

# Code of Conduct and Ethics

## Ferbar and Alibar



# Top Management Commitment

The Board of Directors of Ferbar, S.A. and the Management of Alibar, Lda. define as mandatory the implementation, fulfilment and maintenance of the principles and guidelines contained in this Code of Conduct and Ethics (hereinafter referred to as the Code), mirroring their commitment to social reflecting their dedication to social responsibility and ethical corporate governance.

It is the responsibility of these senior corporate bodies to ensure that this Code is effectively communicated to all Stakeholders and to ensure the effective implementation, compliance, monitoring and review of the effectiveness of the actions recommended, with the aim of guaranteeing compliance with the principles and commitments underlying it.

It is also the responsibility of Ferbar's Board of Directors and Alibar's Management to provide the necessary resources to implement the actions set out in this Code and to ensure the involvement of all Stakeholders.

This commitment is formally signed by the Chairman of the Ferbar Board of Directors and Manager of Alibar, Mr Fernando Nogueira Coelho de Barros.

# Message from the Board

Ferbar, S.A. and Alibar, Lda. endeavour to ensure ethical and sustained growth.

In this sense, it's essential that each of us upholds the highest standards of commitment, responsibility and professional ethics.

This Code has its roots in the organisation's policies, but it aims to anticipate new challenges brought about by the changing environment and to boost its quality and productivity levels. It also aims to share principles that guide our behaviour when we are faced with circumstances that are not always simple or straight forward. At the same time, it is hoped that each of us will be aware of and comply with the internal rules and legislation in force, guiding our day-to-day actions in accordance with this Code.

Our quest for quality and excellence must be accompanied by a commitment to acting with integrity and ethical responsibility.

We are all individually responsible for protecting the business, reputation and good name of the companies we work for. By following this Code of Conduct and Ethics we will collectively contribute to the success of the business, guided by ethical behaviour and fostering our continued professional relevance.



Fernando Barros,  
Presidente do Conselho de Administração Ferbar  
Gerente Alibar

# 1 General Provisions

Aware of its social and corporate responsibilities towards all stakeholders, Ferbar, S.A. and Alibar, Lda (hereinafter referred to as Ferbar and Alibar) have formalised a Quality and Food Safety Policy, the principles and guidelines of which underpin this Code.

## Objective

This Code aims to:

- 1) To establish clear Conduct Guidelines, the basis of the ethical principles and social responsibility that should guide Ferbar and Alibar's activities;
- 2) To promote the adoption of ethical conduct, in line with Ferbar and Alibar's principles, by its stakeholders;
- 3) Promote respect for and compliance with applicable legislation and regulations, in particular the obligations arising from the General Regime for the Prevention of Corruption (RGPC), in fulfilment of Ferbar's Regulatory Compliance Plan (PCN);
- 4) Strengthen Ferbar and Alibar's institutional image, based on its Mission, Values and the Quality of its Products

It should be noted, however, that this document provides general guidelines and therefore does not exhaust all possibilities, nor does it anticipate every situation or circumstance that its stakeholders may face on a day-to-day basis.

## Scope

This Code applies to all members of the governing bodies, Ferbar and Alibar employees, suppliers, business partners and other stakeholders who represent us. It also establishes the fundamental principles of Conduct that must be observed by the Company, Employees, Suppliers and Business Partners and other Stakeholders.

This Code does not supersede the other regulations, policies and commitments made by companies, which must also continue to be followed and respected by everyone.

All stakeholders must adhere to the principles and rules outlined in this code.

Although it applies to everyone, regardless of their hierarchical position, duties and responsibilities, example and a particularly diligent level of compliance is expected from senior management and department heads.

## Approval and entry into force

This Code is approved by Ferbar's Board of Directors and Alibar Management. It comes into force after publication and dissemination to Stakeholders.

## Monitoring the application of the Code

The Board of Directors of Ferbar and Alibar Management, in collaboration with the Human Resources Departments and the Quality, Environment and Food Safety Department of Ferbar and Alibar, are responsible for monitoring the application of and compliance with this Code.

Any questions about the interpretation or application of this Code should be addressed to the Board of Directors, Management, Resources Department and Quality, Environment and Food Safety Department.

## Dissemination and Training

This Code will be communicated to employees when they are welcomed and to business partners when new partnerships are launched.

Current employees will be informed via e-mail, to all those who have this IT tool, and to the rest by to others through structured awareness programs in the classroom and/or using illustrative leaflets.

