



Code of Ethics and Conduct

WHAT IS THE CODE OF ETHICS AND CONDUCT

The Code of Ethics and Conduct (Code) is the instrument in which the values that guide the performance of JANZ-CGF (Janz) are inscribed, as well as the ethical principles and norms of conduct to which the organization globally and its collaborators, in particular, are subject and assume as intrinsically theirs.

TO WHOM IT IS INTENDED

This Code applies to all Janz employees regardless of their hierarchy or position. In this sense, we understand as collaborators all members of the corporate bodies, consultants, directors and other employees, regardless of the type of their link, as well as all other elements that in some way act on behalf of JANZ-CGF.

FUNDAMENTAL OBJECTIVES

To make known generally, to all interested parties the principles and values by which Janz governs its activity, fostering relations of trust among all of them, as well as reinforcing the identity elements of the Janz culture.

To clarify, the collaborators, the rules of conduct which they must observe, through their decisions, behaviors and attitudes, continuously and scrupulously, both in their reciprocal relations, as well as in the relations established in Janz's name with all interested parties.

PRINCIPLES AND VALUES

VISION

"TO BE A GLOBAL REFERENCE IN PRODUCTS AND SYSTEMS OF MEASUREMENT AND MANAGEMENT OF ENERGY AND FLUID AND IN METALLIC AND THERMOPLASTIC TECHNICAL PARTS".

MISSION

"PROVIDE PRODUCTS AND SYSTEMS OF MEASUREMENT AND MANAGEMENT OF ENERGY AND FLUID AND IN METALLIC AND THERMOPLASTIC TECHNICAL PARTS, CREATING ADDED VALUE TO PARTNERS, COLLABORATORS AND SHAREHOLDERS."

These values should be evidenced, through the behavior of its collaborators, in the following actions:

CUSTOMERS

Treat customers with professionalism, efficiency, respect, loyalty, good faith and dedication.

Ensure equal treatment to all customers not making any unjustified discrimination between them.

Provide products and services in order to satisfy the needs of customers, fulfilling the agreed conditions and assumed commitments in accordance with the deposited expectations.

PROVIDERS

Choose providers based on impartial, fair and transparent criteria, without granting privileges or favoritism.

The selection must be made in accordance not only with the commercial conditions and quality of the products or services offered, but also with regard to its ethical behavior as perceived by Janz.

Honor the established commitments.

SHAREHOLDERS AND THE MARKET

To act with loyalty to the shareholders, attending to their interests with the fundamental objective of creating value and control of risk.

Absolute compliance with legal principles, equal treatment of shareholders, ensuring that the necessary information is made available in an appropriate, true, transparent and rigorous manner.

COMPETITION

Respecting market rules, promoting fair competition, avoiding any practice that could prevent, distort or otherwise restrict competition.

Relate to competitors in a healthy and cordial way and promote mutual respect.

PUBLIC AUTHORITIES

Ensure strict compliance with all legal, regulatory and national and international regulations applied in the regions where it operates.

Provide the supervisory authorities, within their reach, with all required cooperation or information requested.

COLLABORATORS

Define human resources policies with respect for the dignity, diversity and rights of each person.

Is not admissible any form of individual discrimination that is incompatible with the dignity of the human person, including by reason of origin, ethnicity, sex, political conviction, religious belief, sexual orientation or physical disability, and are not admissible any conduct such as sexual harassment, mobbing or abuse of power.

Treat each collaborator with fairness and promote equal opportunities for personal and professional development, in particular through rigorous and constructive performance evaluation, participation in vocational training programs and encouragement of participation in extra-professional activities.

Respect and promote the balance between work and personal life of the collaborator.

HEALTH AND SAFETY AT WORK ENVIRONMENT

Provide a good work environment in the most adequate conditions of health and safety at work and promoting the team spirit, unity and mutual aid among collaborators.

Ensure communication, share and registration of information between collaborators.

Ensure compliance with applicable safety, health, hygiene and welfare standards in the workplace, and employees must strictly observe the laws, regulations and internal instructions in this regard.

SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT

Acting on a logic of sustainable development in the economic, social and environmental aspects.

Take social responsibility to the communities where you carry out your business activity in order to contribute to your progress and well-being.

Mitigate and / or minimize the environmental impacts resulting from the environmental aspects associated with the activities and services developed.

Promote, disseminate, stimulate and influence collaborators, customers, suppliers and the community in general to adopt the best environmental practices, namely, with regard to the prevention of waste production, the correct segregation of those, in order to enhance its valorization and right forwarding, their water and soil pollution prevention, as well as the efficient use of the natural resources consumed (water and energy).

NORMS OF CONDUCT OF COLLABORATORS

INTERPERSONAL RELATIONSHIP

Observe the principles of loyalty, integrity, cooperation, civility and respect for hierarchies, guiding their reciprocal relations on the basis of a cordial, respectful and professional treatment.

Promote the participation of knowledge or information and interdisciplinary or inter-departmental cooperation, giving priority to team spirit.

To have a high sense of responsibility and cooperation, privileging the good environment and the personal treatment both with colleagues and with hierarchical superiors and these with subordinates.

