



Code of Ethics



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1.Introduction

Objective

The code of conduct acts as a **guide reflecting the principles** in which Nextbitt believes and how we should act in a **professional context and on behalf of the company**. Its application is therefore imperative. This code of conduct does not replace the existing policies, procedures and internal documentation in each area, but is intended to be a framework for them.

This code does not anticipate all situations, nor is it intended to provide all the answers, nor can it replace the careful judgment and common sense of everyone who works for the company.

It is a guide which, by indicating privileged ways of deciding and acting, aims to help us understand sensitive or less common situations and reject unacceptable practices.

Scope

All employees, corporate members, service providers and anyone acting in the name of or on behalf of Nextbitt - regardless of the position they hold or the country in which they work have a duty to apply and disseminate the principles of professional ethics set out in this Code.

It is up to all of us to be fully aware of the existence of this Code and to ensure that it is applied on a daily basis.

Nextbitt's leaders have an added responsibility to act as role models and ensure that their teams know and apply the ethical principles described in this document.

2. Principles of Ethics

Contributing to a more sustainable future doesn't just mean offering our clients a solution of excellence, it also means guiding our daily lives by a set of key values that reflect our identity and ambition.



We are a company that is guided by respect for all the people involved in our processes, that works honestly and with integrity throughout its value chain, promotes and practices relationships of trust with all parties and is focused on contributing to a fairer and more sustainable future.

2.1. Respect for people

There are no businesses without relationships, there are no companies without people, which is why for Nextbitt people are at the heart of our success.

Respect for people is a fundamental principle that guides the way we relate to all our stakeholders.

We believe that every individual should be treated with dignity, recognizing the unique value of each person, regardless of their origin, identity or perspective.

At Nextbitt we respect and promote the fundamental rights defined in the Universal Declaration of Human Rights and we are absolutely opposed to any kind of violation of human dignity.

"We believe that every individual should be treated with dignity."



Our employees have been instrumental in the journey that has taken us this far and are a fundamental pillar for the journey we aspire to make.

We promote a culture of respect and acceptance, where everyone feels listened to and valued, of concern for physical and mental health and well-being, of safety and of promoting people's development.

2.1.1. Diversity and inclusion

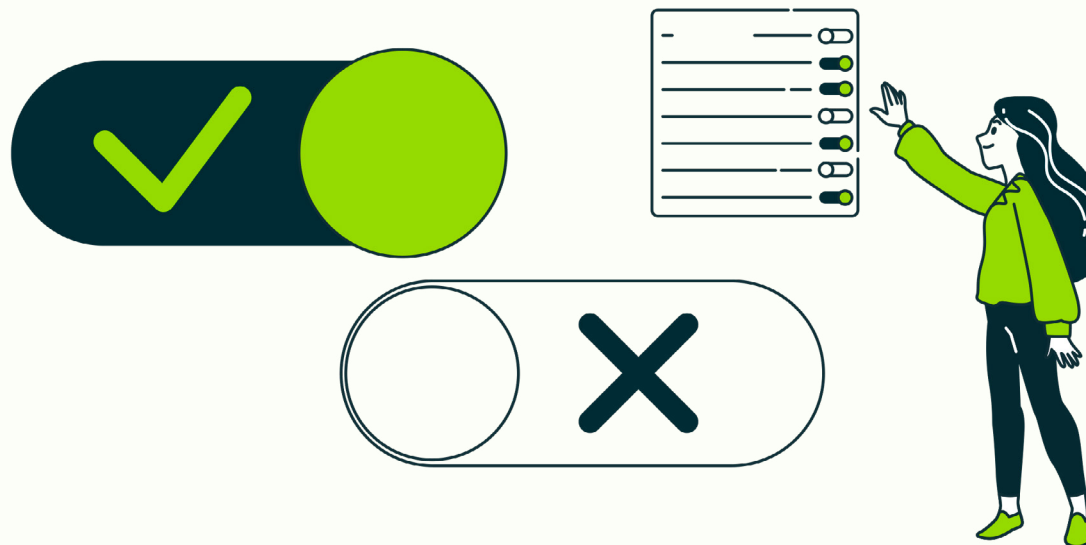
At Nextbitt we promote a diverse and welcoming work environment that celebrates differences, promotes equal opportunities and ensures that all voices are not only heard, but embraced.

