



ONDE A NATUREZA TEM HISTÓRIA

# CODE OF ETHICS AND GOOD CONDUCT

Belas Clube de Campo

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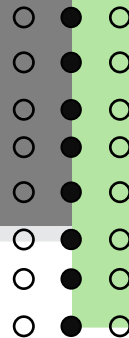
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## **Ethics and Good Conduct Within Belas Clube de Campo Companies**

This document establishes the operating principles of all companies that constitutes Belas Clube de Campo. These guidelines aim inspire all employees to assert themselves through a conduct guided by Truth, Respect and Commitment to all the challenges that arise daily in different areas and to make Belas Clube de Campo grow and prosper.

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1.

# SUBJECT MATTER AND SCOPE

All the measures and principles defined in the present document apply to the group of companies that make up Belas Clube de Campo (hereinafter referred to as "Belas Clube de Campo" or "BCC"). The companies are described in Annex I of this document. The Code of Ethics and Professional Conduct (also referred to as the "Code") is an internal document, approved by the Board of Directors (common to all BCC companies), which establishes a set of principles, values and regulations of conduct in terms of professional ethics, which must be duly observed in order for BCC employees to perform properly, both in their relationships with each other and in the relationships they establish with individuals and other entities, thus contributing to the affirmation of an institutional environment of rigour and transparency.

Ethical principles, based on common core values, foster behaviour that guarantees integrity and reputation as an organisation. The present document has been prepared with the aim of promoting a healthy communication environment, encouraging the formulation of questions related to ethics and compliance. Channels are set up for identifying and reporting incidents/situations/occurrences of discrimination, harassment or violations of the regulations/recommendations contained in this document, regardless of the circumstances and duties performed by those involved/employees.

Integrity is crucial to Belas Clube de Campo and should guide the behaviour of the commitments we make to our people, customers, suppliers and organisations. The combination of technical competence and ethical behaviour generates trust, the basis of Belas Clube de Campo's reputation. Everyone must be committed to our Common Principles and Core Values. Adopting ethical behaviour is the responsibility of each and every one of us.

Anyone who observes or becomes aware of a potential fraudulent, illegal, ethically reprehensible, retaliatory act and/or violation of the policies defined in this Code, whoever the offender may be (colleague, superior, customer, representative of a customer, supplier, partner, or other BCC-related person), is responsible for reporting it, through the communication channels available for said purpose, as detailed in **Chapter 7 – Reporting channels** of this document. Failure to comply with the provisions of this Code constitutes a serious disciplinary offence, punishable under the terms of the law, as detailed in **Chapter 7 – Non-compliance and penalties** of this document.

All BCC employees must sign the Declaration of Knowledge of the Code of Ethics and Conduct (Annex II), which must be sent to the Human Resources Department to be included in their individual file.

The regulations of this Code are complemented by BCC's internal regulations,

procedures, regulations and manuals.

2.

## **BASIC PRINCIPLES OF BEHAVIOUR AT BELAS CLUBE DE CAMPO**

All persons subject to this Code, in the performance of their duties, must act in accordance with the following ethical principles:

### **Principle of integrity**

BCC employees must fulfil criteria of personal honesty and integrity of character.

### **Principle of fairness, impartiality and equality**

BCC employees must treat all citizens fairly and impartially, operating according to strict principles of neutrality. They must not favour or disadvantage any citizen on the basis of their ancestry, gender, race, language, political, ideological or religious convictions, economic situation or social status.

### **Principle of information and responsibility**

At BCC we are committed to providing information and/or clarification in a clear, simple, courteous and prompt manner.

### **Principle of reconciling work and personal life**

BCC will endeavour to promote activities that reconcile employees' work and personal lives in order to achieve their well-being and work-life balance.

### **Principle of occupational risk prevention**

BCC is committed to providing the necessary means to achieve a safe and comfortable working environment and promote the principles of occupational safety, hygiene and health in the

workplace. Employees will comply with the applicable preventive measures in terms of health and safety at work, complying with the training and prevention programmes established by BCC. Employees in charge of teams must ensure that the members of their team carry out their activities in suitable conditions. This same principle is required of suppliers who provide services to BCC.

