

MORAIS LEITÃO
GALVÃO TELES, SOARES DA SILVA
& ASSOCIADOS

CODE OF ETHICS, INTEGRITY AND COMPLIANCE



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1. Mission

Our mission is unequivocal: to build a leading and innovative firm for solving problems and creating value for its clients on a daily basis.

As we project our tradition of rigour, respect and knowledge going forward, we bring together the best talents and help them to realise their potential with our commitment to people and community.

Commitment and Independence

Commitment begins within our Firm and extends to the client and the community. It is based on trust and collaboration, with an ongoing sense of mission. It is this commitment that enables us to be completely independent.

Rigour and solidity

We believe in the importance of rigour and investing in knowledge and talent. We are a team of professionals distinguished by our dedication and quality, geared towards creating value for our clients, and towards the creative and innovative resolution of problems.

Humanity and Ethics

Our identity is marked by a very distinctive institutional culture, which values a demanding legacy of ethics and integrity on a day-to-day basis. We pride ourselves on our inclusive, diverse and family-friendly working culture, and believe that only through human-focused relationships it is possible to recognise and promote talent.

2. Scope and Objectives

All Moraes Leitão professionals are committed to the pursuit of the highest ethical values and have a duty to act with integrity, in strict compliance with the provisions laid down in the Statutes of the Portuguese Bar Association (hereinafter 'EOA'), with the Portuguese constitution and with Legal Regime on the Operations of Professional Companies that are subject to Public Professional Associations (hereinafter 'RJSPAPP'), as well as other regulations and laws applicable at any particular time.

With this in mind, the present Code contains the values that guide the activities of the Firm and the principles of ethics, integrity and compliance, which govern all those who practise law at Moraes Leitão. It also covers all those who provide consulting, development and assistance services in computing and technology and related management consulting areas at Moraes Leitão, as well as all other employees, particularly in their relationship with clients, partners, colleagues, courts, administrative or other authorities and with the community as a whole.

3. Values

Our values are:

Client-oriented Service

Morais Leitão favours a close relationship with its clients, and invests in technical knowledge about each of the markets and sectors in which they operate. For each case, we employ the most efficient processes and technologies, and always seek to add value for the client.

Quality and Innovation

The quality of the services we provide is widely recognised, and emphasises responsiveness, professional rigour and the ability to present innovative solutions that consider different angles.



Professional ethics

At Moraes Leitão, the highest ethical principles inform the institutional culture, from professional confidentiality to respect for conflicts of interest, which is a safeguard and guarantee of the defence of the rights and expectations of clients and other stakeholders.

Independence

Morais Leitão is an entirely independent Firm, and is involved in several international partnerships that allow it to find the best response to the client's needs.

Our professionals carry out their activities with independence in compliance with the ethical duties applicable to each professional activity carried out.

Global service

At Moraes Leitão, we offer specialist services for all areas of law. We establish teams with the appropriate qualifications according to the needs of the client and their project.

At Moraes Leitão, we have also developed a range of consulting and technological development solutions, to transform our clients' business processes and operations by leveraging the reputation and experience of the Firm in the legal sector.

Diversity and inclusion

At the heart of Morais Leitão is a deep respect for human dignity. This has given rise to various programmes and initiatives to promote the inclusion, diversity and well-being of all.

One Institution, One Community

The Firm has grown beyond its original founders and professionals with a strong and cohesive team, who respect the principles on which its activity is based and act with a strict sense of institutional and social responsibility.

4. Principles

The principles set out below are not intended to be an exhaustive list of all the values that serve as a behavioural model for all those that are part of Morais Leitão, but rather correspond to the principles of ethics, integrity and compliance that are most prominent.

Integrity and Loyalty

We act with integrity and honesty, with civility and discretion, and in accordance with the highest moral and professional standards, to promote confidence in all relationships with the Firm, and to uphold its reputation.

We proceed with diligence, loyalty, transparency and conscientious respect for the interests entrusted to us, to ensure the quality and excellence of service provided to our clients.

Without prejudice to the full pursuit of our client's interests, we act in an unbiased and impartial manner, taking account of the common interests of the Firm and any conflicts or activities that may compete directly or indirectly with it. The accumulation of company positions is subject to prior assessment by the Board of Directors, and other possible interests or duties external to the Firm are subject to internal procedures for communication and prior assessment by the Board of Directors.

Responsibility

We act constructively and responsibly, taking into account the impact of our services and the strict fulfilment of our mission to clients, third parties and the wider community.

We take responsibility for contributing to a fair and sustainable society, promoting, among others, the following principles:

- **Protection of Human Rights** – we encourage compliance with the standards set out in the Universal Declaration of Human Rights and major international treaties in this regard;
- **Promotion of Diversity and Equality** – we treat equally all those who are part of Morais Leitão, as well as clients and partners, and do not seek to favour or harm any person or entity because of their ancestry, gender identity, ethnicity, language, political, ideological or religious convictions or social status, and promote talent and diversity of skills, experiences and competences within the Firm;



- **Sustainability** – we promote practices and measures for sustainable development by proactively managing the social, economic and environmental impacts of the Firm's activities and contribute to the development of actions that generate value in the community and promote innovation and digital transformation, while taking into account the sustainable development goals from the UN 2030 Agenda;
- **Social Responsibility** – we encourage engagement in civic duty, volunteering and pro bono work and contribute to social projects in support of the community;
- **Family Responsibility** – we adopt internal welfare policies that contain strategies for a fairer society, with superior human resources, oriented to the well-being of each person, and a positive work/life balance.

