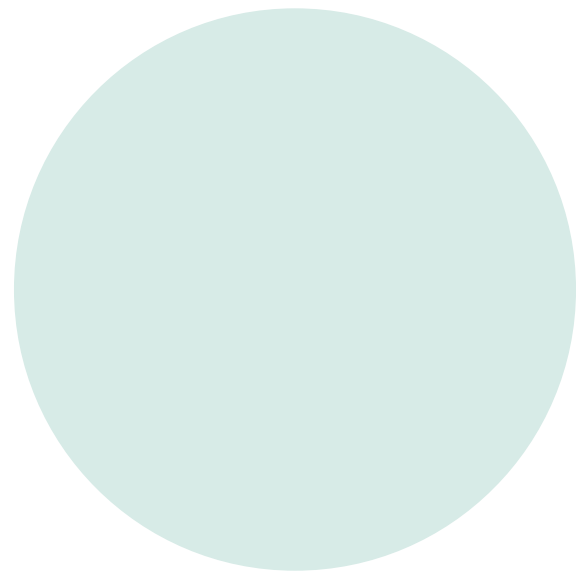


Code of Ethics and Conduct



PL102ENr5

May/2026
INTERNAL

Distribution List

Name
All employees via the Employee Portal

Document History

Data	Versão	Descrição
15-01-2019	R1	Initial Version
02-05-2019	R2	Update
02-07-2021	R3	Update
04-02-2026	R4	Update
18-05-2026	R5	Update

Approval

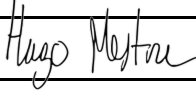
Approved by:	
Name	Hugo Mestre
Signature	


Table of Contents

Distribution List	2
Document History	2
Approval	2
Table of Contents	3
Who must follow the code.....	7
Policies and procedures of the corporation.....	8
Human Rights	8
Principle 1:.....	8
Principle 2:	8
Labour.....	8
Principle 3:.....	8
Principle 4:.....	8
Principle 5:.....	8
Principle 6:.....	8
Environment.....	9
Principle 7:.....	9
Principle 8:.....	9
Principle 9:.....	9
Anti-Corruption	9
Principle 10:.....	9
Responsibilities.....	9
Management.....	9
Employees.....	10
Work Environment.....	11
Health, Safety and the Environment.....	12
Company Property	12
Intellectual Property.....	13
Communications.....	13
Electronic Mail and Internet Usage	13
Confidential Information	13
Data Protection and Privacy	14
Gifts and Entertainment.....	14
Conflicts of Interest	15
Making your tech journey more secure	3

Illegal and Improper Payments.....	15
Relationships with External Stakeholders	16
Customers	16
Suppliers, Partners and Third Parties	16
Competition	16
Governments.....	16
Public Authorities	16
Improper Payments	17
Our Policy.....	17
Your Role	17
Supplier Relationships	18
Our Policy.....	18
Your Role	19
Anti-Money Laundering.....	20
Our Policy.....	20
Your Role	20
Examples:	20
Fair Employment Practices	21
Our Policy.....	21
Your Role	22
Environment, Health & Safety	22
Our Policy.....	22
Your Role	23
Working With Governments	24
Our Policy.....	24
Your Role	24
Competition Law	24
Our Policy.....	24
Your Role	25
Securing Integrity Operations Globally	26
Our Policy.....	26
Your Role	26
Cyber Security & Privacy	26
Our Policy.....	27
Your Role	27

Intellectual Property.....	28
Our Policy.....	28
Your Role	29
Controllership	30
Our Policy.....	30
Your Role	30
Conflicts Of Interest	31
Our Policy.....	31
Your Role	31
Insider Trading and Stock Tipping.....	32
Our Policy.....	32
Your Role	32

Board statements

A large, light green circle is positioned on the left side of the page, partially overlapping the text area.

The Code of Ethics and Conduct set clear expectations on our business conduct and provides useful guidance for the management of critical risk areas such as privacy, conflicts of interest, improper payments, environmental impacts and others. Our actions, words and behaviours do matter. Regardless of where we live or the job we do when we do what's right — in other words, when we act with the highest integrity. The Code cannot cover every possible situation, but it provides the basic legal guidelines and essential ethical behavioural standards that will help us make the right business decisions.

We need to be diligent and committed in reporting any concerns or violations of the Code as soon as they arise – without exception. That means maintaining an environment in which we feel comfortable raising concerns about potential violations. We will not accept any negative actions against employees who raise legitimate compliance concerns in good faith.

Our standards of business ethics and conduct emphasize the role that each of us plays in building trust, and the approach you should take in making decisions. When we apply these principles in our daily work, we can move forward with confidence in our ability to make good decisions that build trust and empower our customers and partners to achieve more.

Thank you very much.

