



CODE OF CONDUCT, ETHICS
& SOCIAL RESPONSIBILITY

syone

INTRODUCTION

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Our values reflect the ethical conduct by which we are guided, make decisions and act.

Syone believes that **honesty**, **integrity** and **trust** are it's business foundations. All company actions are based on the highest ethical and legal standards.

As a company that operates not only in Portugal but in foreign territory, Syone has an obligation to comply with the laws and regulations of the countries where it operates. In cases where the law is not explicit or is in conflict with Syone's Code of Ethics, local law will apply.

COMMITMENT



CONTRIBUTORS

Our team is the key to our success, so all team members take responsibility for their actions, conduct and should know and practice the principles set out in this Code of Ethics as well as influence colleagues to put it into practice. To its employees Syone ensures: diversity, equal opportunities, health, safety and respect in the workplace.



STAKEHOLDERS

Cientes: we have the obligation to act with integrity and with the quality of products and services we provide;

Partners: we are compromised to work in compliance with local laws, internal rules of human and labor rights standards, environment and ethical conduct, and we relate to partners whose ethical conduct is consistent with ours;

Government: - we strive to establish relationships based on transparency and honesty and to be compliant with laws and anti-corruption regulations.



DATA PROTECTION & PRIVACY

All team members and other stakeholders that relate to Syone's activity have the right to privacy. Thus, Syone protects all personal data of all it's stakeholders. The personal data protection gives individuals the right to control the collection, processing, use, disclosure and storage of information.



HEALTH, SECURITY & ENVIRONMENT

Syone undertakes to:

- Protecting the health and safety of its employees;
- Limiting the environmental impact of it's activities;
- Encourage stakeholders to adapt the correct measures with respect to health, safety and the environment.

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WORK ENVIRONMENT

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Syone values **diversity** and **equal opportunities** in the workplace. The company respects and promotes an **equal opportunity environment** - in terms of recruitment, training, compensation, welfare, internal mobility and career development - and free of discrimination and harassment based on age, ancestry, race, social status, marital status, health status, intellectual disabilities, physical disabilities (including people infected with the HIV virus or persons with AIDS), nationality, religion, gender and sexual orientation. This way, Syone enables to **attract, encourage** and **retain talent**, as well as recognize the performance of it's employees in order to remain innovative, respected and competitive. **Offensive or abusive actions of any kind are considered inadmissible and interfere with the work performance of team members.** Any collaborator who faces harassment is encouraged to report the incident to it's manager, Human Resources or Managing Director, without fear of reprisal. All incidents will be immediately investigated and all necessary and appropriate measures will be taken.

CONDUCT AND BEHAVIOUR

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Syone's team is the key to the company's business as it contributes to the company's success through it's work and the adoption, in a professional and consistent manner, of the business philosophy, values and standards of business conduct. The following list includes, but does not limit, the conduct considered detrimental to Syone's interests, whose adoption may result in immediate disciplinary action and, if applicable, in dismissal:

- **Falsification** of company facts or records;
- **Unethical, immoral, indecent or unlawful** conduct;
- **Harassment** (which includes, but is not limited to: sexual harassment, physical fighting, or other abusive conduct that creates an intimidating or hostile/ offensive work environment);
- **Discrimination** against any employee or applicant because of age, ancestry, race, social status, marital status, health status, mental disability, physical disability, nationality, religion, gender and sexual orientation;

CONDUCT AND BEHAVIOUR

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- Deliberate destruction of company property or of another employee;
- Deliberate stoppage or slowdown of other collaborator's work pace;
- Theft, misappropriation or unauthorized use of personal ownership of the company or of another coworker;
- Insubordination or refusal to follow legitimate instructions from a Manager or deliberately undermine the authority of the Manager;
- Be in possession of weapons or other contraband on the company's property;
- Being in possession or under the influence of illegal substances on company property or company's customers;
- Any action which seriously affect the company's business or transmit a negative or destructive image;
- Any conduct that constitutes a serious threat to the health or safety of employees or the company's operations;
- Sick leave improper use;
- Recreational activities during working hours, on the company's property or the company's customers;
- Consumption or being under the influence of alcohol on the premises;
- Misuse of Syone's property, including the company's equipment, e-mail, intranet and computer systems and voice mail that may constitute unethical behavior;
- Violation of company policies;
- Misrepresentations, concealment, falsification or destruction of any document or information related to the company's business;
- Any other activity or conduct that may lead an individual or business to violate any governmental law, rule or regulation, shall be reported.

