



Code of Ethics and Business Conduct

CONFIDENTIALITY

Public

IDENTIFICATION

	Role	Date
Elaborated by	Eduardo Cruz (RCC)	2021.12.10
Revised by	Helena Castro (HR)	2021.12.17
Approved by	Renato Oiveira (CEO)	2021.12.17
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Porto, 17th December 2021*RENATO OLIVEIRA*

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João Lima Pinto**Update and approval**

This Code of Ethics and Business Conduct shall be updated annually or, if deemed necessary, whenever there is a need or requirement to do so. This instruction shall be updated in respect of changes within business requirements or other regulatory changes, changes in the market where the company operates, and internal changes within the company. Any changes to this code is subject to approval by the Board of Directors.

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The success of our business is dependent on the trust and confidence we earn from our employees, and other stakeholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.

ebankIT is committed to comply with internationally recognized human rights. ebankIT's approach to respecting human rights is based on the United Nations Guiding Principles on Business and Human Rights as well as Portuguese laws.

The safety of ebankIT's employees and other individuals performing work on ebankIT's behalf is of the utmost important to ebankIT. Environmental, health and safety risk and threats that could cause harm to personnel on duty, on and off-site, are regularly analyzed and controlled by ebankIT.

CODE OF ETHICS AND BUSINESS CONDUCT

ebankIT conducts business ethically, treating customers, partners, suppliers, employees, and others with respect and in full compliance with the applicable laws and regulations. Integrate this Code of Ethics and Business Conduct into our business activities and daily operations is of extreme importance to ebankIT.

All ebankIT's collaborators are expected to be fully committed to conduct business ethically and in compliance with the applicable laws and regulations that apply in the markets where ebankIT operates.

The Code of Ethics and Business Conduct aims to share a set of ethical and deontological principles that guide and clarify the standards of a personal and professional relationship of all employees and formal representatives of ebankIT.

Human Resources are responsible for the disclosure and updates of this code of conduct.

This Code is made known to all collaborators on the first day of the current version. It is available on Sharepoint\Human Resources Management and on the ebankit.com website.

The violation or non-compliance of them constitutes a disciplinary infraction punishable under the terms of the legislation in force, without prejudice to civil, administrative, criminal or other liability that may occur.

TO WHOM DOES THIS CODE APPLIES

This Code of Ethics and Business Conduct applies to all ebankIT's employees and collaborators as also the board of Directors and provides a standard guideline for what is required from everyone at ebankIT.

ebankIT also expects its suppliers, contractors, consultants, and other business partners to follow these same principles when dealing with ebankIT.

This Code is approved by ebankIT's Board of Directors.

CONTACT INFORMATION

If you have any questions or need any clarification regarding this Code of Ethics and Business Conduct, you may contact the Human Resources Coordinator.

VISION, MISSION AND VALUES

VISION

ebankIT wants to shape digital transformation of financial institutions from all over the world by offering an intuitive experience to their customers, while humanizes banking experience.

MISSION

Our purpose is to provide the most adequate user experience within a fully customizable and omnichannel digital banking. By strengthening customer relationships and taking advantage of third-party innovations through open banking possibilities, ebankIT platform accelerates digital transformation and improves member/customer experience, enabling a 360° vision following a customer-centric perspective and providing a truly connected and safe experience.

VALUES

- Customer satisfaction.
- Ethics and social responsibility.
- Initiative.
- Dynamism.
- Innovation.
- Professionalism.
- Honesty.
- Team spirit.
- Respect for the individual.
- Development of our Human Resources.

ETHICAL PRINCIPLES

In line with values stated above, ebankIT expects that everyone:

- a) Act with integrity, openly and clearly, respectfully to each other and responsibly towards society and environment in all business relationships;
- b) Comply with all the laws, rules and regulations and internal arrangements with all details, concerning their job roles;
- c) Treat any non-public information in strictest confidentiality and not disclose it to any third parties;
- d) Use assets and resources of ebankIT with proper care and efficiency;
- e) Report to ebankIT's Board of Directors, Process Owner, Human Resources ombudsman@ebankit.com or <https://www.ebankit.com/reporting-channel> if anonymity is required of any violation to this Code, of legal or regulatory applicable rules;
- f) Consult with ebankIT's Process Owner, Human Resources with any doubt on any ethics or compliance issues;
- g) Not utter any kind of damaging statements against customers and business partners on the media and/or social media with their own or hidden/faked identities;
- h) Never use the intellectual property of any third party without permission or legal right;
- i) Never use or copy software, music, video, publications or other copyright protected content at work or for business purposes unless ebankIT is legally or contractually allowed to use or make copies of such protected content;
- j) Never offer or receive any payment of anything of value that may be considered a form of bribery or corruption.

ebankIT will not retaliate – and will not accept any retaliation, against any individual for reporting a concern in good-faith or complaint to a Director or for participating in the investigation of a concern or complaint. However, we also do not tolerate knowingly false reporting.