— **Hugo Mestre**

Objective

This Code of Ethics and Conduct¹ explains the standards of behaviour that INTEGRITY, S. A. (whose trading name is Devoteam Cyber Trust)² expects of you in your daily activities and dealings with others. The Code cannot foresee every situation that might arise. Rather, it identifies guiding principles to help you make decisions consistent with INTEGRITY's values and reputation. You should also familiarize yourself with various corporate policies that provide more detailed guidance on specific issues that may affect your work, such as international business and marketing, Internet policy, health, safety and the environment and human resources.

When a company practises and promotes ethical behaviour, everyone benefits. Being honest, forthright and consistent in our dealings with others fosters a positive work environment. A company that prides itself on integrity inspires confidence in employees, customers, shareholders, suppliers and the wider community. From time to time, changes in the business context or regulatory environment create a need for new guidelines.

Our Code of Ethics and Conduct guide all employees to uphold our core values, standards of behaviour and commitment to the United Nations Global Compact's 10 principles of social responsibility throughout our global activities.

In accordance with the General Regime for the Prevention of Corruption (RGPC), this Code shall be reviewed whenever deemed necessary, particularly following relevant changes in the organizational, legal, or regulatory context, and mandatorily at least every 3 (three) years. This ensures that the Code remains current, effective, and aligned with best practices in ethics and compliance.

Who must follow the code

The Code of Ethics and Conduct is intended for all employees of INTEGRITY, nationally and internationally, regardless of their activities and responsibilities. INTEGRITY suppliers and partners, as well as third parties, are also expected to adhere to the Code when dealing with or acting on behalf of INTEGRITY.

Compliance with these standards is mandatory. Any breach of our Code of Ethics and Conduct will be investigated and subject to appropriate disciplinary measures, in accordance with the law.

¹ Hereinafter, Integrity's Code of Ethics and Conduct will be referred to as "the Code."

² Hereinafter, Integrity, S.A. will be referred to as "Integrity".

Policies and procedures of the corporation

Each team issues its own set of procedures, in line with INTEGRITY's corporate policies. Employees have an obligation to follow those policies and procedures in addition to those described in this Code.

United Nations Global Compact's 10 principles

Human Rights

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2:

Make sure that they are not complicit in human rights abuses.

Labour

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4:

The elimination of all forms of forced and compulsory labour;

Principle 5:

The effective abolition of child labour; and

Principle 6:

The elimination of discrimination in respect of employment and occupation.

Environment

Principle 7:

Businesses should support a precautionary approach to environmental challenges;

Principle 8:

Undertake initiatives to promote greater environmental responsibility; and

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.

Integrity Mission Statement

To lead the Information Security industry through innovation, expertise and by providing products and services to satisfy the needs and exceed the expectations of our customers and business partners.

Responsibilities

The key responsibilities associated with this Code are understanding and compliance. The Code makes INTEGRITY's expectations of employees and management clear and explicit.

Management

The responsibilities of INTEGRITY managers include and go beyond those of other employees. As a manager, you are expected to:

- know the Code in detail and actively promote it in the workplace;
- lead by providing a model of high standards of ethical conduct, creating a work environment reflecting the content and the spirit of the Code;

Making your tech journey more secure

- develop strong processes to anticipate risks, including new and changing regulations;
- monitor regulatory compliance on an ongoing basis and conduct periodic audits of key processes;
- be vigilant in preventing, detecting and responding to any violations of the Code;
- protect those who report violations; and
- distribute the Code to employees and collect the above-mentioned acknowledgments.

Employees

As an employee, you are expected to:

- assume personal responsibility for performing your duties with fairness and integrity;
- agree to do your part to achieve INTEGRITY's objectives to the best of your abilities, while making decisions consistent with the Code, and without compromise;
- have a basic understanding of the Code and review it from time to time. You should also have a detailed knowledge of its provisions that apply specifically to your job.

If you become aware of a possible violation of the Code, you are expected:

- act promptly and in good faith by reporting the situation;
- be prepared to cooperate in investigations regarding violations of the code.
- you may report the matter by email to pt.integrity.compliance@devoteam.com or directly to your supervisor
- You may file a report through the company's **Whistleblower Channel**, available on the company's website. This channel guarantees confidentiality, protection of the whistleblower's identity, and is fully compliant with the EU Whistleblower Protection Directive. Retaliation against anyone who makes a report in good faith is strictly prohibited.

Values

Our core values are:

FIRST PEOPLE: Our priority is the human person. In order to continually enrich our culture, we invest in developing their skills and competences.

COMMITMENT TO EXCELLENCE: Our commitment is to demonstrate excellence in all spheres of our work and in our interactions with customers, shareholders, suppliers, colleagues, partners and communities. In addition, we commit to exercising judgment, professionalism, rigour, self-discipline, perseverance and team spirit.

RESPECT: We treat all people with equal respect and dignity regardless of their age, sex, culture, race, nationality, religion or sexual orientation. We demonstrate our respect for human dignity, autonomy, and privacy.

PROFESSIONALISM: Rigor, responsibility and integrity in the relationship with customers, national and international, and internal and external partners.

