

**MORAIS LEITÃO**  
GALVÃO TELES, SOARES DA SILVA  
& ASSOCIADOS

# CODE OF ETHICS, INTEGRITY AND COMPLIANCE



# CODE OF ETHICS, INTEGRITY AND COMPLIANCE

## 1. MISSION

Our mission is very clear: to daily build a firm that is a leader and innovator in solving problems and creating value for clients.

By projecting our tradition of rigour, respect and knowledge into the future, we bring together the best talent and promote its fulfilment in a commitment to people and the community.

### Commitment and Independence

Commitment begins with our institution and extends to the client and the community. It is based on trust and collaboration, with a permanent sense of mission. It is this commitment that allows us to be totally independent.

### Rigour and solidity

We believe in the importance of rigour and investment in knowledge and talent. We train lawyers who stand out for their dedication and quality, always focused on adding value to the clients and solving problems creatively and innovatively.

### Humanity and Ethics

Our identity is marked by a very distinctive institutional culture, valuing a demanding heritage of ethics and integrity on a daily basis. We assume an inclusive, plural and family-responsible work culture, arguing that only with humanity in our relationships is it possible to recognise and promote talent.

## 2. SCOPE AND OBJECTIVE

Morais Leitão's lawyers and staff are committed to pursuing the highest ethical values and duties of upright conduct and to strict compliance with the provisions of the law, the Statute of the Portuguese Bar Association and other applicable regulations.

In this context, this Code sets out the values that guide the Firm's activity and the principles of ethics, integrity and compliance by which its lawyers and staff are governed, particularly in their relations with clients, partners, colleagues, the courts, administrative or other authorities, and the community in general.

## 3. VALUES

Our values are:

### Client-oriented service

Morais Leitão gives priority to close relationships with our clients, investing in our technical knowledge in relation to the market and specific sector of law. In each particular case, we assure the most efficient processes and technologies, adding value to the clients' business.

### Quality and Innovation

Our firm is widely recognised for the quality of the legal services provided, standing out for the promptness of our response time, the professional rigour as well as the capacity to present innovative solutions that contemplate different perspectives.

### Professional ethics

At Moraes Leitão, our institutional culture stands on the strictest principles of professional ethics, extending from professional confidentiality to respecting potential conflicts of interest. This respect for professional ethics safeguards and guarantees the defence of our clients' rights and interests.



### Independence

Morais Leitão is a truly independent Firm. Moreover, that formed several international partnerships to provide the best answer to clients' needs.

### Global service

At Moraes Leitão, we offer a specialised service in all branches of the Law. Our organisational structure allows us to create cross-practice teams, according to our clients' needs and the project at hand.

### Diversity and inclusion

The core of Moraes Leitão is a profound respect for the dignity of every human being. Therefore, we have established several programs and initiatives to promote the inclusion and the diversity and above all the well-being of everyone.

### One Institution, One Community

Our Firm exists and persists beyond its founders and individual team members and presents itself as a strong and consistent entity. We respect a coherent set of principles on which our activity is based, while observing a demanding standard of institutional and social responsibility.



## 4. PRINCIPLES

The principles listed below are not intended to exhaustively identify all the values that serve as a model of behaviour for all those who are part of Morais Leitão, but rather correspond to the principles of ethics, integrity and compliance that stand out the most.

### Integrity and Loyalty

We act with integrity, in an honest manner and with urbanity and discretion and in accordance with the highest moral and professional standards, promoting trust in the relations with the Firm, as well as its reputation.

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

Without prejudice to the full pursuit of the client's interests, we act in an impartial and unbiased manner, looking after the common interests of the Firm and taking into account any conflicts or activities that may compete directly or indirectly with it (the accumulation of any corporate positions being subject to the assessment of the Board of Directors).

### Responsibility

We act constructively and responsibly, taking into account the impact of our services and the strict fulfillment of our mission towards clients, third parties and the community in general.

