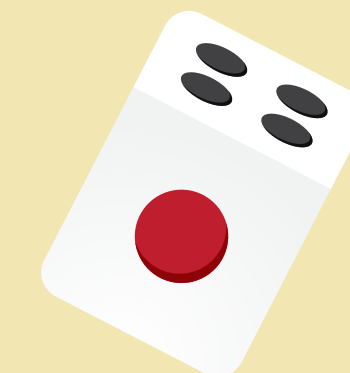
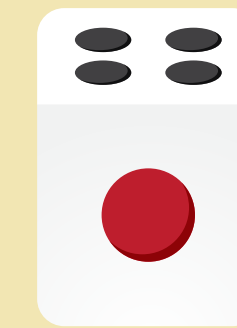


Code of Conduct



Introductory not

The Wondercom Group has always sought to conduct its business based on standards of integrity, transparency, honesty, professional ethics and respect for others, the environment and compliance with legislation.

As part of our growth and evolution process, and aware that each of us plays a fundamental role within the organisation, it is the Wondercom Group's responsibility to promote and ensure compliance with the ethical principles and values that characterise our identity.

The guidelines contained in this code therefore represent a shared commitment within the Wondercom Group. For this reason, all our employees must be familiar with this document, incorporate these principles into their daily professional lives, and promote their dissemination within the organisation, contributing positively on a daily basis to improving these guidelines.

Recipients



This Code of Conduct defines the ethical standards for all employees of Grupo Wondercom (Wondercom, , KnowledgeWorks and Wondertrade), regardless of their hierarchical level. All employees are expected and encouraged to act in accordance with the Organisation's fundamental principles and values.

It is also intended that these guiding principles be known and accepted by all those who collaborate or interact with us, namely service providers and partners.

Professionalism and diligence



Employees must strive to perform their professional duties with the utmost rigour, diligence and competence, acting in the interests of the Organisation and always complying strictly with the laws and internal procedures applicable to their activities.

Our organisation values personal accountability and professionalism in its employees. It also considers punctuality and respect for working hours to be essential requirements for all its employees.

Without prejudice to recording attendance using the means provided by the company, employees must notify their manager and the Human Resources Department as far in advance as possible of any situation that may compromise their ability to comply with working hours, providing the necessary justification.

Confidentiality

The information obtained while working for the Wondercom Group is privileged information and may only be used by Employees in the performance of their duties. It may not be used to obtain advantages for themselves or for third parties.

Therefore, during your relationship with the Wondercom Group and for up to two years after that relationship, you must maintain absolute confidentiality regarding any information relating to the Wondercom Group or any other persons or entities related to it, namely:

- Personal data or other data considered privileged;
- Information about business opportunities or ongoing business;
- Information about technical skills, working methods and project management developed by the Wondercom group;
- Information relating to any projects or products completed or under development, knowledge of which is limited to Wondercom group employees in the exercise of their duties or by virtue of those duties.



Integrity and loyalty



The Organisation's Employees must behave in an appropriate and dignified manner, safeguarding the reputation of the company, its customers and its brands.

Employees must refrain from any practices that could raise doubts about the ethics of their behaviour, particularly with regard to offers to or from third parties. Gifts received from third parties, including gratuities, presents or participation in events, must be reported to management. All gifts from third parties must be refused if there are indications that they may give rise to unethical behaviour on the part of the givers or employees of the Organisation.

Training



The Organisation seeks to provide adequate Training for the performance and improvement of its employees' professional activities, the development of their skills, and the promotion of their safety.

Employees must also continuously seek to update their knowledge and skills, with a view to maintaining or improving their professional abilities and perfecting the functions they perform, by attending the training courses offered by the Organisation.

Non-competition



In their relations with third parties, Employees must remain loyal to the Wondercom Group and look after its interests, refraining from engaging in activities that compete, directly or indirectly, with those carried out by the Organisation.

Equal opportunities discrimination and harassment

The Organisation respects the principle of equal opportunities and does not discriminate on the basis of factors unrelated to individual professional performance.

No forms of individual discrimination that are incompatible with human dignity are permitted, namely on the grounds of origin, ethnicity, gender, age, political beliefs, social class, religious beliefs, sexual orientation, disability or any other grounds. Conduct constituting sexual harassment, moral harassment, mobbing, abuse of power or other conduct that undermines the normal dignity of the human person and behaviour contrary to normal practices is also not tolerated.

Mutual respect must be shown between employees and an inclusive working environment must be promoted.

No abusive behaviour that harms others is permitted, and the right to privacy must be respected.