The main guidelines and commitments underlying this Code of Conduct and Corporate Ethics will also be shared with our main suppliers, our business partners, by inviting them to formally sign up to a Charter of Principles.

Any changes and/or revisions to this Code will be communicated to Stakeholders, using the same methodology.

In addition to the original filed in the Integrated Management System, a controlled copy is available for free consultation by employees in each of the company's units.

Control of the distribution of this document complies with the assumptions of document management and control ensured by the Ferbar and Alibar Integrated Management System.

Every year, Ferbar will guarantee internal training for all staff on corruption and related offences, given by people with appropriate technical knowledge, so that they know and understand the rules and procedures for preventing corruption and related offences that have been implemented.

## Versions

Version 0	12/05/2017	New document
Version 1	05/05/2020	The wording was maintained
Version 2	10/05/2023	The wording was maintained
Version 3	12/02/2025	General Review; Reference to Ferbar/Alibar (remove Calimenta)

This document is reviewed every three years or whenever there is a change in the duties or in the organisational or corporate structure of the entity that justifies its review, as well as the set of principles, values and rules of action of all Managers and Employees in terms of ethics and professional conduct, taking into account the criminal rules on corruption and related offences and the risks of exposure of the entity to these crimes.

## 2 Principles and Commitment of Conduct and Ethics of the Senior Management of Ferbar and Alibar:

### 2.1 Customer Relations

Providing products and services to satisfy customer needs, fulfilling the agreed conditions and commitments.

Ensure equal treatment for all Customers, without unjustified discrimination between them.

Treat customers with professionalism, efficiency, loyalty and dedication.

Conduct all interactions with diligence, impartiality and discretion.

Respect the privacy of customer information.

### 2.2 Relations with Shareholders and the Market

Acting loyally towards shareholders, looking after their interests with the fundamental aim of creating value, guaranteeing sustainability and controlling risk.

Ensuring the rigour and veracity of the information provided to shareholders and the market.

### 2.3 Competitor Relations

Respecting market rules, promoting fair competition and avoiding any practice that could prevent, distort or appreciably restrict competition.

### 2.4 Employee Relations

Not to allow any form of discrimination that is incompatible with the dignity of the human person, particularly on the grounds of origin, ethnicity, gender, political convictions, religious beliefs, sexual orientation, physical disability or type of attachment to Ferbar or Alibar.

Promote and value diversity in all its forms

Do not allow any conduct that constitutes sexual or professional harassment, abuse of power or threats.

Do not allow abusive disciplinary practices. Disciplinary proceedings must be carried out in accordance with the legislation in force.

Do not allow any form of forced, involuntary, slave-like, child or illegal labour.

To treat each employee fairly, to promote equal treatment and opportunities for personal and professional development, from recruitment and selection to hiring and termination of employment.

Promoting personal and professional development through training, sensitisation and awareness-raising activities.

Provide employees with the appropriate means to improve and update their knowledge in order to carry out their duties.

Ensuring compliance with applicable labour rules, including matters relating to Health and Safety at Work.

Promote team spirit and sharing.

Handle all personal data collected or processed from Employees impartially, lawfully and carefully, in order to protect the privacy of each Employee and in strict compliance with applicable legislation.

Not improperly retain original documents, deposits, contributions or remuneration of Employees for Social Security, Tax Authority or any other purpose.

Promoting the presentation of new ideas and/or suggestions by Employees as a way of creating value, promoting proactive communication and continuous improvement.

Respecting the balance between employees' professional and personal lives.

## 2.5 Work environment, safety and health

Providing a good working environment, with appropriate hygiene, safety and health conditions at work.

Ensuring communication and sharing of information between Employees, as well as the recording of data relevant to the execution of their duties and the activities that may have an impact on them.

Ensure compliance with the rules on Safety, Health, Hygiene and Welfare in the workplace; Employees must strictly observe the laws, regulations, rules and internal instructions on these matters.

Provide all the individual and/or collective protection equipment necessary for the safe execution of the activities and tasks to be carried out, at no cost to the Employees.

## 2.6 Suppliers

Choosing suppliers on the basis of impartial, fair and transparent criteria, without granting privileges or favouritism.

Promoting a supply chain that is committed to the Principles of Conduct and Ethics, as upheld by Ferbar and Alibar.

The selection of suppliers (including: service providers) must be made in accordance not only with the commercial, quality and safety conditions of the products or services to be purchased, but also with their ethical, social and legal behaviour, as perceived by Ferbar and Alibar.

