

dstgroup

Code of Ethics and Conduct

[revision 3]

Table of Contents

Chairman's Address	3
dstgroup	4
Mission.....	4
Vision.....	4
Values.....	4
Main objectives of the Code of Ethics and Conduct	6
Premise.....	6
Principles and rules of conduct.....	7
Our 14 Commandments.....	7
Respect for Human and Labour Rights	8
Transparency	9
Corporate social responsibility	10
Non-compliance	
Commitment to our stakeholders.....	11
Human Resources	11
Customers	11
Suppliers.....	12
Competitors	12
External community	12
The Environment	13
Process management.....	13

Chairman's Address

We are the by-product of those that came before us, we inherited the value of respect, thoroughness, responsibility, solidarity, loyalty, courage, passion, ambition and aesthetics.

Almost everything is resolved, even at times of extreme tension, by this obsession with fulfilling our identity.

What we lack we gain through restlessness, a kind of intellectual dissatisfaction that haunts us and lifts us up against adversity and, awakened by an intense need to know more, we create value in business areas where competition demands sophistication only within the reach of those who (as António Variações sang) always feel that the grass is greener on the other side.

We act in the sense of being authors of our corporate narrative, which is like saying that we like independence and love freedom.

Much of the business we run is created by us and we will continue to strive to surprise and continue to do so.

We have six very clear areas on our strategic map: Engineering and Construction, Environment, Renewable Energies, Telecommunications, Ventures and Real Estate.

Each area makes its net contribution to the others: some supply the others.

Networking and symmetrical communication are one-way and non-negotiable.

In construction, we move towards understanding what will be consumed and, in time, we gain the knowledge that we lacked in the certainty that tomorrow what we know will once again be little - that what has been gained cannot be lost but what we have to gain, once again, requires more knowledge.

We are intensely under construction.

José Teixeira

Chairman of the Board of Directors of **dstgroup**

dstgroup

Founded in the 1940s, in Braga, **dstgroup** (Domingos da Silva Teixeira) came about in the Civil Construction sector, but today it is also a major player in the areas of Environment, Renewable Energy, Telecommunications, Ventures and Real Estate.

Mission

To build sustainable business projects that add value to the community.

Vision

To build with art and ingenuity so that we can go down in history as the “Renaissance” entrepreneurs of the 21st century. .

Values

Respect (from the Latin *respectu*) masc. noun 1. act or effect of respecting; 2. consideration; appreciation; 3. deference; compliance; veneration; 4. homage; worship; 5. relationship; reference.

We believe that everyone should be respected for their work, attitudes, opinions and choices.

Thoroughness (from the Latin *rigore*) masc. noun 1. hardness; strength; 2. fig. severity; punctuality; accuracy.

There is no such thing as "more or less levelled", "more or less upright", "more or less clean" or "more or less safe", but rather "level", "upright", "clean and safe". Thoroughness is reflected in our procedures, schedule and rules to be followed. Being strict, from the point of view of principles and morals, means being thorough.

Passion (from the Latin *passione*) fem. noun 1. intense and generally violent feeling (of affection, joy, hatred, etc.) that makes it difficult to exercise impartial logic; 2. object of this feeling; 3. great predilection; 4. partiality; 5. great upset; immense suffering.

Under the sign of passion - text by the poet Regina Guimarães - is our icon. Passion means having great enthusiasm for something, a favourable or contrary mood towards something.

It is the sensitivity that an engineer or architect conveys through a work.

Passion means dedication to a project. Passion means an intense state of mind.

Loyalty (from the Latin *legalitate*) fem. noun 1. quality of being loyal; fidelity; sincerity.

Solidarity (from the Latin solidare) masc. noun 1. quality of solidarity; 2. reciprocal responsibility between members of a social, professional, etc. group; 3. feeling of sharing the suffering of others.

Showing solidarity means being a friend, it means extending a hand with genuine generosity, it means bringing joy and human warmth to those who, in some way, are marginalised. Showing solidarity means being more human.

A caring company is recognised as a fair, unselfish company. A caring company is preferred in business. It is a more competitive company.

Volunteering is a vehicle for solidarity. It is modern, fair, cultured, friendly. It is a noble and morally elevating gesture.

