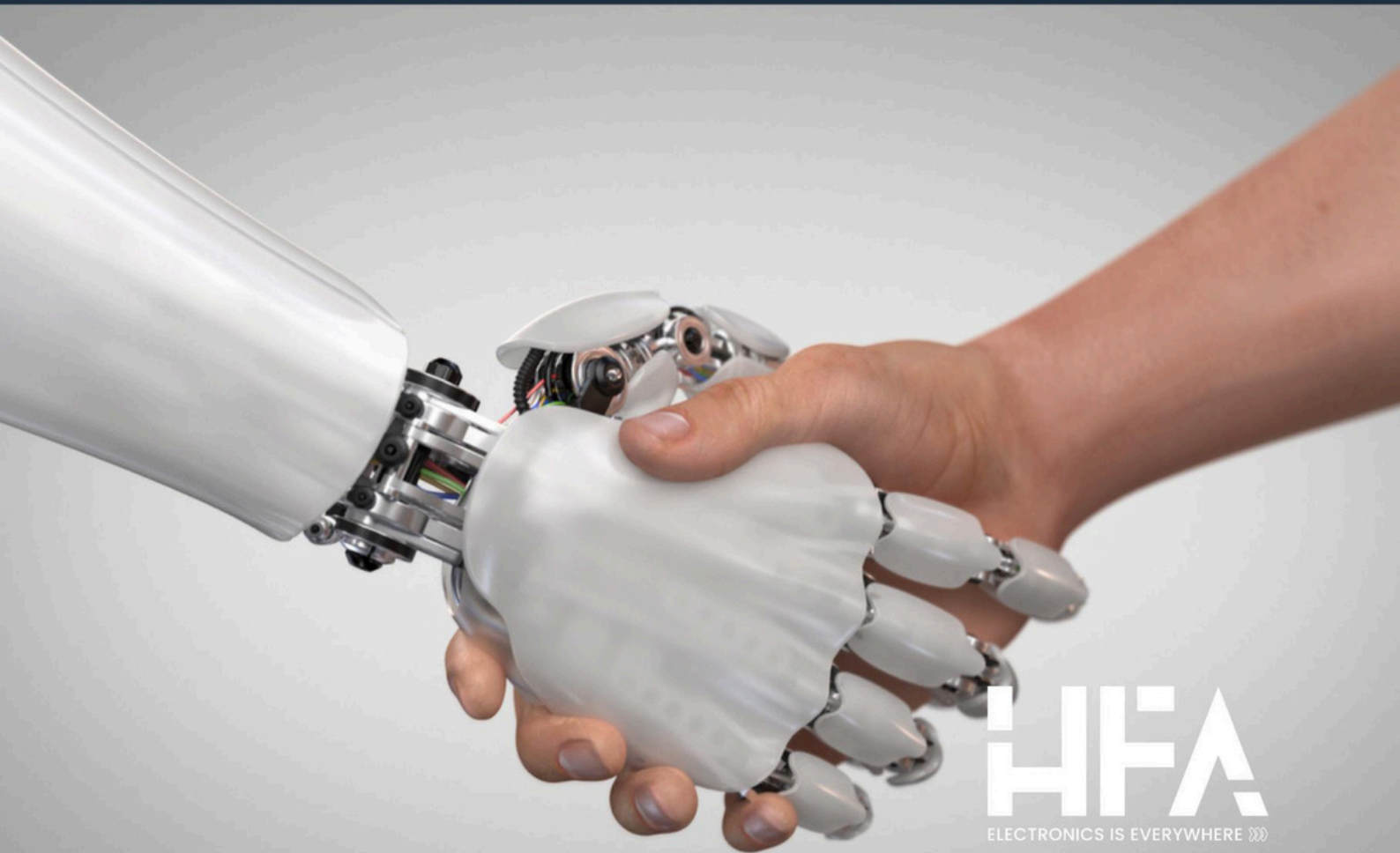


# Code of Conduct

Human Resources

MA.8001



**HFA**  
ELECTRONICS IS EVERYWHERE

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## MESSAGE

At HFA, we are committed to being a benchmark for trust, quality, and responsibility in the industry in which we operate. We know that our products and services directly impact people's lives and businesses, and it is with this sense of mission that we work every day.

