

SUPPLIER'S CODE OF CONDUCT



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1. OBJECT, SCOPE AND DEFINITIONS

OBJECT

The purpose of this code of conduct it is to establish a set of ethical norms and primordial principles that should guide the activity of “ERT Group” (from now on nominated by “ERT”) partner entities, namely:

- All the activities developed by the suppliers and their respective subcontractors are realized in an ethical and responsible way;
- Each and every person that keeps, directly or indirectly, a labour, economic, social or industrial relationship with the suppliers and their respective subcontractors, receives a fair and respectful treatment;
- All the suppliers and their respective subcontractors’ activities are realized with respect for the environment;
- All the suppliers and their respective subcontractors adhere totally to these compromises and promote their responsibility of guarantee that booth them and their subcontractors accomplish the norms stated in this code of conduct.

SCOPE

The present code has a global appliance to all “ERT Group” universe, linking namely:

- All the suppliers and their respective subcontractors who have any commercial relationship with the ERT Group Societies as long were these have a dominant participation, regardless the place and the activities developed.

DEFINITIONS

By “**ERT Group**” we consider ERT Automotive, ERT Industrial, HOUSPRING, WTEX, KLEBERT, LÍDIO BRANDÃO, XVISION and UOU.

By “**Suppliers**” it is understood the singular or collective persons that supply products and services to ERT.

2. PRINCIPLES

Stablished in 1992, the “ERT Group”, based in São João da Madeira, Portugal, keeps, since its beginnings, an uninterrupted activity, booth in its origin country as in several foreign countries.

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The number one mission goes by corresponding to the market and the clients demands, through a sustainable business model and qualified and motivated human resources, generators of economic, social and environmental value, in order to provide an attractive return to our shareholders.

Our extent and history establish responsibilities towards our external grid, our workers, our partners, those who are related or contracted by us and, naturally, the society in general.

In our form of acting we assume full observance of the following general principles:

- a) Respect for the United Nations Universal Declaration of Men’s Rights;
- b) Respect for the International Labour Organization recommendations;
- c) Rejection of any form of Child Work;
- d) Fulfil of the legal impositions of the countries where we practice activity;
- e) Adopt high standards of ethics and integrity in the business management;
- f) Social responsible conduct;
- g) Respect for the environment.

FORCED WORK PROHIBITION

ERT will not allow any kind of forced or involuntary work in the productive centres and/or settlements of our suppliers or subcontractors.

The suppliers or subcontractors cannot demand any “counterpart” from their workers or make any retention of documents that prove their identities.

The suppliers or subcontractors will acknowledge their workers’ rights of leaving their jobs, since they respect a reasonable pre-warning.

MINOR WORK PROHIBITION

The suppliers and their respective subcontractors will not contract minors. **ERT** respects the 190 Recommendation, of the International Labour Organization, which authorizes the job or work from the age of 16, counting that the child’s safety, security and moral are fully protected and requires the child receive the specific instructions or the proper professional training regarding the activity he/she will

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develop. If the local legislation establishes a superior age limit, that limit will be respected.

People minor than 18 years should not work in rotative shifts or in dangerous conditions, as defined by the 190 Recommendation of the International Labour Organization.

Whenever it is verified the existence of any form of child labour in the production centres and/or settlements of the suppliers and their respective subcontractors, **ERT** will act in conformity with the applicable laws and norms for those cases.

DISCRIMINATION PROHIBITION

The suppliers and their respective subcontractors should not apply any type of discriminatory practices in hiring, remuneration, access to training, promotion, contract termination or retirement, based in the race, caste, creed, nationality, religion, age, physical or mental illness, gender, marital status, sexual orientation and/or union or political filiation.

FREEDOM OF ASSOCIATION AND COLLECTIVE NEGOTIATION RESPECT

The suppliers and their respective subcontractors will assure to their workers, without exception, the rights of associations, filiation and collective negotiation, without reprisals arising their exercise, and will not offer any kind of remuneration or payment to their workers with the end of hamper the exercise of such rights.

The suppliers and their respective subcontractors will adopt an open and collaborative attitude regarding the union activities.

The worker’s representatives will be protected against any type of discrimination and will be able to do their representative roles freely in their workplace.

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HUMAN RIGHTS COMMITMENT

The suppliers and their respective subcontractors will treat their workers with dignity and respect. In any circumstance will tolerate physical punishment, sexual or racial harassment, verbal or power abuse or any other form of harassment or intimidation.

WORK SAFETY AND HEALTH

The suppliers and their respective subcontractors will provide to their workers a safe and healthy work environment, assuring the minimum conditions of illumination, ventilation, hygiene, fire protection, safety measures and access to potable water.

Workers must have clean toilets and changing rooms with access to potable water.

When conditions require, it must be assured food preservation installations.

The dorms, if supplied, must be hygienic and safe.

The suppliers and their respective subcontractors will adopt the necessary measures to prevent accidents and health damage to workers, minimizing, in the possible measure, the inherent risks of the activity.

The suppliers and their respective subcontractors will supply regular training in occupational health and safety to their workers. The company must keep an adequate register of the ministered training sessions.

The suppliers and their respective subcontractors should name one person responsible for safety and health with authority and capability of decision making.

SALARY PAYMENT

The supplier and their respective subcontractors should guarantee that the salary payed to their workers is equal to the minimum legal or to the established in the contract if this is superior. In any case, the referred salary must be always enough to cover, at least, the basic needs and those others that could be considered reasonable additional needs from the workers and their families.

