



# Code of Ethics

March 2022





# Index

<b>1. Message from the CEO</b>	<b>5</b>
<b>2. Introduction to the Code</b>	
2.1. The Code Matters	8
2.2. For you and for everyone	9
2.3. Question yourself	10
2.4. Question us	11
<b>3. Our People</b>	
3.1. Our Commitments towards you	14
3.2. Your Commitments towards us	17
3.3. The commitments between us	20
<b>4. Our Stakeholders</b>	
4.1. Commitments towards Customers	24
4.2. Commitments towards the Shareholder and the Market	26
4.3. Commitments towards Suppliers and Business Partners	28
4.4. Commitments towards Government and Administrative Entities	30
4.5. Commitments towards the Competition	32
4.6. Commitments towards Society and the Environment	34
<b>5. Conduct in our Business</b>	
5.1. How to ensure compliance with legislation	38
5.2. How to use our resources	38
5.3. How to use our information	41
5.4. How to avoid corruption and related offences	44
5.5. How to avoid conflict of interest	46





# Message from the CEO

Professionalism, integrity, transparency and independence are fundamental principles of our company. These principles underpin NOS' good reputation with its stakeholders and must be reflected in everything we do.

Our behaviour, our actions and our decisions are the referential our customers, suppliers and business partners judge us by. Only through the consistent application of our principles can we earn and keep their trust, our most treasured asset.

The ethical behaviour we endorse in this Code should be understood in its broadest acceptance. It is certainly a commitment towards our customers and partners, but it is also a commitment made by our employees to other employees, regarding how they relate with the company as well as each other. Above all, it is an essential condition for personal development and the growth of our organisation and our businesses.

I should like to point out the added responsibility of our managers in upholding the Code of Ethics. In addition to guaranteeing all employees receive fair and equal treatment, managers must be available at all times to listen and reply to any questions posed by their teams. They must also lead by example, making it clear that our rules are to be observed and respected by all.

Business integrity is the main pillar sustaining our ambition and the growth goals we set out to meet. I have no doubts that the level of excellence we all aspire to can only be achieved if we abide to the strictest ethical standards. This is why I expect all of you to be fully committed to understanding and upholding the principles laid out in our Code of Ethics.

I believe the individual actions of every one of us make a difference and that together we will build a company we can all be proud of.

**Miguel Almeida**  
CEO NOS

A handwritten signature in black ink, consisting of the letters 'MA' in a stylized, cursive font, with a horizontal line underneath.





# Introduction to the Code

# The Code Matters

The Code of Ethics ("Code") represents the set of principles and rules that govern the internal and external relations of the NOS Group companies ("NOS" or "Group") with its stakeholders and was created with the aim of sharing these principles and rules, promote and encourage their adoption.

The present Code must be interpreted together with the other regulatory instruments of the policies assumed by NOS, as well as with the legislation and/or regulation that is, at each moment, applicable.

In case of conflict between the principles and rules described in this Code and the principles established in specific Codes of Conduct, the rules of an ethical and deontological nature, described in the latter, prevail.



# For you and for everyone

The Code applies to all members of the corporate bodies and Group Employees ("Employees") as well as, with the necessary adaptations, to all those who represent NOS ("Partners") and any person or entity that provides services, on a lasting or temporary basis, to the Group ("Suppliers").

All Employees undertake to comply with the principles described in the Code by accepting a Declaration of Commitment, attesting to their knowledge and individual commitment to its compliance.

NOS is committed to make the Code known to all its Partners and Suppliers who must act in accordance with the rules described therein.

Partners must ensure compliance with the Code by all human resources allocated to the provision of services to NOS.

## Question yourself

Deciding in a correct and ethical manner is essential to gain and maintain the trust of our stakeholders and reinforce the positive reputation of NOS.

When decision making is not easy, ask yourself:

- ▶ Does making this decision breach any applicable NOS policy, law, or regulation?
- ▶ Does making this decision lead, on my part or on the part of NOS, to a breach of the business commitments assumed?
- ▶ Does taking this action create a conflict between my personal interests and those of NOS?
- ▶ Would I feel ashamed if this decision were made public?
- ▶ Would I feel uncomfortable telling my family about this decision?
- ▶ If you were asked to justify the situation, would you feel embarrassed?

If you answered "yes" your decision is probably not ethical and may even be illegal.

If you have doubts consult the Code, NOS policies available on the institutional website and/or question us.

## Doubts

**I witnessed a situation that seems unethical to me, but there is nothing written about it in NOS' Code. Does this mean that it's ok?**

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No. The Code cannot predict all situations. The principles and values expressed herein should serve as an inspiration for ethical action in respect of anything that was not included. Our concern should be to act with integrity in all situations. If you have any doubts you can express them to the Ethics Committee ([duvidas.etica@nos.pt](mailto:duvidas.etica@nos.pt)).