Courage (from the Latin coraticum) fem. noun 1. bravery in the face of danger; intrepidity; boldness; 2. moral strength in the face of suffering or setback; 3. [fig.] energy in carrying out a difficult task; perseverance.

Courage is essential in our life. Courage to face less pleasant situations in the most difficult issues, not expecting random resolutions.

It is a value that we must demonstrate in opposition to fear, cowardice and laziness. Courage to react to criticism, not with an attitude of demotivation or sadness, but rather by looking for the means and action to overcome its reason. This type of courage, which is also intellectual courage, is highly recommended.

Ambition (from the Latin ambitione) fem. noun 1. vehement desire for wealth, honour or glory; 2. expectation regarding the future; aspiration; 3. greed; covetousness.

A strong desire to achieve a certain goal. Ambition so that we don't settle for less. Ambition to bring out the greatest potential in ourselves. Ambition to be worthy of ourselves. Ambition to be athletes in our highly competitive profession. Ambition to bang the drum for our brands. Ambition to do the best business with maximum value, availing ourselves of the highest level of competence and efficiency.

Aesthetics (from the Greek aisthetiké, «sensitive») fem. noun 1. Branch of philosophy that studies beauty and the nature of artistic phenomena; 2 style specific to an author, period, etc.; 3. harmony of shapes and colours, beauty; 4. set of techniques and treatments that aim to beautify the body.

We chose to base the group's economy on an aesthetic of beauty, which corresponds to the aesthetic of good, truth and freedom. Aesthetics because we are sensitive. Aesthetics just because.

Responsibility (from the Latin respondere) fem. noun 1. obligation to answer for one's own actions, those of others or for things entrusted to one.

We have to be sure that when faced with a choice, we choose what is best for both of us and not just what is best for each of us. Each worker is responsible for his/her negotiated activity and is jointly responsible if a colleague does not carry out his/hers, preventing the common objective.

A team means the whole - it is the whole. In the business world, as in the social or family world, everyone has to comply with their relative position and everyone must contribute so that, by omission, we do not allow one of our own not to be one of our own.

Main objectives of the Code of Ethics and Conduct

Here at **dstgroup** we like to do good business and maintain great relationships with all our stakeholders. To do this, it is essential to always bear in mind a set of strong principles that guide us in our professional relationships. It is part of our strategic vision to promote and nurture this ethical and socially responsible management.

Our values, principles, practices and business attitudes are based on the thoroughness and transparency that we cultivate in all our interactions, and it is our intention to encourage all our partners to share with us this culture geared towards sustainable development.

We aim to ensure a maximum respect for human and employment rights and we wish to be governed by the most demanding standards of hygiene, health and safety at work, encouraging our stakeholders to be guided by the same standards of excellence.

Reducing the environmental impact of the activity we carry out and giving back to society what it provides us with is another of our objectives, and this ecological perspective is deeply rooted in our management policy.

Ensuring compliance with the guidelines of this Code of Ethics and Conduct by employees, customers, suppliers and partners of the **dstgroup** in all its commercial and institutional relationships, whether internal or external, is absolutely essential for us to be able to carry out our activity in a responsible, sustainable manner.

In order to ensure that the code of ethical conduct is globally known, here at **dstgroup** we share on the internal e-learning platform (when welcoming new employees), in the various facilities where we operate, on the intranet and at **dstgroup** website. There is also an ethics committee, chaired by the Chairman of the Board of Directors, which meets periodically and consists of an agenda where it is discussed whether all ethical principles are being complied with within the organisation.

Premise

This Code of Ethics and Conduct covers all employees of the various companies in the **dstgroup**. The internal and external professional relationships of **dstgroup** are governed by this Code, and the group is aware that its success and that of its companies depend on the scrupulous ethics applied in conducting business.

All stakeholders of the **dstgroup**, whether they are directors, managers, workers, customers, suppliers or other partners who maintain business relationships with the group, are responsible for the strict respect and compliance with the standards contained in this Code.

The **dstgroup** and its employees undertake to base their attitudes, actions and decisions on the principles of action described in this document, always being responsible and professional in the diligent exercising of their duties.