When anonymity is required, the complaint must be registered in through ebankIT reporting channel in the website.

These principles shall be emphasized in the following rules and actions.

RULES AND ACTIONS

EMPLOYMENT PRACTICES

ebankIT is committed to providing a workplace free of harassment (including sexual harassment) or discrimination based on a personal trait. Personal traits include race, color, ancestry, national origin, religion, creed, age, mental and physical disability, sex, gender, sexual orientation, gender identity or expression, medical condition, genetic information, marital status, or any other characteristic protected by law.

ebankIT is dedicated to maintaining a creative, culturally diverse, and supportive work environment, and do not tolerate discrimination or harassment of employees or non-employees with whom we have a business, service, or professional relationship. This applies to all interactions where an employee represents ebankIT, and includes interactions with other people at ebankIT, customers, suppliers or business partners.

ebankIT ensures fair and equal opportunities for all potential and existing employees. This relates to gender, marital status, family status, age, disability, race, sexual orientation, or religious belief.

Applicants need to be made aware that their employment is dependent on the results of the screening checks where we could look for your relevant qualifications, previous employment history and any misconduct or any conflicts of interest.

Prior to a formal offer of employment being made to a preferred applicant a statement of oath must be completed by the applicant.

RESPECT FOR THE INDIVIDUAL AND ORGANIZATIONAL ENVIRONMENT

We all deserve to work in an environment where we are treated with dignity and respect. EbankIT is committed to keep such a positive and respectful environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

All EbankIT employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Always treat others with dignity and respect.
- Avoid prejudice judgments;
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.
- Seek out insights from employees with different experiences, perspectives, and backgrounds.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.

EbankIT will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive, or unwelcome.

SEXUAL AND MORAL HARASSMENT

Workplace harassment is a highly reprovved behavior, which will lead to a disciplinary process and may be punished by criminal and civil law.

For the present purposes, "workplace harassment", in case of moral harassment, is considered to be an isolated or repeated and unwelcome behavior based on a discrimination factor, with the aim of disturbing or embarrassing someone, affect his or her dignity, or even create an intimidating, hostile, degrading, humiliating or destabilizing environment.

Sexual harassment means unwelcome sexual behavior, in a verbal, nonverbal or physical form, with the purpose or effect of embarrassing, humiliating or intimidating.

Any practice of moral or sexual workplace harassment is forbidden on ebankIT.

The following conducts are intimidating and harassing behaviors, assuming the concept of moral harassment (non-exhaustive list):

- Insults, intimidations or threats (verbal or written), made or not, in the presence of third-parties;
- Restrictions or limitations to the free speech, opinion or dialogue;
- Attribution of humiliating, temporary or permanent tasks;
- Non-consensual intrusion into private, personal or loving life;
- Repeated opposition and unfounded criticism of the work method and adopted decisions, to persecute and unnecessary public disclosure;
- Dissemination of rumors or false information of any nature;
- Comments, critics or public behavior for the main purpose of humiliating, disparage or ridicule;
- Power abuse (unjustified and disproportionate), by the superior hierarchical over his subordinate.

It is also forbidden the practice of any act of discrimination (direct or indirect) related to race, ethnical nature, sex, sexual orientation, gender identity, age, reduced work capability, disability, chronic ill, economic situation, political or ideologic convictions, religion, or union membership.

It is forbidden to sexually harass other co-workers, costumers, or external persons, such as, the following behaviors (non-exhaustive list):

- Sexual solicitations or advances;
- Requests for sexual favors;
- Invitation for unwelcome meetings;
- Sexual jokes, pictures, written messages or e-mails;
- Explicit and disparaging comments about the appearance;
- Presentation of sexually suggestive images or pornographic content.

Every employee, member of social entity, of administration or board, hierarchical superior or inferior, must refrain from any practice of workplace harassment, ensure a work environment that prevent that type of behaviors, participate on awareness about this theme, discourage other co-workers from practicing any harassment, intimidating e or humiliating behavior, as well as report workplace harassment incidents of which they have been victim, witness or known.

An employee that has been a victim of workplace harassment, carried out by any co-worker, member of social entity, of administration or board, hierarchical superior or inferior, costumer, or other external persons shall report the situation through available reporting channels. The reports should include details of what happened and if possible, have mains of proof, and even witnesses if there are any.

ebankIT provides specific, independent, and anonymous channel that adequately ensure the reception, processing and filing of communications related to any violations of the legislation and regulations in force and of the ethical procedures and principles of the company.

The whistleblower and witnesses of workplace harassment will be protected against retaliation and cannot be subject to disciplinary sanctions/procedures related thereto, unless they act with intent, based on statements or facts contained in the judicial, administrative or administrative proceedings, triggered by harassment until final decision, final and unappealable, without prejudice to the exercise of the right to contradictory;

In case of workplace harassment, ebankIT guarantees celerity and confidentiality in the investigation.

COMPLY WITH LAWS, RULES AND REGULATIONS

ebankIT is committed to ensuring compliance with applicable laws, rules and regulations. Each employee must ensure an understanding of the company's policies, laws, rules and regulations that apply to their specific roles.

If we are unsure of whether a contemplated action is permitted by law or ebankIT policy, you should seek the advice from Compliance office (compliance@ebankit.com).

CONFLICT OF INTERESTS

A conflict of interest is any activity that may damage ebankIT's reputation or financial assets or gives the appearance of divided loyalty. It is forbidden for ebankIT's employees to benefit themselves or others directly or indirectly, abusing their position and authorities or by any other means, to promise third parties to benefit them.

EbankIT are dedicated to ethical, fair and vigorous competition. We sell our products and services based on their merit, superior quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors.

ebankIT's employees and collaborators are expected to avoid any situation that creates a real or perceived conflict of interest. If an ebankIT's employee or collaborator is unsure about a potential conflict, he/she should immediately talk with one of ebankIT's Directors or Compliance Officer.

We will not offer or solicit improper payments or gratuities in connection with the purchase of our services, nor will we engage or assist in unlawful boycotts of particular customers.

It is forbidden for ebankIT's employees to benefit themselves or others directly or indirectly, abusing their position and authorities or by any other means, to promise third parties to benefit them.

Below, we provide guidance in several areas where conflicts of interest often arise:

- a) personal investments;
- b) outside employment, advisory roles, or outside own businesses;
- c) business opportunities found through work performed at ebankIT;
- d) friends and relatives and co-worker relationships;
- e) accepting gifts, entertainment, and other business courtesies.

The employees must refrain from participating or developing any activity that may cause conflict with the performance of their duties or compromises the standards or their ability for decision-making at ebankIT.

AML, ANTI-BRIBERY AND CORRUPTION POLICIES

ebankIT encourages its employees and collaborators to build and maintain relationships with its business partners throughout networking and social interaction, always be aware of applicable laws and ebankIT's internal rules and reject all forms that can be perceived as bribery or corruption or raise questions about potentially being a violation of the applicable laws.

ebankIT adopted Anti-money laundering and anti-bribery and corruption policies with the special purpose of maintain reputation as a concerned company with high ethical values of integrity.

ebankIT condemns corruption as it undermines legitimate business activities and distorts competition.

ebankIT is opposed to all forms of corruption, irrespective of which country we operate it, and adheres to the Portuguese anti-corruption applicable laws provided in the Portuguese Criminal Code and other applicable statutory law.

All ebankIT's representatives (Directors, managers, employees, and, in general, all ebankIT's collaborators) cannot offer or receive bribes from any individual, regardless of whether that individual is a public official or private person.

Giving and accepting gifts or hospitality that could affect business decisions are forbidden.

Employees shall have special care during negotiations, decision-making processes, bids, tenders and similar processes and shall always be made in a transparent way.

Special caution shall be taken when dealing with public officials. Payment of money or giving anything of value to any public official is not allowed under any circumstances.

ebankIT's representatives should consult the Board of Directors or ebankIT's Compliance office . if there is a question as to the appropriateness of a particular business decision or course of action.

Any employee or collaborator who becomes aware of any misconduct or suspicious activities, including potential violations of ebankIT anti-bribery policy and of the applicable law, should immediately report the situation through available reporting channels.

INTELLECTUAL PROPERTY

ebankIT's intellectual property rights (ebankIT's trademarks, logos, trade secrets, copyrights, "know-how") are among ebankIT's most valuable assets. Unauthorized use or misappropriation can lead to their loss or serious loss of value.

All ebankIT's employees and collaborators are expected to respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. No ebankIT's logos, brands or other protected information or property can be used in any business or commercial venture without the approval of ebankIT.

We strongly encourage all ebankIT's employees and collaborators to report to Compliance office (compliance@ebankit.com). any suspected misuse of ebankIT's trademarks, logos, software or other ebankIT intellectual property infraction.

It is of great importance to ebankIT to respect the intellectual property of other Parties. Inappropriate use of third Parties' intellectual property may expose ebankIT and the person who inappropriately used such intellectual property to criminal and civil liability.

ebankIT employees, whenever in doubt, should seek advice from the Compliance department before requesting or accepting the use of third-party intellectual property or allowing ebankIT's intellectual property to be used or accessed, such as source code or applications incorporated in the product, installation of software without the use of appropriate licenses, among others.

EbankIT Intellectual property principles are specified on each employment contract.

CONFIDENTIAL INFORMATION

One of ebankIT's greatest assets is information about its products, services and customers.

All ebankIT's collaborators are expected not to disclose any sort of confidential information, including, operational, financial, trade-secret, or other business information without verifying with ebankIT's Directors whether such disclosure is allowed under the applicable law, agreements to which ebankIT is a part of, or appropriate. Even inside ebankIT, confidential information should only be shared on a need-to-know basis.

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to EbankIT, its business operations, plans, financial condition, results of operations or any development plan.

We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Customers, partners, suppliers and other third parties with whom ebankIT does business may disclose confidential information to ebankIT. All people at ebankIT are responsible for protecting and maintaining the confidentiality of any information entrusted to ebankIT, classified as such. Compromising that trust may damage our image and our relations with third parties, as it can result in criminal and civil liability for ebankIT and to the person who breached its confidential duties.

Employee's confidentiality principles are specified on their employment contracts. If you have any question regarding this point please contact the Compliance office.

USE OF COMPANY RESOURCES - INFORMATION SECURITY

ebankIT will provide to all employees and collaborators a set of policies and procedures related to information security management system, available on our internal network.

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent ebankIT are trusted to behave responsibly and use good judgment to conserve company resources.

Generally, we will not use company equipment such as computers, copiers, and fax machines in the conduct of an outside business or in support of any religious, political, or other outside daily activity, except for company-requested support to nonprofit organizations.

We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to the Information Security Manager.

DATA PROTECTION

ebankIT is committed to comply with all applicable laws related to his business activities and therefore we take personal data and privacy very seriously. ebankIT aim is to ensure that all personal data processed should be kept safe and always secured, and that the personal integrity is respected.

Internal Privacy Policy defines our compromise with the principles of the GDPR (General Data Protection Regulation) and how we seek to protect personal data and ensure that our personnel understand the rules governing their use of personal data to which they have access in the course of their work.

MEDIA INQUIRIES

EbankIT is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. To ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Human Resources and Marketing Directors.

No one may issue a press release without first consulting with the Human Resources and Marketing Directors.

SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT

Sustainability is at the core of our business and it has therefore been vital to all of us.

eBankIT wants to have a positive impact on society and is committed to doing its best to provide good conditions for its employees, minimize the environmental impact and thus positively shape the world in a sustainable way.

Through our business activities, we want to be economically successful, create value for society and avoid generating subsequent costs for society.

CODE OF ETHICS AND BUSINESS CONDUCT MONITORING AND REPORT

eBankIT encourages all who become aware of potential violations of this Code, relevant laws and regulations, or eBankIT governing documents to report the situation to ombudsman@ebankit.com or <https://www.ebankit.com/reporting-channel> if anonymity is required.

Each one of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy.

If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Human Resources Coordinator.

eBankIT provides specific, independent, and anonymous channel to treat any violations regarding this code. All employees and Board of Directors are expected to be vigilant and to play an active part.

EBANKIT INTERNAL CONTROL

eBankIT will ensure the compliance with this policy promoting awareness sharing sessions to maintain a culture that fosters a positive and constructive attitude.

At least annually this code is revised and whenever necessary eBankIT will perform specific internal audits to this Code.

TRAINING

To raise awareness of Code of Ethics and Business Conduct issues, sharing sessions are regularly performed to foster knowledge of the obligations arising from the law.

All employees are required to complete annual Ethics and Business Conduct form to review and certify their understanding of this Code and depending on results or work responsibilities, may be required to participate in additional mandatory trainings on specific topics such as money-laundering, bribery and anti-corruption.

In the case of new employees, ebankIT provides upon admission, appropriate training on policies, procedures and internally defined controls.

UPDATING OF CODE OF ETHICS AND BUSINESS CONDUCT

This Code is reviewed each year by the Human Resources team.

Updated versions are to be adopted by the Board of Directors of the Company, where deemed necessary or appropriate.