Honouring commitments.

Avoid exclusive situations whenever possible.

## 2.7 Public authorities and supervisory bodies

Ensuring compliance with the legal, regulatory and normative obligations applicable to Ferbar and Alibar.

Provide the supervisory and inspection authorities with all the collaboration required or information requested, to the best of their ability.

## 2.8 Association activities

Maintain an attitude of openness with regard to trade union or association activity, freely and without dependence on any authorisation; as long as these are not intended to promote violence and their purposes are not contrary to the law.

## 2.9 Environment and Community

Adopt and encourage the adoption of best environmental practices, particularly in the selection of raw materials and packaging, provided they are economically viable.

To assume a socially responsible attitude in the wider community in which Ferbar e Alibar operates.

Promoting best practices aimed at the sustainable use of water and the rational use of energy.

Maintaining a willingness to establish partnerships with public/private social action and youth training organisations, as a mirror of the companies' commitment to social responsibility in the region where they are based.

Support the local community or institutions with donations.

Act in accordance with the principles of legality, truthfulness, objectivity, timeliness and clarity in the information provided to the public and Consumers.

## 2.10 Corruption and Bribery

Do not accept any favours, payments, commissions or bribes between Ferbar e Alibar and Customers, Suppliers or Other Entities. This prohibition applies irrespective of the bribe's value or perceived significance, since such bribes affect the duties of impartiality, transparency and integrity inherent in the exercise of functions in an organisation or entity, as well as constituting the commission of crimes.

It is not permitted to accept gifts or gratuities that could be considered as an attempt to influence you to obtain any kind of advantage (value limited to €150.00).

## 3 Ferbar and Alibar's Principles and Commitment to Conduct and Ethics

### 3.1 General principles of conduct

When dealing with Customers, Suppliers (including: service providers), Competitors and other Stakeholders, Employees must be professional, responsible, diligent, conscientious, upright and available.

### 3.2 Employee responsibility

Employees must use their technical and professional skills with the prudence and care appropriate to the performance of their duties at Ferbar and Alibar, respecting all regulations. To this end, they must:

- Acting in good faith in the fulfilment of their duties and with respect for others, not carrying out any acts that could harm other employees.
- Adapt their behaviour and attitudes to the principles defined here.
- Respect internal instructions on the use of equipment and resources.
- Not to use the power delegated to them in an abusive way, but to use it to achieve Ferbar and Alibar's objectives and never to obtain personal advantages.
- Do not engage in any illegal activities and immediately stop any illegal conduct.
- Refrain from violating the rules on conflicts of interest, insider dealing and market defence.
- Comply with all the rules handed down with particular care.
- Report any irregularities that may jeopardise their safety, the development of the business or the good name of Ferbar e Alibar.

### 3.3 Loyalty to Ferbar e Alibar and its Customers

Assume a behaviour of loyalty towards Ferbar and Alibar; striving to safeguard the credibility, good name and prestige of the companies and their Customers, in the Market and Community of which they are an integral part.

### 3.4 Conflicts of interest

#### **Duty of communication**

Avoid situations that could give rise to conflicts of interest by intervening in decision-making processes that directly or indirectly involve entities with which they collaborate or have collaborated, or natural persons to whom they are or were linked by ties of kinship or affinity of any kind. If this isn't feasible, employees must promptly notify their direct supervisor of the existence of these relationships.

Refrain from working outside Ferbar and Alibar whenever such activities may jeopardise the fulfilment of their duties and obligations as Ferbar and Alibar employees, or in organisations whose objectives

may conflict (or interfere) with the objectives of the companies. If this isn't feasible, employees must promptly notify their direct supervisor of the existence of such situations.

#### **Conflicts of interest with Ferbar and Alibar**

Avoid preferential treatment based on personal or familial relationships.

Not to intervene in any judgement or decision in which they, their family members or those close to them are directly or indirectly involved.

#### **Examples of situations that could give rise to a conflict of interest:**

- family/personal relationship with another company employee
- family/spouse/relative/other relevant personal relationships that collaborate with Competitors, Suppliers or Customers

#### **Conflicts of interest with clients**

Ferbar e Alibar avoids the creation of exclusive relationships between employees and clients that could lead to personal or economic dependence.

Employees will avoid encouraging a transaction to be carried out by one Client in order to benefit another, unless both (and the companies) are aware of their positions respectively and accept them.