More than achieving results, it's important to know how we achieve them. Integrity, respect, transparency, and professionalism are values that guide every decision, every relationship, and every project we develop. We believe that only through ethical and exemplary conduct can we build lasting relationships with our clients, partners, and the entire community.

The HFA Code of Conduct is a clear expression of this commitment. It defines principles and rules that all Employees and partners must know, respect and apply in their daily lives, in all internal and external interactions, regardless of their role or hierarchical level.

This Code aims to ensure that our actions are always aligned with HFA's values and industry best practices. It serves as a guide for responsible decision-making, promoting a healthy and collaborative work environment, and ensuring we maintain an ethical stance in all circumstances.



We aim to continue growing sustainably, making positive contributions to society, respecting the environment, promoting the well-being of our people, and enhancing our brand's reputation.

We rely on everyone's dedication and commitment to establish ethics as a solid foundation of our identity and success.

Sara Marques, Human Resources Director

Code of conduct – principles,  
rules and values



## CODE OF CONDUCT - PRINCIPLES, RULES AND VALUES

### What is the Code of Conduct?

The Code of Conduct is the document that integrates a set of principles that govern the activity of HFA and a set of rules of an ethical and deontological nature to be observed by the members of the corporate bodies and by all Employees in the performance of their respective professional functions.

### Who is it for?

This manual is intended for all internal employees, external employees, interns and others, regardless of their affiliation with HFA – Henrique, Fernando & Alves, S.A..

### Objectives of the Code of Conduct

Share the principles that guide the activities of HFA, S.A. and the ethical and deontological rules that should guide the behavior of all Employees.

Promote and encourage the adoption of the principles of action and

- behavioral rules, defined with respect to the relationships between Employees, with HFA, Shareholders, Customers, Suppliers and Public Authorities.
- Consolidate our institutional image of excellence, demand, responsibility and rigor.

### HFA's operating principles

Customers Treat Customers with professionalism, respect and loyalty.

Provide customers with excellent products and services.

- Suppliers
- Selection of Suppliers based on clear and impartial criteria

### Vision

Electronics is a force transforming the world and driving humanity forward. We believe in continuous technological evolution. We want to build solutions that not only connect, transport, entertain, and heal, but also foster a more inclusive and better future for all.

### Mission

Let's build a better future, where success is measured not only by results, but also by the positive impact we have on people's lives and the planet.

### Values

#### People Power - the pillar of our success.

The Strength of Integrity - the foundation of everything we do.  
The Importance of Innovation - the energy that moves us.  
The Strength of Partnerships - partners come first.  
The Urgency of Sustainability - a better future for everyone.



Treat Suppliers with respect, in particular by honoring the commitments made to them.

### **Quality**

Quality is our key to achieving excellent business results. Since its inception, the company's philosophy has been based on providing services and producing products of the highest quality standards. HFA's services must meet the needs and expectations of its clients.

### **Flexibility**

Our success is measured by our clients' satisfaction with our services. Therefore, their expectations are our primary focus. We strive to satisfy them by delivering quality end products and services. The flexibility our clients desire encompasses the organization of production and work systems and human resource management. We must not forget that flexibility is also linked to the formation of supplier networks.

### **Innovation and Dedication**

We invest in Innovation, seeking to create a competitive advantage in the services we offer, in addition to differentiating ourselves in terms of market positioning.

We strive to create a pleasant working environment where all stakeholders are encouraged to express their opinions and actively participate in company activities.

### **Know How**

HFA invests in the technical knowledge and ongoing training of its employees. Our continuous improvement processes are based on the use of appropriate methods, best practices, and the development of our knowledge.

We accept constructive criticism as a way of developing professional and personal growth.

### **Trust / Confidentiality**

We demonstrate respect for all those who interact with us – Employees, Customers, Suppliers, etc. – the success of our services is everyone's responsibility.

Our ethical and behavioral standards indicate that credibility is only maintained when earned through trust; being and appearing to be has become a matter of survival.