## Principle of environmental protection

Belas Clube de Campo is a perfect and timeless refuge, surrounded by the Mata de Belas and the Serra da Carregueira Forest Park, habitats for countless species of our fauna and flora. Respect for the environment is a basic core principle at BCC. In this regard, employees will comply with the legal requirements that apply to BCC, as well as the internal procedures it establishes from time to time on environmental matters and corporate social responsibility, in order to reduce or avoid the environmental impact of their activities as much as possible, using resources rationally and respecting the environment.

## Principle of preventing and combating discrimination and harassment

At BCC we are fully committed to offering all employees, whatever their role, a respectful, inclusive environment, free from any kind of discrimination or harassment, including sexual harassment, racial harassment, religious harassment, ideological harassment or any other particular condition protected by law, so that each person is treated with courtesy, dignity and respect, and given access to equal opportunities, with a view to everyone's success. The definitions of "harassment", "sexual harassment" and "discrimination" are detailed below.

### **MORAL HARRASSMENT**

Behaviour of intimidation, belittlement, oppression, mistreatment or coercion directed at an individual or group, which interferes with the professional performance of one or more people, creating an intimidating or hostile working environment. It can be overt or subtle, intentional or unintentional, and often happens when the exercise of power is misused.

### **SEXUAL HARRASSMENT**

Behaviour of intimidation, belittlement, oppression, mistreatment or coercion directed at an individual or group, which interferes with the professional performance of one or more people, creating an intimidating or hostile working environment. It can be overt or subtle, intentional or unintentional, and often happens when the exercise of power is misused.

### **DISCRIMINATION**

Less favourable treatment of a person or group based on a specific status or based on the perception that individuals of that status have certain undesirable characteristics or lack certain desirable characteristics. It occurs when any employee is denied equal treatment in relation to employment (including hiring, working conditions, training, promotion or benefits) for reasons related to their characteristics or legally protected condition, such as racial or ethnic origin, citizenship, ancestry, pregnancy, political party, colour, religion, gender, age, sexual orientation, marital status, disability, etc.

Any behaviour, intentional or not, obvious or subtle, that is unwanted, offends, embarrasses or intimidates another person, initiated by or directed at anyone at BCC, is contrary to our core values and principles. Whether such behaviour is expressed by partners, directors, employees, contract workers, customers, other third parties or any visitor to our premises, and whether it occurs anywhere (during or after working hours, at meetings, at events or on business trips), and regardless of its form (attitudes, comments, physical contact, text messages, social networks, telephone calls, etc.).

Any professional who believes they have experienced, or witnessed, any form of harassment or discrimination should, without fear of retaliation, and as soon as possible after the incident, report the situation or conduct to the Human Resources Department or to the managers of each department, through one of the channels defined in **Chapter 7 – Reporting channels** of this document.

Management, directors and those in charge of each department must ensure that:

- Leading by example, always demonstrating appropriate behaviour;
- Take an active role in preventing harassment or discrimination;
- Be aware of incidents that may constitute harassment or discrimination and act to prevent such behaviour;
- Create an environment that helps people feel at ease and report incidents of harassment or discrimination.

All employees are legally required not to engage in, encourage or tolerate any prohibited behaviour, including harassment or discrimination, towards their colleagues or superiors, as well as customers, subcontractors or other third parties with whom they come into contact through work or while representing BCC.

All employees have a duty to co-operate with any investigation into harassment or discrimination and to keep confidential any data reported to them or to which they have access in the course of the investigation.

The identification of the individuals involved will be kept confidential unless its disclosure is necessary for the purposes of investigation or corrective action in relation to the incident, or is otherwise required by law.

In the course of investigations, all personally identifiable information will be handled correctly and will incorporate appropriate processes and controls to manage and prevent its misuse, as required by law.

3.

