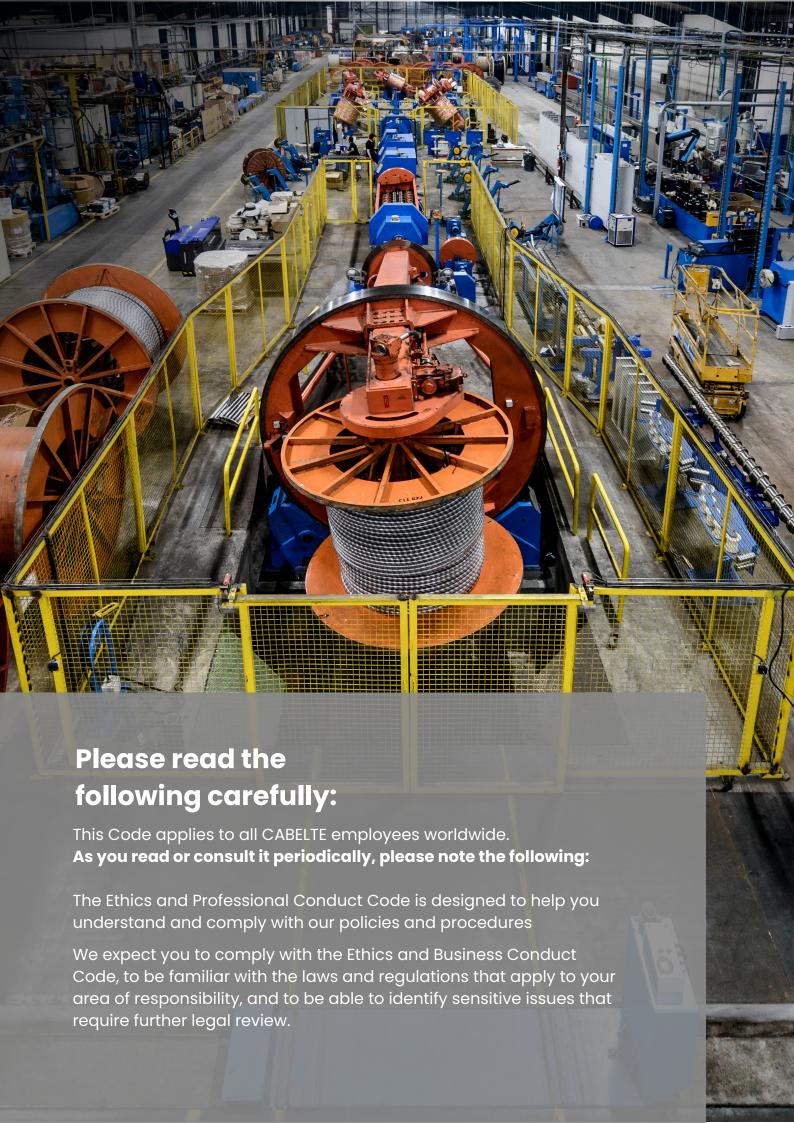
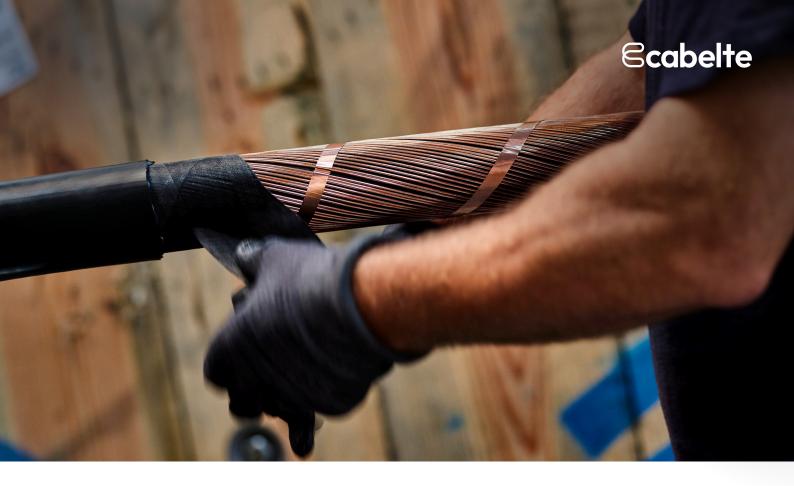
Scabelte

ETHICS AND PROFESSIONAL

Conduct Code





To all the Employees

Through the introduction of the following Code of Conduct, we, CABELTE, have taken a further determined step towards exercising our global and local responsibility.