Credibility and Confidentiality are important in the relationship we have with our Customers and it is a bilateral relationship, we trust in the projects they bring us and we commit ourselves with all our knowledge, to find the best ways to satisfy the desired requirements.

### **Competition**

Respect market rules and criteria, promoting healthy and fair competition.

Relate to competitors in a cordial manner and promote mutual respect, namely, for each person's intellectual property rights.

### **Shareholders and Market**

Always act to protect the interests of our shareholders and generate greater value for them. Ensure the accuracy and veracity of the information provided to shareholders and the market.

### **Public Authorities**

Respect and ensure scrupulous compliance with the legal and regulatory standards applicable to the activity of HFA, S.A.

Provide the Public Authorities with the necessary collaboration to carry out their activities, in particular, through the timely provision of requested information.

### **Environment**

Adopt best environmental practices, specifically by promoting eco-efficient management, minimizing the environmental impacts of our activities, and rationally utilizing natural resources. Promote, disseminate, and encourage the adoption of good environmental practices among our employees, suppliers, customers, and the community at large.

### **Collaborators**

Base human resources management policy on respect for the dignity, diversity and rights of each person.

Treat each employee fairly and promote equal opportunities for personal and professional development, in particular through rigorous and constructive assessment, job rotation and flexibility, participation in professional training programs and encouraging participation in extra-professional activities.

Respect the Employee's work-life balance.

Each Employee is responsible for their actions.

## Work Environment, Health and Safety

### 1. Work Environment

- Promote a safe, inclusive and respectful work environment for all.
- Harassment, discrimination, violent or inappropriate behavior will not be tolerated.
- Encourage team spirit, open communication and mutual respect.

### 2. Health and Safety

- Respect the safety standards stipulated by the company.
- Use the necessary protective equipment and always perform electrostatic discharge at the entrance to the Production area.
- Report any risky situation or accident immediately.

### Individual Rules of Conduct

Interpersonal Relationships Adopt a behavior of honesty, respect, cooperation and clear communication towards Employees and all those who interact with HFA, thus contributing to a good work environment.

### Responsibilities

Respect HFA's values and the principles expressed in this Code, both in internal and external relations. Report any irregularities (behaviors or circumstances) that may compromise the development of the business or the good image of HFA.

### Professionalism and Entrepreneurship

Act responsibly and rigorously, improving and updating knowledge with the aim of continuously improving professional capabilities.

Contribute to the business in a consistent, creative, rigorous, committed and persistent manner.

### Confidentiality and Use of Insider Information

Preserve confidential facts or information, respecting the rules established in this regard.

Do not use insider information for your own benefit or that of third parties.





### **Protection and Use of HFA Resources and Assets**

Ensure the protection and good conservation of the resources and assets of HFA, S.A. made available for the performance of functions or to which it has access by virtue of these functions.

Use HFA's resources and assets rationally and efficiently, with a view to achieving the objectives to which they are linked.

### **Conflicts of Interest**

Avoid intervening in decision-making processes that directly or indirectly involve organizations with which they collaborate or have collaborated, or individuals with whom they are or have been linked by family or friendship. If unable to abstain from intervening in the aforementioned processes, Employees must inform their supervisor of the existence of such ties. Refrain from participating in or performing functions in organizations where the activity to be performed may conflict with the performance of their duties at HFA or whose purposes may conflict with those of HFA.

### **Gifts and Commercial Payments**

The HFA prohibits, in any form, the offering, solicitation or acceptance of bribes, illicit commissions or any undue benefit with the intention of influencing ongoing decision-making processes.

### **Reporting Channels**

HFA provides secure and confidential channels for reporting misconduct, including corruption or bribery. Reporting in good faith is protected against retaliation.

Our Whistleblower Channel is available on our website: [www.hfa.pt](http://www.hfa.pt).

Although the Code of Conduct establishes minimum acceptable standards of behavior, it is not intended to anticipate every situation that may arise. Your common sense should always be your guide.

# Preventing and combating harassment

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## PREVENTING AND COMBATING HARASSMENT

HFA does not permit harassment practices in the workplace, of any nature, including relationships between colleagues, superiors, customers, suppliers, partners, or any people with whom they interact.