# GENERAL REGULATIONS OF THE CODE OF GOOD CONDUCT

## Compliance with regulations and ethical behaviour

Employees will always refrain from taking part in illegal activities or those whose legality is questionable. For said purposes, under no circumstances will it be justifiable to use the excuse of attracting business or generating profits for BCC. Accordingly, parties covered by this Code may not:

- Carry out activities related to betting or gaming with people who have any kind of professional relationship or are customers of BCC;
- Accept any type of income, fees or advantage, in a personal capacity, that could be considered a gift originating from operations carried out on behalf of BCC;
- Use their position in BCC for their own benefit.

Any employee who is investigated or accused in a criminal judicial process that may affect its activity, and especially if it originates from said activity, must immediately notify the Human Resources Department. Consequently, all BCC employees must fully understand their responsibilities and operate with integrity in the performance of their activities, observing in their professional duties the requirements that result from the application to their specific activities.

## Non-competition

BCC employees may not provide professional services to other entities or competing companies, regardless of whether they are remunerated or not, and regardless of the relationship on which they are based, and must report any potential or actual conflicts of interest they may have to the Human Resources Department.

Under no circumstances will it be permitted to involve BCC with political parties to which employees belong or with which they sympathise.

Employees who carry out other types of professional activity or take part in activities that may imply a conflict with the interests or conduct described in this Code must inform the Human Resources Department of this circumstance as soon as it arises.

## Professionalism and responsibility

BCC employees must carry out their work with objectivity, professionalism and honesty, fulfilling their duties and responsibilities, always focussing their actions on achieving excellence. In order to preserve their technical and professional capacity, as well as appropriate prudence and care



in the performance of their professional activity, employees must:

- Act professionally, safely and ethically in accordance with the Code of Ethics and Conduct;
- Know and comply at all times with the regulations in force and the applicable internal procedures, with particular attention to the regulations relating to the professional responsibilities of BCC;
- Observe the utmost rigour in accounting for the operations contracted, as well as in keeping and archiving the documents and records necessary for its activity;
- Carry out internal procedures related to the process of preparation and integrity of financial information and ensuring the truthful transmission of the information that must be communicated, both internally and externally;
- Make correct and appropriate use of the means and goods to which they have access in the course of their professional activity;
- Use the computer equipment provided by BCC, respecting the computer security measures implemented and intellectual property rights;
- Not to use the image, name, brand or logo of BCC outside the scope of their professional activity without proper authorisation;
- Respect the regulations on safety and hygiene at work, with the aim of preventing and minimising occupational risks.
- Take responsibility for obtaining the necessary training to better perform their duties.

## Measures to prevent alcohol and drug use in the workplace

Alcohol and drug abuse in the workplace can have negative consequences for workers and the organisation that represents them.

The consequences of alcohol and drug consumption can be varied:

- Loss of productivity and poor performance;
- Delays and non-compliance with schedules;
- Safety and accidents in the workplace;
- Negative consequences for team spirit and interpersonal relationships;
- Disciplinary and behavioural problems;
- Damage to the company's image and external relations.

Detection of alcohol consumption will be carried out by means of a test to determine the Blood Alcohol Content (BAC), using blowing equipment, commonly known as a "balloon", which assesses the amount of alcohol in the exhaled air.

Detection of the use of amphetamines, cannabinoids, cocaine and opiates, also known as psychoactive substances, will be carried out through saliva and/or urine tests.

For more details, see [Measures to prevent alcohol and drug use in the workplace](#) - Available for consultation at the Human Resources Department.

## General policies of Belas Clube de Campo

### Working hours

Working hours must be complied with in accordance with those contractually defined for each employee and in accordance with the legal terms and limits.

## Remote working

The policy established for all BCC employees is to work in person. However, in order to meet the personal needs of each individual, approval may be sought from the line manager to provide services from a location other than the office. Employees whose duties, by their nature, cannot be carried out away from the workplace will not benefit from this policy.

This flexibility may not exceed 6 working days per month.

Departments must coordinate so that needs are always met. In departments whose nature requires it, it may be necessary to have one or more people working in the office.