Consumption of alcoholic beverages, tobacco and drugs



The Wondercom Group does not allow its employees to be under the influence of alcohol or illegal drugs during working hours and in the workplace. The Organisation reserves the right to monitor the consumption of these substances during working hours in order to comply with occupational health, safety and hygiene requirements.

Smoking is strictly prohibited on company premises, whether in offices, corridors, toilets, social areas, the canteen, vehicles, etc.

Extra-professional activities



Extra-professional activities during working hours that jeopardise productivity or performance in the professional activity are not permitted, including: personal telephone calls that are not urgent, use of the internet and social networks, excessive breaks, among others.

Protection of company assets and natural resources



All employees must respect and protect the Organisation's assets (movable and immovable) and not allow their use by third parties, unless duly authorised by their line manager.

The space belongs to everyone and as such must be respected. Employees must therefore ensure that the company's premises are kept clean and tidy.

Employees who have been entrusted with company assets for the performance of their professional duties must ensure that these assets are used and maintained properly. They must not be used for personal gain, unless duly authorised by a superior.

Assets made available to employees must be used exclusively for their intended purpose, in compliance with safety standards in order to prevent accidents and personal injury or damage to property.

All employees, in the performance of their duties, must also make efforts to minimise the consumption of natural resources, thereby contributing to mitigating the environmental impact of the company's activities.