# Question us

Throughout this Code you will find contacts for each circumstance. However, you can always ask and raise questions, in this case through the e-mail [duvidas.etica@nos.pt](mailto:duvidas.etica@nos.pt), or report irregularities through the e-mail [comunicar.irregularidades@nos.pt](mailto:comunicar.irregularidades@nos.pt). NOS, and all those involved, are bound by the duty of confidentiality, so all shared information must be treated as confidential and restricted.

NOS guarantees non-retaliation to anyone who, in good faith and, when applicable, under the terms of applicable legislation, reports an alleged irregularity or participates in the investigation thereof.

The breach or non-compliance with the ethical rules of the Code and other Group policies, by Employees or Partners, can have serious consequences, including disciplinary proceedings against Employees, penalties/termination of contracts with Partners and civil and/or criminal liability of Employees or Partners.



For more  
information

Get to know the  
**NOS Ethics  
Committee here**



Useful  
contacts

Regulation for  
**Reporting  
Irregularities**





# Our People

This Code sets out how NOS relates with our own people, how we expect them to relate with each other and the attitude we all must adopt regarding the business.

# Our commitments towards you

With regard to our Employees, NOS is committed to:

- ▶ Develop our HR management policies based on respect for diversity, individual rights and non-discrimination (be it on the basis of age, gender, sexual orientation, race, disability, religion or creed), especially with regard to recruitment, promotion or termination of employment;
- ▶ Promote diversity and inclusion as a fundamental value, in order to strengthen the commitment to meritocracy in all internal processes and procedures;
- ▶ Prevent and combat any form of harassment, or any other form of attack on the dignity of Employees, or the people with whom they relate;
- ▶ Treat each Employee in a fair manner, namely by carrying out rigorous, constructive, transparent and merit-oriented performance evaluations;
- ▶ Promote equal opportunities through job rotation, training and personal development programmes;
- ▶ Promote the health and well-being of Employees, respecting the balance between professional, personal and family life;
- ▶ Create a good workplace environment, ensuring compliance with applicable health and safety regulations;
- ▶ Promote communication, free expression of opinions and information sharing among Employees;
- ▶ Promote team spirit, shared objectives and mutual help between Employees;
- ▶ Ensure the privacy of Employees' personal data.



For more information

Gender  
**Equality Plan**  
Code of  
**Conduct for Preventing  
and Combating  
Harassment**  
Employee  
**Privacy Policy**  
Declaration  
**of Commitment to  
Diversity and Inclusion**



Useful contacts

**Requests for clarification**  
duvidas.etica@nos.pt  
**Irregularities report**  
comunicar.irregularidades@nos.pt  
**People and Organization Department**  
pessoas.organizacao@nos.pt  
**Diretor | Manager**  
**Quality, Environment and Health  
and Safety Management System**  
arc.riscocompliance@nos.pt  
**Personal Data Protection**  
dpo.privacidade@nos.pt

## Discrimination

**What should I do when I hear a negative comment about a colleague's sexual orientation during a meeting or in any other professional context?**

---

At NOS we seek a diverse and inclusive culture, where individual characteristics are accepted, respected and valued. Disrespectful or discriminatory actions are not tolerated. If you feel comfortable doing this, you can and should challenge this behaviour. Otherwise, expose the situation to your Manager / Director, or to the Human Resources Director or the Ethics Committee.

**I witnessed an unpleasant and derogatory comment addressed to a colleague who has just returned from maternity leave. What should I do?**

---

You should speak to the colleague and advise her to raise the issue with the Manager/Director, the Human Resources Director, or the Ethics Committee. NOS is a family-friendly company that values diversity and inclusion. Any type of discrimination, be it gender, age, sexual orientation, or religion, among others, is intolerable and must be reported.

## Psychological Harassment

**I am aware of a Manager who screams a lot and, when he does not like some work, makes unpleasant public comments. My colleagues feel humiliated and intimidated. What should I do?**

---

Harassing behaviours aimed at intimidating, offending, insulting, or humiliating anyone are not acceptable and should be repudiated immediately. Report the situation to your Manager/Director, or to the Human Resources Director or the Ethics Committee, according to the procedures defined in the Code of Conduct for the Prevention and Combat of Harassment.

## Meritocracy

**There is a colleague in my department whose assessment is systematically higher than mine, and I know that this is not fair. What can I do about it?**

---

If you have concrete data that allows you to state that your colleague's evaluation is not done in a transparent way or that it is not based on merit, you can and should talk to your Manager/Director, Human Resources Director or, if you are not comfortable with this, expose the situation to the Ethics Committee. Failing to evaluate based on merit, violates the content or spirit of this Code and the principle of NOS meritocracy.

## Team Spirit

**A colleague from a different department asked me for information he needed in order to carry out a project. I know we have that information, but our department does not usually share this type of information with other areas. What shall I do?**

---

Sharing information between teams is natural and desirable. However, if the information is sensitive or confidential, do not send it without first confirming it with your Manager/Director. If everyone does this, in this and other situations where there are or may be obstacles to sharing information, we can achieve a more transparent organization with a greater team spirit, without however compromising the security rules on sharing information.



