

A large industrial robot arm is the central focus, positioned in a factory or laboratory environment. The robot is mounted on a circular base and is holding a component. The background shows various industrial structures, including beams and other machinery. The entire image is overlaid with a blue tint.

iNTROSYS
Global Control System Designers

CODE OF ETHICS AND CONDUCT

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Review 3

Reviwed by

Ana Vale

14/01/2025

Approved by

Nuno Flores - CEO

Eurico Dias – COO

14/01/2025

ÍNDICE

1. MESSAGE FROM THE BOARD.....	1
2. PURPOSE.....	2
3. SCOPE.....	2
4. PRINCIPLES.....	2
5. CONSEQUENCES OF THIS CODE VIOLATION.....	5
6. REPORTING IRREGULARITIESIRREGULARIDADES	5
7. CHANGE CONTROL	6
8. ANNEX I TO THE CODE OF ETHICS AND CONDUCTE	7

1. MESSAGE FROM THE BOARD

Our Code of Ethics and Conduct reflects INTROSYS' culture, values and corporate identity.

INTROSYS is a benchmark company in the areas in which it operates, and it is essential that all employees, suppliers, customers and other stakeholders act with integrity and honesty, guided by internal rules and policies and the legislation in force in each country where we operate.

a) Commitments to Integrity and Sustainability

In 2019, INTROSYS subscribed to the BCSD Portugal (Business Council for Sustainable Development) Charter of Principles, which establishes a set of guiding principles for responsible and sustainable business management.

This Charter is inspired by the Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact, and INTROSYS is committed to adopting business practices in line with ethical, social, environmental and quality standards, applicable in any context of the global economy.

We recognize the merit and relevance of this initiative, since the BCSD Portugal Charter of Principles encourages subscribing companies to adopt and develop management practices that promote transparency, responsibility and sustainability.

b) Joining the Portuguese Platform for Integrity

In 2024, INTROSYS joined the PPI (Portuguese Platform for Integrity), reaffirming its commitment to business ethics and the fight against corruption. This platform promotes transparency and integrity in business, encouraging organizations to implement mechanisms to prevent and manage risks related to illegal and unethical practices.

Joining this platform reflects our ongoing commitment to strengthening the culture of integrity within the company and in our business relationships, reinforcing the trust of our partners and society in general.

c) A Commitment by All

INTROSYS' Code of Ethics and Conduct is a fundamental tool for formalizing the principles we stand for and defining the rules of conduct that guide our professional relationships.

As it is a set of basic ethical principles and, by its nature, general, the matters regulated in the Code are developed in more detail in internal policies and procedures.

We expect a serious commitment from all employees, clients and suppliers to read and scrupulously comply with this Code, as this is the only way to ensure that our work continues to be recognized for its quality, integrity and social responsibility.

2. PURPOSE

The purpose of this Code of Ethics and Conduct is to define the framework for the actions of INTROSYS employees, as well as customers and suppliers, in their relationships, in order to convey the ethical standards that guide INTROSYS' conduct.

In this way, INTROSYS can continue to work to maintain relationships of good ethics and conduct with all its Stakeholders, ensuring that the established principles are complied with by employees, customers and suppliers, promoting an environment of trust, transparency and mutual responsibility.

3. SCOPE

Without prejudice to scrupulous compliance with the rules of conduct and the law applicable in each place where its activities are carried out, this Code of Ethics and Conduct is applicable to all our Stakeholders listed below, and in accordance with the scope better defined in Annex I, which forms an integral part of this Code:

- CLIENTS
- EMPLOYEES
- SHAREHOLDERS
- SUPPLIERS
- SCIENTIFIC AND TECHNOLOGICAL PARTNERS

This Code applies to INTROSYS' head office and all its delegations, subsidiaries or sites entrusted to it, and to all sites where its Employees carry out their professional activities.