### 3.5 Corruption and Bribery

Do not engage in or offer to engage third parties in any form of bribery, corruption, extortion, improper receipt, influence peddling, fraud or money laundering.

Offers received from third parties that go beyond mere courtesy or a symbolic and commercially negligible value must be reported to the person in charge and refused if they indicate that the offerors expect to obtain special favours.

### 3.6 Utilisation of company resources

Use the resources made available by the Companies only for their intended purpose

Respecting and protecting company assets to ensure that they are not lost, damaged, misused or wasted, or lent to others or transferred without authorisation.

Professional e-mail accounts with the Ferbar and/or Alibar domain must not be used for personal purposes.

Special care should be taken to avoid sharing passwords for access to computer systems and service information platforms, including the sharing of information on matters that are reserved or have some degree of confidentiality.

### 3.7 Information and confidentiality

#### **Inside information/abuse of information**

Employees may not disclose or use information about facts or elements concerning the life of Ferbar e Alibar or its relations with its Customers or Suppliers which they become aware of in the course of carrying out their duties or providing their services.

This confidentiality obligation remains in effect beyond the termination of duties or services.

Inside information may be demanded when the signing of Confidentiality Agreements is considered relevant

## Foreign relations

### **Media relations**

Employees are prohibited of transmitting, on their own initiative or at the request of third parties, any news or information about Ferbar and Alibar to the media.

Any communication must be previously informed and authorised by Ferbar's Board of Directors or Management.

Employees must refrain from spreading comments or rumours about Ferbar and Alibar.

### **Relations with public authorities and supervisory bodies**

Employees must provide the public authorities and supervisory and inspection bodies with all the necessary co-operation that is requested and required, under the terms of the law and within the scope of their duties, responsibilities and authority.

### **Political and associative activities**

Membership of political parties, institutions or associations is a free choice for each company employee.

During the course of the activities, it must be made clear and unequivocal to all those involved the personal nature of their adherence to it. Ferbar and Alibar must not be linked (or inferred to be linked) at any time without the prior formal authorisation of the companies' senior management.

## 4. Reporting irregularities

Whenever any irregularity is detected, any Stakeholder should report it through Ferbar's Whistleblowing Channel, which is available at: <https://www.ferbar.com/pt>.

You can also do this verbally, by telephone or voice message, or request a meeting with a member of the Board of Directors/Management, but the complaint must be transcribed through the Whistleblowing Channel.

All situations reported ("complaints"), provided they are duly substantiated, will be treated and investigated in complete confidentiality, in accordance with the provisions of the Whistleblowing Policy.

You can also do so in writing by sending a letter to the following postal address, for the attention of the administration:

Ferbar - Fernando Barros, Produtos Alimentares, S.A.

Board of Directors

Rua Carlos Sousa Gomes, 200 Zona Industrial da Maia I, Sector 8, Lot 2,

4475-297 Maia

Alibar - Indústria e Comércio de Produtos Alimentares, Lda.

Management

Zona Industrial Maia I, Sector 7, Lote 141, A/B/C 4470-461 Maia

Anyone reporting a situation of non-compliance is entitled to:

- Confidentiality of your identity unless disclosure is required by law;
- Information on the receipt of your complaint (within 7 days);
- Information on the status of the case and the outcome of the investigation (the deadline for informing a whistleblower about the progress of the case cannot exceed 3 months);

To ensure that everyone has the opportunity to clarify their enquiry and their motivation, you should clearly identify all those involved.

The guarantee of anonymity for all those involved cannot jeopardise the duty to:

- Provide information during the course of the investigation;
- Co-operate with and support the Board of Directors/Management to ensure full compliance with this Code.

### 4.1 Ferbar and Alibar Whistleblowing Channel

The Whistleblowing Channel is a means of communicating/denouncing irregular practices, namely those provided for in Ferbar's Whistleblowing Policy, the General Regime for the Prevention of

Corruption (hereinafter RGPC) and the Regulatory Compliance Plan (hereinafter PCN) established for Ferbar, as a Portuguese company with more than 50 employees.

Whistleblowers, as defined in Ferbar's Whistleblowing Policy, can provide information, evidence and facts relating to possible offences, either anonymously or identified.

It's important to emphasise that the more detailed the information shared, the easier the investigation will be.

