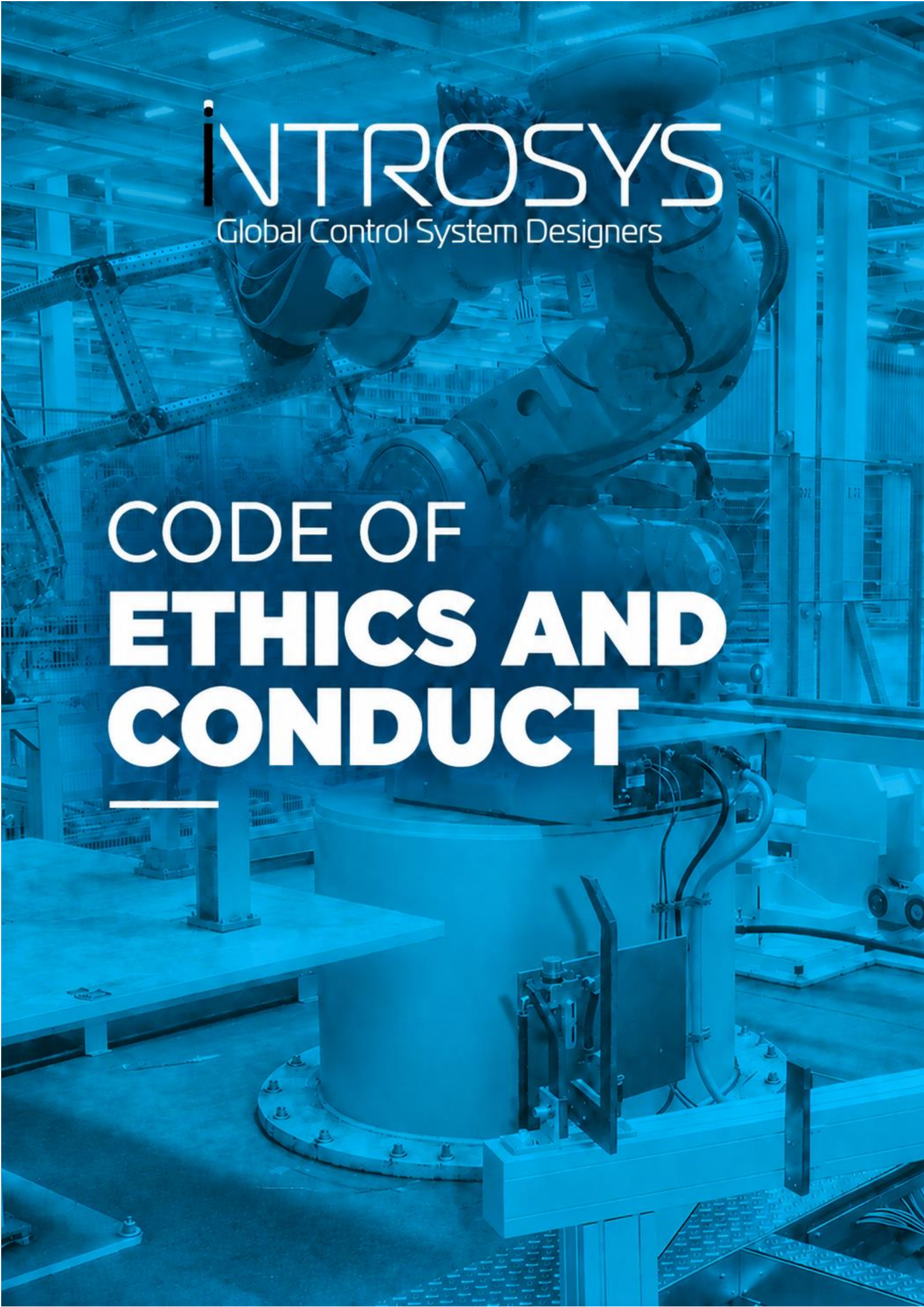




INTROSYS
Global Control System Designers

CODE OF **ETHICS AND CONDUCT**

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1. BACKGROUND

This Code of Ethics and Conduct reflects the culture, values and corporate identity of INTROSYS, S.A. (“INTROSYS” or the “Company”), establishing the principles and standards of behaviour that must guide the actions of the Company and all those who have direct or indirect dealings with it.

INTROSYS operates internationally and in sectors with demanding technical and operational requirements, where trust, integrity, responsibility, respect for people and transparency are essential to business sustainability and to building and maintaining long-term relationships with Customers, Employees, Suppliers, Business Partners and other stakeholders.

