



CODE OF ETHICS AND CONDUCT





MESSAGE

The Águas de Portugal (AdP) Group undertakes its public service mission through managing a strategic resource essential to life and human development.

The activities of general interest developed by our companies produce the greatest impact on the livelihoods of the Portuguese and, over recent decades, have contributed towards the profound transformation of this sector in Portugal.

We are fully aware that the decisions we take when providing a public service essential to life, especially the options and the implementation of the investment plans of our companies, as well as the normal course of our activities, impact on every citizen, consumer, employee and supplier, among other interested stakeholders.

Water management represents a central focus of adaptation to climate change, the protection of public health, the quality of the environment and the preservation of biodiversity.

We hold a firm commitment towards integrity, based on the high ethical standards of our management practices and compliance with our purpose of making the difference in the lives of people.

The Code of Ethics and Conduct is the fundamental guiding instrument that supports our people in understanding the ethical norms of the AdP Group and conveying to our partners and interested parties the principles underlying the ways in which we develop our activities. This provides the core foundation for the AdP Group integrity model, shaping the culture of integrity that we defend and deploy to ensure we continue to deserve the trust of our stakeholders.

A handwritten signature in black ink, appearing to read "José Furtado".

José Furtado
Chair of the Board of Directors

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SECTION I - FRAMEWORK

ARTICLE 1 - OBJECT

1. The Code of Ethics and Conduct (CEC) formally represents the ethical framework of the AdP Group, featuring the system of values and principles of actions, as well as the norms, which are conveyed by the model of behaviour adopted by all members of staff and consolidating the AdP Group culture of integrity.
2. Providing orientation for behaviour in key areas, this complementarily interacts with the other procedures and norms in effect to provide specific additional information.

ARTICLE 2 - SCOPE OF APPLICATION

1. The CEC applies to every member of staff, to members of the management bodies of the AdP Group, service suppliers, individuals undertaking internships as well as other persons holding functions in representation of the group, irrespective of their employment status, function or hierarchical position.
2. For the purposes of simplification, the CEC shall henceforth refer to members of staff, referring thereby to all employees, members of management boards, service suppliers and others acting on behalf of the AdP Group.
3. The CEC establishes the ethical framework of the AdP Group and thus correspondingly applies to all group companies.

ARTICLE 3 - OBJECTIVES OF THE CODE

1. To establish a formal and institutional framework for the professional conduct of all members of staff, becoming a standard for relationships both internally and with the external publics of the AdP Group;
2. Strengthening the existence and sharing of common values, principles and norms of conduct in the AdP Group, deepening its shared culture of integrity;
3. Fostering relationships of trust between the AdP Group and its partners;
4. Reducing the subjectivities of personal interpretations of moral and ethical principles;
5. Responding to the civic challenge of leveraging ethical principles in society that respects the orientations handed down by supranational organisations.

ARTICLE 4 - NATURE OF THE RULES

1. The CEC seeks to promote and guarantee the practice of professional behaviours of a high ethical and moral standard on behalf of all AdP Group members of staff in addition to the legal and regulatory stipulations that are also abided by.
2. The constant ethical norms in the AdP Group CEC also provide a framework of reference for the public in general as regards the standards of behaviour required in the relationships between Group companies and third parties.
3. Within the scope of issuing orientations on the core themes interrelating with the ethical commitments made by the AdP Group, this CEC thus provides a framework but does not replace the responsibility of individuals for evaluating the specific situations and contexts.
4. Situations for which this code does not present any response or guidance are to be assessed taking into consideration the current values and principles as the reference criteria for decision-making processes.



SECTION II – ETHICAL FRAMEWORK OF THE AdP GROUP

This section sets out the ethical framework of the AdP Group, which is constituted by the adopted system of values and principles for action. These should be interpreted as reference criteria in the decision-making processes inherent to daily activities and in the relationships with internal and external entities, generating the ethical attitudes and responsible behaviour that drive and substantiate a culture of integrity.

ARTICLE 5 - PURPOSE

The purpose encapsulates the reason for our organisation existing, reflected in the determination to generate a unique impact on society. We consider our involvement and contribution an opportunity and, above all, an obligation, towards the more sustainable development of humanity. The purpose of the AdP Group is to: **“Make a difference in the lives of people”**.