It is the employee's responsibility to follow this policy responsibly and to ensure that this flexibility has no impact on their performance.

Failure to comply with the provisions of this policy will result in a written warning in the first instance and will entail sanctions that may include certain employees not being allowed this flexibility.

## Meals in BCC spaces

The Board of Directors authorises BCC employees to use the services of BCC's F&B operation, namely the Clubhouse restaurant and Café no Campo, as customers, for a fee, in accordance with the unit's price list.

For more details, see the [Manual of Procedures – F&B Discount Policy](#) - Available for consultation at the Human Resources Department.

## Dress code

The present guidelines are intended to systematise a set of guidelines regarding the type of clothing to be worn when performing the duties of each employee and/or representing BCC.

Employees who wear uniforms provided by BCC as part of their duties must wear them during working hours and must ensure that they look good, are clean and present themselves, as detailed in **Chapter 4 – Guidelines for behaviour in specific situations** (in the subchapter of Use of Belas Clube de Campo's assets and equipment and provision of work tools) of the present document.

For employees who do not wear a uniform: From Monday to Thursday no jeans or trainers may be worn; on Friday jeans and trainers may be worn, with the exception of employees who have direct contact with customers or suppliers (e.g. meetings or events).

## Holidays

Holidays must be booked by the end of March, by filling in the [Holiday Booking Request Form](#) - Available for consultation at the Human Resources Department - and approved by the head of each department. There must be at least one period of 10 consecutive working days.

If all the holiday days to which each employee is entitled have not been taken by the end of the year, they must be taken by the end of April of the following year. Otherwise, those days will be forfeited, with the exception of duly justified situations approved by management.

The Board of Directors approves time off work on each employee's birthday, if it falls on a working day.

## **Organisation**

Worktables should always be organised. No papers should be left on the tables to make them easier to clean at the end of the day. When meeting rooms are used, they must be left clean and tidy. The use of meeting rooms must be booked through Outlook calendar choosing the desired location as the respective room's name. Bookings schedule must be respected.

## **Canteen/Pantry**

The canteen and pantry are communal dining areas, so there must be good practice in using them, namely leaving everything clean and tidy. Food cannot be kept in the fridges for more than a week. If any food smells bad or is in a severe state of decomposition, it should be put in the bin immediately.

## **Business expenses**

Employees must ensure that the expenses they incur in carrying out their activities are appropriate, reasonably proportionate to the circumstances and related to the fulfilment of BCC Group's business targets.

The submission of expenses by employees as part of their duties must be duly governed by a set of regulations set out in the [Regulations on the Reimbursement of Expenses on Duty](#) - Available for consultation at the Human Resources Department.

4.

# **GUIDELINES FOR BEHAVIOUR IN SPECIFIC SITUATIONS**

## **Conflicts of interest**

Employees will operate in accordance with BCC's interests and, consequently, will refrain from carrying out any private activity or activity of mere personal interest that could give rise to conflicts of interest with BCC, its customers or investors.

Employees shall also refrain from participating (either in decision-making or in a representative capacity) in transactions of any kind in which there is an interest of their own or of any person linked to them. Consequently, an employee may not be granted special or unjustified treatment or working conditions based solely on personal or family relationships.

If an employee wishes to participate in business in which BCC has an interest, will participate directly, or even in which BCC has waived participation, they must obtain prior written authorisation from the Board of Directors. It will be necessary to verify that there is no possible prejudice to the interests of BCC and/or its customers, and that there is no conflict of interest in any sense, nor is it likely to occur in the future.

## Ethical behaviour

Employees who have direct contact with customers, investors or suppliers must under no circumstances jeopardise the quality, image or good name of BCC and must carry out their actions responsibly.

Customers and suppliers must be treated ethically, fairly and in accordance with applicable laws.

By way of example, the following conduct or behaviour will not be considered ethical and are therefore strictly forbidden:

- Unauthorised access to other companies' confidential information;
- Industrial espionage;
- Disclosure of trade secrets;
- Use of inside or outside information for any type of transaction or business;
- Acts aimed at creating misleading advertising;
- Scams, frauds and deceptions of any kind;
- Spreading false rumours about products, services, etc.;
- Manipulation of public tenders;
- Counterfeit means of payment;
- Cunning schemes to drive the company into insolvency in order to defraud creditors.