The technical and operational excellence that characterises INTROSYS must always go hand in hand with conduct based on high standards of ethics, integrity and responsibility, compliance with applicable laws and regulations, and respect for the principles, commitments and values adopted by the Company.

INTROSYS recognises as important references for its activities the principles of responsible and sustainable business management set out in the Charter of Principles of BCSD Portugal – Business Council for Sustainable Development, which it endorsed in 2019. Although INTROSYS is no longer a member of BCSD Portugal, the principles adopted at that time remain a reference for the Company's culture and responsible conduct.

The BCSD Portugal Charter of Principles is aligned with major international references on ethics, human rights and sustainable development, notably the Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact, which also guide INTROSYS's conduct.

As part of its commitment to promoting a corporate culture founded on integrity, transparency, responsibility and the prevention of unlawful practices, INTROSYS also endorses the principles and commitments of the Portuguese Integrity Platform, reinforcing its commitment to high standards of integrity in conducting its business and in its relationships with different stakeholders.

This Code is therefore a fundamental instrument for guiding, preventing and formalising the principles and values that must govern INTROSYS's conduct, as well as the essential rules of conduct to be observed in professional, commercial and institutional relationships.

Given the cross-cutting and general nature of the principles established herein, certain matters are addressed in greater detail in INTROSYS's policies, procedures, regulations, codes and other internal instruments, which supplement this Code and must be known and complied with by all those to whom they apply.

INTROSYS expects everyone covered by this Code to demonstrate a genuine and ongoing commitment to its principles and rules, actively helping to foster an organisational culture based on integrity, respect, responsibility, transparency, equality and sustainability.

Compliance with this Code is both an individual and a collective responsibility and is essential to preserving the trust placed in INTROSYS by its Employees, Customers, Suppliers, Business Partners, Shareholders and other stakeholders.

2. PURPOSE

The purpose of this Code of Ethics and Conduct is to establish the principles and standards of behaviour that must guide INTROSYS, its Employees and, where applicable, its other Stakeholders.

In particular, it seeks to:

- promote a corporate culture based on integrity, responsibility and respect;
- establish clear principles for decision-making and professional conduct;
- prevent unlawful or unethical behaviour, or behaviour contrary to INTROSYS's values;
- ensure compliance with applicable laws and regulations;
- protect the rights and legitimate interests of individuals and entities that have dealings with INTROSYS;
- strengthen trust in relationships with Customers, Suppliers, Partners, Employees, Shareholders and other Stakeholders;
- contribute to sustainability and long-term value creation.

3. SCOPE OF APPLICATION

This Code applies to INTROSYS and its subsidiaries, branches and other locations where the Company carries out its activities, without prejudice to the mandatory rules in force in each jurisdiction.

The Code applies directly to all Employees, members of corporate governing bodies and other persons acting on behalf of or in the interests of INTROSYS, irrespective of the nature or duration of their relationship.

INTROSYS also seeks to ensure that its principles are observed by other Stakeholders with whom it has commercial or institutional relationships, namely:

- Customers;
- Suppliers and Service Providers;
- Shareholders;
- Scientific and Technological Partners;
- Consultants and other business partners;
- Subcontractors and other third parties acting in the name of or on behalf of INTROSYS.

Those covered by this Code must know and comply with its principles and rules, as well as the internal policies and procedures applicable to them.

Where local legislation imposes stricter requirements than those laid down in this Code, the applicable legislation shall prevail.

4. PRINCIPLES OF ETHICS AND CONDUCT

INTROSYS's conduct is based on the following fundamental principles:

1. Equality and Non-Discrimination;
2. Integrity, Legality and Responsibility;
3. Respect for Human Rights and Labour Rights;
4. Health, Safety and Well-being at Work;
5. Respect and Zero Tolerance of Harassment;
6. Personal Data Protection and Confidentiality;
7. Loyalty and Good Faith;
8. Transparency and Accuracy;
9. Prevention of Corruption and Conflicts of Interest;
10. Fair Competition;
11. Protection of Intellectual Property and Company Assets;
12. Social and Environmental Responsibility and Sustainability;
13. Responsibility in Relationships with Customers, Suppliers and Partners;
14. Communication and Reporting of Irregularities.

4.1. Equality and Non-Discrimination

INTROSYS respects the principle of equal opportunities and rejects all forms of direct or indirect discrimination in access to employment, throughout the employment relationship, in training, career progression, remuneration or any other aspect of employment.

