



## Conduct and Ethics code

July 31, 2023



## Preamble

It is evident that all decisions and daily actions in the professional forum comprise ethical content to a certain extent.

The possibility of perceiving areas whose ethical content may be less clear, led us to compile in this Code of Conduct and Ethics, hereinafter referred to as CCE, the values and principles that guide our daily attitudes and behaviors.

This CCE is a reference that is used in the relationships among us, with our customers, competitors, suppliers, National and European authorities and society in general being permanently in line with our values in the daily performance of activities and our mission.



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## Scope

This Code of Conduct and Ethics reflects HCCT's commitment to maintaining the ethics of its relationships, defining the company we want to be, looking at each customer in a unique and individual way.

The application and enforcement of this CCE by **HCCT** employees, whatever the nature of the respective relationship, is subject to simultaneous application of ethical codes from specific professional groups as well as the law and internal regulations in force.

Each associate is responsible for complying with this CCE and is also responsible for requiring compliance by those who interact with us.

**HCCT's** activities in the market are based on strict compliance with all legal requirements and respect for people and organisations.





## Our Values

### Loyalty

We base our actions on congruence with our principles and ethics; We maintain a superior dedication to the objectives set, honoring the commitments with our customers and maintain honest and sincere relationships with our partners.

### Confidence

We strongly believe in the reliability of our actions, activities and relationships with our stakeholders; We face the future with optimism and audacity, aligning our projects toward sustainability

### Commitment,

Our commitment and perseverance are demonstrated through passion and proactivity to create value for the organization and continually improve individual and team performance.

## Our Propose

Supporting people in their technical and inner growth on the path to continuous development towards success, self-realisation and happiness.





## We take as our Responsibility

Deliver solutions that adhere to professionalism and integrity and to exceeding the expectations of our interlocutors, thereby achieving excellence in service provided to our customers.

We stand by our customers and other stakeholders, helping them pursue the best solutions for their business with trusting, lasting and prosperous relationships for both parties, achieving sustained growth economically, socially and environmentally.

Been passionate in every project and activity about achieving the results that we have set on time and exceeding them in the following period without losing sight of the rules of CCE described below.

## Among US

1. Promote objective, open, honest and transparent communication as foundation of healthy relationships for mutual support and versatility,
2. Ensuring a relaxed and balanced work environment, with autonomy and responsibility, that encourages innovation and the free exchange of ideas and opinions without prejudice,
3. Stimulating proactivity and continuous learning, as a means of self-realization and development of individuality;



## With our Clients

4. We are committed to maintaining the confidentiality of information received from our customers, handling it with confidence and respect for the privacy of organizations and people involved;
5. We always treat our customers and the general public cordially and politely, and serve them with transparency, efficiency and speed;
6. We provide our customers with the information necessary for making the right decision in an informed and timely manner and ensure strict adherence to the agreed conditions;

## With our Partners and/or Suppliers

7. We establish ties with partners and suppliers in a transparent manner, without privileges or favoritism, and based only on objective technical, commercial and relational criteria;
8. We value maintaining win-win relationships that provide added value to our customers, according to their needs and a shared vision;

## With our competitors

9. We seek to outperform our competitors in a healthy way, offering our customers solutions and services with a differentiated cost / benefit;
10. We relate to competitors in a cordial manner, promoting mutual respect, in particular regarding intellectual and industrial property;



## With society

11. We create a healthy working environment, ensuring compliance with applicable health and safety standards;
12. We stand for respect and fulfilment of the rights of people with physical or psychological disabilities and / or special needs;
13. We do not adopt or welcome discriminatory behavior, particularly based on race, sex, age, sexual orientation, political opinions or religious beliefs;
14. We do not practice or exude behaviors that may constitute libel or slander;
15. We do not commit or condone violence of any kind;
16. We do not use or permit the use of illegal substances or anything else that may affect the proper performance of duties;
17. We use all resources, tangible and intangible assets, with respect and responsibility towards the environment;
18. We recognize the need of protecting people data and all entities and, therefore, we respect the new General Data Protection Regulation 679/2016 of April 27, 2016.

