

dstgroup

# **Code of Ethics and Conduct**

[revision 3]



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## **Message from the Chairperson**

A product of those before us, we have inherited the values of respect, rigor, responsibility, solidarity, loyalty, courage, passion, ambition and aesthetics.

Almost everything is resolved, even in moments of extreme tension, through this obsession of fully being in synch with our identity.

What we lack we gain through restlessness, some sort of intellectual dissatisfaction that stalks us and makes us rise to face adversity and, awakened by an Intense need to know more, we create value in business areas where competition demands a sophistication only available to those who (as António Varicose sang) are only doing well where they are not.

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

Much of the business we undertake is created by us and we will continue to strive to surprise ourselves and for this to be so.

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

Each area makes its own net contribution to the others, as one supplies the other.

Networking and symmetrical communication are unique and non-negotiable.

In construction we are moving towards understanding what is worth consuming and, in time, we gain the knowledge we previously lacked in the certainty that tomorrow what we know will be too little once again - that what is gained cannot be lost, but what we have to gain from what is new needs more knowledge.

We are, intensely, under construction.

### **José Teixeira**

Chairperson of the Board of Directors of the **dstgroup**

## The dstgroup

The **dstgroup** was founded in Braga in the 1940s (Domingos da Silva Teixeira) and its origins lay in the construction sector, but nowadays it is also a leading player in the areas of the Environment, Renewable Energies, Telecommunications, Ventures and Real Estate.

### Mission

Building sustainable corporate projects that add value to the community.

### Vision

Building with art and skill to go down in history as the 21st century "Renaissance" entrepreneurs.

### Values

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

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

**Rigor** (from the Latin rigore) n. 1. hardness; strength; 2. fig. severity; punctuality; exactness.

There is no such thing as "somewhat level," "somewhat tidy," "somewhat clean" or "somewhat safe," but rather "level," "tidy," "clean and safe." Rigor is reflected in our procedures, scheduling and the rules to be followed. To be strict, from the point of view of principles and morals, is to be rigorous.

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

Our icon is situated under the sign of passion, a text by the poet Regina Guimarães. Passion is having great enthusiasm for something, being in favor or against something.

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

Passion is the commitment to a project. Passion is a hot state of mind.

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

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

To show solidarity is to be a friend, to reach out with genuine generosity, to bring joy and human warmth to those who are marginalized in some way. To show solidarity is to be more human.

A caring enterprise is recognized as a fair and unselfish company. A supportive company is favored in business. It is a more competitive company.

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

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

Courage is essential in our lives. Courage to face less agreeable situations in the most difficult issues, not expecting chance solutions.

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

**Ambition** (from the Latin *ambitione*) n. 1. vehement desire for wealth, honors or glory; 2. expectation of the future; aspiration; 3. covetousness; greed.

A strong desire to achieve a certain goal. Ambition not to feel resigned. Ambition to get the most out of our potential. Ambition to deserve ourselves. Ambition to be an athlete in our highly competitive profession. Ambition to beat our marks. Ambition to do the best business with maximum value at the cost of the highest competence and efficiency.

**Esthetics** (from the Greek *aisthetiké*, "sensitive") n. 1. Philosophy 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 colors, beauty; 4. set of techniques and treatments aimed at beautifying the body.

We chose to base the group's economy on the aesthetics of beauty, which corresponds to the esthetics of goodness, truth and freedom. Esthetic because we are sensitive. Esthetic because we can.

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

We have to ensure that, when faced with a choice, we choose what is best for both and not just what is best for one. Each employee is responsible for their negotiated activity and co-responsible if their colleague fails to fulfil theirs, which hinders the common goal.

A team is a group - it is like a whole. In the corporate game, as in the social or family game, everyone must fulfil their relative position and everyone must contribute so that, by omission, we do not allow one of our own not to be as such.

## Main objectives of the Code of Ethics and Conduct

At the **dstgroup** we like to do good business and maintain optimal relationships with all our stakeholders. To do this, it is essential to always keep 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 such ethical and socially responsible management.

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

We want to ensure the utmost respect for human and labor rights and want to be governed by the highest standards of hygiene, health and safety at work, through encouraging our stakeholders to strive for the same standards of excellence.