# Your commitments towards us

NOS' Employees agree to:

- ▶ Act with loyalty towards the Group, endeavouring to enforce its policies as they are defined and to protect the Group's reputation in all situations;
- ▶ Act in a professional, responsible and diligent manner, adopting the conduct that best serves the Group's interests;
- ▶ Improve and update their knowledge with a view to the continuous improvement of their professional skills;
- ▶ Contribute to NOS' businesses in a consistent, creative, committed and persistent manner, seeking to achieve the objectives while adequately managing risks and ensuring the effectiveness of the controls required for said management;
- ▶ Cooperate with all of the Group's areas, particularly with internal audit, and provide information and knowledge in an objective, factual, comprehensive and truthful manner, without any omissions or restrictions;
- ▶ Responsibly use the material, immaterial and financial resources provided by NOS for the exercise of professional activities (e.g. mobile phones, vehicles, information);
- ▶ Respect the safety and health rules applicable to the activities for which they are responsible;
- ▶ Adopt individual behaviors that contribute to minimize the environmental impact of NOS 'activity (e.g. rational use of energy in the workplace; reuse of materials and separation of waste; sharing a vehicle with colleagues on professional trips);
- ▶ Use Social Media in a responsible way, in order to prevent such use from harming the work performance or the reputation of the Company.



For more  
information

Guide to a  
**Responsible Online  
Presence**



Useful  
contacts

**Requests for clarification**

duvidas.etica@nos.pt

**Irregularities report**

comunicar.irregularidades@nos.pt

**People and Organization Department**

peessoas.organizacao@nos.pt

**Diretor | Manager**

**Quality, Environment and Health  
and Safety Management System**

arc.riscocompliance@nos.pt

**Security and Privacy Incidents**

incidentes.seguranca.privacidade@nos.pt

## Responsible driving

**I was driving on the highway when a car characterized by the logo of NOS passed by me at high speed, making a dangerous overtaking to exit immediately to the right. I did not see the driver, but I took the license plate of the car. Should I report?**

---

In addition to being a dangerous behaviour, the driver was disrespecting NOS resources and jeopardizing the company's reputation. You must report to the Ethics Committee.

## Disclosure of information

**A friend of mine gave my contact to one of his/her friends who is a journalist and is currently preparing a news story about NOS. I spoke to him/her over the phone and the kind of information he/she needs seems rather harmless, it includes no privileged or confidential material, just background information. May I assist him/her?**

---

No. Only those who due to its assignments are allowed to provide inside information about certain matters to third parties outside the Group can do so. Any information, however harmless it may seem to you, can be misused or contradict the messages defined by the company. For example, how many people work in a given building, what's the usual schedule of a certain person, comments on the growth of a given product or a Supplier or a Customer, all of that is information that can be harmful to NOS.

## Professionalism and accountability

**Although I feel I have met all the deadlines and performed all the tasks that I was asked, my supervisor has given me a poor assessment, arguing that he/she always has to correct or do from scratch whatever I hand him/her. I don't understand what I'm doing wrong...**

---

We are all individually responsible for doing our jobs. If in doubt, you should ask for clarification about the task. You must always meet deadlines and make sure that whatever you hand in complies with the request and needs no further revision. Forcing others to correct our own mistakes reveals not just lack of rigour but also a poor management of our time.

## Comments on blogs or websites

**Yesterday I came across negative comments about the latest NOS campaign on a blog. I did nothing but my desire was to respond in kind.**

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You did well not to react. Send comments to responsible persons who, on behalf of NOS, officially respond to comments that appear on blogs, Facebook, or other sites. Let communication experts respond to negative comments.

# Commitments between us

NOS' Employees agree to:

- ▶ Maintain a cordial and respectful attitude (including towards Partners and Suppliers), minding tactfulness and politeness, language, tone of voice and following basic standards of civic behaviour;
- ▶ Adopt, among colleagues and others (namely Partners and Suppliers) an attitude based on honesty, cooperation and clear communication, thus contributing to a workplace environment that is both pleasant and productive;  
Repudiate and report harassment behavior, in accordance with the NOS Code of Conduct for Preventing and Combating Harassment;
- ▶ Harassment can be moral or sexual in nature and practiced when accessing work, at work or outside work, provided there is a connection with it.



For more  
information

Code of Conduct for  
**Preventing and  
Combating Harassment**



Useful  
contacts

**Requests for clarification**  
duvidas.etica@nos.pt

**Irregularities report**  
comunicar.irregularidades@nos.pt

**People and Organization Department**  
pessoas.organizacao@nos.pt

**Diretor | Manager**

## Cordiality

**A colleague of mine arranges meetings with Suppliers and colleagues but systematically leaves them waiting. What can I do?**

You should alert your colleague that this behaviour goes against NOS principles. If he persists, you should report it to your Manager/Director, to the Human Resources Director or to the Ethics Committee. This behaviour violates the commitment to contribute to the maintenance of a good and productive internal work environment, but also with Partners and Suppliers.