Image, Appearance and Hygiene

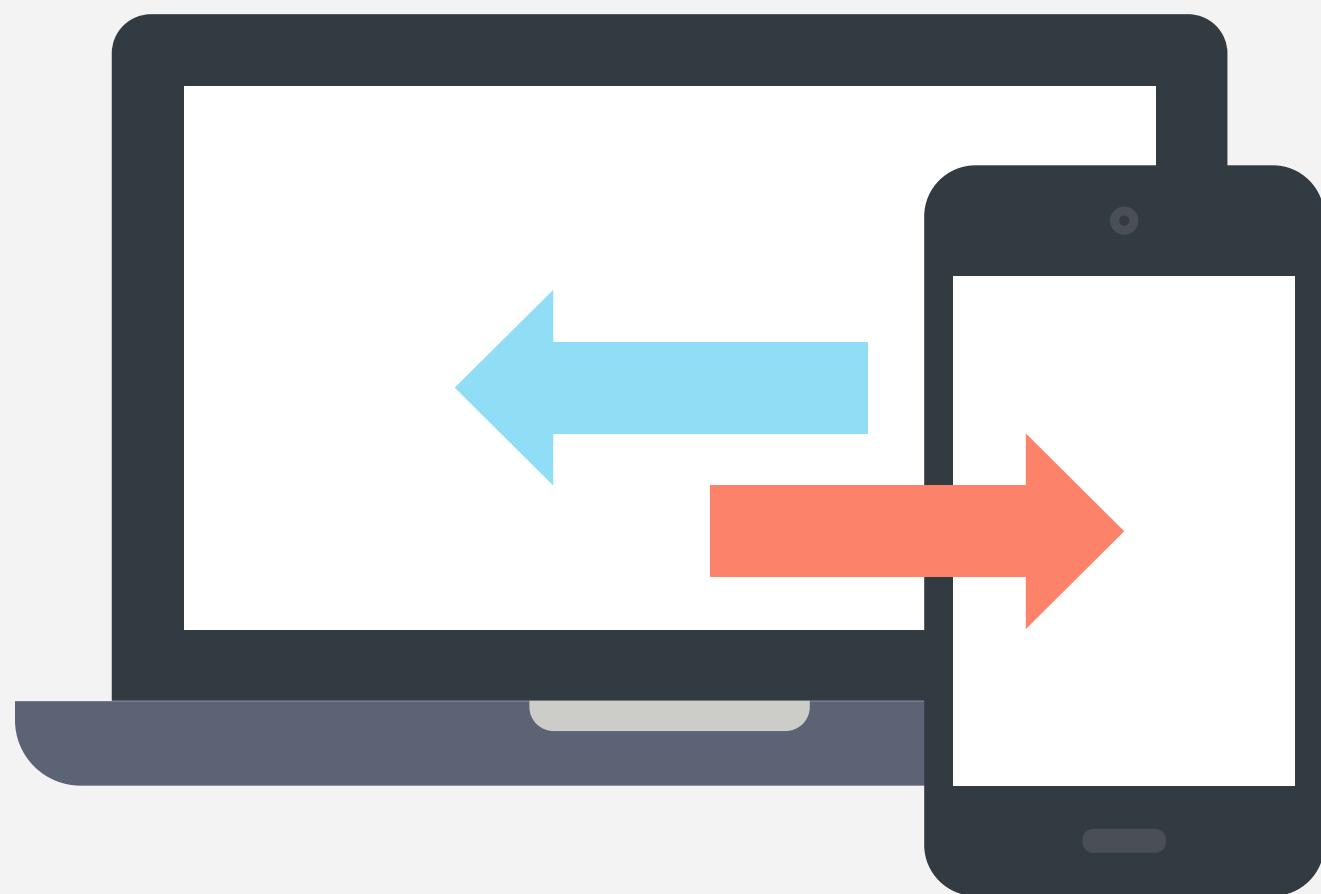


All employees in the performance of their professional duties represent the organisation and must therefore take care of their appearance in order to preserve that image.

Employees who are assigned uniforms for the performance of their duties must wear them without exception whenever they are on company business and ensure that they are kept in good condition and clean. Whenever a uniform is damaged, this must be reported to the respective line manager.

The use of uniforms in situations that may damage the company's image is not permitted.

Use of IT and communications equipment



Computers, mobile devices, software and other equipment or technological services related to information and communication technology must be used in accordance with the following rules:

- You must not access or store images, texts or materials that deliberately promote violence, hatred or religious intolerance or any other characteristic protected by law;
- Install or use unauthorised or prohibited software;
- Equipment and devices must be kept in good working order;
- The email address provided by the Wondercom Group to its employees must be used exclusively for professional purposes.

Personal data protection



The Wondercom Group processes the personal data of its employees, customers and other stakeholders by adopting the best technical and organisational measures to ensure data security and compliance with applicable legislation. Employees who process personal data in the performance of their duties must comply with the procedures implemented and, in case of doubt, contact the DPO by email:

dpo@wondercom.pt

Internet activity (social media) of employees



The Wondercom Group disseminates and communicates with customers and other stakeholders on the internet through its website, Facebook, LinkedIn and other platforms and social networks. Employees who use the aforementioned social networks or others must refrain from intervening or making any contacts on behalf of or representing the Wondercom Group, except in cases that have been previously authorised.

Employees who wish to intervene or express their opinion directly and personally on matters related to the Wondercom Group should do so with their line manager or management, refraining from any conduct on the internet or social media that could damage the image of the Organisation, its customers or other stakeholders.

Relationships with colleagues



It is the duty of all employees to contribute to a good working environment and a spirit of teamwork and mutual support within the Organisation. Relationships between employees should be based on friendliness and respect for others. Inappropriate conduct, namely behaviour that causes disruption or embarrassment to employees, compromising their dignity or promoting an intimidating or destabilising environment, will be subject to disciplinary proceedings.

Conflict of interest



Whenever, in the course of their work, employees are called upon to intervene in decision-making processes that directly or indirectly involve entities with which they collaborate or have collaborated, or persons to whom they are related, they must inform their superior of the existence of such relationships.

Similarly, employees who have family or similar relationships with each other should not, unless authorized by a superior, carry out their activities internally in a hierarchical relationship or one of direct functional dependence.

Customer relations

Employees must demonstrate professionalism, respect and cordiality in their relations with customers, seeking to ensure equal treatment and acting in such a way as to provide a high-quality, effective and efficient service and convey the best image of the Wondercom Group to the outside world. Wondercom Group employees must ensure compliance with the agreed conditions regarding service quality and guarantees and deal with complaints received in a diligent manner.

Complaints made by Wondercom Group customers, regardless of the form used (in person, letter, fax, email, telephone, etc.), are forwarded to the Customer/Project Manager and the QAS Department. All complaints addressed to the Wondercom Group are analysed and must be responded to as soon as possible. The employees assigned to this task must ensure an effective and efficient response to complaints by acting immediately after receiving the complaint in order to promote its proper resolution and prepare the respective response.