Lawfulness

We always act in strict compliance with the law and legal regulations, both ethical and professional, whether national or international, that are applicable to us in the exercise of each professional activity carried out at Morais Leitão, including, without limitation, the standards set out in the EOA and RJSPAPP.

We act in compliance with the duties of confidentiality, professional secrecy and avoidance of conflicts of interest, as well as the ethical duties for the exercise of each profession whose activity is part the Firm's purpose. This, however, does not prevent collaborative action within the Firm, including sharing the information necessary to organise our work and undertake professional acts to serve our clients' interests. We organise our teams in such a way that those responsible for the guidance, control and execution of services are professionals qualified to carry out this activity and are registered in public professional associations as applicable.



We comply with the applicable rules, *inter alia*, with regard to the following matters:

- **Incompatibilities and impediments** – we implement internal policies and procedures to ensure compliance with the regulations on incompatibilities and impediments applicable to our business;
- **Conflicts of Interest** – we implement internal policies and procedures to detect conflicts of interest, within the scope of EOA and RJSPAPP compliance, and in accordance with other applicable legal, contractual or general requirements and others arising from our internal procedures for the detection of possible conflicts of interest, and apply the same policies and procedures to the provision of legal services as we do to the provision of IT and technology consulting, development and assistance services and to related management consulting areas;
- **Prevention of Money Laundering and Terrorist Financing** – we have introduced internal policies and procedures to implement the necessary

due diligence measures, on a mandatory basis, for potential new clients, as well as for the analysis and monitoring of established relationships;

- **Anti-Corruption and Related Offences** – we implement internal policies, procedures and plans to prohibit any practice that constitutes (i) corruption or a related offence, carried out against or through the Firm, in accordance with the general regulations on corruption prevention, as well as (ii) any situation of improper offer or receipt (or request or promise) of advantage that may compromise the impartiality and integrity of the performance of a duty or favour any third party (whether to or from the public or private sector);
- **Internal Reporting Channels in relation to Harassment, Corruption and Irregularities** – we provide communication channels to all members of the Firm, ensuring complete confidentiality and absence of retaliation in their use as regards any type of harassment, corruption or related offences, money laundering and terrorist financing and non-compliance or irregularities concerning the internal compliance policies and procedures at Morais Leitão (including this Code) or other rules that may imply a risk of committing a crime or offence;
- **National or Cross-Border Tax Mechanisms** – in accordance with current legislation, we implement procedures for monitoring and preventing any practice that falls under the so-called ‘DAC 6’;
- **Risk control** – we have established a department responsible for risk control at the Firm in accordance with current legislation.

Confidentiality and Professional Secrecy

We always act in strict compliance with the ethical duty of confidentiality and professional secrecy (including, *inter alia*, any information provided by clients, regardless of whether it is transmitted digitally or physically), as well as any other legal or contractual confidentiality duties, in the applicable manner. When providing consultancy, development and assistance in computing and technology matters and in related management consultancy

areas, we discharge that duty with the same scope and under the same terms as when providing legal services to protect client information and ensure compliance with the ethical obligations applicable to each professional activity carried out at Morais Leitão.

We meet all applicable standards, including in relation to the following:

- **Information Security and Personal Data Protection** – we implement internal policies and procedures to ensure information security, risk prevention and mitigation and thus ensure the confidentiality, integrity and availability of all information, as well as for the purpose of compliance with the general personal data protection regime;
- **Prevention of Market Abuse** – we adopt internal procedures to ensure compliance with the prohibition of transmission outside the normal scope of functions or of misuse of inside information in view of the general regime on prevention of market abuse;
- **Media and Social Networks** – we have implemented a guide on communication in the media, and for other forms of public communication and use of social networks, in the form of guidelines for all those who are part of the Firm, to mitigate legal, reputational, ethical and contractual risks.

5. Monitoring and Penalties

Monitoring the implementation of this Code is the responsibility of the Board of Directors (including a review at least every three years, or whenever deemed appropriate), in coordination with the Ethics, Integrity and Compliance Committee, the Conflict of Interest Committee and the compliance officer(s), to the extent of their duties (as expressly defined by the Board of Directors in the Firm’s internal policies, procedures or programmes).

Failure to comply with this Code and with the policies and procedures in force at Morais Leitão may give rise to the imposition of penalties or the adoption of other measures depending on the type of relationship maintained by each of its addressees with the Firm, such as disciplinary penalties and termination of the relationship, as applicable (in addition to the legally sanctioned criminal penalties and the duty to compensate).

This Code entered into force on 4 August 2022, and was revised on 16 January 2025 with effect from 27 February 2025.



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