In relation to said activities, special attention will be paid to the following prohibited behaviours:

- Accessing a competitor's data or business strategies through a common supplier, a relative, a trusted contact or an investigation that goes beyond information that could be considered public;
- Formalising false expectations or promises to a customer or the market about the qualities or characteristics of one's own product or that of a competitor;
- Falsifying the economic and financial information of BCC companies;
- Spreading rumours on social networks, in the media or directly to customers about a competitor, its products and services, or about any other company;
- Using confidential information to which they have access due to their position or work in the company to transfer it to third parties, sell it or use it to acquire or sell shares, or for any other transaction or business.

## Inside information

If an employee has inside information, they must not carry out transactions for their own account or for the account of others, directly or indirectly, that affect them, outside the strict exercise of their professional duties. Nor may they communicate such information, promote or recommend third parties to carry out operations.

## Fair competition

BCC and its employees must respect the principles and regulations of fair competition and must not violate competition laws. All agreements between competitors aimed at coordinating their behaviour on the market are prohibited.

## Duty of independence and confidentiality

The confidentiality of information about customers, employees, investors and suppliers is the cornerstone on which the relationship of trust, which is part of BCC's core values, is built.

All our people, regardless of their level of responsibility, have an obligation to ensure full compliance with BCC's policies, to follow them strictly and to identify in advance any situation that could potentially result in a conflict of independence, both from the perspective of the provision of professional services and regarding their private lives.

In business decisions, personal interests cannot override those of BCC employees must maintain professional secrecy about any non-public data or information that they become aware of as a result of carrying out their professional activity, whether originating from or referring to BCC, its customers or investors, other employees or any other third party.

Confidentiality duties will remain in force for the duration of the employee's employment and will continue indefinitely after the termination of the employment relationship with BCC.

We fully prohibit the disclosure of confidential customer information to any professional who does not work for the customer, or to any professional who works for the customer but has no need to access the information in question. Exceptions are situations in which there is a legal or professional right or duty to disclose, and those in which the customer's written consent has been obtained.

We do not individually take the lead role in any project for customers with whom we have close social or family ties, when said relationship could lead to excessive influence by the customer on our actions and when it could jeopardise our independence.

We assess situations that could give rise to conflicts of interest before accepting or continuing a relationship with a customer or a specific project, and before entering into any agreement with a supplier. If there is or could be a conflict, we bring it to the attention of our colleagues and superiors, and only proceed if the situation can be resolved satisfactorily.

Any situation that may involve a conflict of independence or interest may also have a negative impact on our customers, which is why any potential conflict should be reported for analysis and decision as soon as it is identified.

### INSIDE INFORMATION

Behaviour of intimidation, belittlement, oppression, mistreatment or coercion directed at an individual or group, which interferes with the professional performance of one or more people, creating an intimidating or hostile working environment. It can be overt or subtle, intentional or unintentional, and often happens when the exercise of power is misused.

All Inside information is information owned by an organisation or information in which an organisation has a protected interest. It is sensitive information which, if improperly disclosed, could cause serious damage to the organisation.

## Relations with investors

BCC expresses its purpose of creating value for its investors and following the highest standards and best practices. It will always act with the aim of preserving, protecting and enhancing the assets, rights and legitimate interests of investors, while respecting the commitments it has

made in terms of corporate responsibility.

In relations with investors, one of the guiding principles is BCC's commitment to transparency, whereby information will be transmitted to investors in a truthful and complete manner.

## **Relations with suppliers**

The contracting of external supplies and services, as well as negotiations with external suppliers, must be duly carried out in accordance with BCC's internal procedures established for purchases, expenditure and invoicing. The contracting of suppliers by employees must always be carried out impartially, objectively and responsibly.

BCC will promote the principles of the present code to its suppliers and contractors for the purposes of better application of the principles contained therein and requesting their acceptance.

