



QUINTA NOVA  
DE NOSSA SENHORA DO CARMO

**TABOADELLA**  
1255

## CODE OF PROFESSIONAL CONDUCT

October 7, 2024

Approved by the Boards of Directors of Quinta Nova de Nossa Senhora do Carmo, S.A. and Taboadella, S.A. at meetings held on October 7, 2024

## I – Introduction and scope

This Code of Professional Conduct formalises a set of principles and rules of conduct for all Employees of Quinta Nova de Nossa Senhora do Carmo, S.A.. ("**Quinta Nova**") and TABOADELLA, S.A. ("**Taboadella**").

The Code of Professional Conduct supplements the other internal rules of Quinta Nova and Taboadella, and this document does not contain all the duties and rules to which both companies are bound. Its aim is to foster a high level of rigour and responsibility in the daily actions of its Employees, both in internal relations (between all Employees) and in external relations with clients, suppliers of goods and services and other public and private institutions, as well as local communities and Society in general.

Quinta Nova and Taboadella count on all Employees actively adhering to this Code of Professional Conduct (including members of governing bodies, senior management, officers and staff).

All entities that have an economic, institutional or social relationship with Quinta Nova and Taboadella, namely shareholders, investors, clients, business partners and suppliers, proxies and representatives, are also bound to comply with the principles established in this Code.

Suppliers must also comply with the Suppliers' Code of Conduct.

Quinta Nova and Taboadella shall promote awareness of ethical and behavioural requirements among its Employees and stakeholders at all times.

## II – Standards of Professional Conduct

### A. General Principles

Quinta Nova and Taboadell, along with all their Employees, undertake to respect good business practices and to avoid engaging in or facilitating conduct, behaviour or practices that might be considered improper, illegal, criminal, unethical or dishonest in the course of their relationships with clients, suppliers, business partners, competitors or public authorities.

### B. Zero tolerance for corruption or related offences

Quinta Nova and Taboadella do not permit active or passive corruption and bribery, whether in the private or public sector, including facilitation payments and the creation, maintenance or promise of improper situations or favours, for whatever reason.

Any Employee who becomes aware of any situation that indicates or makes him/her suspect less ethical or inappropriate conduct, even if

only potentially, must immediately report it through the whistleblowing channels available for this purpose.

### a. Prevention of risks of corruption and related offences

In line with the above and in compliance with the provisions of the General Regime for the Prevention of Corruption, approved by Decree-Law no. 109-E/2021, of 9 December, Quinta Nova and Taboadella have a Regulatory Compliance Programme that seeks to address risks of corruption and related offences.

Corruption and related offences are defined as the following crimes: active corruption, passive corruption, receiving and offering an undue advantage, embezzlement, graft, extortion, abuse of power, administrative misconduct, influence peddling, money laundering, fraud in obtaining a subsidy, grant or credit and misappropriation of the same.

The criminal offences that can be committed within Quinta Nova and Taboadella, considering their private nature, have the criminal framework and associated sanctions described in the table below:

Legal type	Description of penalties	Portugal Legislation
ACTIVE CORRUPTION	<p>Whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises to give to an official, or to a third party by indication or with his/her knowledge, a monetary or non-monetary advantage for the performance of an act or omission in the exercise of his/her duties, even if the action or omission does not imply a violation of the duties of office.</p> <p>Punishable by <u>imprisonment for up to 5 years</u> or a <u>fine of up to 360 days (€1,800 - €180,000)</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 600 days, between €60,000 and €6,000,000</u>.</p>	Penal Code Article 374
OFFERING AN UNDUE ADVANTAGE	<p>Whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises to give to an official, or to a third party by indication or with his/her knowledge, a monetary or non-monetary advantage which is not due to him/her for the performance of his/her duties, or because of them.</p> <p>Punishable by <u>imprisonment for up to 3 years</u> or a <u>fine of up to 360 days (€1,800 - €180,000)</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 360 days, between €36,000 and €3,600,000</u>.</p>	Penal Code Article 372