CABELTE is committed to conducting all of its activities and relationships with customers, shareholders, suppliers, competitors, government representatives, the media, the community and its employees according to the highest ethical and professional standards.

To achieve this goal,

- We act responsibly for the benefit of our customers, shareholders and employees;
- We consider that compliance with international conventions, laws and internal rules is the basis for sustainable and successful economic activities;
- We act in accordance with our statements; and
- We take responsibility for our actions.
- In addition to international conventions, laws, and internal rules, our vision, mission, and core principles also underlie our actions.

With this Code of Conduct, we offer the employees a guideline that combines the fundamental basic principles of our activities and helps them to deal with the legal and ethical challenges of their daily work. This Code of Conduct is a CABELTE-wide guideline that applies to all our employees and members of the executive bodies.

As a member of CABELTE, this responsibility is also yours. Your personal and professional actions must reflect integrity, which is part of CABELTE's values.

You may be faced with situations involving ethical and moral aspects, with several options for action. In this situation, you should not rely solely on your judgment. If you are in doubt about the best course of action, consult your supervisor or HR. By acting quickly and honestly, you will fulfill your obligation to conduct yourself according to our ethical and professional standards. We represent respectable and honest actions in daily transactions, according to the rules and complemented by the following Code of Conduct.

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1. General requirements

for conduct and behavior

1. General requirements for conduct and behavior

1.1. Responsibility for Reputation

CABELTE's reputation is largely determined by the conduct, the actions and the behavior of each individual employee. Inappropriate behavior from just one employee could cause serious damage to the organization. Each of our employees must ensure their conduct in public does not damage CABELTE's reputation. Their duties should always be directed in this direction in all respects.



1.2 Responsibility for Basic Social Rights and Principles

We respect internationally recognized human rights and are committed to scrupulous compliance. We act in full respect and compliance with the applicable requirements of the International Labor Organization. Not only that, but we recognize and accept the basic right of all employees to establish unions and elect labor representatives. We reject and condemn any deliberate use of forced or compulsory labor.

Child labor is strictly forbidden, and we will ensure that the minimum working age is adhered to, as required by law. Remuneration and benefits paid or otherwise provided in compensation for one month's work must at least conform to the minimum national standard for the respective national economic region.

1.3. Equal opportunities and mutual respect

We guarantee equal opportunities and equal treatment regardless of ethnicity, skin color, disability, ideology, gender, religion, nationality, sexual orientation, social status or political convictions, as long as this is based on democratic principles and tolerance of those with convictions contrary to ours. As a matter of principle, our employees are selected, hired and supported on the basis of their qualifications and abilities. All our employees are prohibited from any form of discrimination (e.g. harming, harassing or intimidating) and are expected to interact respectfully and in partnership with each other.

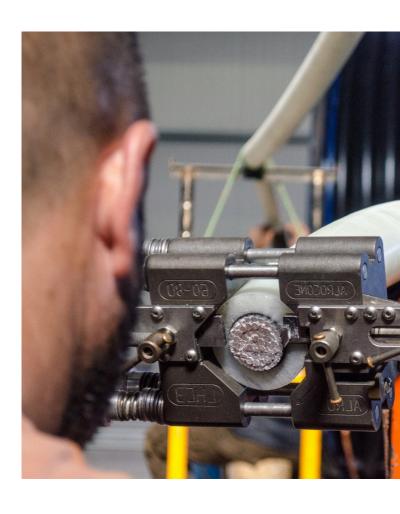




1. General requirements for conduct and behavior

1.4. Discriminationor Harassment

The Company is committed to providing a work environment free of discrimination and any form of harassment. The Company prohibits all forms of harassment, including verbal, physical or visual harassment directed against an employee's race, color, religion, sex, age, national origin, citizenship, marital status, sexual orientation or disability. This policy applies to all behavior on company premises and to all conduct by employees off company premises that affects the work environment. The use of computer systems to create, display or send offensive language, or offensive images, or derogatory, or offensive remarks about any employee, person or group is also prohibited. The same prohibitions apply importation, transmission or creation sexually, racially or otherwise offensive or discriminatory material of any kind. All management personnel are responsible for complying with the Company's policy on discrimination and harassment.



1.6. Employees and employee representatives - freedom of association

The company respects free association, recognizes labor unions as legal representatives of the employees, and seeks constant dialog. Likewise, Cabelte advises its suppliers and service providers to respect equally the rights of all the employees to organize through associations or unions, in accordance with the laws in force, and to maintain constant dialog with organizations. The negotiations and the dialogue with the entities must be done only by formally authorized persons.