## Sexual harassment

**I witnessed (or was made aware of) a colleague making sexual remarks about a colleague. What should I do about it?**

You should speak directly with the colleague, and report the situation to your Manager/Director, to the Human Resources Director or to the NOS Ethics Committee. Sexual harassment is intolerable and can come in many forms - verbal, non-verbal or physical - such as comments on clothing, looks, touches, repeated invitations, etc...

## Honesty

**I am negotiating a contract with a supplier who has the best proposal, but their payment terms involve a payment period which I know is not in accordance with the company's standards. May I omit this fact?**

No. We must always be honest. You must clearly explain our payment terms to the supplier, who will then decide whether to maintain the proposal or not. If you accept a proposal with a payment period that you know beforehand you're not going to meet (because it's not in accordance with company practice and does not qualify as exception), you will also be putting NOS in a situation of breach of contract. Both you and the company would look bad in such situation.

## Inappropriate behaviour

**I have a colleague who often catcalls me, but last time he was a little more daring. I have tried to avoid it, but he insinuates himself more and more. What should I do?**

You can and should speak to your Manager/ Director and, if you wish, you can report to the Human Resources Director or the Ethics Committee. NOS does not accept any form of harassment or any other form of attack on the dignity of Employees.





# Our Stakeholders

NOS and our Employees are committed at institutional and individual level to observe strict ethical principles in the relations with our stakeholders, in accordance with the latter's needs and specificities as well as the strictest principles of rigour and transparency in all forms of reporting.

# Commitments towards Customers

- ▶ Seeking maximum Customer satisfaction;
- ▶ Scrupulously respect the protection of Customers' privacy and personal data;
- ▶ Treating Customers with professionalism, clarity, loyalty and respect;
- ▶ Providing our Customers with all the information necessary for informed decision-making and guaranteeing strict compliance with the agreed conditions;
- ▶ Informing Customers about possible risks associated with the use of the products and services.



For more  
information

**Customer  
Privacy Policy**



Useful  
contacts

**Requests for clarification**  
duvidas.etica@nos.pt

**Irregularities report**  
comunicar.irregularidades@nos.pt

**Client Area**

**Support lines**

**Family and friends**



## Respect for Customers' Privacy

**A friend of mine is a NOS customer and has been receiving phone calls and messages for some time, night, and day, with an insulting content from an concealed number. My friend has already contacted the police, but the situation has not yet been resolved. Now asks for my help. What should I do?**

You can never try to get that information and pass it on to your friend. This is information that you cannot under any circumstances disclose. So, if you see someone, in a similar situation, passing information of that nature outside, you should report the situation immediately via email incidentes.seguranca.privacidade@nos.pt. What you can do is to inform him that in addition to filing a complaint with the police, he has the right to ask NOS, in writing to Customer Service, to identify the source of disturbing concealed calls. In that case NOS will have to ask the CNPD for an opinion and, in case of authorization, NOS may proceed to eliminate the concealment of the calling number. In cases like this, check if there is any NOS policy or any law or regulation that goes against what you are asked to do. If there are, do not.

## Treating Customers respectfully

**In the course of an occasional and informal conversation with a colleague, he told me that in his department Customers are sometimes purposely kept waiting for replies to clarification requests, in the hope that they won't call again. Doesn't this behaviour violate our Code of Ethics?**

Of course it does! You should speak with your colleague and alert him to the fact that not replying to a customer is a violation of the commitment to treat customers with professionalism, clarity, loyalty and respect. If the situation persists despite this, you can alert the Ethics Committee, who will be able to evaluate the situation with total confidentiality.

# Commitments towards the Shareholder and the Market

- ▶ Upholding the principle of transparency and protection of legitimate expectations in our relations with shareholders, investors, other stakeholders and the market;
- ▶ Upholding the principles of equal treatment of shareholders and creating value for their investment, including mechanisms for the protection of minority shareholders;
- ▶ Ensuring the accuracy, truthfulness and timeliness of the information provided to our shareholders and the market;
- ▶ Ensuring the financial information disclosed is complete, truthful, up-to-date, lawful, clear and objective.



Useful contacts

**Requests for clarification**

[duvidas.etica@nos.pt](mailto:duvidas.etica@nos.pt)

**Irregularities report**

[comunicar.irregularidades@nos.pt](mailto:comunicar.irregularidades@nos.pt)

**Administrator | Director**

# Accuracy and integrity of information

**My superior asked me to perform the final review of an annual report and I identified an error which, if corrected, will have a negative impact on the company's statement of achievements. Nobody seems to have noticed it yet and I'm really not sure how to approach the subject with my superior because I fear this might affect our relationship negatively.**

---

If your Manager asked you to review the report, it was precisely to ensure that it is accurate. It is your duty to inform her of the identified error, even if it seems that she would not like to know. If you do not do this, you may be questioning the accuracy and veracity of the report and consequently the integrity of NOS information.