### **Harassment**

Unwanted behavior (namely, that based on discrimination) practiced: In access to employment; In employment, work, or professional training. With the purpose or effect of: Disturbing or embarrassing; Affecting dignity; Creating an intimidating, hostile, degrading, humiliating, or destabilizing environment.

### **It is called sexual harassment**

When the unwanted behavior is of a sexual nature, it is practiced verbally, non-verbally, or physically.

### **Consequences of Harassment Practice**

- The practice of a discriminatory act that is harmful to an employee or job applicant grants the victim the right to be compensated for material and moral damages, under general law terms; It constitutes just cause for termination of the contract by the employee, when the offense to the physical or moral integrity, freedom, honor or dignity of the employee, including the practice of harassment reported to the service with supervisory authority in the labor area, is practiced by the employer, its legal representative or another person within HFA, S.A.
- The employer's liability for compensation for damages arising from illnesses resulting from the practice of harassment
- It constitutes a severe offence, without prejudice to any possible criminal liability, provided for under the law
- The employer must institute disciplinary proceedings whenever he becomes aware of alleged situations of harassment at work

### **Whistleblower and Witness Protection**

- The complainant and witnesses cannot be subject to disciplinary sanctions (unless they act intentionally), based on statements or facts contained in the records of a judicial or administrative process triggered by harassment, until the final, final decision is reached.
- Disciplinary sanctions motivated by the employee's actions are considered abusive, up to one year after the complaint or other form of exercising rights related to equality, non-discrimination and harassment.

### **Equality and Non-Discrimination**

- Direct discrimination is considered whenever, due to a discriminatory factor, a person is subjected to less favorable treatment than that which is, has been, or will be given to another person in a comparable situation. Indirect discrimination is considered whenever an apparently neutral provision, criterion, or practice is likely to place a person, due to a discriminatory factor, at a disadvantage compared to others, unless such provision, criterion, or practice is objectively justified by a legitimate aim and the means to achieve it are appropriate and necessary.
- Equal work is considered to be that in which the functions performed in the service of the same employer are equal or objectively similar in nature, quality and quantity.
- Work of equal value is considered to be work in which the functions performed for the same employer are equivalent, taking into account in particular the qualifications or experience required, the responsibilities assigned, the physical and mental effort and the conditions in which the work is carried out.

A mere order or instruction that aims to harm someone due to a discriminatory factor constitutes discrimination.

### **Preventing and Combating Harassment in the Workplace**

In order to prevent and combat harassment, all workers in the performance of their duties, during breaks or pauses within the employer's facilities and when working for the employer, even outside the establishment, must behave normally, in accordance with the standards of coexistence, civility and citizenship required in their relationships with members of the employer or their representatives, work colleagues, suppliers of goods and services and customers.

**In particular, the general duties of workers are:**

Comply with the Law, the applicable Collective Bargaining Instrument and this Code of Conduct, refraining from any harassment practices in the workplace;

- Participate in training and awareness-raising activities on preventing and combating harassment in work;

Act, whenever possible, to prevent behaviors witnessed by him/her that could be considered harassment;

- Draw the attention of your superior or employer's representative, possible situations that may constitute harassment;

Report the practice of harassment in writing to the employer, to the Human Resources

- Humans, of which they are victims or witnesses.

Collaborate with the company and each other to create a work environment that prevents harassment at work;

- In the case of Employees with hierarchical responsibilities, they must especially strive to create and maintain a healthy work environment, both in hierarchical relationships and among Employees under their direction.