2. Prevention of Corruption and

Conflicts of Interests



2. Commitment to Diversity

2.1. Conflict of Interests

It is important to us that the work activities of our employees do not create a conflict between their private interests and the interests of CABELTE. For this reason, it is mandatory that all situations from which conflicts of interest may arise are avoided.

2.2. Secondary Employment

Each of our employees has a duty of providing their own labor and to perform the tasks assigned to them to the best of their knowledge and ability. Secondary employment(s) that prevent the fulfillment of this obligation is not permitted. We support and promote volunteer activities by our employees.



2.3. Interests in othercompanies

Any of our employees with interests in other companies, who work for or provide services to companies with business relationships with CABELTE, must notify the Human Resources Department in writing on their own initiative. In case of risk of conflict of interest, these interests must be terminated.

2.4. Fighting Corruption

success With the aim of the sustainability of the company, we convince by the quality and value of our products and services against the competition. We support (inter)national efforts not to influence or distort competition through bribes and reject any corrupt and harmful conduct. None of our employees may use the Company's business contacts for his or her own or a third party's benefit or to the detriment of the Company. This means in particular that none of our employees grants or accepts improper personal benefits (e.g. money, tangible goods or services) in order to influence a decision based on facts. To avoid legal consequences for CABELTE, associated business partners and also for yourself, from the outset, all our employees should always take the initiative to inform themselves about the internal rules before giving or accepting gifts, making or accepting invitations, or business entertainment. Every one of our employees is obliged to seek help or advice in case of suspicion or legal doubt regarding the existence of corruption or crime. Advice and assistance are offered by superiors, the responsible internal departments (e.g. Legal or Human Resources). In addition, any employee may also approach Company's management.

3. Business Partners and Third Parties

Negotiations



3. Negotiations with business partners and third parties

3.1. Fair Competition

We are committed to dealing fairly with our business partners as well as third parties, undistorted support free and competition based on compliance with competition and antitrust laws. Each of our employees is obliged to comply with the requirements of competition and antitrust laws. This means, for example, that none of our employees conducts discussions with competitors where prices or capacities are referred to. Agreements with business partners and third parties regarding noncompetition, the submission of fictitious bids for bid requests, or the division of customers, regions or production programs are also not permitted. Arbitrary favoritism or exclusion of contractual partners is also not permitted. Furthermore, we expect our business partners fully exercise their own responsibility for safeguarding fair competition.

3.2. Donations and Sponsorships

We only make donations, i.e. voluntary contributions without expectation of return, and we only grant sponsoring funds within the context of the respective legal framework and in accordance with the applicable internal rules. We make monetary and material donations for science education, culture and sports, and social concerns. Furthermore, make we only donations to organizations recognized as non-profit or authorized by special provisions to accept donations. The giving of donations must be transparent; the purpose, the recipient of the donation and the receipt for the donation must be documented so that it can be verified. None of our employees initiate donations that could damage CABELTE's reputation. With our sponsoring activities, we support culture, education, science and sport. Any employee wishing to initiate a sponsorship should make initial contact with the responsible CABELTE department (Human Resources).

3.3. Bribery

The use of Company funds or property for illegal, unethical or improper purposes (as well as personal funds or property for such purposes on behalf of the Company) is prohibited, including bribes. Bribery is the giving of money or anything else of value in order to unlawfully influence the actions of a public official. No employee may pay, offer or authorize any bribe or other illegal payment on behalf of the Company. This prohibition extends to payments made to lawyers, agents or other third parties where there is reason to believe that a portion of the payment or "fee" will be used in a bribe or to improperly influence governmental action. A payment (other than for the purchase of a product or service) or offer of value made to suppliers or clients or their employees or representatives may considered "kickbacks" and may constitute a violation of law. No employee should pay, offer or authorize an illegal payment or gift on behalf of the Company to anyone, including suppliers, customers or their agents, employees or representatives.

3.4. Contributions and political activities

No employee is authorized to make political contributions of any kind, locally, regionally or nationally, on behalf of the Company or to use the Company's funds or materials for that purpose, or to make a personal contribution based on a promise of reimbursement by the Company.

Management may authorize in writing, on behalf of the Company, any political contributions that are not prohibited. When so authorized, such contributions must be made by means that allow the Company to easily verify at any time the amount and source of such contribution.

These prohibitions relate only to the use of Company funds, property and assets and are not intended to discourage employees from making personal political contributions or participating in political activities on their personal time.