ARTICLE 6 - VISION

To be among the most efficient and sustainable international operators in water management, focusing on excellence of client service, innovation, resilience, energy and carbon neutrality and the circular economy.

ARTICLE 7 - MISSION

Constructing, operating and managing water supply and wastewater sanitation systems within a framework of economic, financial, technical, social and environmental sustainability with a high level of competence capable of responding effectively and efficiently to the major challenges faced by the environment sector in Portugal and in the world.

ARTICLE 8 - COMMITMENTS

Due to the structural role played by the environment sector, contributing decisively towards both managing the resources available to the country and implementing public policies and national objectives in the environment sector; in keeping with the transversal impacts of all human activities, the AdP Group makes the following commitments to society within the scope of achieving its mission:

- a. **Sustainability** in the utilisation of natural resources and the preservation of water as a strategic resource essential to life.
- b. **Balancing** and improving the quality of the environment.
- c. **Equity** in accessing basic services.
- d. **Fostering wellbeing** through improvements to the quality of life of citizens.

ARTICLE 9 - SYSTEM OF VALUES

I. The values of the AdP Group constitute the reference criteria applied to orient the decisions, actions and conduct of all those working for or representing the Group in alignment with its purpose and its mission.

2. Each value represents the expectations of the Group towards the attitudes and conduct to be adopted by members of staff in undertaking the functions they are assigned:

- a. **Spirit of service:** Acting with zeal and dedicated to complying with our Public Service Mission.

- b. **Excellence:** Acting with perseverance, seeking to face adversity as a challenge and an opportunity, with a spirit of initiative, striving to achieve continuous improvements in service, in the performance of its activities, the AdP Group deploys members of staff that systematically seek solutions incorporating innovation and technological development and that contribute towards optimising processes in accordance with best practices.



c. Integrity: The Group acts according to the highest ethical standards taking into consideration that society and the public service mission are at the centre of the actions of each person. In undertaking their functions, the members of staff commit to an ethical attitude, seeking to ensure consistency and equity in their options and decisions, honouring the commitments made and spurning corruptive practices in all of their forms.

d. Responsibility: Accepting responsibility for the actions and options taken and applying best practices in their professional performance. Aware of the importance of their mission, members of staff carry out their roles according to the highest quality standards in representing the AdP Group.

e. Rigor: Acting through coherent approaches deriving from the application of the values and principles of the AdP Group, in strict compliance with the law and respecting the policies, orientations and internal norms, decisions are taken with impartiality, equity, objectivity and transparency.

ARTICLE 10 - PRINCIPLES OF ACTION

The principles of action guiding the AdP Group in implementing its strategy, policies and objectives are established by the directives that are to be adopted by all members of staff.

a. Legal and regulatory compliance and other declared commitments: The AdP Group respects all the legal and regulatory norms applicable to its activities as well as the commitments made towards third parties. There can be no actions in violation of the different normative stipulations.

b. Respect and protection of human rights: The AdP Group is fully committed to safe and healthy working environments, respecting and protecting the rights of our members of staff in keeping with the internationally recognised human rights conventions that include the eradication of all forms of exploitation and all discriminatory practices.

The AdP Group promotes human resource management practices that strive for diversity and inclusion, valuing the members of staff and reconciling their professional, family and personal lives.

c. Combatting corruption: The AdP Group adopts the very highest standards of integrity and transparency within the scope of its Integrity Policy, taking as its reference the Principles of Good Governance and the 10 Principles of the United Nations Global Compact, which combats corruption in all its forms and in alignment with Sustainable Development Goal 16 - Peace, Justice, Efficient Institutions of the United Nations Agenda 2030 and publicly advocating for the collective anti-corruption policies and actions.

d. Contribution towards sustainable development: With an activity intrinsically bound up with valuing and protecting the environment and human development, the AdP Group contributes decisively to the implementation of national public policies and objectives in the environmental sector and to economic development, social cohesion and the quality of life of populations in accordance with the Sustainable Development Goals of the United Nations Agenda 2030.

The AdP Group deploys practices that strive for the efficient management of resources and the mitigation or minimisation of environmental impacts and correspondingly prioritising, among other aspects, circularity, decarbonisation and digitalisation through management systems that ensure continuous monitoring and control.