INTEGRITY: We behave with integrity and in an ethical manner in everything we do and say, thereby earning and maintaining the trust and respect of customers, shareholders, suppliers, colleagues, partners and communities.

CONFIDENTIALITY: Reservation, discretion and confidentiality in relation to facts and information received and transmitted in the exercise of their functions.

CUSTOMER ORIENTATION: We work to identify new GAPS in the market and we develop technology and approaches that increase the effectiveness and efficiency of our clients' Information Security Management.

INNOVATION: We promote a customer-centered culture that emphasizes outstanding service and meets our commitments at every level of our organization.

OBJECTIVITY: Acting in an impartial and unbiased manner.

Principles of Ethics

This Code addresses ethical conduct in relation to the work environment, business practices and relationships with internal and external stakeholders.

Work Environment

INTEGRITY treats all employees fairly, ethically, respectfully and with dignity. The Corporation offers equal employment opportunities without regard to any distinctions

Making your tech journey more secure

based on age, gender, sexual orientation, disability, race, religion, citizenship, marital status, family situation, country of origin or other factors, in accordance with the laws and regulations of each country where it does business.

INTEGRITY policies protect employees from harassment, bullying and victimization in the workplace, including all forms of sexual, physical and psychological abuse. As an employee, you are entitled to, and are expected to preserve, a positive, harmonious and professional work environment.

INTEGRITY expressly prohibits the promotion of, or participation in, political or religious activities during working hours or on company premises.

The document “PL101_Código de Conduta para a Prevenção e Combate ao Assédio no Local de Trabalho” can be consulted on the INTEGRITY Portal.

Health, Safety and the Environment

The occupational health and safety of employees and environmental protection are priorities at INTEGRITY, where they are regarded as a fundamental corporate social responsibility. We strive to reduce the impact of our activities and of the performance of our products on the environment.

INTEGRITY and its employees comply with all applicable laws and regulations. We adopt standards, procedures, contingency measures and management systems to ensure that our operations are managed safely, ecologically and in a sustainable way.

To protect their own safety as well as that of their colleagues and communities, employees undertake not to work under the influence of any substance that could impair their judgment or interfere with the effective and responsible performance of their duties.



Company Property

Company property should only be used for legitimate business purposes. INTEGRITY employees are expected to take good care of company property and not expose it to loss, damage, misuse or theft.

Intellectual Property

Intellectual property comprises trademarks, domain names, patents, industrial designs, copyrights and trade secrets. Employees have a duty to protect INTEGRITY's intellectual property, just as they have the obligation to respect that of others. Subject to applicable laws, any inventions or discoveries made by employees during the course of their work are INTEGRITY's property. Intellectual property is considered confidential information. For more detail see "Intellectual Property" section of this Code.

Communications

As an INTEGRITY employee, you should be truthful and straightforward in your dealings and not intentionally mislead colleagues, customers or suppliers. Use appropriate, professional language, both in written documents and public conversations.

Communications with the media, the investment community and regulators are the responsibility of designated corporate spokespersons. Inquiries received by an employee must be referred to an authorized spokesperson.

Electronic Mail and Internet Usage

INTEGRITY's electronic mail and Internet systems are provided for business use. When using electronic mail, you should remember that it is susceptible to interception, creates a permanent record, can be printed or forwarded to others by the recipient and will likely be retained on the recipient's computer for a long time. Therefore, exercise the same care in sending electronic mail as in other written business communications. Never use INTEGRITY's Internet connection or computer equipment to access, transmit or download content that is inappropriate and does not meet business requirements.

Confidential Information

Confidential information is information belonging to INTEGRITY that is not subject to public disclosure. Confidential information encompasses information produced by INTEGRITY or obtained in confidence from a third party and covered by a non-disclosure agreement.

Examples of confidential information are financial data, strategic plans, intellectual property, information on bids, personal employee information, legal documents and information on customers and suppliers.

Do not divulge confidential information to anyone other than the person or persons for whom it is intended, unless authorized or legally required to do so. This includes confidential information provided by suppliers and customers. Employees agree to maintain such confidentiality at all times, even after leaving the employ of INTEGRITY.

Employees should also exercise caution to avoid misusing or inadvertently disclosing confidential information. This includes:

- keeping electronic and paper documents and files containing confidential information in a safe place;
- not discussing confidential matters where they could be overheard, for example, in public places, such as elevators, hallways, restaurants, airplanes and ride-sharing vehicles (e.g., Uber, Bolt, taxi);
- exercising caution when discussing confidential matters on mobile phones or other portable devices;
- transmitting confidential documents by electronic devices, such as by fax or e-mail, only when it is reasonable to believe this can be done under secure conditions; and
- avoiding unnecessary copying of confidential documents.

Data Protection and Privacy

INTEGRITY respects the right to privacy of our clients as well as our team members. We consider all personal data and information as sensitive and confidential and we treat them accordingly.