## **Relations with customers**

Good relations with customers must be guided by the principles set out in the present Code. Employees must avoid situations involving conflicts of interest. They will not promote or practise bad practices in contracting, purchases or sales and will always act with the utmost transparency, avoiding situations of fraud or abuse.

In said regard, under no circumstances will employees encourage one customer to carry out a transaction for the benefit of another, unless both are aware of their divergent positions and expressly agree to carry out the transaction.

## **Protection of personal data**

The commitment to quality and efficiency with all people who interact with BCC implies that employees keep confidential any personal information to which they have access due to their professional activity, adopting the necessary measures to collect, store and access this information in accordance with the applicable regulations and the internal policies and procedures established by BCC.

For further details, please consult the Information Systems Utilisation Policy.

## **Acceptance of offers, fees or financial facilities**

It is not permitted to accept offers or payments, nor to undertake activities that are inappropriate to our projects, neither to obtain new customers nor to contract suppliers. We promote competition exclusively on the basis of the quality of the services we provide.

It is not permitted to use one's position in BCC, or that of our immediate family members, to request funds, free gifts or services from any customer, supplier or others, for personal use or for the benefit of third parties.

We do not accept offers of any kind if it is judged reasonable that:

- Will influence the commercial relationship with the customer or create an obligation towards customers, suppliers, contractors or partners;
- Violate laws, professional regulations and regulations, or the Code of Ethics and Professional Conduct;

- Constitute an improper way of conducting business or cause embarrassment or negative impact for BCC;
- May imply a loss in the ability to act objectively and independently of criteria.

Any BCC employee who receives a gift (including meals, trips, invitations to sporting events, etc.) worth more than €100 (individually or in aggregate) must request approval from the Human Resources Department by sending an e-mail to [drh@belasclubedecampo.pt](mailto:drh@belasclubedecampo.pt).

## **Use of Belas Clube de Campo's assets and equipment and provision of work tools**

Employees must take care of BCC's property and equipment at their disposal or to which they always have access. They shall use the property and equipment at their disposal in the performance of their professional duties in a manner appropriate to the purpose for which it was given to them and shall not sell or encumber it without proper authorisation.

Employees undertake to use all BCC property/equipment in accordance with the instructions they have received, to preserve and maintain it in good condition, and to report any faults or deficiencies of which they become aware.

Upon termination of employment, employees must return all instruments, materials, equipment, documents or any other items entrusted to them to carry out their work duties. The return of said work tools may also be determined in other circumstances, namely during holiday periods, suspension of the employment contract or absences. Likewise, any media containing confidential information must be returned, and employees are prohibited from retaining in their possession any copies, records or transcripts, as well as electronic messages or documents, or simple notes, relating to BCC's activity.

## **Intellectual and industrial property rights of Belas Clube de Campo**

Employees will fully comply with BCC's intellectual and industrial property (including, but not limited to, courses, projects, programmes, computer systems, processes, technology, know-how and, in general, other works developed or created by BCC). Thus, their use by employees will be carried out in the course of their professional activity and all material on which they rely will be returned when necessary or when they cease to be employees.

Employees will not use BCC's image, name, brands or logos, except for the proper development of their professional activity.

It is BCC's objective to guarantee compliance with intellectual or industrial property laws. As such, employees should check before using information from the Internet whether it is protected by intellectual or industrial property laws.

## **Corporate image and reputation**

BCC considers its corporate image and reputation to be a very valuable asset for preserving the trust of its investors, customers, suppliers, authorities, as well as its employees.

Employees must take the utmost care to preserve BCC's image and reputation in all their professional operations. Therefore, all employees must respect good behaviour when dealing with all stakeholders: employees, suppliers, BCC residents, as well as others.

5.

## **GUIDELINES FOR BEHAVIOUR IN SPECIFIC SITUATIONS**

### **Participation in external training and seminars**

Any employee wishing to take part as a speaker in external courses or seminars must request prior approval from the Human Resources Department by sending an e-mail to [drh@belasclubedecampo.pt](mailto:drh@belasclubedecampo.pt), whenever they are attending on behalf of BCC or because of their role at BCC, regardless of whether the employee is paid or not.