**In preventing and combating harassment, the company will:**

a) Providing information and, whenever necessary and possible, carrying out training, awareness-raising, support and advice to workers with a view to promoting a working environment free from harassment practices at work, both in hierarchical relationships and between workers themselves;

b) In order to ensure that any new employee hired by the company is informed at the initial stage of their integration of relevant content regarding harassment, and is made aware of the importance of their engagement in preventing and combating possible harassment behavior at work;

c) The implementation of any necessary corrective measures, in particular exercising disciplinary power if the respective legal and regulatory requirements are met, in relation to duly detailed situations of harassment at work;

d) Making this Code of Conduct available to all workers, making every effort to disseminate to them, through appropriate internal communication channels, information on the topic of harassment at work;

e) Promote a working environment among its Employees, at all levels, free from situations of violence at work, considering the existence of harassment, moral or sexual, at work to be unacceptable;

f) In preventing and combating the specific practice of sexual harassment, access, posting and use by any means of content of a sexual nature is now prohibited in the workplace.

**Secrecy**

All company employees must maintain absolute confidentiality regarding information to which they have had access as a result of performing their duties, regarding the outside world.

Company employees are prohibited from making statements to the media or posting on social media that could harm the company's business or its image/reputation.

**Support and Complaints**

Any violation of this Code of Conduct must be reported in writing to the email [etica@hfa.pt](mailto:etica@hfa.pt) or through our Reporting Channel, available on the HFA website: [www.hfa.pt](http://www.hfa.pt).

# GDPR implementation and compliance



## GDPR IMPLEMENTATION AND COMPLIANCE

### General Data Protection Regulation (EU) 2016/679 of 27 April 2016

A HFA, SA, as a reputable and reliable company, intending to maintain its level of excellence and to comply with the law, implemented and complied with the GDPR, which came into effect on May 25, 2018.

Considering such a sensitive matter as individual personal data, HFA, S.A., implements the GDPR by respecting the principles of confidentiality and integrity, ensuring its protection from start to finish, ensuring its lawfulness in its application, limiting data to a specific purpose, and adhering to the minimization of data obtained, ensuring that the data is accurate and up-to-date, and only for the necessary period, in compliance with the provisions of Article 5. We will do everything possible to protect our employees' personal data because we believe that people are one of the most important pillars of a company.

After in-depth analysis and serious consideration of the cultural shifts that sometimes arise during projects, we believe it's necessary not only to train and raise awareness among people during projects, but also to provide ongoing support. This isn't just about changing processes and documentation, but also transforming the day-to-day practices of the entire company, integrating data protection concepts into the forefront.

### Procedures

In order to comply with and be legally bound by the GDPR, HFA, S.A. has implemented certain procedures whose purpose is to clearly comply with the a fore mentioned regulation:

### Consent

Carrying out awareness-raising actions among Employees and subsequent collection of a written statement, in clear and simple language, with the assumptions of art. 6, no. 1 and 7 and 9, no. 2 of the GDPR, in which the personal data that need to be collected and the purpose given to them are mentioned.

The declaration is duly signed by the data subject, thus observing its lawfulness and demonstrating that the subject of the personal data (Employee) in addition to giving consent was also provided with this information.



## **Rights**

Information is provided about the rights of the holder of personal data, in the form of a written statement, using clear and simple language, which must be signed and collected, thus providing evidential proof that they have been informed.

## **Video Surveillance (Scope and Purpose)**

The security of people and property is a topic of growing concern to society. To safeguard, protect, and even provide a sense of security and peace of mind, organizations are increasingly turning to various available solutions. Video surveillance cameras can be an advantage when it comes to monitoring situations such as robberies or assaults, detecting certain situations, identifying their causes, and taking preventive measures to improve security. They should only be used for these purposes. Furthermore, installing cameras deters any criminal intent and provides visitors with a sense of security.

With the flexibility afforded by its relationship with so-called new technologies, video surveillance is one of the security solutions whose demand has increased the most in recent years.

**Location:** HFA, S.A., as an entity that ensures the safety, protection, and well-being of its employees and facilities, has installed several video surveillance cameras in strategic locations throughout the various production areas and at the facility's access points. These cameras capture and transmit images to a video management system that allows, among other things, viewing/recording of these images. Legally mandated signs informing of the existence of a video surveillance system are posted at all entrances, making them visible to both employees and visitors.

The video surveillance cameras located outside are directed towards the company's space/perimeter and do not capture images of the public road or neighbors.

Ethics

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## ETHICS

### Concept

Being ethical means acting within conventional standards, it means behaving well, it means not harming others intentionally and deliberately.