When we collect various personal data and information necessary to duly carry out our business, we acknowledge the responsibility to protect their confidentiality and security.

We never share such personal data and information with anyone unless we are required to do so by law. We use them exclusively for legitimate business purposes for which they were obtained and collected. All team members are required not to use any such data or information for other purposes – neither internal nor external.

We safely discard all personal data and information when we no longer need them or when we are required to do so by the respective person.

Exceptionally, we may be required to allow an inspection by the authorities. Therefore, it is highly recommended that you do not keep any sensitive personal records or information not authorized.

Gifts and Entertainment

Employees, suppliers, partners and other third parties representing INTEGRITY must avoid giving or receiving gifts or entertainment if these might improperly influence the recipient's judgment or might be perceived to do so. Gifts can include goods, services, favours, loans, trips, accommodation or use of property, etc.

Sometimes in business, for example, in certain cultures, an exchange of gifts is appropriate. In such instances, the gifts should be reasonable, in good taste, and have token or nominal value. Employees must never give or accept gifts when prohibited from doing so by law or by the recipient's or donor organization's policies.

Conflicts of Interest

Avoid conflicts of interest, whether real or perceived, in the performance of your duties.

A conflict of interest is considered to be any situation or arrangement where your personal activities or interests conflict with your responsibilities to INTEGRITY.

Do not put yourself in a position where there is or could be an obligation to any third party who might benefit from such situation at the expense of INTEGRITY. Your actions must never lead to personal gain to the detriment of INTEGRITY's stated business interests.

Situations of conflict of interest can also arise when you take on outside work that could compromise the diligent performance of your duties for INTEGRITY.

Should such a situation arise, you are encouraged to discuss it with your supervisor to assess the impact the outside work could have on your duties for INTEGRITY and, if necessary, remove yourself from the situation to avoid any conflict of interest.

For more detail see "Conflicts of Interest" section of this Code.

Illegal and Improper Payments

INTEGRITY employees, suppliers, partners and other third parties are strictly prohibited from offering or taking any form of illegal or improper payment. INTEGRITY funds and assets must never be used for any unlawful purpose.

As an employee, you must never approve, authorize or make any payment, gift or favour to any person in a position of authority, such as a government or corporate official, in order to obtain favourable treatment in negotiations or the awarding of contracts, or any other dealings.

Relationships with External Stakeholders

Customers

INTEGRITY is committed to meeting the needs of its customers and strives to provide high-quality services and products. In customer relationships, employees behave in an ethical fashion. Sensitive, private or confidential customer information is safeguarded according to INTEGRITY's standards, with access restricted to those who have a need to know.

Suppliers, Partners and Third Parties

All agreements with suppliers, partners and third parties must be in accordance with the Purchasing and Supplier Management Procedure (PR113). Such agreements must be in line with reasonable competitive and market practices, the principles established in this Code and relevant corporate policies.

Competition

INTEGRITY employees and suppliers, partners and third parties must never employ unethical or illegal practices to collect competitive intelligence. INTEGRITY complies with antitrust laws wherever it does business. In general, we must guard against:

- price-fixing or arranged market segmentation; or
- monopolistic behaviour that aims to reduce competition.



Governments

Given its international and diversified nature, INTEGRITY is subject to a great variety of national and local laws and regulations. The Corporation and its employees and partners comply with all legal and contractual obligations in dealing with the various governments and regulatory agencies with which they are in contact.

Public Authorities

INTEGRITY maintains a position of independence from public institutions and political parties, without prejudice to professional relationships. Under no circumstances does it fund political parties or organisations whose mission is primarily political.

Principles of Conduct

Compliance with anti-bribery and anti-corruption laws must be at the forefront of this commitment and understanding those laws and the ethical standards required of all of us is therefore essential.

As part of this commitment, INTEGRITY will not tolerate any form of bribery or corruption. Our Code of Conduct states that we do not bribe anyone. This Policy sets forth the respective principles and rules and how they must be implemented.

Improper Payments

INTEGRITY earns its business on merit and strongly supports the rule of law around the world. We will not tolerate improper or corrupt payments made directly or indirectly to a customer, government official or third party, including facilitation or “grease” payments, improper gifts, entertainment, gratuities, favours, donations or any other improper transfer of value. We engage only reputable sales representatives and other third parties who share the same commitment.

RULE TO REMEMBER >> Do not permit or engage in bribery or corruption of any kind.

Our Policy

INTEGRITY prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.

INTEGRITY prohibits even small facilitation payments to expedite routine administrative actions, except in extraordinary circumstances and with the prior approval of an INTEGRITY’s administration, or where an employee’s safety or security is at stake. Our goal is to eliminate all facilitation payments.

We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on INTEGRITY’s behalf in business dealings.

We maintain accurate books, records, and accounts that correctly reflect the true nature of all transactions.

Your Role

- **Never offer, promise, make, or authorize** a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.

