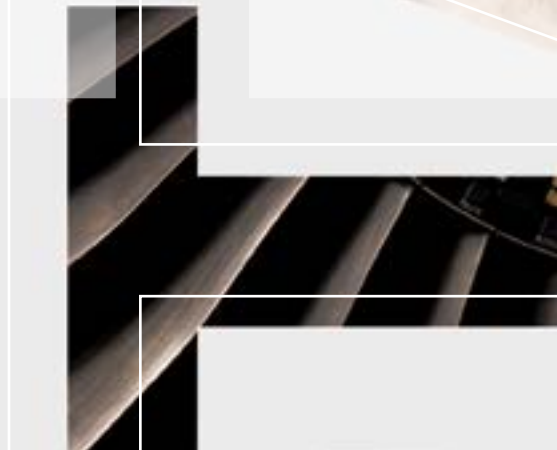




# Supplier's Code of Conduct

2022



GRUPOTAP

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## FRAMEWORK

**A**mong the essential objectives of the TAP Group<sup>1</sup> is to engage in our activity with high standards of integrity, with a commitment to achieving and promotion of sustainable development throughout our supply chain, continuously creating value and delivering quality service to our Clients.

The solidity of this action begins in our conduct, but also in the behavior of those with whom we relate. For this reason, we relate to suppliers, service providers and other business partners (hereinafter “Vendor” or, together, “Suppliers”) in an ethical and transparent manner, and we demand from them that they comply with those same values and fully follow the law.

Because we believe that a transparent and socially responsible relationship between TAP group Companies and our Suppliers should be grounded in perfectly clear and previously defined principles, we have developed this Supplier Code of Conduct (hereinafter “Code” or “Code of Conduct”).

By accepting the commitments of this Code of Conduct, Suppliers/Potential Suppliers acknowledge that all current and future agreements, contracts and business relations with TAP group Companies are subject to the provisions contained in this document, detailed below.

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<sup>1</sup> “TAP Group” means, together, TAP - Transportes Aéreos Portugueses, SGPS, S.A., Transportes Aéreos Portugueses, S.A., Portugália - Companhia Portuguesa de Transportes Aéreos, S.A., TAPGER - Sociedade de Gestão e Serviços, S.A., UCS - Cuidados Integrados de Saúde, S.A. and TAP Logistics Solutions, S.A. In this Code any of these companies is referred to as “TAP Group Company”.



# 01.

## **SAFETY AND WELL-BEING IN THE WORKPLACE**



The Supplier/Potential Supplier affirms its commitment to:

- Fully comply with applicable legislation on health and safety at work;
- To provide all its workers with safety and well-being conditions at work and a healthy working environment;
- Ensure all their workers that workplaces are safe, hygienic and do not pose risks to their health and safety. They shall be provided, where necessary and at no cost to the worker, personal protective clothing and equipment that promote safety and prevent the risk of accidents or incidents at work or other harmful effects on the health of workers.



# 02.

## HUMAN RIGHTS AND LABOUR PRACTICES



The Supplier/Potential Supplier affirms its support for fundamental human rights by declaring and ensuring that its workers fully enjoy all the rights and duties set out in the current legislation of the country in which they are incorporated and in the International Conventions, without any restriction. This guarantee applies to all its workers, including those in temporary employment or traineeships and service providers, and is extended to subcontractors.

### **Freedom of Employment**

The creation of free employment will be respected, and any involvement or support in the use of forced or compulsory labor and human trafficking will be prohibited, with particular attention being paid to migrants and other vulnerable groups.

### **Prohibition of child labor**

There will be no recourse to child labor. Compulsory minimum age and education in the respective countries will always be respected. All applicable legislation and regulations concerning the work of minors will be complied with.

**Working hours**

Workers must keep working hours in accordance with applicable legislation and regulations. The provision of additional work shall be voluntary where possible, and shall not be required as a standard, nor shall it constitute a form of replacement of insufficient regular wages, being always remunerated in accordance with national law and the provisions of the Collective Conventions.

**Compensation and benefits**

Discrimination in employment, employment practices, access to training, career progression or any other working condition will be prohibited, so that all workers enjoy equal opportunities and treatment, regardless of race, religion, gender, age, sex, belief, union membership, sexual orientations, origin, nationality, marital status, or any other conditions protected by law.

**Non-discrimination**

Discrimination in employment, employment practices, access to training, career progression or any other working condition will be prohibited, so that all workers enjoy equal opportunities and treatment, regardless of race, religion, gender, age, sex, belief, union membership, sexual orientations, origin, nationality, marital status, or any other conditions protected by law.

**Coercion and harassment**

Workers will be treated with dignity and respect and the application of physical punishments, threats of violence, or other forms of harassment or coercion is prohibited, either based on their ethnic origin, color, nationality, gender, religion, disability or other characteristics.

**Training and retraining**

Workers will be given an opportunity to participate in training programs and/or professional retraining, in order to guarantee their good professional performance and their training for the work, taking into account the individual needs of all.





# 03.

## INTEGRITY AND ETHICS IN BUSINESS



The Supplier/Potential Supplier of the TAP group affirms its commitment to the principles set out below, ensuring its application in the relationship with all its stakeholders.

### **Compliance with applicable legislation**

The Supplier/Potential Supplier of the TAP group will comply with all legislation and regulations applicable to its activity, as well as the industry standards in which it belongs. Where the provisions of this Code of Conduct are stricter than the applicable local, national or international law, the Supplier/Potential Supplier shall comply with this Code of Conduct. If there is conflict between the requirements of this Code of Conduct and the requirements of any applicable local, national or international law, the Supplier/Potential Supplier shall comply with the legislation applicable to its activity.