We believe that by valuing each person's difference and uniqueness, we collectively become better.

Our commitment to diversity means that, more than just accepting differences, we actively seek to complement our team with people with different perspectives, skills, racial or ethnic origin, age, gender identity, sexual orientation, etc.

In this way, we embrace diversity as a differentiating factor that contributes positively to our productivity, innovation and development as a team and as people.





WE MUST:

- Act proactively so as not to be induced by bias, whether conscious or unconscious, when making decisions;
- Promote mutual respect and equal opportunities, thus fostering an inclusive work culture;
- Ensure a safe space where everyone can give their opinion without fear of reprisals;
- Expressing our ideas and opinions in a transparent and respectful way, protecting the uniqueness of each person.



WE MUST NOT:

- Determine or condition any type of decision on the basis of discriminatory factors, namely ancestry, age, sex, sexual orientation, gender identity, marital status, family situation, economic situation, education, social origin or condition, genetic heritage, reduced working capacity, disability, chronic illness, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological convictions, trade union membership, or on the basis of function, activity or professional category.

2.1.2. Safety, health and well-being

everyone's safety, health and well-being are fundamental issues for Nextbitt. This means making the well-being of our people a priority, so all employees must seek to know and respect not only the legislation in force, but also the internal rules and recommendations on this matter.

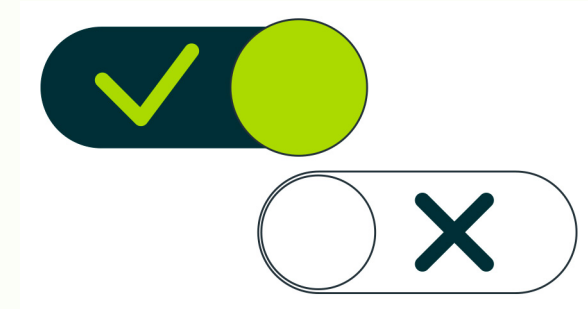
Our commitment to well-being is embodied in our management policies, which aim to provide a healthy professional environment that promotes the satisfaction and professional fulfillment of our people.

Therefore, in addition to complying with labor legislation, we seek to implement a series of initiatives that actively contribute to this end, such as the continuous development of skills, the inclusion of flexibility in our work model, whether it is face-to-face, hybrid or remote, thus promoting a better reconciliation of professional and personal life, among others.

"Our commitment to well-being is embodied in our management policies."



It's up to all of us to promote and maintain a working environment in which everyone can thrive, with leaders playing a key role in ensuring that everyone feels part of the whole that is their company and that **people's well-being** is more than a set of initiatives, it's something that is reflected in day-to-day practices.



WE MUST:

- Ensure that everyone, including suppliers acting on behalf of the company, complies with health and safety standards and practices, in accordance with current legislation and regulations.
- Ensure the continuous reinforcement of a safe, healthy and productive working environment, namely through awareness-raising actions, training and the sharing of good practices.
- Watching ourselves and others for signs of physical or mental exhaustion, such as persistent tiredness, difficulty concentrating, memory failure, insomnia or oversleeping, distress, anxiety or irritability, among others.
- Invest in work-life balance, recognizing the importance of individual well-being for a healthy and balanced work experience.



WE MUST NOT:

- Neglect strict compliance with the company's health and safety objectives.
- Ignore signs of employee distress, stress or burnout.
- As a leader, neglect care and communication with each member of the team, as well as fairness in the distribution of work.

