



ETHICS and ANTI-CORRUPTION Code

Editions Control Table

Edition	Data2	Modification's Resume
1	09-11-2020	1st Edition
2	16-11-2020	Channel to communication/ report of violations to the code
3	30-06-2022	General review and compatibility with fundamental labour principles according FSC-STD-40 -004-V3.1 Standard
4	17-06-2024	Text adjustments, writing and image improvements. Update address for reporting complaints and violations

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A yellow Volvo excavator is shown in the foreground on the left side of the page. The excavator's arm and bucket are visible, and the word "VOLVO" is printed on its side. The background is a hazy construction site with other machinery and structures visible in the distance.

Objectifs and Scope of the Code

This code is the reference document that establishes guidelines for conduct defended and required by BSL for its employees, as well as a guideline for the relationship with suppliers, subcontractors costumers and other interested parties.

This document is completed by other internal procedures, as well as by legal, normative and other applicable and mandatory regulations in this domain.

Therefore all [BSL](#) workers are bound by this code, regardless of their hieriarchical of function position, type of contractual relationship, etc., and it is also a standard guide to observe in the professional relationship with third parties.



Anti-corruption Statement

The lack of integrity, ethical conduct, transparency and the use of corruption practices, in any of their forms, promotes among others, unfair competition, generates inequality in opportunities, affects corporate sustainability, destroys reputation / the notoriety of those companies and often also of those who have a relationship with them, exposing them to lost of trust and sometimes to sanctions and other direct or collateral damages.

Everyone loses!

In the exercise of their functions, BSL employees must adopt ethical standards and a conduct avoiding practices of conflicts of interest, and other unfair and reprehensible attitudes in terms of ethical standards, fundamental principles of work, and against corruption.

The relationships of and between employees, suppliers, subcontractors, customers and other interested parties are ruled by principles of ethical conduct based on mutual respect, trust, transparency, promoting mutually beneficial results.



Declaration of Principles

In line with our Supply Policy, the respect for applicable legislation and standardization, the promotion of safety and health at work, environmental preservation and sustainability, the promotion of principles and practices that, at our scale, dissuade and reject under any of their shapes:

- **The corruption and bribery,**
- **Child labor.**
- **Forced and compulsory Labour,**
- **Inequality and discrimination or unworthy treatment in occupation and work,**
- **Violation of any fundamental rights of Communities and sensitive people, such as freedom of association and the right to collective bargaining, in the sphere of influence and geographies of our bussines.**



Commitment

The proven violations of this principles imposes sanctions, in accordance with the legally applicable procedures, in each case, including the repair of the damages caused, and the proof of practices that violate these principles, on the part of BSL, may to rupture of the relationship with whom proven to practice them. .

Anti-corruption and bribery

Adopt standards of ethics and conduct of loyalty and transparency that reject practices of conflicts of interest , and other unfair and reprehensible attitudes in terms of ethics and anti-corruption and bribery standards..

BSL does not engage in or support the use of practices that constitute corruption and bribery

Child Labor

The minimum working age must be respected in compliance with the legislation in force and can't be in any case, when allowed and in the conditions legally regulated, less than 15 years old, whatever the type of activity. Respect for this principle is transversal to all subcontractors.

BSL does not engage or support the use of child labor.



Commitment

Forced Labor

It occurs when work is imposed by those who have the power to control workers through severe deprivation, such as, physical violence or verbal abuse, restricting people's freedom, withholding wages or documents, forcing them to stay at work or withholding them by fraudulent means from which they can't refuse or escape. Forced labor is a crime and a violation of fundamental human rights.

BSL promotes transparency and freedom in relationships with its employees, investing the creation of a healthy work environment that encourages people's development.

BSL therefore rejects any type of inappropriated behaviour, and practices that constitute forced labor or violates physical and psychological and moral integrity and fundamental freedoms at work.



Commitment

Freedom of association and right to collective bargaining

Through ILO Convention nr. 98, all workers who as this intention and if in the local context is a possibility, have the right to adhere to organizations they find appropriate and to affiliate with them, with the aim of promoting and defending their respective interests and celebrating collective negotiations, in terms of the law, freely and without interference of one over the other.

Freedom of association is a fundamental human right which, together with the right to collective bargaining, represents a core value of the ILO.

BSL respects the right of its employees to associate and organize themselves freely, not preventing them from the right to collectively negotiate with the company, with the guarantee that they will not be subject to retaliation in the exercise of this right.



Commitment

Discrimination

For the purposes of Convention Nr. 111 of the ILO, discrimination means (art. 1): "a) *any distinction, exclusion or preference, based on race, color, gender, religion, political opinion, nationality or social origin, which has as its effect to nullify or reduce equality of opportunity or treatment in employment or occupation; b) any other distinction, exclusion or preference, which has the effect of nullifying or reducing equality of opportunity or treatment in employment or profession,...*".

BSL condemns any form of discrimination and does not apply discriminatory criteria in its processes of recruitment, selection, admission, training and management of its employees, promoting equal opportunities. Likewise, BSL does not interfere with the exercise of employees' rights to observe precepts or practices related to race, nationality, religion, disability, sexual orientation, familiar responsibility or any other condition, promoting the principles of equal and respectful treatment.

BSL respects and promotes the application of this principle in its professional relationships.



Measures

BSL has established rules for, within its network of influence, to disclose and dissuade the adoption of behaviors that violate this code and commitments:

- ❖ Make available the code to all employees and subcontractors, suppliers, service providers, customers and other interested parties;
- ❖ Integrate, as a subject, in all internal training or information initiatives, to suppliers, service providers, etc.;
- ❖ Keep in place the specific procedures that allow for detailed records and that adequately reflect all financial transactions with due official/legal reporting,
- ❖ Maintain an internal control system, including and organizational checks, audits or arbitrary checks;
- ❖ Conduct an self assessment, in compliance with the fundamental principles of work required under the FSC-STD-40-004-3.1 Standard.



Measures

➤ Apply, in conjunction with legal support, depending on the severity of sanctions for violations, namely:

- ❖ The proven violation by any member of BSL of this code will trigger disciplinary action, provided for in the legislation, which may include written reprimand, temporary suspension of functions or termination of the contract, under the legal terms, for just cause.;
- ❖ The breach proven by any supplier, service provider or customer may result in the temporary suspension of transactions or services, or even the termination of the contract, under legal terms, due to force majeure.;
- ❖ Other sanctions that may be applicable under legal terms and to be judged and applied by the competent authorities.

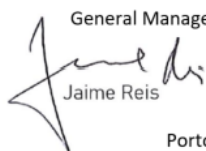
Reporting Channels

Violation of this code and of legislation, namely anti-corruption, bribery and others in the field of ethics and fundamental principles of work, by Directors or employees of BSL, in addition to the reputational risk and legal consequences, implies that it is subject to immediate reporting.

BSL focuses on the Chain of Custody Team the management of compliance and the forwarding of any reports of non-compliance, in this context, which must be communicated, in a mandatory and prompt manner, to the Administration for due diligence.

Anyone (partner or otherwise) who has knowledge of any activity that may violate this code must promptly report such activity (even if it has already ended) to coc@bsl.pt. If you wish to remain anonymous, you can send it by post to the address of BSL in Porto: **Rua Engenheiro Ferreira Dias, 444 – A4– 4100-246 Porto – A/C Resp CoC.**

If the report is anonymous, sufficient information must be provided to allow for an adequate investigation of the matter. All reports will be investigated and dealt with, and the company will keep the associated records.

General Manager

Jaime Reis

Resp. CoC

Cecília Notasco

Porto, 17 de Junho de 2024