Being ethical means complying with the values established by the society in which you live.

### Duties

- The Employee must have professional ethics and comply with all activities of his/her profession or job, following the principles determined by his/her work group and being respected in the fulfillment of daily actions by all employees of the company HFA, S.A.
- In the exercise of their functions, HFA, S.A. Employees must be responsible and cooperative, prioritizing a good environment, respect and good personal treatment, whether with colleagues, either with hierarchical superiors and these with the Collaborators who are affected by them.
- In their professional relationships, HFA, S.A. Employees must promote the exchange of information, cooperation and foster team spirit.

### How to Proceed

If you encounter unethical behavior from colleagues or superiors, you should report it to [etica@hfa.pt](mailto:etica@hfa.pt) or through our Reporting Channel, available on the HFA website: [www.hfa.pt](http://www.hfa.pt). When reporting the situation, you should describe the facts as they occurred and in as much detail as possible.

The communication of the reported situation will be received by the person responsible for this area, who will subsequently proceed with the respective investigation of the mentioned facts, together with those involved.

### Response Deadline

A response will be given to the report of the situation within a maximum period of 30 days after receipt and analysis.

### Sanctions

Given the type and severity of the situation, the rules established by HFA, S.A. will be applied and are included in the company's Code of Conduct and Internal Regulations.

Alcohol, drugs,  
gambling and  
gambling (at  
work)

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## ALCOHOL, DRUGS, GAMBLING AND GAMBLING (AT WORK)

### **Alcohol**

The consumption of alcoholic beverages, in addition to harming health, produces changes in the worker's behavior and can even be responsible for workplace accidents, psychological changes and disruptions in relationships with other workers, even creating a bad environment.

Working with alcohol in the bloodstream can lead to poor concentration and behavioral changes, including falls, violent behavior, and labor disputes, negatively impacting the employee's image and that of the company. Drinking during business hours, whether at work or outside the workplace, and then returning to work under the influence of alcohol, has many negative consequences and can even, in more serious cases, lead to dismissal. It is common knowledge that excessive alcohol consumption has serious repercussions on society and the workplace, as it reduces the desired quality and productivity in the workplace by reducing functional fitness and exposing all workers to unacceptable risks. Employees representing HFA, S.A. in client meetings or participating in the institution's social events, even outside normal working hours, must drink in moderation and not exceed the blood alcohol limit prescribed by the Brazilian Traffic Code if driving. The consumption of alcohol after working hours and outside the Institution's facilities is clearly a private matter and does not directly concern HFA, S.A.

It will only concern you if alcohol consumption determines the worker's attendance, performance and conduct in the workplace.

### **Drugs**

Drug use can be a serious problem in the workplace. Workers who use drugs are more likely to perform their tasks inefficiently, be absent more often, have more workplace accidents, and even endanger the safety of their colleagues.

It is HFA, S.A.'s intention to protect the health, safety and well-being of all its employees.

The prohibition on drug use at HFA, S.A., applies to all drugs considered illegal and, consequently, used without a prescription, as well as their trafficking.

The intention of HFA, S.A. is to deal with problems related to excessive alcohol consumption or drug addiction in a constructive and non-repressive manner.

If the Company detects that an employee has a problem related to alcohol or drug use, it may advise them on how to obtain appropriate treatment. The main objective of this counseling will be to help the employee constructively.

All discussions regarding any employee's alcohol or drug use problem and the record of any treatment will be strictly confidential.

If you have a problem related to alcohol or drug use, you should seek help.

If you have a problem related to alcohol or drug use that affects your conduct or performance in the workplace and refuse treatment, you may be subject to disciplinary action. Similarly, if, after accepting counseling and assistance followed by a subsequent evaluation, you continue to exhibit inappropriate behavior or performance in the workplace, you may also be subject to disciplinary action.

Failure to comply with these rules constitutes a disciplinary infraction and will be subject to sanctions. Depending on the severity of the infraction, it may be considered a very serious offense and may result in dismissal based on a fault attributable to the employee.