- **Remember that providing gifts, entertainment or anything else of value to government employees or private sector** is highly regulated and often prohibited. Do not provide such gifts and entertainment unless you have received prior INTEGRITY's administration approval.
- **Follow Corporate and business guidelines** regarding gifts and entertainment and other business courtesies.
- **Never contribute Company funds or other INTEGRITY assets for political purposes** without obtaining prior approval from INTEGRITY's administration.
- **Follow your business due diligence procedures** and require that any third-party representing INTEGRITY be carefully selected and comply with this policy.
- **Treat with extreme caution** a demand from a third party to receive its commission payment prior to winning a deal/contract
- **Be wary of any suggestion** to direct INTEGRITY business through a specific representative or partner due to a "special relationship."
- **Be suspicious of any request** to make a payment to a person who is not related to the transaction being discussed or a request that payments be made in another country.
- **Watch out for commissions** that seem too large in relation to the services provided

Bribery means giving, offering or promising anything of value to gain an improper business advantage.

Facilitation payments are small customary amounts paid to government employees or sector private to expedite routine clerical or administrative actions such as issuing permits.

Supplier Relationships

RULE TO REMEMBER >> Work only with suppliers that uphold INTEGRITY's values and high integrity standards.

Our Policy

INTEGRITY relationships with suppliers must be based on lawful and fair practices.

INTEGRITY provides suppliers a fair opportunity to earn a share of INTEGRITY's purchasing volume, including small businesses.

INTEGRITY only does business with suppliers that comply with all applicable legal requirements and INTEGRITY guidelines relating to labour, employment and environment, health and safety and that treat workers and others fairly and with respect.

INTEGRITY, as a business enterprise, promotes respect for human rights within our supply chain.

INTEGRITY safeguards information, including confidential and proprietary information and personal data, of both INTEGRITY.



Your Role

- **Protect INTEGRITY's confidential and proprietary information** including, where appropriate, with a confidentiality agreement. Also safeguard any confidential information or personal data that a supplier provides to INTEGRITY.
- **Avoid potential conflicts of interest** when you select a supplier, and never accept improper gifts or other items of value.
- **Follow government acquisition regulations** when purchasing materials and services for use in fulfilling government contracts.
- **If you observe a suspected human rights violation** in INTEGRITY's supply chain, elevate the concern to your manager.
- **Always report issues and concerns regarding supplier relationships:** be the Voice of Integrity and talk to your manager if you see unsafe conditions in supplier facilities, supplier employees who appear to be underage or subject to coercion, or an apparent disregard of environmental standards in supplier facilities.

INTEGRITY's reputation for integrity can be significantly affected by those whom we select to act as our suppliers.

Anti-Money Laundering

RULE TO REMEMBER >> Always know your customer and be alert to possible illegal activity.

Our Policy

INTEGRITY is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations.

INTEGRITY conducts business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

We adhere to risk-based “Know Your Customer” due diligence processes on prospective customers.

INTEGRITY has controls to detect, investigate and report suspicious activity.

We recognize AML risks introduced by third party and business partner relationships and mitigate those risks by, for example, performing watchlist screening.



Your Role

- **Collect and understand documentation about prospective customers, agents and business partners** to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources.
- **Follow your business Know Your Customer procedures** and rules on collecting and verifying information from our customers and related parties.
- **Follow your business rules concerning acceptable forms of payment.** Learn the types of payments that have become associated with money laundering (for example, payments on behalf of a customer from an unknown person).
- **Be alert for and escalate any signs of potential money laundering or other illegal activities.**

Examples:

Making your tech journey more secure

- Offers to pay in cash or through untraceable crypto-assets, or overpayments followed by requests for refunds.
- Payments made through multiple bank accounts, located in different countries and with no apparent connection to the contracting entity.
- Orders, purchases or payments that are unusual or inconsistent with a customer's trade or business.
- Clients with opaque corporate structures or unidentified ultimate beneficial owners, particularly when associated with high-risk jurisdictions or tax havens.
- Transfers of funds to or from countries with no apparent connection to the transaction.
- Transactions that might have been structured to evade recording or reporting requirements.

Money laundering is the process of hiding the proceeds of crime or making the source appear legitimate.

The term **"Customer"** applies to any individual or legal entity that engages the company for the provision of services.

Fair Employment Practices

RULE TO REMEMBER >> Treat all employees fairly and with respect.

Our Policy

INTEGRITY bases employment decisions on job qualifications and merit which include education, experience, skills, ability, performance, and growth values.

Employment decisions should also be made without considering a person's race, colour, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic protected by law.

We respect human rights everywhere we work and do business with others.

INTEGRITY will comply with all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labour, trafficking in persons and employment discrimination.



We take affirmative action where required by law to increase opportunities in employment for women, minorities, people with disabilities and others.

We respect employees' privacy rights and will use, maintain and transfer personal data in accordance with INTEGRITY's Employment Data Protection Standards, related procedures and local law.