# Commitments towards Suppliers and Business Partners

- ▶ Choosing Suppliers and Partners on the basis of objective, clear and unbiased criteria and disclose that information in a transparent manner;
- ▶ Respect and promote the obligations and guidelines imposed by the Resolution of the United Nations Security Council, by the Law or Regulations of the European Union or its members, or by any other countries or competent authorities, namely with regard to matters related to international sanctions;
- ▶ Refraining from abusing power in negotiations and ensuring strict compliance to agreed conditions;
- ▶ Treating Suppliers and Partners with professionalism, respect and loyalty and honouring the commitments assumed with them;
- ▶ Respecting the confidentiality of information and the intellectual property of Suppliers and Partners, namely with regard to proposals and price quotes;
- ▶ Disclose the Sustainability Requirements for Suppliers and Partners, and promote their compliance;
- ▶ Promote the adoption of the best environmental and social practices in its activities and ensure that they comply with the ethical standards established in this Code.
- ▶ Ensure that Suppliers and Partners respect the Code of Conduct for the Prevention of Corruption and Related Offenses



For more information

Delegation  
**of Powers  
and Procurement Manual**  
Sustainability  
**Requirements for  
Partners and Suppliers**  
Code  
**of Conduct for the  
Prevention of Corruption  
and Related Offenses**



Useful contacts

**Requests for clarification**  
duvidas.etica@nos.pt  
**Irregularities report**  
comunicar.irregularidades@nos.pt  
**Diretor | Manager**

# Confidentiality

**I'm in charge of the selection of a supplier for a project. I requested several proposals, but it turns out the supplier who submitted the proposal I liked the most is also the most expensive. May I share with them the prices offered by other suppliers I have consulted, so they can adjust their prices?**

---

You may say you have received a better priced offer, but you may not say whom it was from or its value. If you did, you would be providing a supplier explicit information about the prices offered by its competitors, which is not acceptable. Suppliers must be informed at the time of request if price is one of the criteria in the selection process.

# Commitments towards Government and Administrative Entities

- ▶ Observing and upholding the legal and regulatory norms applicable to the Group's activities;
- ▶ Promoting a spirit of cooperation, collaboration and respect in the relations with public and supervisory authorities, avoiding any behaviour that may hinder the exercise of their duties;
- ▶ Cooperating with the public authorities while they perform their duties, namely through the timely delivery of requested information;
- ▶ Preserving NOS' independence from public institutions and political parties, regardless of any commercial relations related to the sale of products or services;
- ▶ Abstain under all circumstances from supporting – whether financially or in-kind – political parties, organisations or individuals associated with these parties who pursue an essentially political mission.



Useful  
contacts

**Requests for clarification**  
duvidas.etica@nos.pt

**Irregularities report**  
comunicar.irregularidades@nos.pt

**Diretor | Manager**

# Donations to political parties

**A leader of a political party asked us to install our internet access service for free in his/her vacation home**

**Can I do that?**

---

No, under any circumstances. Providing free services may be understood as in-kind support to that political party, as a contribution or even as an attempt to curry favour with a person connected to that particular political party.

## Commitments towards the Competition

- ▶ Strictly complying with Portuguese, EU and international competition laws and regulations;
- ▶ Observing the market's rules and criteria, encouraging healthy and fair competition and avoiding any practices that may prevent, restrict or distort competition;
- ▶ Maintaining cordial relations with competitors and promoting mutual respect, especially as regards material and intellectual property rights;
- ▶ Evaluate and guarantee the legitimacy of contacts or meetings, formal or informal, between NOS and competing companies, identifying, and weighing their objective or need. Examples of permitted contacts are those related to interconnection agreements, sharing or access to network infrastructure, roaming agreements, or negotiations with wholesale customers;
- ▶ Do not solicit, accept, or discuss with competitors subjects that are not legitimate, especially avoiding sensitive or confidential information or commercial matters, such as price changes, commercial conditions for Customers or Suppliers, whether formally or informally;
- ▶ Do not enter into formal or informal agreements with competitors that may affect the normal functioning of the various markets where the NOS Group operates, at the most different levels, such as agreements that fix the retail price of products and / or services, which divide the market between NOS and competitors, which limit the ability to hire professionals in the market, which limit the commercial freedom of NOS or of its competitors;
- ▶ Do not participate in joint negotiations, collective strategies, sales, or group purchases, without prior legal advice.



Useful  
contacts

**Requests for clarification**

[duvidas.etica@nos.pt](mailto:duvidas.etica@nos.pt)

**Irregularities report**

[comunicar.irregularidades@nos.pt](mailto:comunicar.irregularidades@nos.pt)



# Healthy Competition

**I have friends working in management positions of companies we compete with. When attending industry-related meetings or conferences, we sometimes discuss issues related to our businesses or even about common suppliers. Is there something wrong with that?**

---

You must be extremely cautious in these conversations and avoid commercially sensitive or sensitive issues, namely issues that have to do with Customers, Suppliers, prices, promotions, investment in infrastructure, distribution policies or strategies. If any of these issues arise in the conversation, you should refuse to speak because it will violate competition law rules and our internal policies.