Implement the decisions of the hierarchical superiors according to the plans of the company and encourage and support the subordinates in their application.

RESPONSIBILITIES

Collaborators must guide their conduct by scrupulously complying with the laws and regulations applicable to their activity, according to the responsibilities assigned to them, always with exemption, competence, rigor, zeal and transparency.

Use the power that has been delegated to them in a non-abusive way, aimed at achieving the goals of their company and never obtaining personal advantages.

Respect the values of Janz and the principles set out in this Code, both in internal relations and in external relations.

Report any irregularities likely to jeopardize the development of the organization's activity or the good name of Janz.

CONFLICT OF INTEREST

Avoid situations that may cause conflicts of interest, intervening in decision-making processes involving directly or indirectly entities with which they collaborate or have collaborated, or persons to whom they are or have been linked by ties of kinship or affinity of any nature. If they cannot do so, they must inform the respective heads of the existence of such relations.

Refrain from performing any functions outside of Janz, whenever such activities threaten the performance of your duties as Janz collaborators, or in organizations whose objectives may conflict with or interfere with Janz's purposes.

INTEGRITY

Do not accept or propose to third parties offers, payments or other benefits that may create in their interlocutors expectations of favor in their relations with the company.

Gifts received from third parties that exceed mere courtesy or a symbolic and commercially insignificant value should be communicated to the hierarchical responsible, and refused if they indicate the expectations of obtaining special favors from the bidders.

CONFIDENTIALITY AND PROFESSIONAL SECRECY

Janz collaborators, even after they cease their duties in their organizations, are subject to professional secrecy, in particular in matters which, because of their objective importance, by virtue of an internal decision or by virtue of the legislation in force, should not be of the general knowledge.

Use, inside and outside of Janz, reservation and description regarding facts and information of which they are aware in the realization of their duties and respect the internal rules established regarding the confidentiality of the information.

All personal data collected must be processed in an impartial, legal and careful way in order to protect the privacy of each collaborator, and in strict compliance with the applicable legal rules.

LOYALTY

Take on a loyalty behavior towards Janz, striving to safeguard your credibility and good image in all situations, as well as to promote and ensure your prestige.

PROTECTION AND UTILIZATION OF GOODS AND RESOURCES

Ensure the integrity, protection and conservation of the company's physical, financial and intellectual assets and the available resources must be used efficiently, in order to achieve the defined objectives, not using them, directly or indirectly, for personal or others advantage.

GOOD GOVERNANCE

Manage companies with zeal and transparency, creating Top Management's dialogue on objectives, strategy, risk analysis and performance evaluation and compliance with the highest standards of corporate governance.

FIGHT AGAINST CORRUPTION

Having the success and sustainability of the company, we are convincing the quality and value of our products and services against the competition. We support national and international efforts not to influence or distort competition through bribes and we reject any corrupt and harmful conduct.

None of our collaborators may use Janz's business contacts for their own or third party benefit or to the detriment of Janz. This means, in particular, that none of our collaborators grants or accepts improper personal benefits (for example money, tangible goods or services) in order to influence a decision based on facts.

OBJECTIVE AND SCOPE

The security of personal data processed by JANZ – Contagem e Gestão de Flúídos, S. A. (JANZ-CGF), is very important to us. This also includes the data processing of all employees of this company. This section aims to show how we treat the personal data of our employees.

For the purposes of this Section of the Code of Conduct, the term “employees” refers to all persons who have an employment contract with JANZ-CGF, and also includes individuals who provide services other than an employment relationship, such as temporary workers or acting as individual service providers.

The treatment of your personal data by JANZ – Contagem e Gestão de Flúídos, S. A. will always observe the legal and regulatory provisions applicable to personal data protection.

RULES INHERENT TO DATA TREATMENT BY JANZ – Contagem e Gestão de Flúídos, S. A.

JANZ-CGF will process your personal data to the extent necessary for the performance of your contract and to comply with the legal obligations imposed on you by that company (such as reporting your data to tax authorities) as well as according to the legitimate interests of the company in the management of its contractual relationship (eg. the collection of its biometric data for attendance and safety control).

PURPOSES FOR WHICH JANZ – Contagem e Gestão de Flúídos, S. A. TREATS PERSONAL DATA

Personal data collected by JANZ-CGF is only processed for specific, explicit and legitimate purposes and is solely for the purposes identified at the time of collection.

JANZ-CGF collects and uses the personal data of its employees primarily to manage the execution of their employment contract (including purposes such as payroll, absenteeism and vacation processing, career management, training management, access management). facilities and compliance with occupational health and safety obligations).

JANZ-CGF may also process your data to comply with legal obligations (for example, in communications with tax and social security entities) and court orders, as well as to exercise or defend JANZ-CGF's legitimate rights in court. .

In the case of employees by virtue of providing temporary work, to manage the Temporary Worker Use Agreement (in this case including purposes such as fulfillment of the requirements for admission to the job, and also for absenteeism management and training management).

JANZ - CGF also collects data related to the images taken by video surveillance cameras installed in buildings, serving the purpose of protecting people and property.