Your Role

- **You may not refuse to work or cooperate** with others because of characteristics covered by this policy such as race, religion, sex, age, or other characteristic protected by law.
- **Create a work environment free from harassment** on the basis of any protected characteristic, and free from bullying.
- **Never make an unwelcome sexual advance** to an employee or other person with whom you work.
- **Never disclose employment data** to a person who does not have a business need, the authority, or, where required, the subject's consent.
- **Consult with your manager and an INTEGRITY legal specialist** if you encounter a conflict between this policy and local laws, customs or practices.

Environment, Health & Safety

RULE TO REMEMBER >> Follow Environment, Health & Safety procedures and be alert to environmental and safety hazards in your workplace.

Our Policy

INTEGRITY strictly complies with all environmental, health, and safety laws that apply to our operations.

We develop and follow safe work procedures to ensure workplace safety and prevent injuries.

We maintain environmental controls, in accordance with the Environmental Policy (PL104), to ensure our emissions meet legal limits.

We assess the environmental, health, and safety risks of any new activity, whether designing a new product, selling in a new market, building a new factory, or buying a new business.

Our environmental, health, and safety principles apply to everything we do — from making or servicing products and buying businesses to driving vehicles and disposing of waste.



Your Role

- **Understand and comply with all the environmental, health, and safety policies** that apply to you, including corporate policies, business policies, and any specific policies that apply to your site, position, or operation.
- **Implement INTEGRITY management tools and processes** to find and fix environmental, health, and safety concerns at your site.
- **Follow Corporate and business policies** for managing, shipping, transporting, importing/ exporting and disposing of hazardous materials and chemicals.
- **Question unsafe or improper operations.**

Eliminating or guarding against hazards starts with identifying them. You must alert supervisors or the Compliance team if you are aware of hazards or standards that are being ignored or hidden.

Red flags include:

- Failure to obtain or comply with regulatory permits.
- Deviations from written work practices—even if these deviations have become “routine”.
- Lapses in security or emergency preparedness.
- Inadequately maintained tools or equipment.
- Missing machine guards or faulty protective equipment.
- Unsafe driving.
- Failure to use lock-out, tag-out procedures or fall protection.
- Improperly shipped wastes or hazardous products.

Working With Governments

RULE TO REMEMBER >> Never take shortcuts when dealing with government — be transparent, always comply.

Our Policy

INTEGRITY follows the highest ethical standards in conducting business with governments.

INTEGRITY commits to comply with all contract terms and conditions, laws, and regulations applicable to INTEGRITY when working with governments.

We must be truthful and accurate when dealing with governments.

We maintain controls and procedures that target our government business activities specifically to ensure compliance in this highly regulated environment.

Your Role

- **Before submitting a proposal to a government**, review the requirements with all applicable stakeholders and only accept those terms with which INTEGRITY can comply.
- **Do not accept internal government information** about its selection process nor information about a competitor's proposal unless the government contracting officer has specifically and lawfully authorized its release.
- **After award, perform all contract obligations strictly** in accordance with the terms of the agreement. For example, do not make any substitutions for the goods and services to be delivered, or deviate from requirements, without the written approval of the authorized government official.
- **Do not offer, promise, make or authorize the giving of anything of value** to a government employee that is inconsistent with Corporate and business guidelines.

Competition Law

RULE TO REMEMBER >> Do not enter into any agreement with competitors that deprives customers of the benefits of competition.

Our Policy

Every INTEGRITY employee has a responsibility to comply with all applicable competition laws, regulations, decrees and orders.

INTEGRITY must never collude with other companies on price or terms to be offered to customers; agree with competitors to allocate markets or customers; or manipulate the bidding process.

Your Role

- **Do not propose or enter into any agreement** or understanding with any competitor about any aspect of competition between INTEGRITY and a competitor, including agreements on pricing, bidding, deal terms, wages or the allocation of markets or customers.
- **Do not propose or enter into any agreement with any other party** regarding whether or how to bid. Only submit bids if the purpose is to compete for and win a particular piece of business.
- **Avoid contacts of any kind with competitors** that could create the appearance of improper agreements or understandings. Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are raised, and promptly inform your legal counsel.
- **Understand and follow your business's specific guidelines about contacts with competitors**, obtaining and handling competitive information, and participating in trade and professional associations.
- **Avoid agreements or understandings that restrict the price** at which a party may resell a product or service.
- **Do not provide, receive or exchange any of the following types of information with a competitor** or its representative, whether in person, electronically or at an industry meeting:
 - Prices;
 - Bids;
 - Customers, suppliers, sales territories or product lines;
 - Terms or conditions of sale;
 - Production, sales or volume;
 - Costs, profits or margins;
 - Market share;
 - Sales, marketing or development strategies for products or services;

- Distribution methods.

Securing Integrity Operations Globally

RULE TO REMEMBER >> INTEGRITY has no greater responsibility than to protect its people and operations.