<p>ACTIVE CORRUPTION DAMAGING INTERNATIONAL TRADE</p>	<p>Whoever by him/herself or with his/her consent or ratification, through an intermediary, gives or promises to a national, foreign or international official, or to a national or foreign political officeholder, or to a third party with their knowledge, a material or non-material advantage that is not due to them, in order to obtain or retain a business deal, a contract or another undue advantage in international trade.</p> <p>Punishable by <u>imprisonment from 1 to 8 years</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 960 days, between €96,000 and €9,600,000</u>.</p>	<p>Penal Code Article 372</p>	<p>ACTIVE CORRUPTION IN THE PRIVATE SECTOR</p>	<p>Whoever by him/herself or with his/her consent or ratification, through an intermediary, gives or promises to a worker in the private sector, or to a third party with his/her knowledge, a monetary or non-monetary advantage, which is not due, for the performance of an act or omission which constitutes an infringement of his/her functional duties.</p> <p>Punishable by <u>imprisonment for up to 5 years</u> or a <u>fine of up to 600 days (€3,000 - €300,000)</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 600 days, between €60,000 and €6,000,000</u>.</p>	<p>Law no. 20/2008 of 21 April (Criminal liability for crimes of corruption in international trade and private activity) Article 9</p>
<p>PASSIVE CORRUPTION IN THE PRIVATE SECTOR</p>	<p>Whoever [private sector employee], by him/herself or with his/her consent or ratification, through an intermediary, requests or accepts for him/herself or a third party, without being owed such, a monetary or non-monetary advantage, or the promise thereof, for an act or omission that constitutes an infringement of his/her functional duties.</p> <p>Punishable by <u>imprisonment for up to 8 years</u> or a <u>fine of up to 600 days (€3,000 - €300,000)</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 960 days, between €96,000 and €9,600,000</u>.</p>	<p>Law no. 20/2008 of 21 April (Criminal liability for crimes of corruption in international trade and private activity) Article 8</p>	<p>INFLUENCE PEDDLING</p>	<p>Whoever, by him/herself or through an intermediary, with his/her consent or ratification, requests or accepts, for him/herself or for a third party, a monetary or non-monetary advantage, or the promise thereof, in order to abuse their real or supposed influence over any public entity; or whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises a monetary or non-monetary advantage to the above-mentioned persons.</p> <p>Punishable by <u>imprisonment for up to 5 years</u> or a <u>fine of up to 240 days (€1,200 - €120,000)</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 600 days, between €60,000 and €6,000,000</u>.</p>	<p>Penal Code Article 335</p>

<p>MONEY LAUNDERING</p>	<p>Whoever converts, transfers, aids or facilitates any conversion or transfer operation of advantages obtained, for him/herself or a third party, directly or indirectly, for the purpose of concealing their illegal origin or avoiding prosecution for the crime(s) committed.</p> <p>Punishable by <u>imprisonment of up to 16 years</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 1920 days, between €192,000 and €19,200,000</u>.</p>	<p>Decree-Law no. 28/84 of 20 January (Anti-economic offences and offences against public health) Article 36</p>	<p>FRAUD IN OBTAINING CREDIT</p>	<p>Whoever, when presenting a proposal for granting, maintaining or modifying the conditions of a credit intended for an establishment or company:</p> <p><b>a)</b> Provides inaccurate or incomplete written information intended to enhance the application or which may impact on the decision to be taken regarding the application;</p> <p><b>b)</b> Uses inaccurate or incomplete documents relating to the economic situation, namely balance sheets, profit and loss accounts, general descriptions of assets or expert opinions;</p> <p><b>c)</b> Conceals downturns in the economic situation discovered subsequent to submission of the credit application and which may impact on the decision to be taken regarding the application.</p> <p>Punishable by <u>imprisonment for up to 5 years or a fine of up to 200 days (€1,000 - €100,000)</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 600 days, between €60,000 and €6,000,000</u> or even the <u>penalty of winding up the company</u>.</p>	<p>Decree-Law no. 28/84 of 20 January (Anti-economic offences and offences against public health) Article 38</p>
<p>FRAUD IN OBTAINING A SUBSIDY OR GRANT</p>	<p>Whoever obtains a subsidy or grant:</p> <p>a) Providing the competent authorities or entities with inaccurate or incomplete information about themselves or third parties and concerning facts important to the granting of the subsidy or grant;</p> <p>b) Omitting information on facts that are relevant for the awarding of the grant;</p> <p>c) Using a document proving entitlement to the subsidy or grant or important facts for its award obtained through inaccurate or incomplete information.</p> <p>Punishable by <u>imprisonment from 1 to 8 years</u>, in the case of <b>natural persons</b>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 960 days, between €96,000 and €9,600,000</u>, or even the <u>penalty of winding up the company</u>.</p>	<p>Decree-Law no. 28/84 of 20 January (Anti-economic offences and offences against public health) Article 36</p>			