# Commitments towards Society and Environment

- ▶ Promote a fair society, based on mutual respect and equal opportunities;
- ▶ Respect and promote human rights in accordance with commonly accepted international principles, standards and laws, such as the United Nations Global Compact, the Universal Declaration of Human Rights and the Fundamental Principles and Rights at Work of the International Labour Organization, as well as aim to replicate the same principles in the supply chain;
- ▶ Adopting best environmental practices, promoting eco-efficient management, minimising environmental impacts associated to the Group's activities and using natural resources rationally;
- ▶ Use the power of information and communication technologies to develop innovative solutions that contribute to an inclusive society, protect the environment, and enhance social and economic transformation;
- ▶ Promoting and participating in initiatives aimed at stimulating social awareness and sustainable development, particularly those that contribute to the Information Society;
- ▶ Cooperating and collaborating with civil society organisations and associations, in the spirit of solidarity and mutual help with our community;
- ▶ Promoting the adoption of a more sustainable lifestyle by our customers and the general community.



Useful contacts

**Requests for clarification**

[duvidas.etica@nos.pt](mailto:duvidas.etica@nos.pt)

**Irregularities report**

[comunicar.irregularidades@nos.pt](mailto:comunicar.irregularidades@nos.pt)

**Diretor | Manager**

**Sustainability**

[sustentabilidade@nos.pt](mailto:sustentabilidade@nos.pt)

## Contributions to third sector organizations

**I belong to an animal protection association that I believe performs exemplarily. It can always use more contributions, especially food. Can I make a donation on NOS' behalf?**

---

Before making or proposing any kind of donation you must first check the Company's strategy in that regard. After that, even if you feel that the contribution you wish to make fits within our strategy, you must contact and request permission from the Corporate Communication and Sustainability Department, which is in charge of coordinating those matters.

## Environmental impacts

**I am launching a new product and preparing its launch briefing. I want to organise an event, create merchandising and promotional materials (banners, leaflets, etc.). However, the agency wants to reduce the use of materials due to the negative impact it has on the environment. Do I have any responsibility in assuring that NOS, the agency and the suppliers deal with these issues correctly?**

---

Of course you do. We are all responsible for reducing the impact of our activities. When we buy products or choose materials we should opt for those with lower environmental impact. We must also provide and pay the fee due for correct end-of-life management of the materials we produce.





# Business conduct

NOS and its Employees undertake to create value in the long term,  
as well as to develop and put in place mechanisms permitting an  
honest and transparent business management.

## How to ensure compliance with legislation

- ▶ Acting in strict compliance with laws and regulations applicable to NOS' activity.

## How to use our resources

- ▶ Protecting and maintaining in good working order all tangible and intangible resources made available for the purpose of performing duties or which are accessible by virtue of those duties, protecting them against fraud, theft, tampering or loss caused by the actions of third parties;
- ▶ Respecting NOS' intellectual property even when it results from the work of its Employees, on the terms of applicable legal and/or contractual provisions, including any creation, modification, transformation or improvement (and all related documentation), produced in the course of said work;
- ▶ Use NOS' financial or other resources in a rational and efficient manner (e.g. travel expenses; purchase of goods and services).



For more information

**General Information**  
**Security Policy**  
**Delegation of Powers and Procurement Manual**  
**Travel and Mission Expenses Regulation**



Useful contacts

**Requests for clarification**  
duvidas.etica@nos.pt  
**Irregularities report**  
comunicar.irregularidades@nos.pt  
**Diretor | Manager**

## Company property

**I have just placed an order for pen drives with NOS' logo that came out terrific. I am sure that when they become available everyone will want them not only for professional purposes but also to give to their families and friends. May I order some more just to meet those requests?**

---

No. Even if the material had been produced for advertising purposes, it would be targeted at a specific audience, not our families and friends. Ordering and distributing any material for anything other than its original purpose without proper authorisation is a misuse of company property.

## Equipment care

**I have a colleague who has the habit of leaving the company computer in the trunk of the car. I think this is not safe because it endangers material and company information. I told him that, but he keeps doing it anyway.**

---

You must report to your Manager/Director. Your colleague is not being careful, he is putting NOS material at risk of theft and jeopardizing the confidentiality of customer information.

## Information as a company resource

**I often go to the intranet and get information to share with my friends. How do I know if the information I access may be shared?**

All company information you access must be considered, at least, as having the Internal Use classification, so it is not allowed to be shared with any people outside the company (third parties other than NOS Employees or Employees of authorized Partners). Information sharing is allowed if it is classified as Public or if there are company guidelines for sharing it, which can happen, for example, with information about “family and friends” tariffs. Disclosing company information without authorization can harm NOS. If you have doubts, consult the Quick Guide for Classifying Information available on the intranet.

