING is to be understood as communicating the practice or suspected practice of any acts that constitute a violation of the code of conduct.

The code of conduct by which we abide includes the REPORTING of any actions that may come to our knowledge and that we may deem, on adequate grounds, to be illicit or constitute a violation of the established rules.

Reporting should be made through the written form available [HERE](#). Reports will be processed by an external, independent lawyer.

The anonymity of the person submitting the report will be respected, both by the company and the lawyer, unless the former manifests their express wish to reveal their identity.

The aforementioned external lawyer will be responsible for issuing a prior opinion on the reported facts and, should they deem it adequate, submitting a proposal to the management of Seth concerning the procedures to be adopted.