Discriminatory behaviour on grounds including ancestry, sex, gender, sexual orientation, gender identity or expression, age, marital status, family circumstances, nationality, ethnic or social origin, disability, religion or beliefs, political or ideological opinions, trade union membership or any other legally protected characteristic will not be tolerated.

Decisions concerning recruitment, selection, assessment, development and career progression must be based on objective criteria relating to skills, qualifications, experience, performance and organisational needs.

INTROSYS promotes an inclusive professional environment based on respect for each person's dignity and individuality.

4.2. Integrity, Legality and Responsibility

INTROSYS conducts its business in compliance with the laws and regulations applicable in every country in which it operates.

All Employees must perform their duties responsibly, diligently, professionally and with integrity, respecting applicable laws, regulations, internal policies and procedures.

No commercial, financial, operational or other objective justifies unlawful conduct or conduct contrary to the principles established in this Code.

Where an Employee has doubts about the legality or ethical appropriateness of an action, they must seek guidance from their line manager or the Legal Department before making any decision that could compromise INTROSYS.

4.3. Respect for Human Rights and Labour Rights

INTROSYS recognises and respects internationally recognised human rights and seeks to ensure that its activities are conducted in accordance with principles of dignity, respect and responsibility.

INTROSYS expressly rejects:

- child labour;
- forced or compulsory labour;
- all forms of human trafficking;
- labour exploitation;
- any practice that violates human dignity or fundamental rights;
- any form of discrimination or degrading treatment.

INTROSYS expects its Suppliers, Service Providers and other business partners to demonstrate the same commitment to respecting human and labour rights. Serious breaches of these principles may result in appropriate contractual measures.

4.4. Health, Safety and Well-being at Work

INTROSYS considers the health, safety and well-being of its Employees and other persons on its premises to be priorities.

Everyone must comply with applicable safety rules and procedures, use the protective equipment and resources provided appropriately, and report situations that may endanger people, premises or equipment.

Each Employee also has a duty to act responsibly and contribute to a healthy, safe and respectful working environment.

Matters relating to people management and the promotion of well-being are addressed in the applicable internal policies and procedures.

4.5. Prevention of and Response to Harassment

INTROSYS adopts a zero-tolerance policy towards harassment in any form, including psychological harassment, sexual harassment or other conduct that may violate a person's dignity.

Any behaviour, practice or communication intended to, or having the effect of, coercing, humiliating, intimidating, harassing or undermining another person's dignity is prohibited.

This prohibition applies to relationships between Employees, across different hierarchical levels, and in dealings with Customers, Suppliers, Partners or any other Stakeholders.

Anyone who becomes aware of a situation that may constitute harassment must use the available internal reporting mechanisms.

The prevention of and response to harassment are addressed in greater detail in INTROSYS's Policy on the Prevention of and Response to Harassment.

4.6. Personal Data Protection and Confidentiality

INTROSYS recognises the importance of protecting the information and personal data to which it has access in the course of its business.

Information belonging to INTROSYS, its Customers, Employees, Suppliers and Partners must be handled responsibly, confidentially and securely, in accordance with applicable legislation and internal policies. Given the characteristics of the industrial automation sector and the automotive market, INTROSYS attaches particular importance to protecting technical, commercial, industrial and business information, including information covered by confidentiality agreements or Non-Disclosure Agreements (NDAs).

Unauthorised disclosure, use, reproduction or provision of confidential or restricted information is prohibited.

Confidentiality obligations remain in force in accordance with applicable legal or contractual requirements, including after the end of the professional or commercial relationship.

Employees must use INTROSYS's email, IT systems, internet, intranet, digital platforms, equipment and other technological resources responsibly and securely, refrain from using or disseminating unlawful, offensive or inappropriate content, and comply with internal information security rules.

Personal data protection is addressed in greater detail in the Privacy and Data Protection Policy and other applicable policies.

4.7. Loyalty and Good Faith

Professional and business relationships must be based on trust, mutual respect, cooperation, honesty and good faith.

Employees must act loyally towards INTROSYS, avoiding behaviour that could harm its legitimate interests, reputation or assets.

Professional communication must be clear, respectful and appropriate, and Employees must provide truthful and complete information within the scope of their responsibilities.

4.8. Transparency and Accuracy

INTROSYS promotes a culture of transparency, accuracy and responsibility in conducting its business.

Information produced or communicated in the performance of professional duties must be truthful, accurate, complete and appropriate to the context.