4. PRINCIPLES

INTROSYS has identified the basic principles that should regulate the actions of its Employees and which, inherently, will be reflected in the other Stakeholders:

1. Principle of Equality and Non-Discrimination
2. Principle of Efficiency and Responsibility
3. Principle of Personal Data Protection and Confidentiality
4. Principle of Loyalty
5. Principle of Transparency
6. Principle of Legality
7. Principle of No Unfair Competition
8. Principle of Prohibition of Conflict of Interest
9. Principle of Corporate Social Responsibility

10. Principle of Intellectual Property Protection
11. Principle of Human Rights Protection
12. Principle of Well-being in the Workplace and Professional Progression
13. Principle of Combating Harassment and Corruption

INTROSYS seeks at all times to comply with the principles and values in force in national and international legislation on human and social rights, and therefore repudiates any and all discriminatory behavior, particularly on the grounds of ancestry, gender, sexual orientation, religion, age, marital status, family situation, nationality, ethnic origin, disability, political beliefs or ideologies, trade union membership or otherwise.

Equal opportunities are given, both during the recruitment process and during the vicissitudes of the employment relationship, based solely on their technical abilities and willingness to join the company's project in accordance with the People Management Policy.

Suppliers and service providers are also selected on the basis of technical criteria and by consulting the market and alternative suppliers, with the Purchasing Department coordinating all the company's purchasing processes.

Although in some cases we are required by our clients to use certain products from certain brands, INTROSYS makes sure that they also comply with the rules of business ethics and conduct that our company adheres to.

Our vision for selecting Service Providers and Suppliers is based on an impartial decision based on quality, innovation, trust and continuity.

4.1. Principle of Efficiency and Responsibility

INTROSYS ensures that both Employees and Management carry out their duties in a responsible, conscientious, and professional manner, safeguarding the company's assets and those entrusted to it by third parties. This is achieved through the prudent, efficient, and rational use of available resources.

4.2. Principle of Personal Data Protection and Confidentiality

Given the sensitivity of the automotive sector and the importance of protecting "trade secrets," INTROSYS signs Non-Disclosure Agreements (NDAs) with its Stakeholders from the outset of any relationship.

Information is protected even if a contractual relationship is not established. Compliance with the General Data Protection Regulation (GDPR) is reinforced through the company's Privacy and Data Protection Policy.

The use of sensitive data is strictly limited to fulfilling legal and regulatory obligations, and this standard is required of all Stakeholders.

Employment contracts, Purchase Order General Terms, and Service Agreements include clauses that expressly prohibit the disclosure or misuse of confidential information, whether for personal benefit or not. Employees are also responsible for safeguarding information security when using electronic or physical resources provided by the company. The disclosure of illicit, inappropriate, or potentially harmful content is strictly forbidden.

4.3. Principle of Loyalty

Mutual trust between INTROSYS and its Stakeholders is built on loyalty. All relationships must be guided by respect, cooperation, honesty, and clear communication, fostering a work environment grounded in integrity and collaboration.

4.4. Principle of Transparency

INTROSYS follows procedures rooted in effectiveness, efficiency, and integrity. The company firmly rejects all forms of abuse, bribery, corruption, or money laundering, while maintaining a cooperative stance with public authorities and local communities.

All financial information must accurately and truthfully reflect the nature of the business activities carried out.

4.5. Principle of Legality

Employees are strictly prohibited from accepting gifts, benefits, or personal invitations that could influence—or appear to influence—their impartiality in performing their duties.

INTROSYS has a dedicated Anti-Corruption Policy to regulate such situations, ensuring compliance with applicable national and international legislation, supported by in-house legal counsel.

4.6. Principle of Fair Competition

As a commercial company, INTROSYS operates according to ethical market principles. Its relationship with competitors and business partners is based on cordiality and mutual respect.

Employees are prohibited from engaging in any activities that compete with the company, as clearly stated in their employment contracts.

4.7. Principle of Prohibition of Conflicts of Interest

Employees must not engage, directly or indirectly, in any business that competes with INTROSYS.

They are also prohibited from participating in decision-making processes involving individuals with whom they share personal connections (e.g., friends, family), unless expressly authorized in advance by Management.

Employees must not hold roles in organizations whose activities conflict with their duties at INTROSYS or whose goals are contrary to the company's mission.

4.8. Principle of Corporate Social and Environmental Responsibility

INTROSYS operates with a long-term value creation mindset, promoting sustainability, social responsibility, and environmental stewardship.

The company invests in the well-being of the communities in which it operates, encourages healthy lifestyles, supports volunteer work, and adopts environmentally responsible management practices.