WAYS TO COLLECT

JANZ-CGF only collects data that is appropriate, relevant and limited to what is necessary for the purposes for which it is processed.

Data collection can be done orally, in writing (notably through the Application Form, CV, identification documents and employment contract) or through the video surveillance cameras installed in the buildings.

As a general rule, JANZ-CGF collects personal data directly from each Employee, and personal data may also be collected through third parties, notably other Janz Group companies, temporary employment companies and healthcare providers.

CATEGORIES OF PERSONAL DATA TREATED BY JANZ – Contagem e Gestão de Fluídos, S. A.

For the purposes described above, JANZ - CGF handles the following types of personal data:

- Identification data, such as your name, photo, gender and date of birth;
- Identification documents, such as your citizen card, passport, visa application details, driving license, Tax Identification Number and Social Security Identification Number;
- Contact details, such as address, mobile phone, email and contact details of people to contact in case of emergency and / or close relatives;
- Details of your job and duties, such as your position, professional category, place or places of employment, time, seniority, assessments, disciplinary, absence and vacation records and disability records;
- Information concerning academic and professional qualifications;
- Criminal record;
- Financial data, such as salary level, withholding and bank data;
- Health and safety information such as work accident records, medical certificates, medical reports under preventive and curative medicine;
- Union membership data;
- Images of people captured by video surveillance cameras installed in buildings;
- Biometric data.

HOW WE SHARE YOUR PERSONAL DATA

JANZ - CGF is careful to only allow access to your personal data to those who need such access to perform their tasks and duties, as well as to third parties who have a legitimate purpose to access them. Whenever we allow an outside entity to access your personal data, we will implement appropriate measures to ensure that the data is used to ensure the integrity and confidentiality of your data.

Internally, in addition to the HR Department, which is responsible for managing the company's employee data, we share, as necessary, your personal data with the IT Department and the Finance Department for application integration, backup and recovery purposes and troubleshooting issues with the Software and reporting to the bank respectively.

We make certain personal data available to subcontractors who provide services to us. If you would like additional information about these third parties, please contact the HR Department.

We do this following a criterion of necessity and in accordance with applicable data protection legislation. For example, some personal information will be available to subcontractors that provide us with software maintenance services, and to perform mandatory evaluations and complementary diagnostic exams in the area of Health and Safety at Work.

We may also disclose personal data to third parties for other legitimate reasons, such as:

- To comply with legal obligations, including when necessary to comply with a legal regulation or court order. These examples may include the transmission of data to tax and social security entities, as well as courts and enforcement agents.
- When necessary for the legitimate interests of JANZ - CGF or third parties (including the protection of persons and property).

DATA STORAGE DEADLINE

JANZ - CGF will keep your personal data for up to one year after the termination of the contractual relationship, except for data which, by law, must be retained for longer periods of time.

JANZ - CGF endeavors to ensure that your personal data is kept and, where appropriate, securely erased or destroyed in accordance with the policies, guidelines and rules disclosed over time regarding the retention of personal data.

YOUR RIGHTS AS A PERSONAL DATA HOLDER

What are your rights?

In the light of data protection law, you have several rights to your data, including the following:

- **Right of access:** right to obtain information regarding the processing of your data and its characteristics (such as the type of data, the purpose of the processing, to whom your data may be communicated, the retention periods and which data you have to compulsory or optional).

This right may be exercised without any limitations.

- **Right of rectification:** right to request the rectification of data, requiring data to be accurate and current, such as when data are incomplete or out of date.

This right too can be exercised without any limitations.

- **Right to data deletion or "Right to be forgotten":** the right to request data deletion when the holder considers that there are no valid grounds for data retention and provided that there is no other valid basis for such data (such as performance of a contract or fulfillment of a legal or regulatory obligation).

- **Right to Limitation:** the right to suspend treatment or to limit treatment to certain categories of data or purposes.

When the holder exercises this right of limitation, his or her personal data will not be deleted, but may only be processed again with the express consent of the holder, or for the purpose of defending a right in court proceedings.

- **Right to Portability:** right through which the holder may request the submission of their data, in digital format and of current use, allowing the reuse of such data. Alternatively, the holder may request the transmission of his data to another entity that will be responsible for the processing of his data.

This right can only be exercised when the condition of legitimacy of treatment is the consent of the proprietor or the performance of a contract (thus not applicable to the treatment necessary for the exercise of public interest functions or the exercise of public authority). limited to automated treatments.

- **Right of Opposition:** Right that allows the holder to oppose certain purposes. One of the examples of this right concerns opposition to marketing purposes.

This right may not be exercised when legitimate interests prevail over their interests (eg when treatment is necessary for the performance of a contract).

- **Right to withdraw consent:** a right that allows the holder to withdraw consent but can only be exercised when consent is the only condition of legitimacy;

How can you exercise your rights?

All rights described above may be exercised, subject to the limitations provided for in applicable law, upon written request to be sent to the following email address: rgpd@cgf.janz.pt

You may also file a complaint with the National Supervisory Authority (CNPD).