2.1.3. Supporting the growth of our people

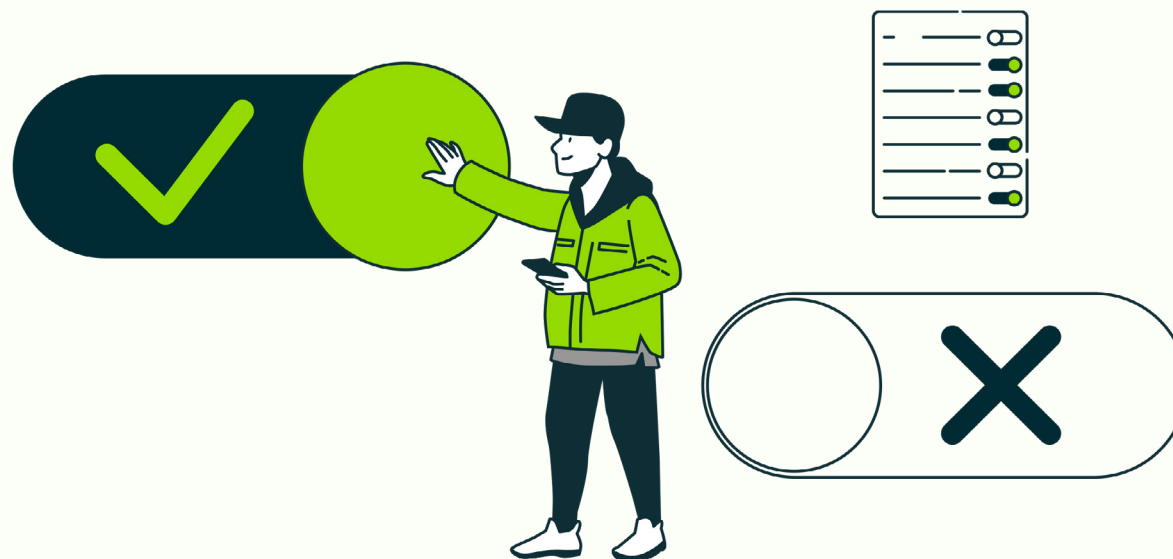
At Nextbitt, our people's success is our success. We constantly promote meritocracy and work hard to attract and retain the most talented professionals.

To this end, we foster a culture of continuous feedback, thus contributing to the development of each individual, ensuring alignment with organizational objectives and identifying potential paths for professional growth.

We seek to promote the continuous development of skills and internal mobility, and it is up to each of us to want to develop ourselves and actively contribute to maintaining this culture of feedback and growth.

"We seek to promote the continuous development of skills"





WE MUST:

- Give objective, honest and regular feedback to every member of our teams;
- Give transparent feedback to our peers and managers;
- Be concerned about our development plan and proactively seek solutions that contribute to our growth;
- Participate in training sessions organized by Nextbitt;
- As leaders, foster team development with the aim of retaining talent at Nextbitt.



WE MUST NOT:

- Give feedback that is not objective or in an erratic way;
- Not include time for training or self-development in team planning;
- Be passive about your own professional development.

2.1.4. Harassment

All employees, particularly those in leadership positions, must promote, at all levels, relationships based on respect for human dignity, which is a basic value for creating and maintaining a healthy and excellent working environment.

Nextbitt is vehemently opposed to any kind of harassment, abuse, intimidation, lack of respect, lack of consideration, or any other kind of verbal, non-verbal or physical aggression, offensive or inappropriate conduct.

The practice of moral or sexual harassment is absolutely forbidden, as is any behaviour that disturbs or embarrasses, affects dignity or creates an intimidating, hostile, degrading, humiliating or destabilizing environment.





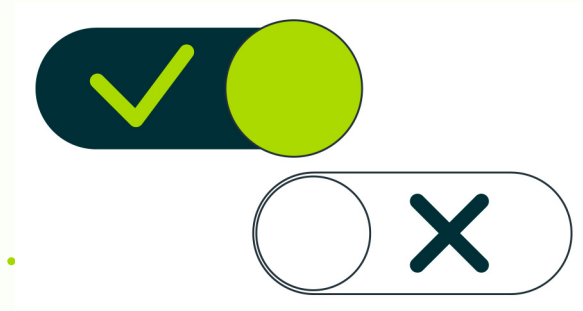
Any of the behaviors described above will trigger the appropriate disciplinary and/or criminal action.

It is the duty of all workers to prevent, confront and report behavior that could lead to a situation of harassment.