3. Negotiations with business

partners and third parties

3.5. Promotion of Interests

As a commercial company and part of a partnership, we defend and promote our interests. We therefore include the wishes and the needs of various interest groups in our deliberations. We respect and observe the principles of free expression of opinion, the principles relating to the right to information, the independence of the media, and the protection of personal rights. Each of our employees ensures that their conduct and their opinion expressed in public does not damage CABELTE's reputation. expressing opinions, employees should avoid drawing attention to their position employment with the Company. All of our employees utilize honest and lawful means to communicate and accomplish these interests only. We are all bound by the truth as far as political institutions, the media and the public opinion are concerned. Each of our employees respects the achievements of their dialogue partners and respects their professional and personal reputations.

3.6. Conflict of Interests, Associations and Outside Activities

Employees are expected to make all of their professional skills available to the Company. No employee may engage in outside professional, administrative, directive, or other gainful, regular outside activity except:(1) with prior written authorization from his or her immediate and next higher hierarchical level or (2) with the approval of the Board of Directors. Subject to the limitations imposed by this Code of Business Conduct, each employee may engage in outside activities that do not interfere with the performance of his or her duties or conflict with the interests of the Company.

If the activities are of a controversial or sensitive nature, employees must consult their line manager before starting them. All employees have a duty to avoid business, financial or other relationships that could be considered to be conflicting with the interests



of the Company or to influence their ability to perform their duties. There are potential conflicts of interest inherent in certain situations, such as: When an employee or member of their household has a direct or indirect financial interest in, obligations to, an actual or potential competitor, supplier or customer of the Company or any firm with which the Company maintains or intends to enter into a business relationship. (Ownership of a small percentage of the capital in publicly incorporated companies, i.e. less than 1% of the subscribed shares, is not considered a conflict of interest). When an employee performs transactions on behalf of the Company with a supplier or customer represented or managed by a relative. When an employee acquires real estate, leases, patents or other assets or rights in which the Company has an interest or in which the employee has reason to believe that such an interest exists. Whenever an employee uses the Company's position or name, or any of its equipment, supplies facilities, or association with outside activities performs any act that may be regarded as sponsorship or support of an activity by the Company, unless he or she has written authorization from his or her immediate superior. Immediate supervisor and the next higher hierarchical level.



3.6. Conflict of Interests, Associations and Outside Activities

Any actual or potential conflict of interest between an employee and the Company is prohibited, unless specifically authorized in writing by the Chief Executive Officer/Administrator, who must consult the Legal Department on this matter. All situations that may give rise to a conflict of interest and that involve executives must be brought to the attention of the Board of Directors, which shall take into account the following factors in determining the presence or absence of such a conflict: The value of the employee's (and/or family members') financial interest in the entity outside the Company.

The employee's position in the Company and the influence the employee may have on business dealings with the outside entity. Other relevant factors. Whenever there is a potential conflict of interest appearance of a conflict of interest between the Company and a member of the Executive Committee of CABELTE, you should notify the Chief Executive Officer as soon as possible. The foregoing does not apply to regularly buying and selling transactions that the Company routinely conducts with other companies, whose officers and directors may be members of CABELTE's Executive Committee. The Chief Executive Officer shall notify the Board of Directors of any such potential conflict of interest in order to ensure the integrity of the Company's transactions and the protection of the Company's interests.





4.1. Privacy and Data Security

Protection of confidential, secret and personal data is one of the principles according to which we govern our relations with our employees (as well as former employees) and their families, applicants, customers, suppliers and other groups of individuals. We collect, process and use personal data only as long as this is necessary for defined, clear and lawful purposes. We ensure that the data is used in a way that is transparent for the data subjects and that we respect their right to information and correction, as well as their right to possible objection and blocking or deletion, is protected. Each of our employees is obliged to comply with the data protection requirements as well as with the statutory and company rules concerning information security and the protection of confidential, secret and personal data entrusted to CABELTE against misuse. We are committed to maintaining appropriate security standards in the processing of information. All information processing components shall be protected in such a way as to safeguard the confidentiality, integrity, availability and verifiably of the protected information and to prevent unauthorized internal or external use.

4.2. Confidentiality

Each of our employees is obliged to keep in confidence any business or commercial secrets which have been entrusted to them in the course of the performance of their duties or of which they have become aware in any other way. Secrecy must be maintained regarding work and matters within the Companies that are significant to CABELTE or its business partners and that have not been publicly disclosed, such as, for example, products under development, plans and tests.

4.3. E-mail / Internet Policy

All computer systems provided by the Company, including hardware and software programs, and

all proprietary, confidential or privileged information relating to the Company are the property of the Company and not its employees. These systems, including the Internet and E-mail, should be used only for company business and not for transmitting the Company's exclusive, confidential or privileged information outside the Company without a specific purpose and appropriate security measures. If you have any doubt about the sensitivity, confidentiality and/or protection of Company information, you should speak first with your line manager before releasing such information outside the Company. The Company reserves the right to monitor and investigate the use of E-mail and the Internet by any employee. The Company has adopted specific policies on these of activities. Any concerning these policies should be directed to your line manager or Human Resources.