<p>MISAPPROPRIATION OF A SUBSIDY, GRANT OR SUBSIDISED</p>	<p>Whoever uses benefits obtained as a grant, subsidy or subsidised credit for purposes other than those for which they are legally intended or those provided for in the credit line as established by the legally competent entity.</p> <p>Punishable by <u>imprisonment for up to 6 years</u> or a <u>fine of up to 200 days (€1,000 - €100,000)</u>.</p> <p>A <b>legal person</b> may be sentenced to pay a <u>fine of up to 720 days, between €72,000 and €7,200,000</u>, or even the <u>penalty of winding up the company</u>.</p>	<p>Decree-Law no. 28/84 of 20 January (Anti-economic offences and offences against public health) Article 36</p>
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Quinta Nova and Taboadella will make Employees aware of their Plan for the Prevention of Risks of Corruption and Related Offences, via the Intranet and on their official website, within 10 days of its implementation and of any revisions or amendments.

### b. Permitted and prohibited practices and conduct

Employees must abstain from promising, offering, delivering, asking or receiving, directly or indirectly, any gifts, invitations to institutional or cultural events, or similar benefits, gratuities, remunerations, commissions, trips, accommodation, favours, privileges or any other kind of incentive or advantage, whether financial or non-financial, that may or are likely to affect impartiality and/or integrity in the performance of their duties, except in cases where:

- a) the value of the items is merely symbolic or less than €150 (one hundred and fifty euros);
- b) the gifts relate to to customary practices, such as Christmas or wedding presents, provided that it is not in cash and within the limit provided for in clause a);
- c) it comprises invitations or similar benefits in connection with participation in official ceremonies, conferences, congresses, seminars, trade fairs, industry meetings, or other similar events, particularly those of a commercial nature, when such participation is in accordance with customary practices and compatible with the institutional nature or the significance of the representation inherent to the role, and when Quinta Nova or Taboadella have a vested interest in their attendance, or when the Employee is expressly invited in this capacity, thereby fulfilling a representative role that cannot be assumed by third parties.

Without prejudice to the foregoing, the offer in question should only be accepted if all the following requirements are met:

- a) It is done publicly and transparently;
- b) It is neither imposed nor suggested by the recipient;
- c) It has a legitimate and verifiable purpose;
- d) It is in accordance with the circumstances and the occasion on which it is offered;

- e) It is not offered in cash;
- f) It is not recurrently offered to the same recipient, i.e., more than once in a period of 6 (six) months;

All Employees and representatives of Quinta Nova and Taboadella whose professional duties allow them to participate in the process of contracting or renewing contracts, are prohibited from accepting any offers, invitations or promises of advantages during the negotiations or in the period preceding the renewal of the contract with third parties, regardless of the circumstances.

Before offering/giving/promising any gift or hospitality, the Employee must consider the following:

- a) Could knowledge of the offer cause any embarrassment, even if merely reputational, for Quinta Nova and/or Taboadella?
- b) Does the recipient exercise public functions or have links, directly or indirectly, to the public sector?
- c) Does the recipient belong to an organisation whose internal policies may prohibit or restrict the receipt of offers?
- d) Is the recipient located in a country where the applicable rules of conduct regarding the receipt of gifts and business courtesies are unknown?