### **Relations with the media**

Employees will not pass on any information or news about BCC, its investors, suppliers, customers or employees to any media (including social networks or other platforms). In all cases, they must inform the Human Resources Department by sending an e-mail to [drh@belasclubedecampo.pt](mailto:drh@belasclubedecampo.pt) for external communication and obtain prior written authorisation. Employees will avoid spreading comments or rumours.

### **Relations with the authorities**

The relationship between employees and representatives of the authorities and supervisory bodies will be governed by the principles of respect and collaboration within the scope of their competences, and any action aimed at impeding the actions of the inspecting or supervisory persons, bodies or entities is forbidden.

### **Political or associative activities**

Any connection, affiliation or collaboration with political parties or any other type of organisation, institution or association with public purposes or which go beyond those of BCC, as well as any contributions or services provided to them, if made, must clearly and unequivocally state that they are made in an exclusively personal capacity, avoiding any possible interpretation of a link or association with BCC.

Donations or contributions to political parties by BCC that contravene the applicable regulations on the financing of political parties are fully prohibited.

If any employee wishes to accept any public office, it must inform the Human Resources Department in advance and obtain its prior written approval.



6.

## **SPECIFIC REGULATIONS TO PREVENT CORRUPTION, FRAUD, MONEY LAUNDERING AND TERRORISM FINANCING**

### **Guidelines to avoid engaging in corrupt behaviour**

It is absolutely forbidden for any collaborator to offer any public agent, authority or individual, directly or indirectly, any kind of gift, remuneration, or any kind of undue benefit or advantage, in order to favour BCC.

This prohibition also extends to cases where the collaborator responds to a prior request from a public official, authority or individual.

Likewise, it is forbidden to receive, request or accept unjustified benefits of any kind, with the aim of favouring third parties to whom the benefit is granted or from whom the benefit or advantage is expected, in breach of their obligations.

This prohibition also extends to persons closely linked by family or friendship ties to the public official, authority or individual.

Prevention of corruption and bribery is based on training and continuous awareness-raising for all BCC employees.

### **Guidelines to prevent conduct related to money laundering and terrorist financing**

BCC is subject to compliance with duties to prevent money laundering and terrorist financing and, consequently, prohibits any conduct related directly or indirectly to money laundering or terrorist financing.

All employees are required to comply at all times with the regulations in force on this matter, as well as the internal procedures that BCC approves and implements to comply with these regulations.

In particular, employees must immediately report to the Human Resources Department any suspicion or indication that may be related to money laundering and/or terrorist financing, in which case they must proceed in accordance with the instructions provided by the Human Resources Department.

### **Guidelines for avoiding conduct related to tax offences or offences against public authorities**

BCC is required to comply strictly with fiscal and tax regulations.

All employees are required to comply with the aforementioned legislation in force, as well as internal tax regulations, and to report to the Human Resources Department any conduct or fact

of which they are aware that may contravene the aforementioned regulations.

## **Guidelines for avoiding behaviour related to social security fraud**

BCC is fully committed to strict compliance with current labour and social security legislation. All employees must comply with the regulations that affect them in this area, as well as inform the Human Resources Department of any conduct that is detrimental to workers' rights and could constitute social security fraud.

7.

# **REPORTING CHANNELS**

## **Reporting channels**

At BCC, every professional has the right and responsibility to speak up when they feel that something is not right and goes against our values and ethical principles, without fearing any kind of retaliation.

There are dedicated and secure communication channels for reporting doubts or concerns relating to the conduct of our people. The aim is not to promote any complaints, but only those that are designed to protect BCC and each of us in the event of any deviation of conduct from the standards set out in this Code, facilitating the taking of appropriate action.

For more details, see the [Whistleblowing Policies at Belas Clube de Campo](#) - Available for consultation at the Human Resources Department or through the website [www.belasclubedecampo.pt](http://www.belasclubedecampo.pt).