Our Policy

We implement Business Continuation Plan (BCP) designed to ensure the security of our people and operations globally. Our BCP include a process for identifying, and protecting against, the risks posed by man-made or natural incidents that affect our people, facilities, information technology assets and systems, or products, services and supply chain.

Communicate, as appropriate, about prevention, emergency response and business continuation with the INTEGRITY community, government officials, the media and the public.

Your Role

- **Maintain situational awareness.** Help us protect you, your colleagues, and visitors; know your surroundings.
- **Adhere to all entry/exit procedures.**
- **Comply with Devoteam and/or INTEGRITY travel policies.**
- **Make travel arrangements.**
- **Create and maintain a safe working environment.**
- **Conduct rigorous background checks** on new hires and contractors as permitted by law.
- **Be an active participant** in Business Continuity, security awareness sessions to ensure you have the knowledge to remain safe at work.

Involve INTEGRITY Security professionals if you encounter security concerns (for example, thefts, assaults, missing employees or data loss). **Report these events, or any other unusual or suspicious activity**, to your Director or Security Management.

Cyber Security & Privacy

RULE TO REMEMBER >> Respect privacy rights and protect against cyber risks to INTEGRITY information, networks and products.

Our Policy

INTEGRITY respects individual privacy rights. INTEGRITY is committed to collecting, handling and protecting Personal Information responsibly, and in compliance with applicable privacy and information security laws and with INTEGRITY's Commitment to the Protection of Personal Information (GDPR and other laws), where applicable.

INTEGRITY seeks to protect its networks, systems, devices and information in our possession. It is our policy to use information only for legitimate purposes and to maintain appropriate access controls.

INTEGRITY's policy is to conduct security testing on our products prior to release and to monitor for cyber security threats and vulnerabilities.

Any and all **assets** provided by the Organisation to employees must be used **exclusively** for **professional purposes**.

Your Role

- **If you have responsibility for software, IT or product development,** follow INTEGRITY guidelines for Secure Software Development. Ensure appropriate vulnerability testing prior to release, monitor for potential threats and vulnerabilities, and let customers know how to report any potential vulnerabilities they find to INTEGRITY.
- **Communicate as appropriate with customers** about cyber security issues. Follow INTEGRITY's vulnerability disclosure guidelines.
- **Contact the INTEGRITY's information security manager** prior to participating in efforts to develop industry standards around cyber security.
- **Limit access to INTEGRITY information to authorized individuals** who need it for legitimate business purposes.
- **Prevent unauthorized access, accidental loss, disclosure or destruction of INTEGRITY information:**
 - secure physical copies and storage areas;
 - use strong passwords; don't share your password with anyone;

- use only INTEGRITY-approved systems and tools for storage, transmission and backup of INTEGRITY information. Do not use personal email, unapproved devices or software to conduct INTEGRITY business;
- when posting information online, do not disclose Personal Information, trade secrets, proprietary or other commercially sensitive information;
- know the signs of phishing and recognize efforts to improperly acquire INTEGRITY information.
- **Consult with your security manager** before implementing new or significantly modified processes that use Personal Information, including new software or code.

Personal Information is any information relating to a directly or indirectly identifiable person. **Examples:** name, address, email, phone, national identifier and credit card number.

Also, Cyber Security & Privacy incidents can happen in a number of ways. Report any risk or incident to your manager, including:

- Possible loss or theft of data, including lost laptops and other computing equipment;
- Loss, misuse or improper access to data;
- Security issues involving an INTEGRITY product or system.

Intellectual Property

RULE TO REMEMBER >> every INTEGRITY employee has a responsibility to safeguard INTEGRITY's intellectual property — it is the key to our competitive advantage.

Our Policy

INTEGRITY aggressively protects its intellectual property (IP) and enforces its rights against others who take or use INTEGRITY Intellectual Property without proper authorization.



INTEGRITY respects valid Intellectual Property rights and avoids unauthorized use of IP that belongs to other people or organizations.

INTEGRITY must own the IP created by its employees as part of their employment. We require employees to review and sign an Intellectual Property clause in the contract with INTEGRITY.

Your Role

- **Classify, label, store and share all INTEGRITY data, information and documents** in accordance with INTEGRITY's Data Classification Policy, and ensure that access to information and documents is granted only to individuals with a legitimate need.
- **Only use or distribute INTEGRITY's proprietary information for the benefit of INTEGRITY**, and not for personal gain.
- **Do not take, access, provide access to, or use any of INTEGRITY's proprietary information or other IP** without authorization after leaving INTEGRITY.
- **Consult with your manager if you have any questions** or concerns regarding how to identify, handle and protect INTEGRITY's IP.
- **Do not bring, access, keep, share or use a third party's proprietary information**, especially proprietary information from a previous employer, without first consulting with and receiving prior approval.
- **Do not provide INTEGRITY's proprietary information to a third party without the proper internal approval** and the necessary confidentiality agreement with the third party.
- **Do not use any source code or other software from a third party in any INTEGRITY product or as a tool without obtaining prior approval.**
- **Direct each unsolicited third-party suggestion** for new or improved INTEGRITY products, features or services to the portal "Contacts" at www.integrity.pt.