Principles and rules of conduct

Our 14 Commandments

The ethical principles and values that we hold most dear make up the commandments of **dstgroup**, strict compliance with which is the responsibility of all parties involved.

dstgroup is committed to:

1. Ensuring transparency and thoroughness in all activities carried out with its stakeholders;
2. Rejecting illegal, immoral and incorrect behaviour, used only to achieve economic aims set a priori;
3. Disapproving of actions and attitudes driven by purely personal interests and/or those of third parties, to the detriment of the group's interests, also rejecting any type of corruption;
4. Preventing all abusive behaviour that is harmful to workers, namely the four types of harassment: bullying, sexual harassment, moral harassment and stalking;

5. Offering quality services and products to all its partners, demonstrating compliance with the most demanding criteria of excellence and competitiveness;
6. Ensuring all equipment necessary to perform the function, as well as ensuring all safety and hygiene standards at work;
7. Boosting loyalty in competition, promoting a freer, fairer and more open market for all stakeholders;
8. Supporting, stimulating and valuing its human resources, helping them to reach their maximum potential and providing them with a good work-life balance;
9. Treating employees' personal data with all due respect and ethics, both during their employment with the company and after they leave;
10. Ensuring the retention of data on workers and former workers for the periods required by law;
11. Respecting and ensuring respect for equal opportunities in the workplace, strongly condemning discrimination based on gender, age, ethnicity, race, place of birth or nationality, sexual orientation, marital status, religious beliefs, political opinions, association or trade union affiliations and health status;
12. Defending the scrupulous fulfilment of the rights set out in the Universal Declaration of Human Rights;
13. Minimising the environmental impact deriving from its activity and promoting the conscious and responsible use of resources, fostering a management policy based on a culture of ecological sustainability;
14. Ensuring that the standards and principles described herein are fulfilled with thoroughness, seriousness and loyalty by all its employees, creating an environment of trust.

Respect for Human and Labour Rights

dstgroup respects and ensures respect for Human Rights and is committed to promoting decent labour practices.

dstgroup is committed to:

- Respecting and complying with the Universal Declaration of Human Rights and international treaties, conventions and initiatives, such as the Conventions of the International Labour Organisation, the United Nations Global Compact and the Guiding Principles on Business of the Human Rights Council;
- Honouring all forms of freedom within the company, namely freedom of opinion and expression, conscience, religion, organisation and association, recognising the right to collective bargaining;
- Rejecting the use of child employment, including condemning this practice by its business partners;
- Ensuring decent working conditions for its employees, promoting respect for their innate dignity and always seeking to protect them against acts of moral or psychological violence that may create a humiliating, unstable or hostile environment, such as insults to the person or their professional performance, social isolation, threats of any kind or attempts at coercion;
- Managing its employment policy in order to prevent any form of discrimination or different treatment based on the factors referred to in point 11 on the previous page;
- Ensuring the appropriate dissemination of hygiene, health and safety standards and measures at work, as well as environmental and quality management measures, carrying out frequent audits of said management systems to certify their compliance;
- Ensuring that its employees comply with the guidelines that regulate environmental, quality and occupational health and safety management systems within the various companies in the group, also encouraging them to report any situation that goes against the established rules and principles.

Transparency

dstgroup values transparency above all else.

From a more literal point of view, we can say that the group works in open space and that the internal partitions of its office buildings are made of transparent glass, decorated with a strip that reiterates the company's values:

“The values are inscribed throughout the perimeter of the group, so that the entire perimeter converges towards the centre. At the centre lies the beginning. In the beginning there is also the Verb. At the centre are Respect, Thoroughness, Passion, Loyalty, Solidarity, Courage, Ambition, Aesthetics and Responsibility.” (José Teixeira, Chairman of the Board of Directors)

The transparency of the glass reveals the transparency of the group's activities and, associated with its values, which constitute the company's core, we can state that everything that best defines **dstgroup** is in plain sight for everyone to see.

Every year, the performance of **dstgroup** and its companies is and will continue to be reported in a clear, transparent manner, with the group being aware of its legal duties and the needs and rights of all those involved.

Corporate social responsibility

dstgroup's expanded corporate social responsibility programme is based on sustainability strategies that include concern for collective well-being and the social and environmental effects of its activity, covering areas as diverse as culture, education, health, safety, the environment and knowledge. This programme is transversal to the group and is developed in an external and internal context, involving all workers, in line with the values of **dstgroup**: Ambition, Passion, Loyalty, Solidarity, Aesthetics, Courage, Respect and Thoroughness.