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

- **Human Rights Protection** – we are in compliance with the standards set out in the Universal Declaration of Human Rights and the main international treaties in this regard;
- **Promotion of Diversity and Equality** – we treat all Morais Leitão members, customers and partners equally, not benefiting or disadvantaging any person or entity on the grounds of their ancestry, sex, gender identity, ethnicity, language, political, ideological or religious beliefs or social status, among others, and promoting talent and diversity of skills, experiences and competencies within the Firm;
- **Sustainability** – we promote practices and measures to contribute to sustainable development by proactively managing the social, economic and environmental impacts of the Firm's activities and contributing to the development of actions that generate value in the community and promote innovation and digital transformation, taking into account the sustainable development goals arising from the UN's 2030 Agenda;
- **Social Responsibility** – we encourage involvement in civic duty, volunteering and pro bono work and contributing to social projects to support the community;
- **Family Responsibility** – we adopt internal well-being policies that enable strategies for a fairer society, with better human resources, geared towards the well-being of each person and the reconciliation of family and work.

### Legality

We always act in strict compliance with the law, with the rules laid down in the Statute of the Portuguese Bar Association, as well as with any and all legal and professional regulations, both national and international.



We comply with the applicable rules, among others, in relation to the following matters:

- **Conflicts of Interest** – we have implemented internal policies and procedures to ensure the detection of conflicts of interest, within the scope of compliance with the Statute of the Portuguese Bar Association, as well as in accordance with other contractual or generally applicable requirements;
- **Anti-Money Laundering and Combating Terrorist Financing** – we have implemented internal policies and procedures to apply mandatory due diligence measures to potential new clients, as well as in the analysis and monitoring of established relationships;
- **Anti-Corruption and Related Offenses** – we have implemented internal policies, procedures and plans to prohibit any practice that constitutes (i) corruption or a related offense, carried out against or through the Firm, in accordance with the general regime for the prevention of corruption, as well as (ii) any situation of undue offer or receipt (or the request or promise thereof) of an advantage that may affect the impartiality and integrity of the exercise of a function or the favouring of any third party (whether for or from the public or private sector);
- **Internal Reporting Channels for Harassment, Corruption and Irregularities** – we provide communication channels for everyone in the Firm, guaranteeing total confidentiality and absence of retaliation in their use, in relation to any type of situation of harassment, corruption or related infractions, money laundering and terrorist financing and non-compliance or irregularity in relation to Morais Leitão policies and internal compliance procedures (including this Code) or other rules that may imply a risk of committing a crime or administrative offense;
- **Mechanisms (national or cross-border) with Fiscal Relevance** – we have implemented, in accordance with the legislation in force, procedures for monitoring and preventing any practice that falls under the so-called “DAC 6”.



### Confidentiality and Professional Secrecy

We always act in strict compliance with the ethical duty of confidentiality and professional secrecy (including, in particular, any information provided by clients, regardless of the form in which it is transmitted, digital or physical), as well as any other confidentiality duties from a legal or contractual source, as applicable.

We comply with all applicable regulations, among others, in relation to the following matters:

- **Information Security and Data Protection** – we have implemented 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 purposes of compliance with the General Data Protection Regulation;
- **Prevention of Market Abuse** – we have adopted internal procedures to promote compliance with the prohibition on transmitting outside the normal scope of duties or misuse of privileged information, taking into account the general regime for the prevention of market abuse;
- **Media and Social Networks** – we have implemented a guide for communication in the media or other forms of public communication

and the use of social networks, with a view to guiding everyone in the Firm, mitigating legal, reputational, ethical and contractual risks.

## 5. MONITORING AND SANCTIONS

The Board of Directors is responsible for monitoring the application of this Code (including reviewing it at least every three years, or whenever justified), in coordination with the Ethics, Integrity and Compliance Committee and the regulatory 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 programs).

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

This Code will come into force on August 4, 2022.



**MORAIS LEITÃO, CALVÃO  
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