If the answer to any of the above questions is affirmative, the offer should not be given or promised. Even in the event of doubt, the Employee must refrain from making the offer or accepting it.

In any case, the offer or receipt shall always take place in a public and transparent manner, and the duty of communication and registration provided for in point c. below shall also be complied with.

Finally, under no circumstances may Employees request, accept, give or promise to give to public agents, officials, political office holders or senior public office holders any payments, invitations, favours, advantages or gifts in the exercise of their functions or because of them, when such favours seek acts or omissions that breach the duties of office or when such advantages are undue, even if they do not constitute a breach of the duties connected with the position.

These rules extend to the close family members of officials, civil servants, political office holders, holders of high public office or politically exposed persons.

### c. Accepting and offering gifts

In the event of receiving a gift, if it fulfils the criteria set out in the previous section b., the Employee may accept it, provided that they notify their line manager within two working days.

In the case of gift offers, the Employee must always obtain prior approval, except in the case of customary gifts, such as Christmas or wedding presents, on condition that they are not in cash and do not exceed €150.00 (one hundred and fifty euros) in value.

To this end, the Employee must complete the ***Gift Offer/Acceptance Registration Form***, contained in **Appendix I** to this Code of Professional Conduct, and submit it to the respective line manager.

In the event that the offer is not approved, the Employee must refrain from accepting it.

As for the gifts received, if approval is not obtained, the Employee must return them or, alternatively, obey whatever decision is made.

Any exceptions to any of the criteria described in this Code of Professional Conduct will only be valid if approved in writing by the Board of Directors prior to the offer or acceptance of the gift in question. The Employee must complete, for this purpose, the ***Request for Exceptional Approval to Offer/Accept a Gift***, contained in **Appendix**

**II**, and submit it to the Compliance Office at the following the e-mail address [compliance@amorimfamilyestates.com](mailto:compliance@amorimfamilyestates.com).

Within three (3) working days of receiving the Employee's request, the Compliance Officer shall assess and forward the request, together with his/her opinion, to the Board of Directors, which shall take a decision on it in the shortest possible time.

### d. Facilitation payments

Quinta Nova and Taboadella do not authorise or consent to facilitation payments, i.e. payments related to the need to secure or speed up otherwise legitimate authorisations or approvals from the authorities that may be pending.

### e. Sponsorships, donations and political contributions

Sponsorships and donations may not be used as a means of exerting undue influence, directly or indirectly, on the recipient organisation, nor may they constitute an advantage aimed at the commission of an act or omission by the beneficiary organisation or a third party.

Sponsorships and donations must always be transparent, fair, rigorous, and coherent, and should be allocated within the framework of corporate social responsibility objectives. Additionally, they must be supported by appropriate documentation in all cases.

It is expressly forbidden, regardless of the circumstances or motives, to make contributions to any political party or candidate for political office, whether directly or indirectly.

### C. Conflict of Interests

"Conflict of interests" means any situation in which the personal interests of Employees are, directly or indirectly, actually or apparently, in conflict with and/or contrary to the interests of Quinta Nova or Taboadella.

An Employee has a personal interest when the matter in question affects or appears to affect him or her or a person related to him or her.

The following are considered "related persons":

- a) A spouse or similar;
- b) Family members up to the fourth degree of consanguinity or affinity;

- c) Third parties with common interests, namely corporate, commercial or professional interests;

- d) Organisations in which the above-mentioned persons hold an administrative or managerial position or from which they receive remuneration in any capacity, provided that, in addition, they exercise, directly or indirectly, a significant influence on the financial and operational decisions of these organisations.