### **Sanctions for Alcohol and Drug Consumption**

Although these rules are intended to assist workers with problems related to alcohol or drug use, disciplinary proceedings will be initiated against workers found to be under the influence of alcohol or drugs while working.

Even a small amount of alcohol can affect work performance, potentially having serious consequences for everyone's health and safety. The same applies to drug use. Inability to perform tasks or inappropriate behavior caused by alcohol or drug use in the workplace may constitute a very serious offense and may result in dismissal. This also applies to any employee who traffics (buys/sells) or possesses drugs on HFA, S.A.'s premises.

### **Betting and Games**

Betting and gambling are strictly prohibited within the premises of HFA, S.A. and during business hours.

In addition to being a factor causing a bad environment among employees, in production units, it causes low productivity and poor professional performance.

It is still considered a huge lack of ethics and respect on the part of those who practice it.

As sanctions, disciplinary proceedings will be initiated against the authors and participants in the situations that arise in this matter.

Depending on the level of severity, the dismissal of the Employees in question may be effective.

# Radiological protection and personnel organization



## RADIOLOGICAL PROTECTION AND PERSONNEL ORGANIZATION

At HFA, S.A., there is a hierarchical structure defined by the owner, managed by a Radiological Protection Officer (RPR), appointed in writing. The RPR performs duties under direct supervision of the owner. Other employees are required to comply with the guidelines and decisions established by the RPR regarding radiological protection and to inform the RPR whenever they identify potential radiological risk situations.

### **Responsible for Radiological Protection:**

- a) The RPR is assigned the following responsibilities: Ensure that radiation work is carried out in accordance with the requirements of local procedures or rules;
- b) Supervise the implementation of the workplace radiological monitoring program;
- c) Maintain adequate records of all radiation sources;
- d) Periodically assess the status of relevant security and alert systems;
- e) Supervise the implementation of the individual monitoring program;
- f) Ensure the organization of occupational health and safety services, ensuring that all workers are covered;
- g) Provide new workers with appropriate introduction to local rules and procedures;
- h) Provide consultancy and make observations on work programs.

### **Operating standards in terms of Radiological Protection**

Radiation protection aims to ensure the safety of exposed individuals without unduly limiting the beneficial effects of ionizing radiation. Its fundamental principles include:

- **Justification:** the use of radiation must bring more benefits than risks, it is up to the holder, ensuring that radiation is essential to the company's objectives;
- **Optimization:** radiation protection for people subject to occupational exposure or public exposure should be minimized to the lowest possible level (ALARA principle - As Low As Reasonably Achievable);
- **Dose limitation:** The doses received cannot exceed the legal limits, such facts apply to both workers and the public.



### Safety Rules:

- a) The facility is marked with ionizing radiation signs.
- b) Equipment that produces ionizing radiation is maintained in proper working order and undergoes regular performance checks as part of a maintenance and quality assurance program.
- c) Equipment that produces ionizing radiation is operated by trained individuals who are instructed in its correct and safe use, following the manufacturer's instructions.
- d) All HFA, S.A. professionals are familiar with the Radiological Protection Program and the Internal Emergency Plan. Refresher sessions are held whenever these documents are updated or revised.
- e) The use of the individual dosimeter is non-transferable and its use is mandatory for any Employee who needs to access the equipment, allowing continuous assessment of exposure.
- f) Individual dosimetry measurements are reported quarterly, in accordance with legal requirements, ensuring transparency and the necessary monitoring to prevent excessive exposure.

To maintain the accuracy and reliability of records, dosimeters are replaced every three months, allowing for the renewal and updating of measuring devices.

This process is essential to ensure worker health protection and compliance with radiation safety regulations, reinforcing the company's commitment to a safe and controlled work environment.

- g) In the event of an emergency, the Internal Emergency Plan is activated, which is known to all employees.
- h) All exposed workers are subject to a health surveillance program by an entity recognized for this purpose.