SECTION III - NORMS OF BEHAVIOUR

This section presents the norms of behaviour to be followed by all members of staff undertaking their activities irrespective of their function or hierarchical position.



ARTICLE 11 - GENERAL DUTIES OF BEHAVIOUR

1. Corporate governance: The senior management are to perform their functions according to the highest standards of corporate governance practices.

2. Protection of Personal Data: members of staff guarantee the privacy of data and the lawfulness of data processing, as well as undertaking to guarantee the security of the personal data made available to them. members of staff report any personal data breaches to the Data Protection Officer in good time.

3. Information Security: members of staff act in accordance with information security policies and standards and the general principles for the use of computer systems and communications networks and the Information Security policies in force within the AdP Group, in order to guarantee information security.

4. Non-discriminatory practices: The AdP Group rejects any form of discrimination whether on account of parentage, gender, race, language, place of origin, religion, political or ideological convictions, education, economic situation, physical and social condition or sexual orientation as well as condemning any form of harassment, specifically sexual or psychological in nature, whether involving verbal or physical behaviours, humiliation, coercion or threats.

5. Prevention of harassment The AdP Group condemns the practice of workplace harassment, whether carried out by hierarchical superiors or members of staff, understanding harassment as the practice of undesirable behaviours that affect or may affect the dignity of persons or lead to the creation of intimidating, hostile, degrading, humiliating or destabilising environments.

We prioritise safe and healthy working environments, fostering open and tolerant communication in which everybody feels able to approach taboo themes such as moral or sexual harassment.

Members of staff are to strive to ensure their conduct reflects respect for human dignity in all contexts and situations.

6. Working relations: In exercising their functions, members of staff should be cooperative, fostering a healthy working environment, displaying respect and good personal manners, whether between colleagues or mutually up and down the hierarchical structure.

In their professional relationships, members of staff are to cooperate, foster the exchange of information and nurture the team spirit.

Members of staff who contribute towards making decisions are to display solidarity with the decision-maker and accept their shared responsibility throughout the implementation process for the respective decision.

7. Social networks: The digital social networks represent relevant channels of communication and interaction with internal and external stakeholders but their ease of utilisation and diversity require particular attention in order to guarantee the preservation of their purpose and compliance with the rules of social engagement, the regulations and norms of the AdP Group and its companies and the applicable legislation.

Social networks should be used with transparency and honesty but there is to be no publication of any sensitive and confidential information susceptible to affecting the operations and development of the respective company or the AdP Group.

The AdP Group Social Networks Policy describes the principles for their utilisation as well as the norms and procedures to be adopted by internal and external users.



8. Utilisation of resources: Members of staff are to deploy resources efficiently, within the framework of achieving the professional objectives defined, striving for their protection and good state of maintenance of assets and always striving to maximise their productivity.

9. Workplace safety and wellbeing: The AdP Group guarantees the application of all safety, health, hygiene and wellbeing regulations and practices in the workplace.

Compliance with the safety rules is an obligation of all members of staff who are to inform their hierarchical superiors or the respective service manager(s) responsible in due time of the occurrence of any irregular situation susceptible to compromising the safety of persons, installations or equipment of the company where they undertake their activities.

ARTICLE 12 - PREVENTION OF EXTERNAL INFLUENCES

1. Integrity is a fundamental value to the AdP Group, which correspondingly condemns any recourse to any illegal or illicit means or activity by its members of staff, with or without the objective of gaining either personal benefit or on behalf of third parties.

2. Members of staff should actively prevent all forms of corruption, whether active or passive, taking especially into account any form of payment, favouritism or complicity that may induce the creation of unfair, illicit advantages, which constitutes subtle forms of corruption, such as payments or donations from clients or suppliers.

3. AdP Group members of staff are to reject any gift with an estimated value in excess of €100 even while such gifts may be accepted with a greater value when destined for shared usage and undertaking their respective registration with the Human Resource Department of the respective company.

ARTICLE 13 - CONFIDENTIALITY, SECRECY AND INTELLECTUAL PROPERTY

1. Confidentiality and professional secrecy: All the information related to the company or the AdP Group and its activities, which is not in the domain of third parties, constitutes reserved information to be protected by all members of staff.

Professional secrecy applies to all members of staff, especially those in situations in which, due to their importance or existing legislation, encounter information that should not be of general public knowledge.