The following are some examples, among others, of conflicts of interest:

- a) An Employee or a related person simultaneously acts as a member of the administrative or management body of any of the company's clients, contractors, suppliers, service providers or partners;
- b) An Employee or a related person has a direct or indirect interest in establishing a contractual relationship with any client, contractor, supplier, service provider or partner of Quinta Nova or Taboadella;
- c) An Employee contracts, pays for, contributes towards or performs any action that implies an economic benefit for any related person who is a supplier, contractor, service provider, partner or client of Quinta Nova or Tabodella;
- d) An Employee acts in his/her own interest when this involves harm to Quinta Nova or Taboadella (e.g. use of working time or company resources) or is in competition with the companies;
- e) An Employee engages in external activity involving any potential disclosure of Quinta Nova's or Taboadella's trade secrets;

- f) An Employee oversees, scrutinises or influences the professional appraisal of any of their family members or friends who are employees of or provide services to Quinta Nova or Taboadella.

Whenever a conflict of interest arises, Employees are bound to comply with the internal procedures laid down in the ***Conflict of Interest Declaration***.

#### **D. Fair competition and defence of market values**

When participating in commercial activities, Employees of Quinta Nova and Taboadella must, at all times, promote fair, free and effective competition that in no way harms the market, clients and all those with whom the companies maintain business or professional relationships.

Whenever, in the relationship with competitors, any anti-competitive conduct is detected or suspected, it must be reported through the available internal channels.

In case of doubt, the Employee must contact the Compliance Officer at the following email address: [compliance@amorimfamilyestates.com](mailto:compliance@amorimfamilyestates.com).

#### **E. Third-party Relationships**

All suppliers and business partners must, in conjunction with Quinta Nova and Taboadella, act in accordance with the highest principles of

integrity, transparency, honesty and good business practices, while repudiating all forms of conduct, behaviour or practices that are, or which they may consider to be, irregular, illegal, unethical or dishonest.

Employees, in the performance of their roles, must abstain from relationships with any third parties (clients, suppliers or intermediaries) who do not offer them guarantees of strict compliance with the legal rules applicable to them or who, when necessary, do not ensure adoption of an adequate compliance programme.

#### **F. Privacy and personal data protection**

Quinta Nova and Taboadella rigorously observe the legal rules and guidelines of the competent data protection authorities with regard to the free movement of personal data, the principles and duties to be complied with in their processing and the exercise of rights by the respective data subjects.

Employees must scrupulously comply with the data protection principles set forth in applicable legislation and internal rules when dealing with the personal data of clients, suppliers, shareholders, employees or third parties during the course of their duties.

The privacy policies of Quinta Nova and Taboadella can be found on the following websites:

- **Quinta Nova:**  
<https://www.quintanova.com/en/privacy-policy/>
- **Taboadella:**  
<https://www.taboadella.com/en/privacy-policy/>

## G. Working conditions and relations between employees

Employees are essential to both Quinta Nova and Taboadella, which are committed to creating quality jobs and ensuring their Employees enjoy professional training and career development.

Quinta Nova and Taboadella take human and labour rights as a guiding principle for all their activities, and seek to ensure that this principle is gradually applied throughout their entire value chain.

In particular, Quinta Nova and Taboadella are against detention, torture or execution, forced or child labour or harassment at work, and discrimination, and in favour of human dignity, equal rights, safety and well-being, education, personal and professional development and freedom of conscience, religion, organisation, association, opinion and expression, as well as access to water, which is essential for enjoying the right to life.

Quinta Nova and Taboadella guide their labour procedures and policies to uphold the principles of equality and the right to privacy, fostering mutual respect and ensuring equal treatment and opportunities for all Employees.

Quinta Nova and Taboadella, along with their respective Employees, must not tolerate violations of human rights. Quinta Nova and Taboadella repudiate any discrimination based on sexual orientation, ethnic origin, race, territory of origin or language, age, ethnicity or religion, political or ideological conviction or trade union membership, on the grounds of equal rights and conditions.

### a. Free employment

Quinta Nova and Taboadella do not accept, either internally or within their supply chain and influence, forced, slave, or involuntary labour.

No form of illegal labour trafficking or fraudulent immigration will be allowed, and legislation on aliens and their entry and transit will always be respected.