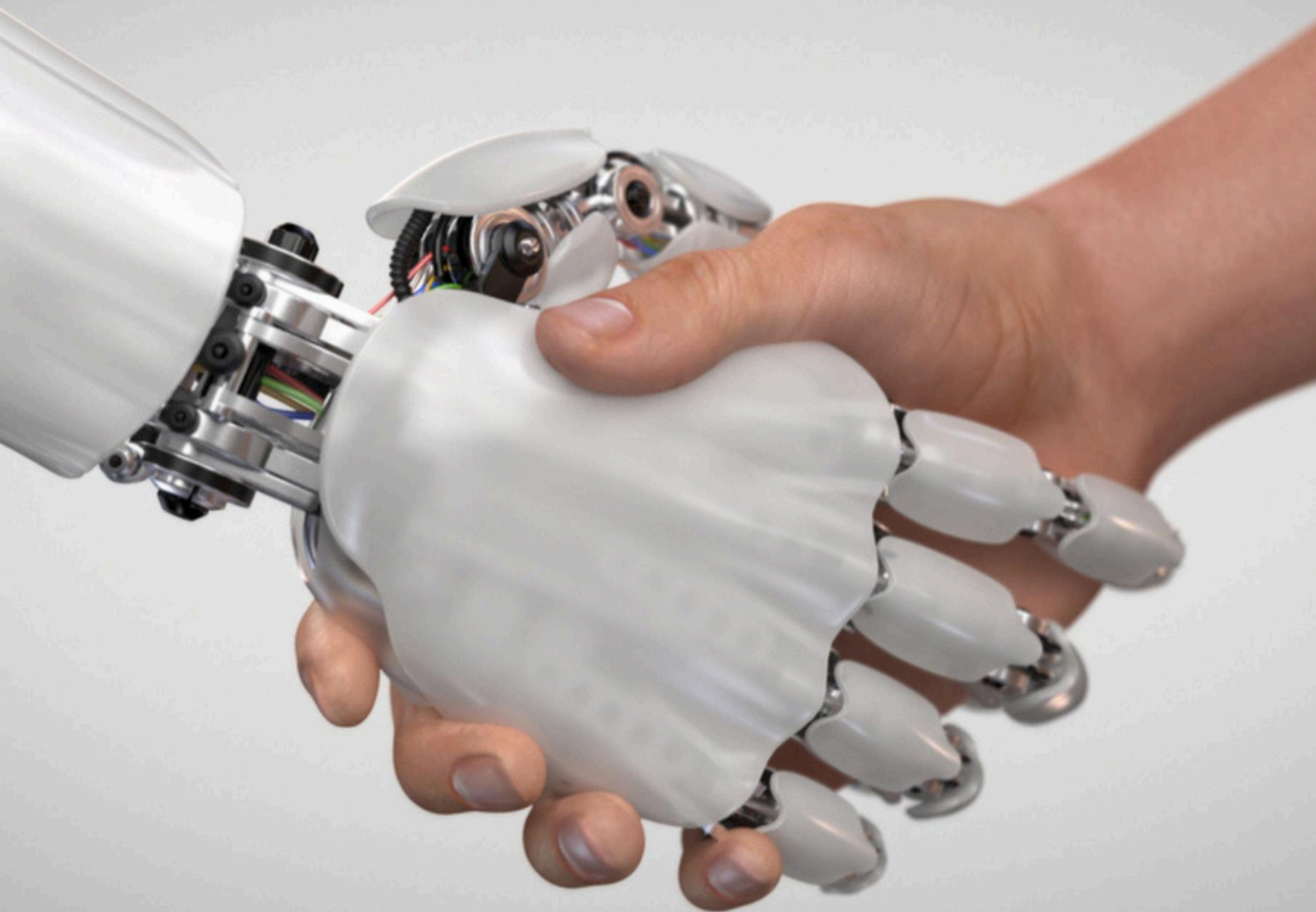


# Violation of the code of conduct



## VIOLATION OF THE CODE OF CONDUCT

A breach of this Code entails the disciplinary consequences provided for in the legislation in force, without prejudice to any possible civil and/or criminal liability.



CHANGE HISTORY					
New version	Change completed	Reason for the change	Made by	Approved by	Approval date
A	Transfer of document PR.8001 to MA.8001 and changes to the document	-	Vera Lau e Patrícia Amaral	Sara Marques	28/03/2025