## **Retaliation**

BCC does not tolerate retaliation of any kind against any professional who has in good faith, which is to be expected, filed a complaint or provided information about an ethics, harassment, discrimination, non-compliance with laws and regulations or other related matter, or who is involved in an ethics, harassment or discrimination investigation or related to retaliation. The definitions of "retaliation" and "good faith" are detailed below.

## RETALIATION

Any negative action taken against a person who, in good faith, has reported an ethical situation, non-compliance with laws and regulations or other related matter, or supported or participated in an investigation or procedure related to ethics, non-compliance with laws and regulations or other related matter. Examples: intimidation, threats, coercion, discrimination, any negative performance feedback that does not reflect the actual performance of the person concerned, or any other form of reprisal.

## GOOD FAITH

The individual believes, perceives or reasonably suspects that the information reported is true.

Retaliation includes, but is not limited to:

- Acts of reprisal that occur because a person has reported or provided information about an incident of harassment or discrimination;
- Pressuring a person to ignore or not report an incident of harassment or discrimination;
- Pressuring a person to lie or to cooperate incompletely with the investigation of an incident of harassment or discrimination.

It is the responsibility of each individual, as well as the duty of those in a supervisory or management position (regardless of whether the report has been formalised or not), to report any indication of retaliation or threat of retaliation, based on a reasonable belief or suspicion, in attempted or consummated form, to report or provide information about a report or incident. Reporting must be done via the appropriate channels, as described in **Chapter 7 – Reporting channels**.

Any professional who engages in acts or threats of retaliation may be subject to the disciplinary measures set out in **Chapter 8 – Non-compliance and penalties**.

## Code of conduct disclosure

BCC undertakes to ensure that all persons to whom this Code applies are duly informed of its existence, content and mandatory compliance. This Code will always be available for consultation in the Human Resources Department or via the website: [www.belasclubedecampo.pt](http://www.belasclubedecampo.pt).

8.

# Non-compliance and penalties

When, according to the facts found, any behaviour or practice is proven to be in breach of the provisions of this Code by any employee, BCC reserves the right to take all necessary and appropriate measures, particularly from a disciplinary point of view. Said measures may culminate in the application of various sanctions (in accordance with article 328 of the Labour Code), the most serious of which may be dismissal for just cause without indemnity or

compensation.

According to Article 328 of the Labour Code, such actions may include, but are not limited to:

- Reprimand;
- Recorded reprimand;
- Financial penalty;
- Loss of holiday days;
- Suspension from work with loss of pay and seniority;
- Dismissal for just cause without any indemnity or compensation;

Professionals who deliberately, or in bad faith, make false or malicious reports are also subject to these disciplinary actions.

ANNEX I

# **BELAS CLUBE DE CAMPO COMPANIES**



<b>COMPANY</b>	<b>VAT N.º</b>
PLANFIPSA, S.G.P.S., S.A.	503597864
PLANBELAS - SOCIEDADE IMOBILIÁRIA S.A.	502403357
COLONADE - SOCIEDADE IMOBILIÁRIA S.A.	502544490
OCOFPDP, S.A.	515274178
INVESPLANO - SOCIEDADE DE MEDIAÇÃO IMOBILIÁRIA LDA.	502943661

ANNEX II

**DECLARATION OF  
KNOWLEDGE OF THE  
CODE OF ETHICS AND  
CONDUCT**

I, \_\_\_\_\_ (1), employee no.

\_\_\_\_\_, in the category of \_\_\_\_\_, working at

\_\_\_\_\_ (2), hereby declare on my honour that I

have read the Code of Ethics and Conduct in force at Belas Clube de Campo, and undertake to

comply with and respect the regulations and procedures laid down therein.

Belas, \_\_\_\_\_ of \_\_\_\_\_ of 20\_\_\_\_

\_\_\_\_\_

Employee's signature

(1) Full name

(2) Employer's name



# BELAS CLUBE CAMPO

ONDE A NATUREZA TEM HISTÓRIA

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