This group's concern for social responsibility issues not only increases the personal wealth of each worker but also contributes to the environment in which they are integrated, transmitting to the market the distinctive positioning of a “cultured, cosmopolitan and cool” group, projected in an image of modernity and social, cultural and economic dynamism.

In light of the trends and challenges facing the world today, the role of companies in promoting sustainability is of the utmost importance in its threefold economic, social and environmental aspects. The progress of companies towards this sustainable development constitutes an inexhaustible task and a permanent challenge, with **dstgroup** aiming to establish itself as a national reference in terms of social, cultural and environmental responsibility.

Non-compliance

Failure to comply with the rules laid down in the Code of Ethics and Conduct constitutes a serious offence, subject to disciplinary proceedings, without prejudice to any civil, administrative or criminal liability in accordance with legal or regulatory provisions.

The disciplinary sanctions that may be applied for failure to comply with the rules established in the Code of Ethics and Conduct are as follows (article 328 of the Employment Code):

- a) Reprimand;
- b) Recorded reprimand;
- c) Pecuniary penalty;
- d) Loss of days of holidays;
- e) Suspension of work with loss of pay and length of service;
- f) Dismissal without compensation or severance pay.

Commitment to our stakeholders

In the search for sustainable, lasting growth, **dstgroup** is ethically committed to all those who interact with the group and its companies.

Human Resources

The workers of **dstgroup** constitute its most precious resource, with each person recognised as a determining element in the success of the group and its companies. By establishing an environment of loyalty and mutual respect and ensuring compliance with hygiene, health and safety standards at work, the group defends the rights of its workers and always seeks to provide them with equal opportunities which promote their professional and individual growth.

Customers

Based on the excellence of the services offered and the permanent search for innovation and continuous improvement, **dstgroup** always seeks to stay ahead of current business times,

anticipating trends, influencing what will be consumed and exceeding all expectations. We would like to continue to sense the needs of our customers, both current and potential and future, and always provide them with the best conditions, fostering a relationship of trust, honesty and cooperation. Respecting the diversity of opinions and sensitivities of customers is another aspect that the group's employees and their companies seek to comply with in their professional relationships.

Suppliers

The partners we choose as suppliers of the products and services we need to carry out our projects play a crucial role in the competitiveness of **dstgroup** and its companies. Hence, the relationships maintained are based on cooperation and equal opportunities. All our suppliers must respect and comply with the principles and standards that make up this Code of Ethics and Conduct.

Competitors

Transparency, freedom of action and fair competition drive the business relations of **dstgroup** with its competitors. A fair market, focused on the innovation and quality of products and services, is one of the ambitions of the group and its companies. Only in this way will it be possible to contribute to the sustainable development of society. Business practices that violate the ethical standards and principles set forth in this Code will be strongly rejected, and no employee of the **dstgroup** should try to justify any improper conduct by claiming that he/she is acting in the interests of the group or its companies.

External community

dstgroup always seeks to give back to the communities where it operates and where it is located what is offered to it. We aim to promote socioeconomic well-being and stimulate the sustained growth of society, contributing to this end with our comprehensive policy of social, cultural and environmental responsibility, focused on valuing resources and individuals. The group and its companies do not accept favours, advantages or courtesy contributions from political parties, associations and other organisations, nor do they offer any.

The Environment

Environmental issues are at the forefront of the concerns of the **dstgroup**, particularly in activities associated with construction with high impacts on the consumption of materials and energy resources and the production of waste. The growth and development of the group's various departments and companies have made it clear that environmental issues need to be integrated into the management system in order to meet socio-economic needs and protect the environment. Hence, the group has adopted a management policy that includes environmental criteria such as the development of processes and procedures that cause less environmental impact, practising the responsible consumption of natural resources and preventing pollution, namely by reducing the use of dangerous products and the production of waste.

Process management

This Code of Ethics and Conduct regulates all ethical and moral issues within the business scope of **dstgroup** which makes this document available to all its workers and other stakeholders.

Any attitude, behaviour or activity which comes into conflict with the values and principles described herein may and should be reported as soon as possible, using our reporting channel available at <https://denuncias.dstsgps.com/>.

dstgroup undertakes not to harm nor retaliate against **stakeholders** who file a complaint and we also guarantee fair treatment of those targeted in the reporting of the event, always bearing in mind the presumption of their innocence when determining the truth.

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Revision 3

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