No employee may be required to leave any "deposit", passport or identity document with Quinta Nova or Taboadella, they being free to terminate their contractual relationship at any time, in compliance with the legally or contractually applicable notice.

Quinta Nova and Taboadella undertake to exercise careful control over their suppliers, subcontractors and service providers and will immediately cease any relationship with them if they are found to be using any form of forced labour.

## b. Child labour

Quinta Nova and Taboadella will not employ child labour or engage in any other form of exploitation of children or adolescents, and under no circumstances will they accept labour by minors under the age of 16.

Quinta Nova and Taboadella will not condone such practices by third-party suppliers of products or services, which shall respect the minimum age limit established by law, and will never accept labour by minors under the age of 16. If they detect that such third parties use child labour, Quinta Nova or Taboadella, as the case may be, will immediately cease any relationship with them.

## c. Workplace harassment

"Workplace harassment" means:

- in the sense of moral harassment, any isolated or repeated unwanted behaviour with the aim of upsetting or embarrassing a

person, affecting their dignity, or creating a hostile, degrading, humiliating, destabilising or intimidating environment; and

- in the sense of sexual harassment, unwanted behaviour of a sexual nature, in verbal, non-verbal or physical form, with the aim or effect of embarrassing, humiliating or intimidating.

Workplace harassment is expressly prohibited, in particular:

- Verbal or written insults, intimidation or threats, whether or not made in the presence of third parties;
- Non-consensual intrusion into private, personal or love life;
- Dissemination of rumours or false information, of any nature;
- Public comments, criticisms, or behaviour intended solely to humiliate, belittle, or ridicule;
- Unjustified and disproportionate abuse of power by a superior over their subordinate;
- Requests for sexual favours;
- Invitations to unwanted meetings;
- Jokes, images, written messages or emails of a sexual nature.

Quinta Nova and Taboadella reject and do not tolerate any kind of harassment, discrimination, coercion, abuse, violence or exploitation at work, within their sphere of influence.

Employees have a duty to report inappropriate behaviour that indicates harassment at work, with a view to clarifying the situation and initiating disciplinary inquiries.

Thus, anyone who suffers from or has any knowledge of workplace harassment must report it to the Human Resources Department or their superior, or use the *Internal whistleblowing channel*, available at <https://quintanova.integrityline.com/>.

Everyone must contribute to an inspiring and pleasant environment, and not allow, tolerate or facilitate any form of harassment, and Employees will enjoy comprehensive legal protection if they are victims and/or report cases of workplace harassment, including the right to anonymity and secrecy under the law.

### III – Consequences of non-compliance

Failure to comply with the rules set forth in this Code of Professional Conduct may have serious consequences for Quinta Nova and Taboadella, and such non-compliance will not, under any circumstances, be tolerated, and Quinta Nova and Taboadella reserve the right to resort to legal remedies to protect their rights, including the initiation of disciplinary, civil or criminal proceedings.

The employer may apply the following penalties according to the law, in the exercise of its disciplinary power:

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

In the case of third parties dealing with Quinta Nova and Taboadella (namely suppliers), failure to comply with the rules contained in this Code of Professional Conduct may be grounds for contractual penalties and/or termination of the contract.

### IV – Internal Whistleblowing

Quinta Nova and Taboadella encourage anyone involved to report any suspicions of any conduct that may amount to corruption or related offences, or which violates the principles contained in this Code, using the *Internal whistleblowing channel* to do so.

Whistleblowers can report anonymously and confidentially and without fear of reprisals, as described in the *Internal Whistleblowing Procedure*.

Employees should always seek clarification from the Compliance Officer if they have any doubts.

## **V – Disclosure and training**

A Quinta Nova and Taboadella will take appropriate measures to ensure that all Employees are aware of the contents of this Code and understand its scope.

This Code of Professional Conduct is made available to Employees through the Intranet.

It will also be made available to Third Parties representing Quinta Nova or Taboadella or who establish contractual relations with any of their companies.