## Asset protection

**I was invited to teach at a university and I think it would be interesting to analyse NOS’ marketing campaigns with my students. May I discuss the strategies of our campaigns in the classroom?**

The campaigns are a commercial product and a patrimonial asset of NOS, in addition to which, part of that work may involve copyright or confidential company information. On the other hand, it is a parallel activity that may conflict with the interests of NOS so you will have to have the authorization of the Ethics Committee with the knowledge of your Manager/Director.



Quick Guide to  
Information  
Classification



# How to use our information

- ▶ Ensuring the confidentiality, privacy and integrity of NOS' information as well as other information that may become available to NOS by virtue of its business;
- ▶ Preserving confidential facts or information, observing the rules established in this regard;
- ▶ Not disclosing or sharing with third parties any of the Group's internal documentation without previous authorisation by the competent body;
- ▶ Not using privileged information for personal benefit or for the benefit of any third parties;
- ▶ Not sharing privileged information that may affect stock exchange values and not advising or making transactions, on their account or on behalf of a third party, directly or otherwise, relating to the securities (or financial instruments) admitted to trading on a regulated market by NOS, its strategic partners or any company related to the Group;
- ▶ Not sharing with any unauthorized third party data which may become available in the course and by virtue of their professional activities, namely not disclosing information about personal data, production methods or transactions. These obligations and duties remain in force even after termination of employment;
- ▶ Do not use your in-depth knowledge about NOS when issuing opinions or passing on information to external entities. Only official NOS representatives can speak on behalf of the company;
- ▶ Do not disclose or share, even when requested, to the media or social networks any information about NOS that has not been previously authorized, in order to protect the reputation of the Group's companies.



For more information

Consult  
the Information  
Security Portal



For more information

**General Information**  
**Security Policy**

**Customer**  
**Privacy Policy**

**Employee**  
**Privacy Policy**

Guide to a  
**Responsible**  
**Online Presence**



Useful  
contacts

**Requests for clarification**

[duvidas.etica@nos.pt](mailto:duvidas.etica@nos.pt)

**Irregularities report**

[comunicar.irregularidades@nos.pt](mailto:comunicar.irregularidades@nos.pt)

**Security & Privacy**

[seguranca.privacidade@nos.pt](mailto:seguranca.privacidade@nos.pt)

**Security and Privacy Incidents**

[incidentes.seguranca.privacidade@nos.pt](mailto:incidentes.seguranca.privacidade@nos.pt)

**Personal Data Protection**

[dpo.privacidade@nos.pt](mailto:dpo.privacidade@nos.pt)

# Violation of Employees' privacy

**I have a strong suspicion that a member of my team is developing a project for another company using NOS' laptop and email. I would like to have proof of this before taking any action. The IT Department may have access to Employees' mailboxes and I am close to the person in charge of that department. May I ask that person, informally, to obtain this information for me?**

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No, you may not, and neither could the person in charge of the IT Department provide you with such information, because that would be a violation of privacy. According to internal procedures, you must report your suspicions about the irregularity of your colleague's behaviour to the Ethics Committee.

# Breach of information confidentiality

**I had a meeting scheduled with a supplier, but when he arrived I was still wrapping up another meeting. I asked that he was conducted to the room where we would meet. When I got there, the supplier was clearly uncomfortable. Through the videoconferencing device (voice only) I could hear the conversation taking place at another meeting. Does this represent a breach of information confidentiality?**

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Yes, it does. In the first place, you should keep in mind that someone external to our company should never be left alone or allowed to wander inside the premises. Additionally, you should be especially careful in protecting NOS' information. This is true for meeting rooms, your desk, your computer screen, video conferences, speakerphones, etc. You should never question the confidentiality of our company's information.

**I am aware of a colleague who spends his life publishing information on events promoted by NOS on his social networks. I am always in doubt whether he can do it?**

---

Although it is not always easy to draw the boundary between the professional and personal spheres, it is essential that, in social media, this boundary is clearly established. You must not disclose information about NOS that has not been properly authorized. Bear in mind that this information, although originally intended for the private sphere, can quickly be forwarded to others, and become public, with an impact on NOS's reputation.

# How to avoid corruption and related offences

- ▶ Repudiate any practice of corruption or bribery in its active or passive form and other forms of undue influence, or illicit conduct, in all its internal and external relations;
- ▶ All behavior that may constitute a crime of corruption or related offenses is prohibited, in particular promising, offering, demanding, or implying that any type of benefits that are not due, to any Public Sector Representative or Representative of the Private sector;
- ▶ Offering or accepting, under any circumstances and regardless of value, cash, checks and other goods subject to legal restrictions is prohibited;
- ▶ Offering or accepting any advantage, which is not due, to influence an action or decision is prohibited;
- ▶ Comply with the Code of Conduct for the Prevention of Corruption and Related Offenses, in particular the offer or acceptance of benefits by Representatives of Public Entities.