4.4. Use of Social Networks and Media in General

To respect, comply with and mirror the principles, values and rules of behavior set forth in this Code of Conduct in the use of social networks and the media. Do not publish information about CABELTE that is of a confidential or internal nature, restricting themselves to information that is of a public nature and always considering implications that may arise from the publication of content relating to CABELTE where they work. Ensure the image of CABELTE by not posting content that could be considered unlawful, offensive, defamatory or threatening, or that could result in damage to CABELTE's image and reputation. The use of social networks during working hours should not interfere with professional duties, but only act as a tool for information.

4.5 Marketing and Advertising Practices

correct and Disclose true, accurate information about CABELTE products and services, their technical characteristics, aftersales service, prices and payment terms. Respect the rules in force, namely those contained in the Advertising Code and the regulations applicable to products, institutional or advertising and promotion campaigns for products and services.Protect the interests of current or potential customers in promotion and advertising actions, ensuring that such actions are developed following the principles lawfulness, veracity, objectivity, clarity and opportunity.

4.6. Information Support

Ensure that the documentation files and other information supports that have been provided to them in the exercise of their functions are properly organized and systematized according to internal rules, effectively ensuring their proper identification and handling, in terms susceptible to allow the full compliance with the duties of cooperation and provision of information contained in the applicable legal and regulatory provisions.

Respect the internal rules regarding security and privacy, as well as access and passwords within CABELTE. Respect the legal and regulatory standards and the internal rules on data protection with regard to the aforementioned information supports, accesses and databases, in particular by keeping the data subjects informed of their rights.

4.7. Company Records and Accounting

All Company books and records, including reports of traveling, representation and other expenses, must accurately reflect the revenues and the expenses.



There should be no:

- Secret accounts or hidden or unrecorded Company funds or assets.
- False or artificial items.
- Transactions made or payments approved with the intention, or condition, of using part of such payments for purposes other than those described in the supporting documents for such payments.

4.8. Insider Information Handling

We ensure that insider information is only made available to authorized individuals. None of our employees provides such information (tips) to family members or other individuals. None of our employees benefits from inside information in securities of CABELTE or companies in which CABELTE has an interest.

4.9. Reporting

All our reports, records and statements are accurate, on a timely basis, understandable, complete and truthful. In this spirit, we inform all capital market participants equally about the company's income and financial situation and performance. We publish our periodic financial statements on a timely basis in accordance with the national and the international accounting regulations.



4.10. Relations with Competitors, Suppliers and Customers

Employees are prohibited from making contracts or other agreements that are against the competition laws. The following is a representative list of the type of agreements with competitors clearly identified as violations of competition laws:

- Agreements to fix or influence prices, or other terms, or conditions of sale;
- Agreements to allocate customers, markets or territories;
- Agreements to establish production levels or quotas;
- · Agreements to boycott third parties;
- Agreements with a customer regarding the price or price levels at which the customer may resell the Company's products.

Other activities such as price discrimination, tied sales, most favored nation clauses, exclusive dealing arrangements or reciprocity may also constitute violations of the law if they are considered a substantial restriction of competition. Employees should consult their Human Resources before approving any such activity.

Employees must refrain from discussing any prohibited matters with competitors in general, and bear competition laws in mind in any discussions or individual relationships with industry peers. Particular attention must be given to activities at meetings of employers' associations that include competitors. No employee should attend meetings of employers' associations or the like without a valid business reason. If an improper discussion arises at such a meeting or at any other time, you should immediately request an end to the discussion and if not, leave (or hang up the phone) immediately and report the incident to Human Resources as soon as possible.

Violations of the law can result in heavy monetary fines and criminal penalties, both at the corporate and individual level. The Company's external operations are subject to various laws, including those of foreign jurisdictions. Employees must immediately report to the Human Resources any proposed action or activity involving a possible anticompetitive effect.

4.11. Cooperation with Government Authorities

It is the Company's policy to cooperate fully with any government investigation or inquiry. Accordingly, if you have reason to believe that a government investigation or inquiry is in progress, you should immediately report such information to the Human Resources department.

Employees must never:

- Destroy or alter any Company documents while anticipating that they may be requested by a law enforcement authority.
- Making false or incorrect statements during an investigation.
- Attempt to cause another Company employee or any other person to fail to provide information, or to provide false or incorrect information.