The suppliers and their respective subcontractors will not make any kind of discounts on the salaries of the workers based in disciplinary or any other cause that not the established in the applicable legislation, without their express authorization.

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The suppliers and their respective subcontractors will supply to their workers in the hiring moment, comprehensive and written information about the wage conditions and in the moment of the periodic payment of the salary, information about its particularities.

The suppliers and their respective subcontractors will assure that the salaries and other benefits will be paid in useful time according to the applicable legislation and, namely, that those payments will be made in the most convenient way to the workers.

NON-EXCESSIVE WORK HOURS

The suppliers and their respective subcontractors will adjust the work journey duration to the disposed in the applicable legislation or to the established agreement for the concerned sector if this is more beneficial to the worker.

The suppliers and their respective subcontractors will not demand that their workers work, as regular rule, more than 50 hours weekly and it will be recognized, in average, at least one day-off for each 7 consecutive days period.

The extra hours should not surpass the 10 weekly and should be payed in a superior value than the normal schedule, according to the disposed in the legislation in force.

AMBIENTAL COMMITMENT

The suppliers and their respective subcontractors will maintain a constant compromise with environment protection and, at minimum, will comply with the established standards and requirements of the local and international applicable legislation.

REGULAR JOB

The suppliers and their respective subcontractors will assure that all the adopted forms of employment will be included in the common work practices and in the applicable local legislation.

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The suppliers and their respective subcontractors will not harm the workers’ rights acknowledged in the labour legislation and the in Social Security through forms of subcontracting, telework, internship and apprenticeship contracts and/or any other similar form in which there is not real intention of promoting the regular employment within the frame of the normal work relations.

CORRUPTION AND BRIBERY

ERT complies the recommendations and applicable norms in the combat to the international trade corruption, including, without limiting, the derivatives of the Fight Against Corruption Of Foreign Public Agents In Commercial Transactions Convention and the guidelines of the OCDE for Multinational Companies.

ERT demands equal compromise from all the suppliers and respective subcontractors, regardless the way they act.

The suppliers and their respective subcontractors will maintain an honest, righteous and transparent behaviour of their activity, assuring a suitable system of accounting registers, as a preventive measure against all and each corruption, bribery and extortion that may occur.

The suppliers and their respective subcontractors attest that they do not have and compromise that they will not adopt practices related to offering any kind of payment, present, promise or other benefit in a direct or indirect way or by a middlemen to any singular or collective person, namely:

- a) That is serving any authority, public or private, politic side or public role candidates, with the intention of obtain or keep business or any other benefits illegally;
- b) With the intention that those people abuse from their influence, with the purpose of obtaining any undue business or vantage;
- c) Whenever they have information that the totality or part of the payment, in cash or in species, will be offered or delivered, directly or indirectly, to any authority, public or private, politic side or public role candidates, aiming the objectives numbered in a) and b);
- d) It will not be accepted the practices that imply the payment in cash or species with the purpose of facilitating or speeding up procedures, in exchange of assured results or the help on altering the course of a process or action towards any judicial

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organism or Public Administration, without prejudice the exceptions within the Prevention of Corruption Acts Policy.

The suppliers and their respective subcontractors compromise not to import materials or raw materials from conflict and high-risk zones through the mineral exploitation and commerce (plater, tantalum, tungsten, respective ores, gold, cobalt and mica) who are used in the automotive industry.

3. ACT PRINCIPLES

SUBCONTRACTING

ERT suppliers will be responsible for the fulfilment of this Code, as so, for the companies by them subcontracted.

The suppliers and their respective subcontractors will apply the principles in this Code to the domiciled workers which make part of their productive chain and will be transparent regarding their work locals and conditions.

MANAGEMENT SYSTEMS

The suppliers and their respective subcontractors shall implement and apply programs to promote and practice this Code.

The suppliers and their respective subcontractors must assign um representative from the Board that will be responsible for the application and fulfil of this Code.

The suppliers and their respective subcontractors must let know this Code to all their workers, contracted, subcontracted, suppliers and agents that, in some form of way, are involved in ERT’s productive chain.

SUPERVISION AND VERIFICATION

The suppliers authorize ERT and/or thirds designed by ERT to conduct inspections and audits to verify the adequate fulfil of this Code. For that, they will supply to the inspectors and/or auditors the right means and the access to their installations, as so any necessary evidence and/or documentation to assure this verification.

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The suppliers and their subcontractors cannot offer or accept any kind of compensation that looks, intentionally or not, interfere in the impartiality or objectivity from the parts designated by **ERT** to perform accomplish of the Code inspections and audits.

ETHICAL COMMITMENT

The suppliers and their respective subcontractors will not manipulate or falsify archives or registers with the purpose of changing the accomplishment verification processes of this Code.

The suppliers and their respective subcontractors will assume the commitment of keeping the documents and registers in a consistent manner, respecting all applicable legal requirements, namely regarding the time of archive required by law.

CUSTOMER’S RIGHTS

If it is proven that the compromises and the conditions defined in this code of conduct were not respected, **ERT** assumes the right of:

- a) Suspend the payment and/or request refund for the advance under the contract terms and/or;
- b) Suspend and/or revoke the contract with immediate effects, due to supplier’s negligence.

PUBLICATION OF THE CODE

The suppliers and their subcontractors will inform their workers about the content in this Code.

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