CONFLICT OF INTERESTS

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It is understood by conflict of interest all and any activity contrary to Syone's best business interests.

Employees must not, directly or indirectly, work for a competitor or consult him or engage in activities that compete with Syone's business interests (including working for one of Syone's supplier). Syone does not consider acceptable that a developer use customer lists or other business contacts to market their goods/services or goods/services of others, even if they do not directly compete with Syone's products or services.

Employees are allowed to give or accept gifts and/or favored treatment provided within the parameters below. However, payoffs are prohibited in all circumstances (regardless of quantity). The guidelines determine what is or is not considered appropriate by Syone in this area:

CONFLICT OF INTERESTS

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- Personal gifts or favored treatment that are expressly or tacitly conditional to obtaining business are not allowed;
- Syone's board and team members may not accept or give bribes to consultants, vendors, suppliers, competitors or customers;
- Reasonable value meals or entertainment;
- Airfare or stay if consistent with the company's travel policy and approved by a board member;
- Gifts consisting of equipment, goods, services, bonuses, discounts, provided they are approved by management.
- Gifts and promotional items distributed by Syone's Marketing Department for delivery to customers, suppliers and others is allowed without requiring the approval of the Board, regardless of the value of the gift or promotional item, provided that the purchase requisition for these gifts or promotional items is approved through the approval process set up by the company.
- Syone can donate equipment to a company or organization, provided

it is authorized by management and this donation is consistent with the patronage policy of the company.

- Syone employees should avoid doing business with family members or other individuals with whom they have interpersonal relationships or make any decision that involves a process of purchasing or contracting based on a personal relationship.
- The company's employees should be aware of the commitment of confidential information that may occur for the benefit of competitors when family members or other individuals interpersonal network are close by.
- Syone expects its employees to fully dedicate themselves to their work and discourages other jobs outside Syone. No Syone employee, either partial or full-time, may provide services outside Syone to an actual or potential customer, competitor or vendor under any circumstances.
- Syone is a company that cares about its competitive advantage. The reputation of the company results lives by its own and not from the depreciation of the competition.

COMMUNICATION WITH THE MEDIA

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Syone considers protecting its image and reputation of utmost importance.

If contacted by the press, Syone employees cannot provide information about the company on its business without permission. Calls and/or e-mails should be forwarded to the Marketing Department.

The information provided about Syone is of the responsibility of each employee. This measure includes the use of social media, professional or particular: social networking sites (eg: Facebook, Twitter, LinkedIn), blogs, video sharing sites and/or photos (eg: YouTube, Flickr), discussion forums and wikis.



CONFIDENTIAL INFORMATION

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The information circulating inside and outside the company is vital for the company's proper functioning. Thus, the lack of protection or misuse of Syone assets can provide confidential information to competition and hurt the company.

It is the responsibility of all Syone employees to protect confidential company information.

Commercial information, technology, ideas, customer lists, financial data, marketing strategies and pricing, business plans, among others, are the most important assets of the Syone activity. Protecting this information and its confidentiality is an ethical duty of each of Syone employees. Employees should consider whether the information will be made available could damage the integrity of the company or its competitive advantage. When in doubt, contact the Administrative Department.

No employee should attempt to obtain or use confidential information for the benefit of Syone or benefit.

GOVERNMENT AND LEGISLATION

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Ethical conduct requires Syone to hear and obey the laws of all countries where it operates.

The violation of the laws governing a country could lead Syone to fines, penalties and reputation damage. Although laws vary, the following guidelines should be followed:

- Never discuss or offer employment opportunities or business to employees who may influence an official act or decision affecting Syone or its business;
- Never offer gifts or favors to individuals with connection to any government activity;
- Never offer, whether in money, goods or other, something that you suspect will be used to influence individuals in order to facilitate decisions involving Syone.



COMMERCIAL LAW

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Commercial laws are intended to promote ethic competition on the markets and limit the activities that restrict trade. Syone employees should not discuss or enter into any agreement or understanding with a competitor about:

- Prices
- Products
- Services
- Market Share
- Financial Information
- Proposals
- Agreements with suppliers and customers

Violations of antitrust and competition laws are punished by law. These issues may arise from contact with competitors, suppliers or customers.

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