Although the government inspections are normally conducted during business hours at the Company's facilities, investigators may attempt to contact the employees at their homes at times outside of business normal hours. lf you approached after business hours by the government employees or inspectors, you may speak with them, although you are not obligated to do so. You may also request that any conversations with you take place at the Company's premises, during business hours, and request that a Company lawyer to be present during such discussions. You should immediately report any contacts from government investigators regarding Company matters to the Human Resources Department.

4.12. Relationship with the media

Cabelte implements a strict communication policy, guided by standards of ethics, honesty and transparency towards the media, safeguarding the secrecy and preserving the confidential information within the interests of the company, with full respect applicable legal and regulatory standards, avoiding deception, exaggeration and concealment of relevant information. Employees should refrain from transmitting, on their own initiative or at the request of third parties, any news or information about CABELTE to the media, and should forward them to the Marketing or Human Resources department or to the Executive Committee. Any communication must be previously informed and authorized by those who are qualified to do so, in accordance with internal regulations, whenever the employee is not a representative with powers to issue opinions about CABELTE to the outside world. **Employees** should avoid spreading comments rumors CABELTE, about including through electronic access platforms or social networks.

4.13. Privacy and data protection policy of Cabelte's employees

This privacy and data protection policy applies to employees of CABELTE - CABOS ELÉCTRICOS, S.A., henceforth CABELTE, to the extent that this company, in the scope of the working relationship with its employees, has the need to collect and process personal data.

CABELTE is thus committed to continue to be guided, in the relationship with its employees, by technical and organizational measures that establish the highest standard of personal data protection, adapting its policies to the new General Data Protection Regulation.

Purpose of the data processing

CABELTE processes data in the context of this policy for the following purposes:



- 1.For the fulfillment of legal obligations to which they are subject, such as the calculation, withholding at source and operations relating to discounts on retribution, mandatory or optional, arising from legal provision; in the context of vocational training to be provided to employees; in the context of medical examinations performed on employees; among other situations.
- 2. For the execution of a signed employment contract, such as the calculation and payment of salaries, additional benefits, other allowances and bonuses; in the scope of disciplinary processes; work accidents; among other situations.
- 3.To provide certain benefits and perks, such as through protocols with insurance companies (for health insurance), based on consent.
- 4.Based on legitimate interests, i.e. where processing is necessary for the purposes of the legitimate interests of CABELTE or a third party, except where the interests or rights and freedoms of the data subjects prevail, such as in the context of the use of means of remote surveillance, biometric checks, among others.

Based on legitimate interests, i.e. where processing is necessary for the purposes of the legitimate interests of CABELTE or a third party, except where the interests or rights and freedoms of the data subjects prevail, such as in the context of the use of means of remote surveillance, biometric checks, among others.



4.13. Privacy and data protection policy of Cabelte's employees

Legal basis for data processing

The legal basis for data processing by Cabelte is provided:

- In the cases referred to in point 1 above (length of legal obligations), in article 6.1 al. c) of Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 - General Data Protection Regulation ("GDPR");
- In the cases referred to in point 2 above (for the execution of the employment contract), in Article 6(1)(b) of the GDPR;
- In the cases referred to in point 3 above (on the basis of consent), in Articles 6.1 a) of the RGPD;
- In the cases referred to in point 4 above (legitimate interests), in Articles 6.1(f) of the RGPD.

Receiver of the personal data

CABELTE communicates and/or transfers the personal data to external entities, based on the purposes indicated above, namely:

IGFSS - Social Security Financia Management Institute:

CABELTE communicates personal data name, salary, fringe benefits, other allowances and gratuities.

Basis: fulfillment of legal/legal obligations;

• DGCI – General Directorate of Taxes

CABELTE communicates personal information: name, salary, fringe benefits, other allowances and bonuses.

Basis: to comply with legal obligations to which the company is committed.

CABELTE's bank institution and the one designated by yhe worker.

CABELTE collects the worker's IBAN data and communicates to the financial institution the amount of salary to be transferred to the bank account of the employee's financial institution.

Basis: For the execution of the employment contract entered into with the employee.

Insurance company designated by CABELTE:

CABELTE collects personal data that is tranferred to the Insurer, for assignment of occupational accident insurance to the worker.

Basis: For the execution of the work contract concluded with the employee and to fulfill a legal obligation.

• ACT – Authority for Working Conditions; CABELTE collects personal data to be sent to ACT.

Basis: to comply with legal obligations to which the company is committed.

• FCT - Labor Compensation Fund;

CABELTE collects personal data to be sent to the FCT.

Basis: fulfillment of legal obligations to which the company is subject.