In addition, the rules set out in this Code of Conduct form an integral part of Quinta Nova and Taboadella's training plan and programme, whose attendance is mandatory for all Employees.

This Code will be reviewed every three years or whenever there is a change in the functions or in the organisational or corporate structure of the companies, while the annual reports will also be considered.

Whenever possible and desirable, Quinta Nova and Taboadella will inform employees of updates to this Code of Professional Conduct and conduct the relevant training programmes to ensure that they are aware of the updated rules contained therein.

## **VI – Approval and validity**

This Code came into force on October 7, 2024, the date on which it was approved by the Board of Directors of Quinta Nova and Taboadella.

Mozelos, October 7, 2024

## APPENDIX I

### Gift Offer/Acceptance Registration Form

Gift: \_\_\_\_\_

Date of Gift Offer/Acceptance: \_\_\_\_/\_\_\_\_/\_\_\_\_

Estimated value of the Gift (in local currency and in euros):  
\_\_\_\_\_

Legal person receiving the Gift: \_\_\_\_\_

Natural person receiving the Gift: \_\_\_\_\_

Is the natural person receiving the Gift a Civil Servant?

YES \_\_\_\_\_ NO \_\_\_\_\_

Legal person offering the Gift: \_\_\_\_\_

Natural person offering the Gift: \_\_\_\_\_

Reason/justification for the Gift: \_\_\_\_\_

Before offering/giving/promising any Third Party or accepting/receiving from any Third Party any Gift, you must check and ensure that said conduct meets all the following criteria:

GENERAL CRITERIA	YES	NO
It is permitted by law		
It is permitted by the internal rules of Quinta Nova / Taboadella		
It has a legitimate purpose		
It is not intended to, nor is it capable of, improperly influencing, nor does it constitute a <i>quid pro quo</i> for any action or omission		
It is appropriate		
It complies with the established limit in terms of value (150 euros)		
It is not directed at a civil servant or equivalent		

If a "No" is the reply to any of the above criteria, the Gift should not be offered/given/promised or accepted/received. Any departure from any of the General Criteria must be approved in writing by the Board of Directors before the Gift is offered or accepted, as defined in the Code of Professional Conduct. If in doubt, the offer or acceptance shall not be made.

I hereby declare that all the information provided herein is true and accurate.

Name/Position: \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature: \_\_\_\_\_

## APPENDIX II

### Request for Exceptional Approval of the Gift Offer/Acceptance

Gift: \_\_\_\_\_

Date of Gift Offer/Acceptance:: \_\_\_\_/\_\_\_\_/\_\_\_\_

Estimated value of the Gift (in local currency and in euros): \_\_\_\_

Legal person receiving the Gift: \_\_\_\_\_

Natural person receiving the Gift: \_\_\_\_\_

Is the natural person receiving the Gift a Civil Servant?

YES \_\_\_ NO \_\_\_

Legal person offering the Gift:: \_\_\_\_\_

Natural person offering the Gift: \_\_\_\_\_

Before offering/giving/promising any Third Party or accepting/receiving from any Third Party any Gift, you must check and ensure that said conduct meets all the criteria established in the Code of Professional Conduct. Any departure from any of the criteria must be approved in writing by the Board of Directors **before** the Gift is offered or accepted. If in doubt, the gift shall not be offered or accepted. Which of the following criteria are not met and is the reason for this Request for Exceptional Approval of the Gift Offer/Acceptance?

CRITERIA	YES	NO
It is permitted by law (including, without limitation, by anti-corruption laws)		
It is permitted by the internal rules of Quinta Nova / Taboadella		
It has a legitimate and verifiable purpose		
It is not intended to obtain improper influence, nor does it constitute a <i>quid pro quo</i> for any action or omission		
It is appropriate		
It complies with the established limit in terms of value (150 euros)		
It is not directed at a civil servant or equivalent		

What are the reasons for this Request for Exceptional Approval of the Gift Offer/Acceptance:

15

I hereby declare that all the information provided herein is true and accurate.

Name/Position::

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature: