CODE OF ETHICS AND CONDUCT

CARITÉ – CALÇADOS, LDA.

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Message from Management

Today, worldwide, we are witnessing continuous monitoring of business performance by the different Stakeholders of each organization, a performance that is not only economic, but also environmental and social.

CARITÉ bases its business and activities on Ethical and Transparent Management, thus creating a relationship of mutual trust and respect with all its Stakeholders.

In this way, we intend to contribute to the promotion of Sustainable Development by creating our Code of Conduct, which defines the principles and values in terms of professional ethics at the company and reflects our commitment to all Stakeholders.

CARITÉ is committed to improving its performance at all levels and integrates the Sustainable Development Goals (SDGs) proclaimed by the United Nations into its Values, Strategy and Decisions.

Our Values

RESPECT FOR PEOPLE (SDG 1, 2, 3, 5 and 10)

We always seek to act correctly and fairly with our employees, customers, suppliers, local communities and society in general

RESPECT FOR THE ENVIRONMENT (SDG 7, 12, 13,)

We act responsibly towards the environment, not only by complying with applicable legislation and ISO 14001 requirements, but also by developing increasingly sustainable products from a circular economy perspective.

TRANSPARENCY (SDG 8, 16) We act with integrity and transparency, governing our actions by the principles of ethics and honesty

PROFESSIONALISM (SDG 9, 12, 17) We collaborate with our Customers in carrying out their projects with seriousness, rigor and competence.

QUALITY (SDG 4, 8, 9, 12)

CARITÉ complies with the regulations and legislation applicable to its products, as well as with the requirements of the Standard applicable to its Quality and Environment Management System.

Scope of application

This Code of Ethics and Conduct (hereinafter referred to as the Code) establishes guidelines regarding ethical professional performance, characterized by high quality standards in line with the achievement of the objectives of Carité Calçados, Lda, clarifying the rules of conduct that all its employees and management members, in the exercise of functions, regardless of the bond or hierarchical position they have, must continue their professional relationship, internally and in contact with the external entities with whom they relate.

General principles

The performance of workers and of the must be guided by the principles of loyalty, rigor and transparency in the context of fulfilling their mission, also privileging the responsibilities underlying the provision of service and the reinforcement of an image of integrity and excellence, and avoiding situations that may lead to conflicts of interest.

Employees and management members must act in all situations in accordance with the fundamental values and principles enshrined in the Constitution of the Portuguese Republic and other applicable legislation, namely those of legality, justice and impartiality in order to ensure safety and effectiveness in the performance of the skills entrusted to him.

Integrity

Employees and management members must act in all situations in accordance with criteria embodied in honest, diligent conduct, guaranteeing the truth and must refrain from practices that may raise doubts as to respect for the ethical principles that regulate their behavior.

Employees and management members must actively combat all forms of corruption, whether active or passive. Special attention must be provided to favors and complicity that may lead to the creation of illicit advantages, which constitute subtle forms of corruption, such as offers or receipts of funds by users, suppliers or other entities.

Respect for the principle of integrity is incompatible with the fact that any employee or administration member requests, receives or accepts, in a personal capacity, offers, favors or other benefits, which exceed a merely symbolic value, and which in any way are related to their duties or activities.

Moral and sexual harassment

Any form of harassment, abuse and bullying is prohibited. Sexual innuendos, requests for sexual favors or inappropriate physical contact are not tolerated. All Employees must treat their colleagues with respect. Employees must be truthful and respect other Colleagues at all times when they maintain contact with their colleagues and Directors. This situation extends to Carité's customers, suppliers, employees and directors.

Equal Treatment, Non-Discrimination and Proportionality

Employees and management members must not practice any type of discrimination, in particular based on race, sex, age, physical disability, sexual orientation, political opinions, philosophical ideas or religious convictions. They must show sensitivity and mutual respect and refrain from any offensive behavior. The right to privacy of private life must be scrupulously respected.

Employees and management members collaborate mutually to prevent and combat any type of harassment at work, having the obligation to report situations that disrespect and may contribute to the lack of fulfillment of the duties that are part of the employment relationship.

Workers and members of the management should only demand, in their relationship with third parties, the information essential for the proper performance of their duties.

Loyalty and Cooperation

For employees, the concept of loyalty implies not only the adequate performance of the tasks assigned to them by their hierarchical superiors, but also the fulfillment of instructions given to them, as well as respect for the appropriate hierarchical channels. They must also guarantee transparency and the ability to dialogue, considered adequate in their daily personal dealings with hierarchical superiors and colleagues

The employees must provide all the information or necessary knowledge for the development of activities or participation in tasks by other workers.

Non-disclosure to hierarchical superiors and colleagues of the necessary information that may affect the progress of the work, especially with the aim of obtaining personal advantages, as well as the provision of false, inaccurate or exaggerated information and the refusal to collaborate with colleagues, considered as inappropriate behavior and in violation of the principle of loyalty and cooperation.

All employees must promote good interpersonal relationships, with respect for others, in order to ensure the existence of cordial relationships.

The general principles referred to above must be evident in the relationship between all and with all entities, whether public or private.

Reporting Channels

Professionals must communicate to their hierarchical superior any facts that they become aware of, in the exercise of their functions, of violation of this Code of Conduct, as well as of compliance with the regulations relating to crimes of corruption and related infractions of good conduct for the prevention and combat of harassment at work

For the transmission of internal denouncements about acts of corruption and related infractions, real or potential violations that have occurred or that are presumed to occur in the company or other organization with which it relates through professional activity and on attempts to conceal such violations, as well as practices that constitute harassment at work, interested parties can use an internal reporting channel, through verbal or written

communication, addressed to the person responsible for compliance with the rules relating to complaints.