IP is among INTEGRITY's most valuable assets. Every employee creates, uses, accesses or has access to IP every day.

IP includes patents, trade secrets, trademarks, copyrights and designs and helps protect INTEGRITY's inventions, manufacturing processes, brands, business plans,

marketing documents and graphics, software, product shapes, proprietary information and many other things.

Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

Controllership

RULE TO REMEMBER >> Be honest and accurate in our accounting, communications and decision-making.

Our Policy

INTEGRITY accounting and reporting will faithfully reflect the economic substance of the Company's business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

We will prepare timely, accurate and complete financial information for use in reports to management, partners, regulators and other stakeholders.

We will ensure that management decisions are based on sound economic analysis based on complete facts with appropriate consideration of short- and long-term risks.

We will comply with all Company policies and applicable laws and regulations relating to the preservation of documents and records.



Your Role

- **Maintain effective processes and internal controls** that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- **Protect** INTEGRITY's physical, financial and intellectual property assets.
- **Maintain complete, accurate and timely records** and accounts to appropriately reflect all business transactions.
- **Create documents that are factual, accurate and complete**, and follow Company policies in deciding when to retain and dispose of them.
- **Avoid transactions that diminish value** even if they enhance near-term financial performance.

- **Never engage in inappropriate transactions**, including those that misrepresent the reporting of other parties such as customers or suppliers.
- **Seek the advice of your director** if you become aware of a questionable transaction.

Raise a concern if you become aware of actions, transactions, accounting or reporting that are inconsistent and the protection of INTEGRITY's reputation.

Red flags include:

- Financial results that seem inconsistent with underlying performance.
- Circumventing review and approval procedures.
- Incomplete or misleading communications about the substance or reporting of a transaction.

Conflicts Of Interest

RULE TO REMEMBER >> Always make business decisions based on what is best for INTEGRITY, never what is best for you personally.

Our Policy

You have a duty to ensure that nothing interferes with your ability to make all business decisions in the best interest of INTEGRITY. This means that nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of the Company.

No activity at work or home should harm INTEGRITY's reputation or good name.

You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.

Misusing INTEGRITY resources or influence is prohibited. Even when nothing wrong is intended, the perception of a conflict of interest may have negative effects.

Your Role

- **Obtain prior approval** from your manager before hiring, promoting or directly supervising a family member or close friend.

- **Obtain prior approval before accepting officer or director positions** with an outside business or not-for-profit organization. This excludes religious or school (non- University) affiliations.
- **Promptly and transparently report** to your manager or the Compliance department any potential conflicts of interest you become aware of, including personal, financial or professional situations that may affect, or appear to affect, your impartiality.
- **Disclose** financial interests you may have in a company where you could personally affect INTEGRITY's business with that company.
- **Do not** accept gifts other than those of nominal value from suppliers, customers or competitors.
- **Do not** accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your INTEGRITY peers.
- **While incidental use may be acceptable, do not** use INTEGRITY resources, intellectual property, time or facilities for personal gain. Avoid any activity which creates the potential perception of a conflict between your personal interests and the interests of INTEGRITY.

A **conflict of interest** is not necessarily a violation of INTEGRITY policy; failing to promptly disclose a conflict is always a violation.

Disclosing potential conflicts of interest allows your management team to mitigate risks which may influence your business decisions.

Insider Trading and Stock Tipping

RULE TO REMEMBER >> INTEGRITY employees are prohibited from using or disclosing material non-public information about INTEGRITY or other companies.

Our Policy

Do not use or share material non-public information for financial or any other personal benefit.

Your Role

- **Only share material inside information on a need-to know basis.**

- **Avoid trading INTEGRITY securities around the time of a significant announcement.**
- **Avoid sharing material inside information with anyone outside INTEGRITY** unless it is necessary for INTEGRITY's business activities and proper controls are in place (such as a non-disclosure agreement with a supplier).
- **Do not serve as an independent consultant or expert outside of INTEGRITY** on business matters within the scope of your INTEGRITY employment.
- **Refrain from discussing INTEGRITY business with family and friends.**

Inside Information is information you may learn in your job about INTEGRITY or other companies that has not been made public.

Using material inside information for your financial or other personal benefit, or sharing it with others, violates INTEGRITY's insider trading policy and may violate the law.

Stock tipping means sharing inside information about INTEGRITY or another company — for example, to a relative, colleague, or friend — to enable the person to buy or sell stock or other securities of the company on the basis of such information.

This Code of Ethics and Conduct is an essential guide for all of us. Adhering to it means protecting INTEGRITY's integrity, strengthening our

reputation, and ensuring relationships of trust with employees, customers, partners, and society. The responsibility lies with each of us.