Reducing the environmental impact of our activities and giving back to society 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 the **dstgroup's** employees, customers, suppliers and partners in all their corporate and institutional relationships, whether internal or external, is absolutely essential if we are to be able to conduct our activity in a responsible and sustainable manner.

In order to ensure that the code of ethical conduct is known throughout the **dstgroup**, we share it on our internal e-learning platform (as soon as we onboard new employees), in the various geographical areas where we operate, on the Intranet and on the **dstgroup** website. There is also an ethics committee, chaired by the Chairperson of the Board of Directors, which meets periodically with an agenda to discuss whether all the ethical principles are being complied with within the organization.

## Premise

This Code of Ethics and Conduct covers all the employees of the various **dstgroup** companies.

The **dstgroup**'s internal and external professional relations are governed by this Code, and the group is aware that its success and that of its companies depend on scrupulous ethics being applied when conducting its business.

All **dstgroup** stakeholders, be they directors, managers, employees, customers, suppliers or other partners who maintain corporate relations with the group, are responsible for the strict observance and fulfilment of the standards set out in this Code.

The **dstgroup** and its employees undertake to have their attitudes, actions and decisions guided by the principles described in this document, in always being responsible and professional in the zealous exercise of their duties.

## Principles and standards of conduct

### Our 14 Commandments

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

#### The **dstgroup** undertakes to:

1. Ensure transparency and rigor in all the activities conducted with its stakeholders;
2. Condemn illicit, immoral and incorrect behavior, used only to achieve a priori economic objectives;
3. Disapprove of actions and attitudes driven by purely personal interests and/or those of third parties to the detriment of the interests of the group, and to reject any form of corruption;
4. Prevent all abusive behavior that is harmful to workers, in particular the four types of harassment, namely bullying, sexual harassment, moral harassment and stalking;

5. Offer quality services and products to all its partners, demonstrating compliance with the most demanding criteria of excellence and competitiveness;
6. Ensure that all the necessary equipment to do the job is available, as well as comply with all safety and hygiene standards at work;
7. Boost fair competition, through promoting a freer, fairer and more open market for all stakeholders;
8. Support, stimulate and value its human resources, helping them to reach their full potential and offering them a good work-life balance;
9. Handle employee personal data with the utmost respect and ethics, both during their employment with the company and after their departure;
10. Ensure that employee and former employee data is kept for the periods required by law;
11. Respect and enforce equal opportunities in the workplace, strongly condemning discrimination based on gender, age, ethnicity, race, place of birth or nationality, sexual orientation, marital status, religious choices, political opinions, union or professional association links and health status;
12. Defend the scrupulous fulfilment of all the rights set out in the Universal Declaration of Human Rights;
13. Minimize the environmental impact resulting from its activity and promote the conscious and responsible use of resources, through fostering a management policy based on a culture of ecological sustainability;
14. Ensure that the standards and principles described here are complied with rigorously, seriously and loyally by all its employees, thereby creating an environment of trust.

## **Respect for Human and Labor Rights**

The **dstgroup** respects and enforces Human Rights and is committed to promoting decent labor practices.



**The dstgroup undertakes to:**

- Respect and comply with the Universal Declaration of Human Rights and international treaties, conventions and initiatives, such as the International Labor Organization Conventions, the United Nations Global Compact and the Human Rights Council's Guiding Principles on Business and Human Rights;
- Honor all forms of freedom within the company, particularly freedom of opinion and expression, conscience, religion, organization and association, recognizing the right to collective bargaining;
- Reject the use of child labor, including the condemnation of this practice by its corporate partners;
- Ensure 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 could 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;
- Manage its labor policy in such a way as to prevent any form of discrimination or differential treatment based on the factors mentioned in point 11 of the previous page;
- Ensure the appropriate dissemination of hygiene, health and safety at work standards and measures, as well as environmental and quality management measures, carrying out frequent audits of these management systems to ensure their compliance;
- Ensure that its employees comply with the guidelines that regulate the environmental, quality and occupational health and safety management systems within the group's various companies, and encourage them to report any situation that goes against the established rules and principles.

**Transparency**

The **dstgroup** values transparency above all else.

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

"The values are inscribed all around the perimeter of the group, so that the entire perimeter converges on the center. In the center is the beginning. The Verb is equally in the beginning. In the center lies Respect,

Rigor, Passion, Loyalty, Solidarity, Courage, Ambition, Esthetics and Responsibility.” (José Teixeira, Chairperson of the Board of Directors)

The transparency of the glass reveals the transparency of the group’s activities and combined with its values, which form the core of the company, we can say that everything that best defines the **dstgroup** is there for all to see.