For any information, including reasonable suspicions, about actual or potential breaches, whether of the nature of workplace harassment or corruption, that have occurred or are likely to occur at the company or other organization with which you are or have been in contact due to the professional activity of the interested party, and regarding attempts to conceal such violations, interested parties may use an internal reporting channel through verbal communication (by telephone or through other voice message systems and, at the request of the complainant, through a face-to-face meeting within a reasonable time) or sending/delivery in a sealed envelope, addressed to the administration with the mention "reserved", thus guaranteeing the confidentiality of the identity of the complainants and third parties mentioned in the complaint and preventing access by unauthorized personnel.

Acknowledgment of receipt of the report will be sent to the complainant within 7 days of receipt. A competent impartial person or service will be designated to follow up on the notifications and who will maintain communication with the complainant and, if necessary, who will request more information and provide the complainant with feedback.

The deadline for providing feedback should not exceed 3 months from the acknowledgment of receipt or, if this has not been sent to the complainant, 3 months from the end of the 7-day period after the presentation of the complaint

Carité Conduct towards Stakeholders

Carité Conduct towards its Workers

. We enhance the skills of our workers through an annual training plan suited to their needs;

. We seek to contribute to improving the quality of life of our workers by paying wages above the industry average;

. In the relationship with our employees, we seek to go beyond the employment relationship, knowing and responding, whenever possible, to the personal and family needs of each one:

. We provide a safe and healthy work environment as the safety, health and well-being of workers is a priority for Carité;

. We treat all our workers with dignity and respect, never allowing any type of harassment: physical, psychological, economic, labor, verbal or sexual;

. We decline all types of forced labor and child labor practices;

. We do not practice any type of discrimination in hiring, access to training and attribution of remuneration;

. We are committed to strict compliance with the personal data protection legislation, in effect, ensuring the treatment of the corresponding information with confidentiality, proportional to the data in question and in order to guarantee the effectiveness of the rights that derive from it for our employees;

. We assure you that all reports will be treated with complete confidentiality and that measures will be taken to investigate the situations reported. Whenever necessary, there will be, preferably, corrective actions and only as a last resort, disciplinary procedures will be triggered; .We provide free transport to workers, contributing to a better reconciliation of their professional life with their family life;

. We maintain a relationship of respect with Union Entities and do not practice any type of discrimination against unionized workers;

. Internally, we promote environmentally responsible practices such as reusing paper, saving energy, recycling, among others.

Conduct of workers towards Carité

. Carité workers will base their actions on high standards of Transparency, Honesty and Integrity; . Employees will carry out their duties in a professional and responsible manner, seeking excellence in performance;

. Workers should promote good relationships and mutual respect in interactions that occur in the workplace.

. A assiduidade e a pontualidade devem ser princípios basilares dos trabalhadores, podendo o seu incumprimento estar sujeito às penalizações inerentes à legislação em vigor;

. Attendance and punctuality must be basic principles of workers, and non-compliance may be subject to penalties according the legislation;

. With regard to uniforms, during working hours it is mandatory to wear a smock.

. Workers undertake not to carry out any external professional activity that interferes with their attributions or with the company's activities;

. Workers must guarantee confidentiality regarding the affairs of the company, its customers or suppliers. The information to which they have access must be used only in the interest of the company;

. Workers shall protect company assets and ensure their efficient use;

. Employees undertake to comply with all aspects of this Code of Conduct.

Carité's conduct towards customers

. Our Mission is to satisfy the needs and expectations of our customers, promoting, for this purpose, a relationship based on trust;

. We ensure that business is conducted effectively, responsibly and ethically;

. We respect the privacy of our customers, guaranteeing total respect for the copyright of the work carried out by us;

. We seek to comply with our customers' Regulations and Codes of Conduct;

. We do not subcontract any type of production to prison entities;

. We assure our Customers of a socially and environmentally responsible manufacturing process.

Carité's conduct towards suppliers

. We create a relationship of mutual trust and respect with our Suppliers;

. We seek to work with Suppliers who share the same ethical values and principles as Carité;

. We undertake to monitor the ethical conduct of our Suppliers and to adopt immediate and rigorous measures in case their ethical conduct is questionable.

Carité's Conduct in the Local Community

We respect the Community where we operate and seek to contribute to its development through participation in educational and social projects in that same Community.

Management Responsibility

Management is responsible for adopting and implementing the regulatory compliance programs provided for in this Code, without prejudice to the powers conferred by law on other bodies, managers or employees.

Disciplinary and criminal sanctions

Disciplinary sanctions are applied for non-compliance with the rules contained in this Code, which may range from verbal/written reprimand, suspension of activity for up to 12 days, to dismissal for just cause, as well as criminal sanctions when associated with acts of corruption or related offenses under the terms of the Penal Code.

General Provisions

All workers and members of Management are bound by the provisions of this Code. Disrespect or non-compliance by any professional, with the rules of ethics and conduct contained in this Code, must be reported to the administration and may make the person concerned incur disciplinary or other applicable liability, depending on the seriousness of the case.

The terms of this Code will be subject to review whenever it turns out that there is a relevant matter that contributes to the reinforcement of the objectives set forth therein, which may be raised by any employee, and subject to approval by the Management. Management ensures that this Code is publicized to its employees.

This Code enters into force on the day following its publication. It is revised every three years or whenever there is a change in the attributions or in the company's organic structure that justifies the revision of its elements

Felgueiras, 19th May 2023

Management