WE MUST::

- Prevent and combat harassment at work;
- Report any situation of harassment at work that we are victims or witnesses of, through the existing channels;



WE MUST NOT:

- Tolerate any bullying behavior, such as: systematically devaluing the work of colleagues or employees; promoting the social isolation of colleagues; constantly ridiculing, directly or indirectly, a physical or psychological characteristic of colleagues or employees; setting goals and objectives that are impossible to achieve or deadlines that are unachievable; assigning duties that are inappropriate to the professional category of employees; unjustifiably not assigning any duties to employees; misappropriating ideas, proposals, projects or work from colleagues.
- Tolerating any sexually harassing behavior, such as: repeating suggestive remarks or comments about the appearance or sexual orientation of colleagues; making unwanted phone calls and sending messages with a sexual content; sending animations, drawings, photographs or images with a sexual content; intentionally promoting unnecessary and unsolicited physical contact or approach; making hiring, professional advancement or any other employment benefit conditional on unwanted activity of a sexual nature.

2.2. Integrity and honesty

For Nextbitt, integrity is the foundation that helps establish trusting relationships with its partners, thus building a positive and solid reputation over the years with all our stakeholders.



We therefore maintain a high level of transparency and honesty in all our activities, through our commitment to complying with laws, regulations, contracts, procedures and ethical principles.

2.2.1. Legal regulations

Nextbitt undertakes to carry out its activities in full compliance with the laws and regulations in force wherever it operates.

2.2.2. Information security and privacy

Ensuring the confidentiality, integrity and availability of its stakeholders' information is a priority for Nextbitt.

It is therefore committed to defining and implementing security controls, policies and procedures in line with the business and the processes that support them.

Nextbitt is therefore committed to complying with European and international legislation and regulations regarding the protection of the personal data of its employees, subcontractors, customers and suppliers.

“Ensuring the confidentiality, integrity and availability of its stakeholders' information.”



WE MUST:

- Comply with the General Data Protection Regulation (GDPR) and the requirements of ISO 27001,
- Comply with the Information Security and Privacy policies and procedures implemented at Nextbitt,
- Complete the Information Security and Privacy training provided by the organization,
- Alert potential breaches of Information Security and Privacy policies and procedures, to actively participate in the continuous improvement of internal practices,
- To continuously improve Information Security and Privacy practices,



WE MUST NOT:

- Neglect the protection, integrity and confidentiality of the data of all Nextbitt's stakeholders (employees, customers, suppliers, business partners).

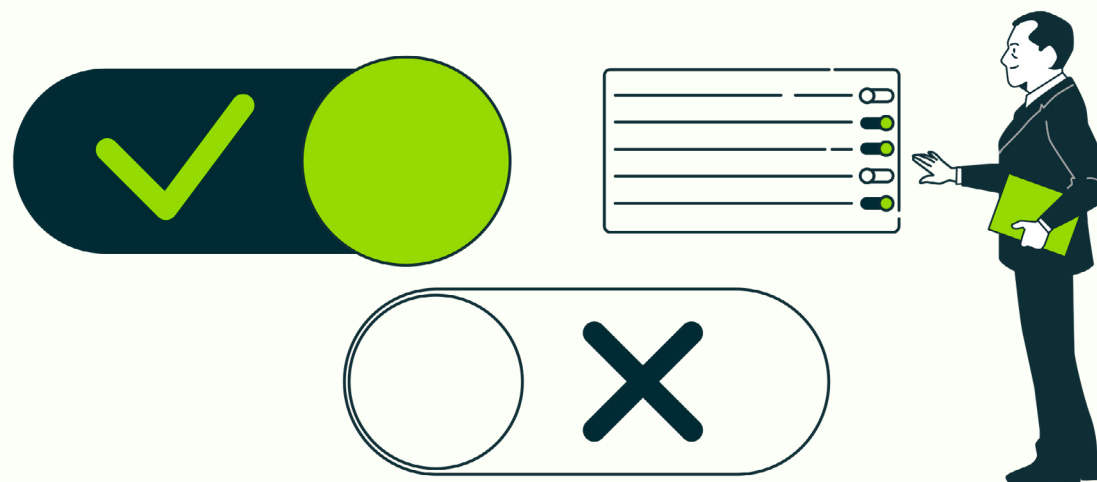
2.2.3. General Regime for the Prevention of Corruption (RGPC)

As approved by Decree-Law no. 109-E/2021, of December 9, Nextbitt has implemented measures to prevent corruption:

- Code of Ethics,
- Plan for the prevention of risks of corruption and related infractions (PPR),
- Whistleblowing channel,
- Training plan for its employees in relation to RGPC issues.