Ferbar e Alibar guarantees that there will be no form of retaliation against anyone who has reported a confirmed situation of non-compliance. The person who reports and who had no involvement in the situation cannot be harmed in any way, such as suspension, dismissal, demotion, transfer of duties, reduction in salary, coercion or discriminatory treatment.

The Whistleblowing Channel must not be used inappropriately, i.e. to promote false or dishonest reports.

Compliance with this Code is reinforced by the ethical obligation of all employees to use the Whistleblowing Channel ethically and fully.

## 5. Consequences of confirmed non-compliance

In such a situation, notwithstanding the applicable civil and criminal proceedings, action may be taken:

- Measures to implement corrective and preventive actions to ensure there is no recurrence;
- Measures with an impact on commercial and/or partnership relations with external stakeholders.

### DISCIPLINARY AND CRIMINAL FRAMEWORK:

Table of Disciplinary Offences  (Violation of the duties set out in article 128 of the Labour Code (Law no. 7/2009, of 12 February, with subsequent amendments) - to which may/should be added any other special or ethical duties that are enshrined for certain sectors or activities)
Workers' duties
Article 128  Workers' duties  1 - Without prejudice to other obligations, the employee must:  a) Respect and treat the employer, hierarchical superiors, co-workers and people who have dealings with the company with respect and integrity;  b) Attend work assiduously and punctually;  c) Carry out the work with zeal and diligence;  d) Participate diligently in vocational training programmes offered to them by their employer;

- e) Comply with the employer's orders and instructions regarding the execution or discipline of work, as well as safety and health at work, which are not contrary to their rights or guarantees;
- f) Maintain loyalty to the employer, namely by not negotiating on their own behalf or on behalf of others in competition with them, nor by divulging information regarding their organisation, production methods or business;
- g) Ensure the conservation and proper use of work-related property entrusted to them by their employer;
- h) Promote or carry out actions aimed at improving the company's productivity;
- i) Co-operate to improve health and safety at work, namely through the workers' representatives elected for this purpose;
- j) Comply with occupational health and safety requirements arising from the law or collective labour regulation instruments.

2 - The duty of obedience concerns both the orders or instructions of the employer and of the worker's hierarchical superior, within the powers attributed to him by the latter.

#### Table of legally prescribed disciplinary sanctions for breaches of duty

##### Article 328

##### Disciplinary sanctions

1 - In exercising disciplinary power, the employer may apply the following sanctions:

- a) Reprimand;
- b) Recorded reprimand;
- c) Financial penalty;
- d) Loss of holiday days;
- e) Suspension from work with loss of pay and seniority;
- f) Dismissal without indemnity or compensation.

2 - The collective labour regulation instrument may provide for other disciplinary sanctions, provided that they do not prejudice the rights and guarantees of the worker.

3 - The application of sanctions must respect the following limits:

- a) Financial penalties imposed on a worker for offences committed on the same day may not exceed one third of the daily wage and, in each calendar year, the wage corresponding to 30 days;
- b) The loss of holiday days may not jeopardise the enjoyment of 20 working days;
- c) Suspension from work may not exceed 30 days for each offence and a total of 90 days per calendar year.

4 - Whenever justified by special working conditions, the limits laid down in points a) and c) of the previous paragraph may be doubled by a collective labour regulation instrument.

5 - The sanction may be aggravated by its dissemination within the company.

6 - Violation of paragraphs 3 or 4 shall constitute a serious administrative offence.

Table of crimes within the scope of the General Regime for the Prevention of Corruption provided for in article 3 of Decree-Law no. 109-E/2021, of 9 December		
Crimes provided for in Law no. 20/2008, of 21 April, with subsequent amendments (New Criminal Regime for Corruption in International Trade and the Private Sector)		
Crime	Legal Definition and Punitive Framework	Examples of practical situations
Corruption in the private sector (Article 8)	"1 - A private sector worker who, by himself or, with his consent or ratification, through an intermediary, requests or accepts, for himself or for a third party, without being due, a pecuniary or non-pecuniary advantage, or the promise thereof, for any act or omission that constitutes a violation of his functional duties, shall be punished with imprisonment of up to five years or a fine of up to 600 days. 2 - If the act or omission provided for in the preceding paragraph is likely to cause a distortion of competition or patrimonial damage to third parties, the agent shall be punished with imprisonment of one to eight years."	When an official of a particular entity or organisation solicits or receives a bribe, or the promise thereof, in exchange for taking a decision that is contrary to their functional duties and that benefits the person who bribed them.



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