For more  
information

Code  
**of Conduct for the  
Prevention of Corruption  
and Related Offenses**



Useful  
contacts

**Requests for clarification**  
duvidas.etica@nos.pt

**Irregularities report**  
comunicar.irregularidades@nos.pt

**Diretor | Manager**

# Gifts and offers

## **A Supplier offered me tickets to a football league final. Can I accept them?**

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Eventually. If the Supplier is inviting you to go to the game with him, you can accept if:

- ▶ The stakeholder who invites accompanies the employee to the event;
- ▶ The event in question contributes to the development of the professional relationship in the context of NOS;
- ▶ Occurs during a commercial relationship in force with NOS;
- ▶ Be punctual and not exceptionally expensive (in line with the ceilings established in the group for travel and mission expenses);
- ▶ Consistent with NOS values.
- ▶ The respective values are appropriate to the circumstances and to the social and professional uses and customs.

If the Supplier is not going with you to the game, then the tickets should be considered a gift, and you will only be able to accept with the approval of your Manager and the Director of the department.

## How to avoid conflict of interest

- ▶ Assume loyal behaviour towards NOS, avoiding any situation or parallel activity to that carried out at NOS that may lead to a conflict of interest;
- ▶ Refrain from exercising any function or negotiating in competition with the Group's companies, whether on your own account or on behalf of a third party;
- ▶ Do not intervene in processes that may result in a potential conflict of interest, particularly in cases of kinship or friendship;
- ▶ Any situation that may give rise to a potential conflict of interest implies requesting prior authorization from the Ethics Committee, with knowledge of the Manager/ Director.

## What is meant by a conflict of interest?

- ▶ Conflict of interest is any situation in which the Employee has an interest, economic or personal, in an interaction that may adversely affect the organization.

## What kind of parallel activity may give rise to a conflict of interest?

Conflicts of interest may arise in the exercise of any parallel activity by the Employee that:

- ▶ Is incompatible with the duties of the position or duties of the Employee, or;
- ▶ It is incompatible or may conflict with NOS 'interests (including activities, duties and positions related to NOS' various sectors of activity); or
- ▶ Is developed in areas related to the Employee's functional competence and that:
  - conflict with his duty of loyalty, or
  - implies the provision of services and/or any contractual link with Partners, Suppliers, Customers and/or competitors of the company, industries, or any organizations;
- ▶ Is performed during working hours, or;
- ▶ May imply the misuse of NOS information to which the Employee only has access because he is an Employee of the company; or
- ▶ May imply the use or misappropriation of NOS information that compromises NOS 'intellectual property.



Useful contacts

**Requests for clarification**

duvidas.etica@nos.pt

**Irregularities report**

comunicar.irregularidades@nos.pt

**Director | Manager**

# What kind of kinship or friendship relationships can give rise to a conflict of interest?

Conflict of interest may arise from a professional interaction involving:

- ▶ Family relationships up to the 3rd degree, whatever the line of kinship, or
- ▶ The life partner or anyone who lives with the Employee or who is financially dependent on him or on whom he depends.

## Kinship relations

**My department regularly contracts the services of a company that is owned by a relative of one of our colleagues. I am certain that there are no tenders and no other companies are invited to submit their proposals. What should I do?**

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There may be a reason or a specific approval for this situation. However, you must report the situation to the Ethics Committee, with the knowledge of your Manager/Director, so that the situation can be clarified.

## Friendship relations

**I am participating in a recruitment process. There is a person whose profile seems to be the most suitable for the job, but it turns out that this person is my friend. I would like to express my approval, but I'm afraid this could fall within the scope of the concept of conflict of interest or be understood as such. Is the concept of conflict of interest applicable only to kinship relations up to 3rd degree relatives, or do they also include these situations?**

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The conflict of interest can be caused by kinship or by friendly relations, so in this case you must inform the Ethics Committee of the personal relationship with the knowledge of your Manager/Director and distance yourself from the decision making process.

## Parallel activities – working for another company

**Concurrently with my activity at NOS I also work for an audit services company as mystery client. If I am not too busy, may I make a few phone calls related to this other work?**

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No, you cannot work for any other company during your working hours and at NOS facilities. And, even outside of work and company hours, you must ensure that the work you want to do is compatible with your duty here. If it seems to you that there is a possibility of a conflict of interest, you must request approval from the Ethics Committee with the knowledge of your Manager/Director.



## Parallel activities – family business

**I have scheduled a meeting with a supplier to negotiate the prices for accommodation in hotels. May I take this opportunity and also negotiate the terms for my own company, which I manage with my wife?**

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No, you may not. Firstly, you may not use your time at NOS' service to perform work for any other company, whether by using scheduled meetings, sending emails or making phone calls. Secondly, you are also not allowed to use company resources, such as our database of suppliers, for the benefit of any entity other than NOS.

## Parallel activities - competitive activity

**I intend to open a company that will provide services in the area of telecommunications. I will dedicate myself to the activities of this company after work and I will not use any information that I have access to at NOS. Can I do it?**

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This situation can be considered a conflict of interest so you should report to the Ethics Committee with the knowledge of your Manager/Director all the details of this situation so that it can be analysed and clarified. According to the NOS Code of Ethics, you must refrain from exercising any function or negotiating, on your own or someone else's behalf, in competition with NOS companies.



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