



Code of Ethics

Short version
for Partners and Suppliers

May 2022



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Introduction to the Code

The Code Matters

Grupo NOS ("NOS") bases its performance on the highest ethical and deontological standards. Professionalism, integrity, independence, and transparency are fundamental principles at NOS, which allow establishing relationships of trust with its Customers, Suppliers and Partners, and constitute an essential element for the success of its business.

The principles and rules described in the NOS Code of Ethics ("Code") must be complied with by each Partner or Supplier that collaborates with NOS and incorporated into their daily processes.

Partners and Suppliers must ensure compliance with this Code by their Employees or other persons involved in the provision of services to NOS, this Code is thus aimed to all Partners/Suppliers and their Employees.

Question Yourself

It is important that you make the right decisions when carrying out your activities in the service 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.

Question us

You can always ask and raise questions, in this case through the e-mail duvidas.etica@nos.pt, or report irregularities through the e-mail comunicar.irregularidades@nos.pt. NOS. If it is a topic related exclusively to your company (NOS Partner entity) or your Employees, you should, whenever possible, address the issue to your company, through the existing channels.

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, by the Partners or Suppliers, may give rise to the application of penalties and/or termination of the contract, without prejudice to other legal consequences.





Commitments

Our Commitments towards our Partners and Suppliers

- ▶ Promote, to the extent possible, conditions for Partners and Suppliers to guarantee:
 - A friendly and fair treatment;
 - Good working environment, ensuring compliance with applicable health and safety standards;
 - Information sharing, effective communication, and training;
 - Team spirit, sharing common goals and helping each other.
- ▶ Provide feedback on the service performed in a rigorous, transparent, and constructive manner;
- ▶ Promote, to the extent possible, the adoption of the best environmental and social practices in its activities;
- ▶ Prevent and combat, to the extent possible, any form of harassment, or any other form of attack on the dignity of the Employees of the Partners;
- ▶ Ensuring the privacy of the personal data of the Employees of the Partners.



Documents to consult

Code of Conduct for Preventing and Combating Harassment
Sustainability requirements for suppliers and partners
Security policy
Privacy policy



Useful contacts

Requests for clarification
duvidas.etica@nos.pt
Irregularities report
comunicar.irregularidades@nos.pt

Safeguard reputation

Q: A friend of mine told me that the NOS technician who installed equipment for him complained that he works hard and is badly paid. I actually happen to know the technician. What should I do?

A: You must report the situation to your Area Manager at your company, as the technician's behaviour was not correct. It is not acting loyally and could damage NOS 'reputation. Do not forget that things that do not look good should be shared, in order to find good solutions.

Commitments of our Partners and Suppliers

- ▶ Comply with the rules and guidelines defined by NOS at all times and safeguard NOS 'reputation in all situations;
- ▶ Acting in a loyal, professional, responsible, and rigorous manner, not exceeding the limits of its autonomy;
- ▶ Assume a cordial behaviour considering the mutual respect between people, namely treatment, posture, clothing, tone of voice, language used and elementary rules of courtesy;
- ▶ Assume with each other and with others, in particular with Customers, a behaviour of honesty, cooperation and clarity of communication;
- ▶ Report harassing behaviour by NOS employees, in accordance with the NOS Code of Conduct for Preventing and Combating Harassment;
- ▶ Responsibly use the resources provided for the exercise of activities at the service of NOS;
- ▶ Use Social Media responsibly, in order to avoid damaging NOS 'reputation;
- ▶ Respect and ensure full compliance with legal and regulatory standards;
- ▶ Promote a spirit of cooperation, collaboration, and respect in relations with public and supervisory authorities, refraining from adopting any behaviour that prevents the exercise of the respective tasks;
- ▶ Provide public authorities with the necessary collaboration to carry out their activities, namely through the timely provision of the information that has been requested.



**Documents
to consult**

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Respect for the Client

Q: My colleague purposely leaves Customers waiting for answers to some requests for clarification, in the hope that they will not contact again. Doesn't this behaviour go against NOS principles and guidelines?

A: Of course, it does! You should speak to that colleague and alert him to the fact that leaving a Customer without an answer is not treating Customers with professionalism, clarity, respect, and loyalty.

Working environment

Q: NOS's Commercial Manager regularly holds progress report meetings, and systematically leaves me waiting. What should I do?

A: You should start by alerting the NOS Commercial Manager that his behaviour breaches NOS principles and guidelines. If the situation continues, you should report it to your Manager and/or to the NOS Ethics Committee, stating what impacts it has on lost work time.





Conduct
in our business

How we relate to the Customer

- ▶ Treat Customers with professionalism, clarity, respect, and loyalty;
- ▶ Provide customers with the necessary information, in a clear and straightforward way, so that they can decide in an informed way;
- ▶ Inform Customers about possible risks associated with the use of products and services;
- ▶ Comply with agreed conditions;
- ▶ Guarantee the satisfaction of the Customers, so that they have a lasting relationship with NOS;
- ▶ Respect the protection of customers' privacy and personal data.



Documents to consult

Sustainability requirements for suppliers and partners

Privacy policy



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Clarity of information with the Customer

Q: I never leave a customer question unanswered, of course I only talk about the most advantageous aspects of the product.

A: In response to questions or requests for clarification from customers, we should always use the information that is transmitted through the official channels and support of the company.