Accounting, financial, operational and commercial records must accurately and transparently reflect transactions carried out and comply with applicable legislation and internal procedures.

INTROSYS does not tolerate the falsification, concealment or manipulation of information or records.

The Company maintains relationships of cooperation and respect with public authorities and other competent bodies, within the limits of applicable legislation.

4.9. Prevention of Corruption and Conflicts of Interest

INTROSYS rejects all forms of corruption, bribery, trading in influence, improper payments and other unlawful practices intended to secure an undue advantage.

The use of third parties, intermediaries or any other mechanisms to circumvent the integrity and anti-corruption rules applicable to INTROSYS is also prohibited.

4.9.1. Gifts, Hospitality and Benefits

Employees must not accept or offer gifts, advantages, meals, travel, accommodation, invitations or other forms of hospitality where their nature, value, context or frequency could influence, or appear to influence, a professional decision.

Only gifts of a purely symbolic nature are permitted, within the limits and conditions established in the Anti-Corruption Policy.

Gifts received in a professional context must be handled in accordance with applicable internal procedures.

In case of doubt, Employees must consult the Legal Department or the internal function responsible for compliance beforehand.

4.9.2. Conflicts of Interest

Employees must avoid situations in which their personal, financial, family or other interests may conflict, or appear to conflict, with the interests of INTROSYS.

Any actual, potential or apparent conflict of interest must be reported to the relevant line manager and, where applicable, to the Legal Department.

Employees must refrain from participating in decisions involving a conflict of interest unless their participation has been expressly authorised following an assessment of the situation.

Employees may not use their position or information obtained in the performance of their duties to secure improper personal benefits.

4.10. Fair Competition

INTROSYS conducts its business in accordance with the principles of fair competition and compliance with applicable competition rules.

Conduct that may constitute anti-competitive practices is prohibited, including unlawful agreements or arrangements with competitors, improper exchanges of commercially sensitive information or other practices contrary to applicable legislation.

Employees must also act fairly towards competitors and must not use confidential or unlawfully obtained information to gain a competitive advantage.

Subject to applicable legal limitations, Employees must respect valid non-compete commitments made to INTROSYS.

4.11. Protection of Intellectual Property and INTROSYS Assets

INTROSYS recognises intellectual property and technical knowledge as fundamental elements of its assets.

All Employees must protect the Company's physical, financial, technological, digital and intellectual assets and use the resources made available to them appropriately, responsibly and solely for legitimate purposes.

These include, in particular:

- trademarks and other distinctive signs;

- patents and inventions;
- designs and models;
- software;
- technical documentation;
- engineering projects and solutions;
- commercial information;
- databases;
- methodologies;
- processes;
- **know-how and knowledge acquired in the course of INTROSYS's activities.**

Unauthorised use, reproduction or disclosure of these assets is prohibited.

Employees may not use INTROSYS information, knowledge or know-how to obtain personal advantages or benefit third parties.

The use of INTROSYS's name, logo, trademarks or image by third parties is subject to prior authorisation whenever required.

INTROSYS also protects the intellectual property rights of third parties; unauthorised use of software, documentation, images, trademarks or other protected content is not permitted.

4.12. Social and Environmental Responsibility and Sustainability

INTROSYS seeks to conduct its business responsibly and sustainably, combining the creation of economic value with consideration of the social and environmental impacts of its activities.

The Company promotes efficient resource use, waste prevention and reduction, continuous improvement in environmental performance, and practices that help reduce environmental impacts.

INTROSYS also seeks to foster a culture of social responsibility, participation and development in the communities in which it operates.

Employees must contribute to these objectives through responsible behaviour and efficient use of the resources provided by the Company.

Sustainability and environmental and social responsibility are addressed in greater detail in the applicable internal policies and instruments.

4.13. Relationships with Customers, Suppliers and Partners

INTROSYS seeks to establish professional and commercial relationships based on trust, respect, transparency, quality, innovation and continuity.

Where applicable, the selection of Suppliers and Service Providers must be based on objective technical, economic, quality, capacity, sustainability and integrity criteria, as well as suitability for INTROSYS's needs.

Procurement processes must comply with applicable internal rules and procedures and avoid improper favouritism.

INTROSYS also seeks to ensure that its business partners respect principles compatible with those established in this Code, particularly concerning human rights, working conditions, integrity, environmental protection and the prevention of corruption.

Where appropriate, INTROSYS may carry out due diligence procedures or request information and documentation to assess integrity, sustainability or compliance risks.