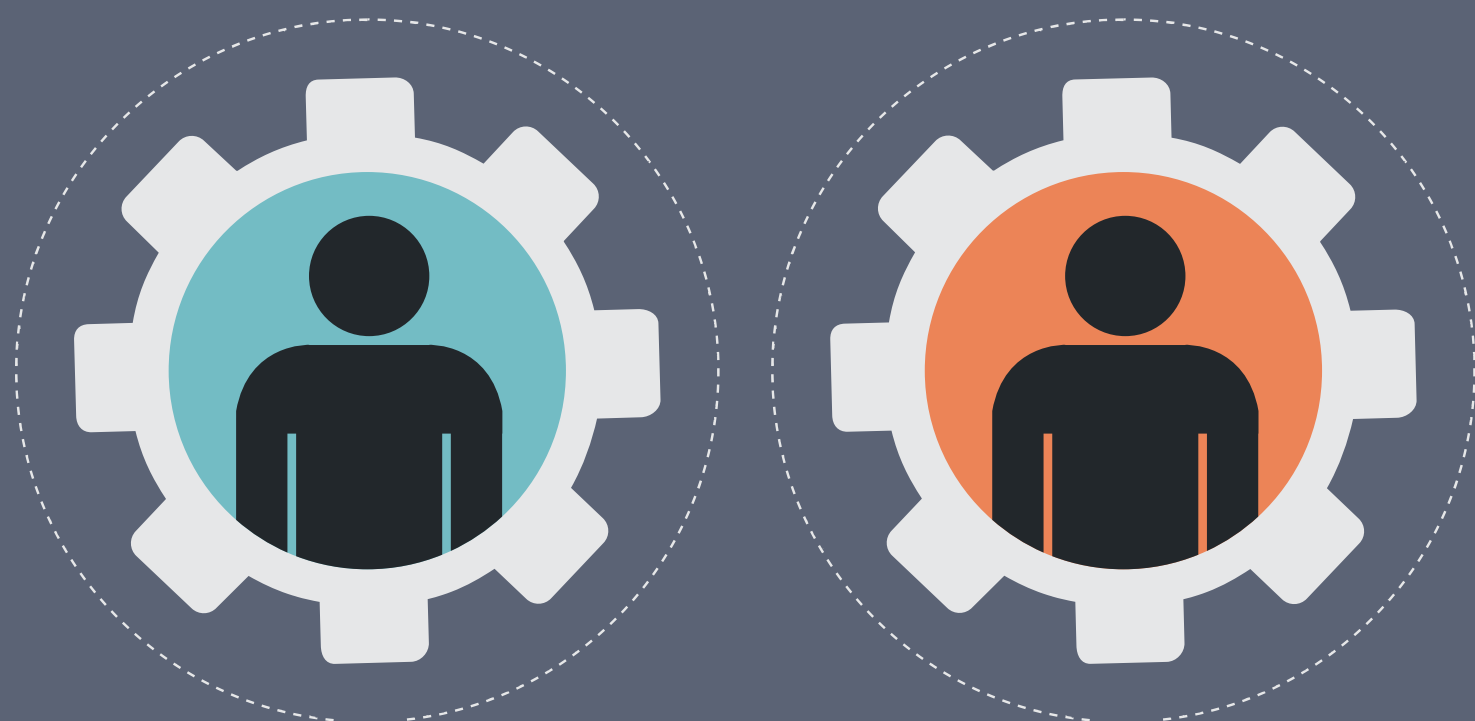


Relationship with Suppliers



Employees must demonstrate professionalism, respect and cordiality in their relations with suppliers, seeking to ensure equal treatment. The Wondercome Group and its employees must honour the commitments made to suppliers or service providers and verify compliance by suppliers with the requirements defined in the contract. Contracts must be drafted clearly and unambiguously and in strict compliance with the rules regarding confidentiality of information. Situations of potential conflicts of interest must be verified and safeguarded. No Wondercome Group employee may ever receive any amount, offer or advantage from any Supplier, either directly or indirectly, except for symbolic offers that have been previously approved by the Administration.

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Relationship with the media



Employees may only make public statements, give interviews (namely to the media) and participate in any type of event that may involve the Wondercom Group when authorised by Management.

Violation of the code of conduct



Wondercom Group employees undertake to respect and comply with the guiding principles set out in this Code. Failure to comply with or violation of the ethical standards set out herein is subject to disciplinary action, without prejudice to applicable criminal, civil and administrative proceedings.

Wondercom Group employees also have an obligation to report any violation of these principles that they witness. Such reports must be made to the human resources department, line manager or management.

The Organisation hereby guarantees that it will use all means at its disposal to swiftly and thoroughly investigate the facts reported, ensuring the confidentiality of the information and the seriousness with which it is treated.

Final note

The Wondercom Group counts on everyone's cooperation in adopting ethical conduct based on the principles and values promoted by this code.

This document is comprehensive in scope, but does not cover every situation that may arise in everyday professional life. For this reason, if you have any questions regarding compliance with the provisions of this code, or any ethical issues, you should inform your line manager or the human resources department.

Validity, amendments and updates

This code shall come into force immediately after its publication on the Forum and/or on the websites of the Group companies.

The provisions contained in this code are subject to changes and updates deemed appropriate in view of the evolution of the Wondercom Group's business or as a result of any changes to the applicable legal regulations.