How to use NOS resources

- ▶ Carefully and efficiently use and preserve NOS material resources, as well as those of its Customers, to which they have access in the course of their duties, protecting them from damage, fraud, theft, alteration or loss resulting from actions of third parties;
- ▶ Respect NOS 'intellectual property, as provided for in legal and/or contractual provisions, including any creations, modifications, transformations or improvements (as well as the respective documentation) carried out within the scope of the provision of services;
- ▶ Use the offer and the means provided by NOS strictly and in accordance with the stipulated rules (discounts, campaigns, product information, promotional conditions, etc.), protecting them against fraud, theft, or alteration.



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Equipment care

Q: I have a colleague who, as a matter of habit, leaves the tablet and the Customer contracts in the trunk of the car. I have already informed him that his behaviour is not safe and that this endangers NOS material and information, but he continues to do the same. What should I do?

A: You should report to your Manager and/or the Ethics Committee, as your colleague is not being careful. This behaviour puts the NOS material at risk of theft and jeopardizes the confidentiality of customer information.

Helping a colleague

Q: A colleague of mine, who is in serious financial trouble, asked me to make a zero charge on the number of his unemployed wife. I know it is not right to do so, but I cannot say no ...

A: You cannot do this because you are committing an illegal act and defrauding the company.

How to use NOS information

- ▶ Respect the confidentiality, privacy, and integrity of the information of NOS, or NOS Customers, especially information related to personal data;
- ▶ Safeguard the accuracy of the information by ensuring that it is consistent, is not altered, lost, or deleted without authorization;
- ▶ Use the information for its intended purposes and never for the benefit of itself or third parties (family, friends, competition, etc.);
- ▶ Do not disclose or share any NOS internal information or documentation to third parties (family, friends, competition, etc.), namely do not disclose information regarding personal data;
- ▶ Do not use your in-depth knowledge about NOS when issuing opinions or passing information on to external entities (e.g. talking to journalists);
- ▶ Do not post any information that harms NOS 'reputation on social networks, blogs or websites.



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Social media posts

Q: There is a person from our team, who identifies himself as being connected to NOS, who spends his life posting about the company on social networks.

I am always in doubt whether he can do it?

A: 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. Whenever you publish opinions or content, you must make it clear that such opinions or content represent your own points of view and do not reflect, for any purpose, NOS positions. 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.

Speaking on behalf of NOS

Q: A journalist asked me to film the interior of my van and my work passing a drop of fibre to the Customer. Even if the work is not about NOS, but about the work of fibre optic technicians in Portugal, what should I do? Do I avoid talking to journalists and let the interior of the van be filmed?

A: You should not authorize the filming. You cannot talk about or on behalf of NOS with journalists or let the van be filmed, even if it is yours. The passing of information abroad can only be done by people who, within NOS and within the scope of their duties, have this responsibility. Any information, simple as it may seem, if misused can damage NOS 'reputation. Also, remember that you have no way of proving the truth of what the journalist said to you.

How to avoid corruption and related offences

- ▶ Reject any practice of corruption or bribery, and other practices of undue influence;
- ▶ All behavior that may constitute a crime of corruption or related offenses is prohibited.
- ▶ Do not accept, for your own benefit or that of third parties, goods, services, or any other advantages;
- ▶ Offering or receiving, under any circumstances and regardless of value, cash, checks, cards, and other goods 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.



Documents
to consult

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



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Undue compensation

Q: I know of a colleague who, in order to close a contract with the owner of a workshop, arranged for the Customer, instead of having to choose between a 100 euro voucher or the 1st free monthly fee, to have both. As compensation, he gave him a discount on the revision of his car in his workshop. Should I report this to my boss?

A: Yes. Using the conditions that NOS gives its Customers for their own benefit is illegal. These situations must be reported immediately to the Ethics Committee.

Q: After an extraordinarily laborious and time-consuming installation, the Customer left the company with me, as she was already late to go to another location. However, it was only when I arrived at the van that I noticed that I had not asked for the additional cost signatures and the final Order of Business signature. As I did not feel like assuming the mistake with my Manager, or coming back later, and the Customer effectively asked for the additional costs, I thought about imitating the Client's signature. Can I do it?

A: Of course not! Counterfeiting, imitation or signature on behalf of others, or identity theft is a crime. Under no circumstances should you falsify any data or let it be done.

How to avoid conflicts of interest

- ▶ Assume loyal behaviour, avoiding any situation or activity parallel to that exercised at NOS that may lead to a conflict of interest;
- ▶ Perform duties at the service of NOS solely in the interest and benefit of NOS;
- ▶ Do not intervene in processes that may result in a potential conflict of interest, particularly in cases of kinship or friendship.

What is meant by a conflict of interest?

- ▶ Conflict of interest means any situation in which the Partner/Supplier or its Employee has an interest, economic or personal, in an interaction that may adversely affect NOS.



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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 partner/supplier or his employee that:

- ▶ Is incompatible with the services provided to NOS; or
- ▶ Is incompatible or may conflict with NOS' interests; or
- ▶ Is developed in areas related to the services provided to NOS and that may conflict with NOS' interests; or
- ▶ Is performed during working hours, or;
- ▶ May imply the improper use of NOS information to which the Partner/Supplier or its Employee has access only for providing services to NOS; or
- ▶ May imply the use or misappropriation of NOS information that compromises NOS 'intellectual property.

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.

