

## 1. FRAMEWORK AND PURPOSE

The Code of Ethics and Conduct of FORteams Lab, S.A. establishes the principles of business ethics that all employees of FORteams Lab are obliged to comply with. The Code sets out the fundamental principles to be considered, inter alia, in matters of fair competition and anti-bribery and anti-corruption (including principles on acceptable offers), money laundering and conflict of interest.

The purpose of this Policy is to continue to develop principles for ethical and appropriate conduct with respect to anti-corruption issues, and entertainment offerings, as well as certain forms of conflicts of interest. This Policy complements the laws applicable to FORteams Lab's business in all countries of Europe. All employees of FORteams Lab are obliged to respect both local laws, the Code of Ethics and Conduct as well as this Policy. However, violation of this Policy does not necessarily entail a violation of national laws and regulations.

## 2. THE ANTI-CORRUPTION POLICY

Anti-corruption principles: zero tolerance

FORteams Lab believes in a free market for the sale of its products, and in a free and fair competitive environment. In this way, at FORteams Lab there is zero tolerance for any situation of bribery, facilitating payments or other undue benefits contrary to this Policy, National laws and regulations, industry standards or any other codes of ethics applicable in Portugal.

The concept of bribery or corrupt behaviour should include the supply or receipt (the act of giving or receiving) as well as facilitating, for example:

- Money and other forms of payment or benefits to ensure you are rewarded with a contract or obtaining a permit or license.
- Inappropriate donations aimed at obtaining specific benefits.
- Some benefits with no financial value, such as club membership, the awarding of prestigious prizes or similar donations and other leisure activities capable of influencing the recipient to act in a certain direction.
- Facilitating payments to obtain a decision or facilitate a process, even if these procedures are accepted or customarily practiced at local level.

It is not necessary that the benefit be given or offered to the holder exercising the power. This can be given or offered to someone with the ability to influence the decision-maker in different ways. Special care should be taken when dealing with officials of public entities or the government.

The definition of what corrupt practices or bribery are varies from country to country. This Policy is in no way intended to allow procedures that are not legal and/or not in accordance with business ethics in any country where FORteams Lab operates, but may supplement and reinforce the requirements for a particular country with less developed anti-corruption legislation.

### 3. CORRUPTION RISK ASSESSMENT

Some of the markets where FORteams Lab operates have problems with corrupt practices and bribery. It is the responsibility of the FORteams Lab Administrator to continuously assess the risk of any FORteams Lab employee engaging in any type of corrupt behavior, to inform the Organization of the risk of such behavior and to take appropriate measures to ensure that this situation is avoided.

Review annually the identification, evaluation and classification of Risks, and trigger actions to mitigate or eliminate them.

When entering new markets, in different types of relationships with external entities, all FORteams Lab managers must ensure that a thorough assessment of the risks of corruption, bribery and other undue benefits has been carried out in the country or relationship in question.

Due diligence procedures should include appropriate investigations of past and present anti-corruption measures and the overall risk exposure with respect to corruption and bribery for each acquisition target or potential partner. It is the responsibility of each department manager or process manager to ensure that these processes are carried out whenever new relationships are initiated and continuously in those relationships, if and when justified.

### 4. INVESTIGATION AND DISCOURAGEMENT OF UNETHICAL BEHAVIOR

#### 4.1 - Permitted Offers/Gifts and Entertainment Offers

Some forms of business-related gifts and entertainment offers may be necessary and acceptable, taking into account local customs, provided that they are within the limits of this Policy and local laws and are made in good faith. The rules of what is appropriate vary from country to country, but you must comply with local laws and this Policy.

Typically, acceptable benefits are those that can be given openly, when the benefit is limited and not when this would normally be considered a possible way to influence the decision-making process.

The following factors may contribute to assessing whether a benefit given to someone related to the FORteams Lab business can be considered corruption or bribery:

- The value of the benefit – particular care should be taken with benefits that have more than a merely symbolic value.
- The position of the recipient – should be considered with the utmost care all types of offers to employees of public entities.
- The nature of the benefit – benefits little or nothing related to the FORteams Lab business will normally be considered inappropriate.
- The group of recipients and the way the benefit is offered – any benefits that are not offered openly are typically not suitable and benefits to selected individuals should be considered more carefully than the benefits offered to a group or category of people. Repeated invitations to or from the same person in a short period of time should be avoided.

#### 4.2 - Applicability of the Anti-Corruption Policy

This Policy is applicable to all employees of FORteams Lab and shall be implemented in all cooperative relationships of the FORteams Lab business to the maximum extent possible. Ensuring that the Policy is understood in its entirety and implemented in all areas of the company is a responsibility of all. Strict compliance with this Policy is mandatory.

Although FORteams Lab cannot impose this Policy on persons who are not part of FORteams Lab, employees shall make all reasonable efforts to include the principles of this Policy in agreements relating to all types of partnerships and other business relationships or to guarantee in any other way that the principles of the FORteams Lab Code of Ethics and Conduct and this Policy apply to all relationships in which FORteams Lab is involved.

Special care should be taken in the selection and management of external agents and representatives. Where appropriate, a risk assessment of relations with third parties should be carried out.

When any type of bribe or other improper benefit is requested, offered or given by third parties, FORteams Lab employees must report this situation to their superior or other responsible person with appropriate functions within the company, such as the Administrator, Manufacturing Director or Quality Director. As soon as reasonably possible, it should be made clear to the third party that FORteams Lab employees may never accept or give any kind of bribe or undue benefit. Subsequently, the FORteams Lab Administrator must ensure that an evaluation is made on the possibility of maintaining the relationship in question. If the decision is made to maintain that relationship, it is the responsibility of the Administrator to ensure that this decision was made after a proper risk assessment and that appropriate safeguards were taken to prevent future incidents contrary to this Policy.

#### 4.3 - Completion and Responsibility

It is the responsibility of the Administrator and department heads to adopt appropriate procedures to ensure that all FORteams Lab employees know, understand, and comply with local laws, rules, and regulations, the Code, and this Policy.

To assist all employees, FORteams Lab issues local guidelines regarding gifts and permitted offers, in line with this Policy and local laws. These standards must be clearly known to all directors and employees to whom they apply.

The guidelines should be reviewed and updated, whenever this is necessary to reflect changes in legislation at national or international level, as well as changes to this Policy.

#### 4.4 - Communications, Investigations and Consequences of Non-Compliance

As with the Code, all Employees who have suspicion or knowledge of situations that do not comply with the provisions of this Policy must report to Human Resources or through the following channels:

Suggestions/Complaints box in the company

WEBSITE: [www.forteamslab.com](http://www.forteamslab.com) (informations / complaints)

Phone: 253 48 90 80

It should be clearly communicated to employees that no employee will suffer negative consequences for refusing to pay or accept bribes or engaging in corrupt practices, even if such refusal results in the loss of a company business.

All reported situations or suspicions will be investigated and followed up appropriately.

#### 4.5 - Review and Monitoring

Compliance with this Policy by employees will be monitored and monitored as part of FORteams Lab's Enterprise Risk Management process, which includes self-assessments, internal and external audits, and routine monitoring of all reported matters.

This Policy will be regularly reviewed by FORteams Lab in order to remain adequate.