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

### **Corporate social responsibility**

The **dstgroup**’s wide-ranging social responsibility program 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 program ranges across the group and is undertaken within an external and internal context, involving all employees, in line with the **dstgroup**’s values: Ambition, Passion, Loyalty, Solidarity, Esthetics, Courage, Respect and Rigor.

The group’s concern for social responsibility issues not only increases the personal wealth of each employee, but also contributes to the environment of which it is a part, conveying to the market the distinctive positioning of a “cultured, cosmopolitan and cool” group, projected within an image of modernity and social, cultural and economic dynamism.

Given the trends and challenges the world faces today, the role of companies regarding sustainability is of the utmost importance in its threefold economic, social and environmental dimension. The progress of companies towards this sustainable development is an inexhaustible task and a permanent challenge. The **dstgroup** aims to become a national benchmark in terms of its social, cultural and environmental responsibility.

### **Non-compliance**

Failure to comply with the rules set out in the Code of Ethics and Conduct constitutes serious misconduct, and is subject to disciplinary proceedings, without prejudice to possible civil, administrative or criminal liability in accordance with legal or regulatory provisions. The disciplinary sanctions applicable for non-compliance with the rules set out in the Code of Ethics and Conduct are as follows (Article 328 of the Labor Code):

- a) Reprimand;
- b) Registered reprimand;
- c) Financial penalty;
- d) Loss of holiday days;
- e) Suspension from work with loss of pay and seniority;
- f) Dismissal without indemnity or compensation.

### **Commitment to our stakeholders**

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

#### **Human Resources**

The employees of the **dstgroup** are its most precious resource, and each person is recognized as a key element in the success of the group and its companies. Through 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 that favor their professional and individual growth.

#### **Customers**

Based on the excellence of the services offered and the constant search for innovation and ongoing improvement, the **dstgroup** endeavors to stay ahead of current business practice, anticipating trends, influencing what will be consumed and exceeding all expectations. We want to continue to be aware of the needs of our customers, both current and potential and future ones, and always provide them with the best conditions, in nurturing a relationship of trust, honesty and co-operation. Respecting the diversity of opinions and sensitivities of customers is another aspect that the employees of the group and its companies strive to fulfil 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 the **dstgroup** and its companies. This is why our relationships are based on collaboration 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 **dstgroup's** corporate relations with its competitors. A fair market, focused on innovation and the quality of products and services, is one of the ambitions of the group and its companies. This is the only way to contribute to the sustainable development of society. Corporate practices that violate the ethical standards and principles set out in this Code will be strongly rejected, and no **dstgroup** employee should attempt to justify any misconduct by claiming to be acting in the interests of the group or its companies.

## External community

The **dstgroup** always endeavors to give back what is offered to it to the communities where it operates and of which it is part. We aim to foster socio-economic well-being and stimulate the sustained growth of society. To this end we contribute, through a comprehensive policy of social, cultural and environmental responsibility, focused on adding value to resources and individuals. The group and its companies do not accept favors, advantages or complimentary contributions from political parties, associations or other organizations, nor do they offer such to them.

## The Environment

Environmental issues are at the forefront of the **dstgroup's** concerns, particularly in activities associated with construction, which have a considerable impact 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 has 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. The group has therefore adopted a management policy that includes environmental criteria such as developing processes and procedures that have a lower environmental impact, practicing responsible consumption of natural resources and preventing pollution, particularly by reducing the use of hazardous products and waste production.

## Process management

This Code of Ethics and Conduct regulates all ethical and moral issues within the corporate scope of the **dstgroup** group. Moreover, we make this document available to all our employees and other interested parties.

Any attitude, behavior or activity that conflicts with the values and principles described here can and should be promptly reported, using for this purpose our reporting channel, which is available at <https://denuncias.dstsgps.com/>.

The **dstgroup** undertakes not to prejudice or retaliate against stakeholders who lodge a complaint and also guarantees fair treatment of those involved in the reporting of the event, always bearing in mind the presumption of their innocence when establishing the truth.

**Code of Ethics and Conduct**

**dstgroup**

Review 3

Approved on February 22nd, 2024