4.14. Communication and Reporting of Irregularities

INTROSYS promotes a culture in which Employees and other Stakeholders may report in good faith situations they consider contrary to the law, this Code, internal policies or the Company's principles of integrity.

Irregularities may be reported through the internal mechanisms made available by INTROSYS, including the Whistleblowing Channel.

Reports will be handled in accordance with applicable legislation and internal procedures, ensuring confidentiality, impartiality, protection of those involved and non-retaliation, as required by law.

Any form of retaliation against a person who makes a report in good faith or participates in an investigation is prohibited.

However, abusive or deliberately false use of reporting mechanisms may result in the consequences provided for under applicable legislation and internal rules.

5. RESPONSIBILITIES

Compliance with this Code is the responsibility of everyone to whom it applies.

The Board of Directors and Management are responsible for:

- promoting an organisational culture based on ethics and integrity;
- ensuring that the Code is communicated and made available;
- ensuring appropriate prevention and reporting mechanisms are in place;
- ensuring that reported situations are handled appropriately;
- promoting periodic updates to the Code.

Line managers are responsible for:

- leading by example through their own conduct;
- promoting awareness of and compliance with the Code among their teams;
- taking action in response to instances of non-compliance reported to them;
- referring matters requiring specialist assessment to the competent departments.

Employees are responsible for:

- knowing and complying with this Code and applicable internal policies;
- acting with integrity, responsibility and professionalism;
- protecting INTROSYS's legitimate interests;
- reporting irregularities of which they become aware;
- seeking guidance whenever they are unsure about the appropriate course of conduct.

6. CONSEQUENCES OF BREACHING THE CODE

Non-compliance with this Code will be assessed in light of the nature, seriousness, circumstances and consequences of the situation, as well as applicable legislation.

For Employees, breaches of the rules established in this Code may result in legally permissible measures, including, where applicable, the initiation of disciplinary proceedings and the imposition of the corresponding sanction, in accordance with applicable labour legislation.

For Suppliers, Service Providers, Customers, Partners or other third parties, non-compliance may result in measures provided for by contract or permitted by law, including suspension or termination of the contractual relationship, without prejudice to possible referral to the competent authorities or appropriate legal proceedings.

Whenever conduct may constitute a civil, administrative or criminal offence, INTROSYS may take the appropriate measures permitted by law.

7. COMMUNICATION AND DISSEMINATION

This Code must be made available to those to whom it applies and communicated through appropriate internal communication channels.

INTROSYS promotes Employee awareness of the principles established in this Code and, where appropriate, includes these matters in its training and internal communication activities.

Each Employee must ensure that they are familiar with the contents of the Code and the internal policies applicable to them.

Lack of knowledge of this Code does not, in itself, justify failure to comply with its rules.

8. REPORTING IRREGULARITIES AND WHISTLEBLOWING CHANNEL

INTROSYS provides a Whistleblowing Channel for reporting situations that may constitute breaches of the law, this Code or applicable internal policies and procedures.

INTROSYS Whistleblowing Channel:

https://whistleblowersoftware.com/secure/INTROSYS_CanaldeDenuncias

The Whistleblowing Channel is one of the mechanisms available for reporting irregularities, without prejudice to other reporting methods provided for by law.

Any questions concerning the interpretation or application of this Code may be addressed to the INTROSYS Legal Department at:

legal@introsys.eu legal@introsys.eu

9. REVIEW AND UPDATE

This Code will be reviewed periodically and whenever relevant changes occur in applicable legislation, the organisational structure, INTROSYS's activities or its internal principles and policies.

Amendments will be communicated and disseminated through the channels deemed appropriate.

10. FINAL PROVISIONS

This Code establishes the general principles of ethics and conduct that must guide INTROSYS and those to whom it applies.

Its provisions must be interpreted together with applicable legislation, contracts entered into, and INTROSYS's internal policies, procedures and other rules.

In the event of a conflict between a provision of this Code and an applicable mandatory legal rule, the legal rule shall prevail.

Commitment to this Code is a collective commitment: to act with integrity, respect, responsibility and professionalism, contributing to a sustainable, ethical and trustworthy INTROSYS.

11. REVISION HISTORY

Rev.	Date	Sections	Changes made
1	06.07.2020	-----	General revision of the document.

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2	15.10.2020	3	Addition of Annex I.
3	15.01.2025	6 and 7	Whistleblowing Channel.
4	30.09.2026	-----	General revision of the document.



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