The FCT is an individual and mandatory capitalization fund, by the employer, established by Law no. 70/2013 of August 30th, which aims to ensure the payment of up to half the amount of compensation due for termination of the employment contract, calculated under the terms of the article 366 of the Labor Code, and which responds up to the limit of the amounts delivered by the employer and any positive valuation.

FGCT – Work Compensation Guarantee Fund;

CABELTE collects personal data to be sent to the FGCT.

Basis: compliance with legal obligations to which the company is subject.

The FGCT is a fund of individual and compulsory membership of a mutual nature, by the employer, established by Law No. 70/2013 of 30 August, which aims to guarantee the amount necessary to cover half the value of the compensation due for termination of the employment contract calculated under Article 366 of the Labour Code, subtracted from the amount already paid by the employer to the employee.

4.13. Privacy and data protection policy of Cabelte's employees

• Legal Authorities;

CABELTE collects personal data for the legal authorities such as Courts, in the context, for example, of legal proceedings in which its employees are parties.

Basis: compliance with legal obligations to which the company is subject.

• Insurance companies;

With whom the CABELTE companies established protocols for the attribution of health insurance to workers.

Basis: consent.

CABELTE also processes data **concerning the health of its employees** in the context of preventive and occupational medicine and to assess the employee's ability to perform their work, based on the article 9.2 h) of the RGPD. This information will be processed under the responsibility of a professional subject to the obligation of professional secrecy pursuant to paragraph 3 of the same article.

Responsible for the data processing

CABELTE is the entity responsible for the treatment of your personal data, since this entity defines which personal data are collected, the means of the processing and the purposes for which the data will be used.

Storage period of the personal data

Without prejudice to legal or regulatory provisions to its contrary, the data will be kept only for the minimum period necessary for the purposes that motivated their collection or their subsequent processing, and may, for billing purposes, be kept for a period of 10 years under the terms of Article 123, paragraph 4 of the IRC Code. We will also keep your data during the period in which you maintain a contractual relationship with CABELTE and up to 1 year after the termination of the employment relationship, without prejudice to the retention

beyond that period by force of legal obligation.

In situations where there is a judicial process, namely as a result of an accident at work or a professional illness, the information can be kept beyond this period as long as it proves necessary, namely for the judicial review of the incapacity.

In the absence of a specific legal obligation, your data will be processed only for the period necessary to fulfill the purposes for which it was collected and while there are legitimate grounds for CABELTE to retain it.

Rights

The data holders are informed of their right to request access to personal data concerning them, as well as their rectification or erasure, and the limitation of processing as far as it concerns the data holder, or the right to oppose the processing, as well as the right to data portability, in legally admissible cases, pursuant to Articles 16 and the following of the RGPD.

Where any of the grounds for processing are based on consent, the data subject shall have the right to withdraw such consent at any time, without affecting the lawfulness of the processing based on the previously given consent. The data subject shall also have the right to lodge a complaint with a supervisory authority, or the right to a judicial remedy against the supervisory authority, or the controller, or processor, as provided for in Articles 77, 78 and 79 of the RGPD. The communication of personal data is a legal or contractual obligation in the cases referred to in points 1.1. and 1.2 above, and the data subject is obliged to provide them, under penalty of breach of legal obligations by CABELTE.

CABELTE does not make automated decisions

4.13. Privacy and data protection policy of Cabelte's employees

Internacional transfer of the data to other entities

The personal data collected and used by CABELTE companies are not, as a rule, made available to third parties established outside the European Union. If such a transfer does occur, CABELTE undertakes to ensure that the transfer complies with applicable legal provisions, in particular as regards determining the suitability of such country with regard to the data protection and the requirements applicable to such transfers.

Security procedures

In compliance with the European data protection laws, we have adopted adequate procedures to prevent the unauthorized access and misuse of the Personal Data.

CABELTE applies appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

CABELTE uses appropriate business systems and procedures to protect and safeguard the Personal Data provided. Security procedures as well as technical and physical restrictions on access to and use of Personal Data on our servers are used. Only authorized staff is authorized to access Personal Data in the course of their work.



5. Safety, Health, Hygiene at Work

Environmental Protection

05. Safety, Health, Hygiene at Work and Environmental Protection

It is the Company's policy to protect the environment and safeguard the health and safety of employees. The Company conducts its operations to avoid or minimize any possible adverse impact on the environment and expects all employees to obey the laws designed to protect the environment and their health and safety. All employees must notify their supervisor or Human Resources if they observe conduct that violates or may violate environmental, health and safety standards. The Company holds all permits required for its activities and observes all applicable environmental and other health and safety laws and regulations.

