

# CODE OF ETHICS AND CONDUCT

A. SILVA LEAL – IMPORTAÇÃO E EXPORTAÇÃO DE  
MATERIAL DE DEFESA, LDA

2024



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## **INTRODUCTION**

A. Silva Leal is a Portuguese company specializing in the commercialization of defense, security, and protection materials, offering a wide range of associated services.

With over 60 years of experience, we pride ourselves on meticulously meeting the demands of our clients, whether governmental or private entities, both nationally and internationally.

As a private entity in the Defense Sector, our activities require the utmost rigor, confidentiality, and transparency, imposing greater responsibility on all those who work within it regarding their conduct and performance.

ASL carries out all its tasks with high professionalism, ensuring the necessary actions and means to achieve its objectives.

This code aims to establish a set of values, principles, and practices to be adopted by all ASL personnel, consultants, and service providers in the performance of their duties.

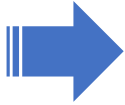
Within the framework of the new generation of ethics and conduct codes, which postulate a new paradigm of behavioral approach, a primarily preventive perspective is favored to encourage employee adherence to the rules of conduct outlined herein.

Besides the preventive dimension, the importance of reinforcing current legal norms is also recognized.

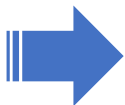
As a support tool for action, its content will be reviewed as necessary.



## **SCOPE OF APPLICATION**



This Code of Ethics and Conduct applies to ASL personnel and collaborators regardless of the nature of the functions performed, hierarchical position, or the respective legal relationship.



ASL collaborators for the purposes of applying this Code of Ethics and Conduct include consultants, external service providers, subcontractors, or other stakeholders who regularly interact in the company's work environment, contributing to the pursuit of its mission.

## **OBJECTIVES**

- This Code aims to guide employees on the expected behavior regarding integrity in their professional duties, particularly in internal relations among employees.
- It serves as a reference for conduct to be observed by employees in their internal and external relationships, reinforcing mutual respect and transparency in relations with various stakeholders.
- It consolidates the foundations of relationships between employees and partners, promoting the adoption of operational principles
- It reduces the subjectivity of personal interpretations of moral and ethical principles.
- It holds employees individually and collectively accountable for their commitment to the company.
- It ensures responsible, judicious, and prudent management.
- It contributes to the affirmation of the company's institutional image.



## **FUNDAMENTAL PRINCIPLES**

To contribute to the affirmation of an institutional image of competence, rigor, efficiency, and ethics, employees must conduct their duties respecting the following principles:

- **Legality**

Employees must act in accordance with the law and the guidance of their superiors within the scope of their functions, ensuring compliance with current legislation.

- **Impartiality and Independence**

Employees must commit to performing their duties with strict objectivity and neutrality in all situations, adopting an impartial stance on matters that may involve interests, thus adhering to the professional ethical codes they are subject to.

- **Equality**

All citizens are equal before the law. The employer must respect the individual particularities of each person without discrimination based on ancestry, age, sex, sexual orientation, gender identity, marital status, family situation, economic situation, education, origin or social condition, genetic heritage, reduced working capacity, disability, chronic illness, nationality, ethnic or racial origin, territory of origin, language, religion, political or ideological convictions, and union membership or other.

- **Responsibility**

Employees must adopt responsible behavior that enhances their prestige and that of the entity they represent. They must avoid any actions that compromise their reputation or that of the company they work for.



▪ **Competence**

Employees must always behave appropriately to the company's objectives and mission.

They must perform all tasks with high professionalism, ensuring the necessary actions and means to achieve their objectives

▪ **Integrity**

Employees must not accept or request any compensation, gifts, favors, or advantages in the performance of their duties, committing to using maximum loyalty.



**ORGANIZATIONAL ENVIRONMENT AND INTERPERSONAL RELATIONSHIPS**

ASL employees must foster a good working environment in their relationships, promoting mutual help and teamwork, guided by mutual respect, professionalism, cordiality, and honesty.

➤ **Responsible use of resources**

Employees must ensure the protection, conservation, and rationalization of resources provided, using them efficiently to achieve the company's defined objectives, and not for personal or third-party gain.

They must implement environmental protection policies in their duties, adopting behaviors that reduce waste, separate garbage for recycling, and minimize energy consumption and material use whenever possible, contributing to sustainable development.

➤ **Interpersonal Relationships and Social Responsibility**

Employees must contribute to creating and maintaining a good working atmosphere through mutual collaboration and cooperation.

They should continuously and sustainably create an organizational climate of trust where each individual has opportunities for professional and personal development.



In their duties, employees must respect the values of human life and dignity, conducting themselves by ethical values.

➤ **External relations**

Employees must handle all matters entrusted to them professionally, making every effort to maximize the satisfaction of all parties involved when dealing with clients, suppliers, or other entities.

➤ **Personal Data Protection**

Employees with access to personal data must ensure that their processing is carried out only within the purposes for which they were collected and not transmitted for purposes not explicitly determined by the employer, in accordance with applicable legislation. They must respect the privacy of data subjects and the integrity of the data, treating it as confidential information that cannot be disclosed to third parties.

➤ **Offers, Gratuities, Benefits and Perks**

Employees must not solicit, receive, or accept for themselves or third parties any gifts, benefits, compensation, or advantages that may compromise their impartiality and integrity in performing their duties. However, accepting goods of an estimated value of less than 150 Euros is allowed, provided it does not compromise necessary impartiality.

➤ **Conflict of Interest**

Employees are prohibited from engaging in acts that directly or indirectly create a conflict of interest.

A conflict of interest exists whenever employees have a personal or private interest.

They must inform the employer if they encounter a situation that may constitute a conflict of interest.

➤ **Corruption Prevention**

Employees must actively oppose all forms of active or passive corruption, economic and financial crime, money laundering, influence peddling, abuse of power, or violation of confidentiality.



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### ➤ **Confidentiality of Information**

Employees must keep confidential all information they access in their duties, not disclosing information about the organization, production methods, or business of the employer or third parties contracting with the employer or associated companies. This information cannot be used for personal or third-party gain during the contractual relationship and even after its termination, unless it has been made public or is publicly available.

## **FINAL PROVISIONS**

ASL's Management Bodies commit to encouraging employees to perform their duties efficiently and with quality, aiming for the development of responsibility and autonomy.

They also strive to ensure harmonious working relationships, promote team spirit, motivate employees, and recognize merit in an environment that fully affirms the primacy of competence and values employees.

## **REVIEW**

This code must be reviewed every four years or whenever there are facts justifying its revision.

## **EFFECTIVE DATE**

This code takes effect after approval by ASL's management body.

Lisbon, April 30, 2024

The Management