The members of staff are always to act with discretion as regards the facts and information they encounter and access while undertaking their functions.

2. Intellectual property: Members of staff are to strive to defend the interests of the AdP Group and its companies, including its property, the results of the work carried out, and extending to its intellectual property.

ARTICLE 14 - PREVENTION OF POTENTIAL CONFLICTS OF INTEREST

1. Members of staff are responsible for avoiding any situation susceptible to generate direct or indirect conflicts of interest.

2. This understands conflicts of interest as whenever somebody holds a direct or indirect personal interest that may result in potential advantages, whether for the person, for a family member, for friends or acquaintances that may influence the individual's performance of their respective functions.

3. Whenever the occurrence of such situations is foreseeable, members of staff should inform their managers of their suspicions with the objective of ensuring their own impartial, objective and transparent performance.



4. Members of staff may not deploy any privileged information they obtain as a result of their functions for their own personal benefit.
5. When engaging in political party or trade union activities, members of staff are to respect constitutionally defined principles and the applicable legal framework, always acting with prudence and respect in order to avoid conflicts and preserve the independence of the AdP Group.
6. Members of staff, in keeping with the legal framework and the internally defined norms, may not undertake complementary activities that are incompatible and/or susceptible to generating conflicts of interests with the professional functions of the AdP Group.

Engaging in complementary professional activities that do not interfere with the working timetable and that do not generate conflicts of interest are not subject to any objection while it remains the responsibility of members of staff to inform their companies of such ongoing activities and commitments. Volunteering activities are actively encouraged by the AdP Group.

ARTICLE 15 - THIRD PARTY RELATIONSHIPS

1. **Relationships with the regulatory authorities:** The AdP Group commits to fully collaborating with the regulatory, supervisory and taxation authorities, complying with the requests addressed to the Group and not engaging in any behaviour that might hinder the exercising of the competences attributed to these authorities.
2. **Institutional relationships with other entities:** The AdP Group commits to maintaining institutional relationships with other entities or organisations, both nationally and internationally, in a cooperative and participative stance, supporting initiatives that fall within the scope of its activities and add value to the AdP Group and to its people.
3. **Media relationships:** The AdP Group commits and totally respects the duty to inform, thereby ensuring transparency through providing, through the appropriate channels and in due time, complete, coherent and true information.

In questions related with the activities and public image of the respective company or the AdP Group, members of staff, in this capacity, should avoid granting interviews, making public declarations or supplying information about any activity or internal matter, whether under normal conditions or in any emergency situation. Responsibilities for such actions are defined with representatives mandated for such purposes.

SECTION IV – APPLYING THE CODE

ARTICLE 16 - APPLICATION

1. The appropriate application of the norms contained within this Code of Ethics and Conduct is the responsibility of every group company and their respective members of staff in accordance with the AdP Group culture of integrity.
2. Representatives of the management bodies and other senior staff hold additional responsibilities for demonstrating coherence and consistency with the AdP Group values and principles.
3. Whenever members of staff encounter issues related to the interpretation of the norms of conduct detailed in the Code or they need any orientation on ethical matters, they may make recourse to their respective managers or, alternatively, the Ethics Commission.
4. Any non-compliance with the norms stipulated by this Code or the principles encapsulated within shall result in the determining of:



- a.** Disciplinary responsibilities and the application of sanctions, written reprimands, fines, suspensions, disciplinary dismissals and the termination of service commissions by managers in accordance with the terms stipulated in the Labour Code, approved by Law no. 7/2009, of 12 February in its most current version.
- b.** Criminal liabilities, specifically in terms of corruption and related offences, including the crimes of corruption, receipt of undue advantage, embezzlement, undue participation in business dealings, graft, abuse of power, prevarication, trafficking of influence and money laundering, coercion, harassment (solicitation, persecution), under the auspices of the Penal Code approved by the annex to Decree Law no. 48/95, of 15 March, in its most recent version and Law no. 52/2019, of 31 July and associated legislation applicable to holders of senior public positions.

ARTICLE 17 - COMMUNICATION

Communication with this entity may be carried out via either of two channels:

- a.** Integrity line: Email: <https://grupoadp.form.maistransparente.com/>
- b.** Via post (letter) sent to the AdP Group Ethics Commission, Rua Visconde Seabra no. 3, 1700-421 Lisbon



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