### **Conflict of Interest**

Supplier/Potential Supplier has an obligation to act in good faith and transparency, excluding personal interests, their own, of any family member, members, close friends, or of any public or private entity, with which we maintain a personal, laboral, professional relationship or others, including, without limitations, entities with social, religious and politics objectives. In the event of a conflict of interest, the

Supplier/Potential Supplier shall immediately communicate the situation to the Ethics & Legal Compliance area of the TAP group via the email address [ethicsandlegalcompliance@tap.pt](mailto:ethicsandlegalcompliance@tap.pt).

#### **Anti-corruption**

The TAP group has zero-tolerance for all violations of anti-corruption laws. Such a violation can destroy the image and reputation of the Companies of the TAP group, in addition to being able to generate civil and criminal liability for them and their involved employees. Thus, the TAP group requires all its Suppliers/Potential Suppliers to fully know and comply with these laws.

#### **Amenities**

Gifts, trips, lodging, meals and entertainment activities (hereinafter together "Courtesy") can only be offered/received in accordance with the internal rules of the TAP group on the subject. The Supplier/Potential Supplier of the TAP group, in order to ensure compliance with the law, and to ensure that no Courtesy is offered, or received, in order to obtain any undue advantage or to unduly influence any action, undertakes to comply with the Rules. TAP group.

#### **Money laundering and terrorist financing**

The TAP group is absolutely committed to preventing any kind of act that could underpin the practice of a money laundering or terrorist financing crime. Thus, the TAP group requires all its Suppliers/Potential Suppliers to fully know and comply with these laws.

#### **Economic Sanctions**

The TAP group is absolutely committed to complying with national and international regulations on financial operations and the import and export of products, services, technology and information. Thus, the TAP group requires all its Suppliers/Potential Suppliers to fully know and comply with these laws and observe the import and export restrictions imposed.

#### **Fair Competition**

The TAP group adopts fair competition practices, accepting and respecting the rules of operation of a market economy, as well as the rules of competition law. Thus, the TAP group requires all its Suppliers/Potential Suppliers to know and comply with these laws.

#### **Intellectual Property and Confidential Information**

Suppliers/Potential Suppliers will respect the intellectual property rights and confidential information of the TAP group Companies. "Confidential Information" means that any and all information relating to any TAP group Company and/or any of its shareholders, whether direct or indirect, as well as any other information to which it has access, which is not public or otherwise disclosed, in violation to the obligation of confidentiality here expected or in contract.

#### **Protection of Personal Data**

The TAP group respects current legislation on the protection of personal data and requires all its Suppliers/Potential Suppliers to know and comply with these laws.







# 04.

## ENVIRONMENTAL RESPONSIBILITY



The TAP group considers that its sustained growth presupposes the compatibility of economic performance with the responsibility it assumes towards society and the environment. The TAP group also recognizes that environmental protection is a responsibility of all, so it seeks to integrate environmental issues into all its activities. In this sense, the Supplier/Potential Supplier of the TAP group should fully comply with applicable environmental legislation and regulation, and establish procedures and practices for identifying environmental aspects in a perspective of continuous improvement of its environmental performance. The Supplier/Potential Supplier of the TAP group should also conserve natural resources, promote efficient energy use, and reduce waste and the usage of dangerous substances.



# 05.

## SOCIAL RESPONSIBILITY



The TAP group is attentive to the themes of social responsibility and requires the same of its Suppliers/Potential Suppliers, which should promote policies that develop social responsibility, as well as participate, directly or indirectly, in social intervention projects, civic, social and cultural activities at the core of the communities in which they are inserted.



# 06.

## COMPLIANCE WITH THE CODE OF CONDUCT



The Supplier/Potential Supplier of the TAP group affirms its commitment to comply with, and enforce, the principles formulated in this Code of Conduct.

When using suppliers and subcontractors in projects/contracts with TAP group Companies, the TAP group Supplier/Potential Supplier will ensure that they comply equally, and fully, with the principles contained in this Code of Conduct.

With a vision of continuous improvement, Suppliers/Potential Suppliers and/or their own subcontractors undertake to participate in monitoring activities of TAP group Companies, as part of alignment with this Code of Conduct.

These activities include the authorization of access by the employees of the TAP group, or others on their behalf, to their premises, follow-up visits, access to information and documents on the management of their activity related to the themes of this document and that allow for their compliance to be vetted. Such activities may result in a plan of remedial, or corrective actions, agreed between the two parties, whenever there is any non-compliance with the guidelines of this Code of Conduct.

In the event of non-compliance or suspicion of non-compliance with this Code, and without prejudice to any other rights, the respective Company of the TAP group may terminate the possible contract with the Supplier without incurring any liability.

The Supplier/Potential Supplier shall be liable to the respective Company of the TAP group for any damages, costs, losses, expenses, and any damages incurred by the Company of the TAP group, as a result of failure to comply or defective compliance of the accepted obligations.



## USEFUL LINKS

Website:

<https://www.tapairportugal.com/pt>

Code of Ethics and Conduct:

<https://www.tapairportugal.com/pt/sobre-nos/manuais>

Internal Rules of the TAP group:

<https://intranet.tap.pt/ethics-legalcompliance>



# 2021