By continuous improvements in the work environment and various preventive and health-improving measures, we preserve and promote the health, productivity and job satisfaction of our employees. Each of our employees contributes to the improvement of their health and meets the requirements of occupational health and safety.

We take responsibility for continuously improving the environmental compatibility of our products and reducing demand on natural resources, while taking economic considerations into account.

For this reason, we use advanced energyefficient technologies and implement them throughout the entire life cycle of our products. In all our plants, we are social and political partners when it comes to shaping positive, socially and ecologically sustainable development.

Each one of our employees uses natural resources properly and economically and ensures their activities have as little influence as possible on the environment.



6. Protection and Use of

Cabelte Assets

6. Protection and Utilization of assets owned by Cabelte

Every one of our employees may use CABELTE's property assets only for professional purposes, unless private use is permitted by special rules.

All our employees must treat all CABELTE property properly and with care and protect it against loss.



7. Code of Conduct

Treatment



7. Code of Conduct Treatment

7.1. Cabelte's Responsibility for Implementation

Cabelte strives to achieve compliance with the Code of Conduct, considering applicable laws and cultural distinctions in different countries and locations. Companies actively promote the distribution and communication of the Code of Conduct and ensure effective implementation, e.g. by information. They further ensure that implementation does not cause any disadvantage to any employee as a consequence of compliance with the Code, and that appropriate responses to violations of the Code of Conduct are ensured.

The Code of Ethics and Professional Conduct is distributed to all employees and to all new employees when they are hired. All employees are given a questionnaire (via a platform) to answer questions in order to identify doubts. The completion of the questionnaires is mandatory, and its registration on the platform confirms that each employee is aware of the code of conduct. This questionnaire must be completed upon hiring and whenever the Code is reissued.

The Human Resources Department is responsible for monitoring the transmission of knowledge and the completion of the questionnaires. The assessment of violations of the Code of Conduct is controlled by the respective internal, statutory and company regulations applicable in CABELTE.

All current legislation in the Portuguese legal system also applies. In addition, we support and encourage our business partners and suppliers to consider the Code of Conduct in their own corporate policies.

7.2. Responsibility for Compliance

Each one of our employees obeys the laws, regulations and internal rules applicable to their work environment

and acts in accordance with CABELTE's values and the Code of Conduct.

Any of our employees who do not behave in accordance with the Code will be subject to appropriate consequences under internal regulations, bylaws and business rules, up to and including termination of employment and compensation for damages. Each manager ensures that employees in his area know and act in accordance with the Code of Conduct.

The initial point of contact for any of our employees with questions or concerns regarding the Code of Conduct is his superior. All employees may also contact Company Management and the Human Resources Department.

7.3. Mandatory Report of infractions

Each employee is responsible for reporting in to the Company circumstances they believe may constitute a violation of this Code of Ethics and Professional Conduct, as well as other Company policies. Any alleged violations should be reported to a manager or to the Human Resources department. The Company will investigate any matter so reported and take the necessary corrective measures. Employees will not suffer any retaliation for reporting in good faith alleged procedural violations, although they will not be covered by possible disciplinary action if they act with malice or engage in any other incorrect behavior. All reports will be treated confidentially, as long as this is compatible with legal requirements.

This Code of Conduct comes into force on January 1st, 2019

8. Annex



8. Annex

8.1. Internationa IConventions

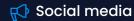
In addition to the laws and regulations of individual countries, there are also a number of conventions and recommendations from international organizations. These are, however, primarily addressed to member states and not directly to individual companies. Nevertheless, they are an important guideline for the conduct of an internationally operating company and its employees. For this reason, we place great importance on the compliance of our business conduct with these guidelines throughout the world.

The following is a list of the most important conventions of this sort:

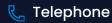
- The Universal Declaration of Human Rights published by the UN in 1948 and the European Convention for the Protection of Human Rights and Fundamental Freedoms, 1950.
- The International Covenant on Economic, Social and Cultural Rights, 1966.
- International Covenant on Civil and Political Rights, 1966.
- The International Labor Organization (ILO) Tripartite Declaration on Multinational Enterprises and Social Policy, 1977, and the ILO Declaration on Fundamental Principles and Rights at Work, 1998 - relating principally to the prohibition of child labor, the abolition of forced labor, the exclusion of discrimination, freedom of association, and the right to collective bargaining.
- The OCDE Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997.
- "Agenda 21" on sustainable development (Declaration on Environment and Development
- The Global Compact principles for a more social and ecological form of globalization, 1999.
- The OCDE Guidelines for Multinational Enterprises, 2000.



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