These commitments are set out in its Environmental and Social Responsibility Policy.

4.9. Principle of Intellectual Property Protection

INTROSYS property—physical, financial, or intellectual—is for professional use only.

The company registers trademarks and patents whenever necessary, and Employees are responsible for protecting these assets and reporting any misuse.

Gaining personal advantage from company know-how or business information is prohibited, as is the use of the INTROSYS name or brand for non-corporate purposes without prior written authorization.

4.10. Principle of Human Rights Protection

INTROSYS is committed to providing a healthy, safe, and respectful work environment that upholds human dignity, as defined in its People Management Policy.

The company strictly opposes child labor, forced labor, or any practices that violate human rights and requires the same ethical standards from its Suppliers, with non-compliance resulting in disqualification.

4.11. Principle of Workplace Well-being and Professional Development

INTROSYS actively promotes the ongoing development of its Employees, fostering equality of opportunity and professional growth through training initiatives.

The company's People Management Policy supports a positive, fair, and motivating work environment.

4.12. Principle of Combating Harassment and Corruption

INTROSYS maintains zero tolerance for any form of harassment or corruption, whether between Employees, superiors, or Stakeholders.

These matters are governed by the Anti-Harassment and Anti-Corruption Policies.

Gifts or personal benefits are only acceptable if symbolic in value (up to €30.00), with the exception of holiday gifts, which must be forwarded to the Purchasing Department for equitable distribution as determined annually by Management.

Any offers involving travel, accommodation, or events must be evaluated by the Legal Department.

INTROSYS also maintains institutional neutrality and independence from political parties and public institutions.

5. CONSEQUENCES OF THIS CODE VIOLATION

Violation of the principles set out in this Code entails different consequences depending on the Stakeholder who violates them. Thus, if you are a Supplier, Customer or Scientific-Technological Partner, INTROSYS will be forced to cease having contractual relations with them, and may eventually determine the appropriate legal action. If you are a Shareholder, INTROSYS will seek to take the appropriate legal measures in the situation. If the violation of these rules is carried out by the Employee, it will imply recourse to disciplinary proceedings with the application of the disciplinary measure that, in the case, best suits.

6. REPORTING IRREGULARITIES/IRREGULARIDADES

To ensure monitoring, updating and strict compliance with the Code of Ethics and Conduct, INTROSYS has implemented a Whistleblower Channel available through the following link or QR Code:

https://whistleblowersoftware.com/secure/INTROSYS_CanaldeDenuncias



Any violation of this Code of Ethics and Conduct will have consequences appropriate to the situation, which, given its seriousness, may be merely disciplinary or criminal in nature.

Any questions, doubts or opinions regarding any situation that has occurred or regarding this document can be consulted by the INTROSYS Legal Department by email: legal@introsys.eu

7. CHANGE CONTROL

Rev.	DatE	Itens	Changes made
01	06-07-2020	-----	General review.
02	15-10-2020	3	New Annexs I.
03	15-01-2025	6 e 7	Reporting Channel

This Policy is available on the Intranet and on the INTROSYS server at X:\IMS\01_Políticas.

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8. ANNEX I TO THE CODE OF ETHICS AND CONDUITE

Label: R(Responsible); A(Co-Responsible); C(Consulted); I(Informed)								
Scope		Define Guidelines	Preparation and review	Final Version approval	Disclosure and Training	Ensure Compliance with the rules	Monitor and Organize audits	Execute the defined sanction
Stakeholders	Sub-Categories							
CLIENTS		I	I	I	I	R	I	I
EMPLOYEES	Administration	R	A	R	A	R	A	R
	Board of Directors	C	R	A	R	R	R	A
	Legal	C	Q	I	I	R	A	A
	Human Resources	C	A	I	R	R	A	A
	All Employees	I	C	I	I	R	I	I
SHAREHOLDERS		I	I	I	I	R	I	I
SUPPLIERS		I	I	I	I	R	I	I
SCIENTIFIC-TECHNOLOGICAL PARTNERS		I	I	I	I	R	I	I



Zona Industrial Vila Amélia
Estrada dos 4 Castelos | Lote 67 | 2950-805 Quinta do Anjo – Portugal
+351 212 951 499 | info@introsys.eu

www.introsys.eu