We comply with Portuguese law and the jurisdiction in which we operate. In the absence of this, we apply Portuguese law.

"We comply with Portuguese law and the jurisdiction in which we operate."



WE MUST:

- Provide internal training to all our employees in order to raise awareness of the importance of the policies and procedures implemented to prevent corruption and related infractions,
- Define and implement mitigation actions in order to reduce the associated risks of corruption and related infractions,
- Ensure and promote transparency of activities, providing an accessible reporting channel for situations of non-compliance with ethical values and/or situations of illegality, such as corruption and related infractions.



WE MUST NOT:

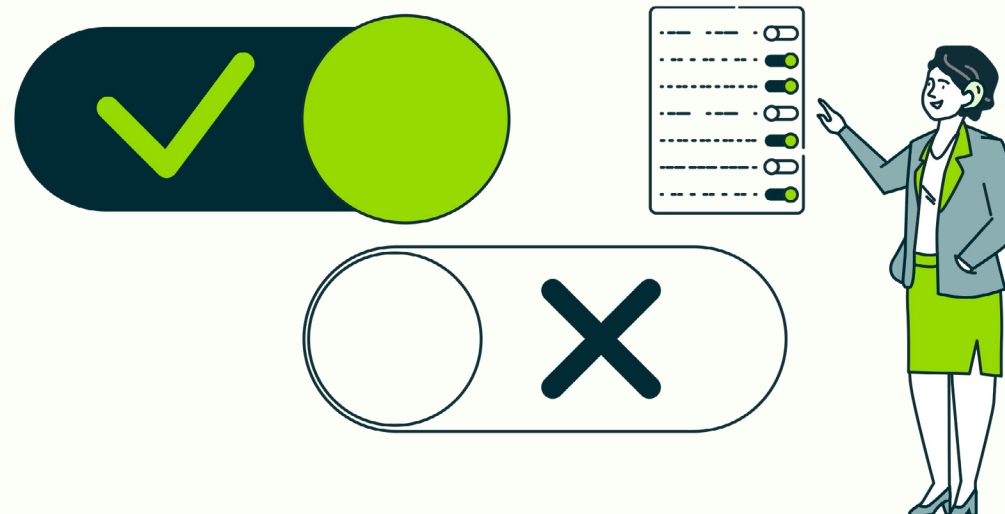
- Neglect to implement adequate mitigation measures,
- Fail to comply with legal requirements.

2.2.4. Prevention of Money Laundering and Terrorist Financing (ML/TF)

In accordance with Law no. 83/2017 of August 18, Nextbitt has implemented various internal mechanisms and rules aimed at preventing money laundering and terrorist financing (ML/TF).

These principles are presented in PC2302 - Prevention of Money Laundering and Terrorist Financing.





WE MUST:

- Consider the risk of poor ethical practices in the analysis and management of the organization's strategic risks, and must implement appropriate mitigation measures.



WE MUST NOT:

- Neglect to implement appropriate mitigation measures,
- Failing to comply with legal requirements.

2.3. Relationships of trust

Nextbitt's growth is the result of close, stable and long-term relationships with our customers, suppliers and employees.

The transparency, respect and honesty with which we relate to each other means that the bonds we maintain are long-lasting and trustworthy.



We take great care to ensure that all our suppliers and employees are aligned with our vision and our commitment to complying with all legal and ethical requirements, thus fostering an environment conducive to respect and the constant search for excellence.

2.3.1. Conflicts of interest

A conflict of interest exists whenever a Nextbitt employee has personal and/or professional interests, in a given matter, in obtaining their own benefits or profits, thus influencing the impartial and objective performance of their duties.

Conflicts of interest can be associated with the concept of corruption, although the existence of conflicting interests cannot, and should not, always be associated with the existence of corrupt practices.

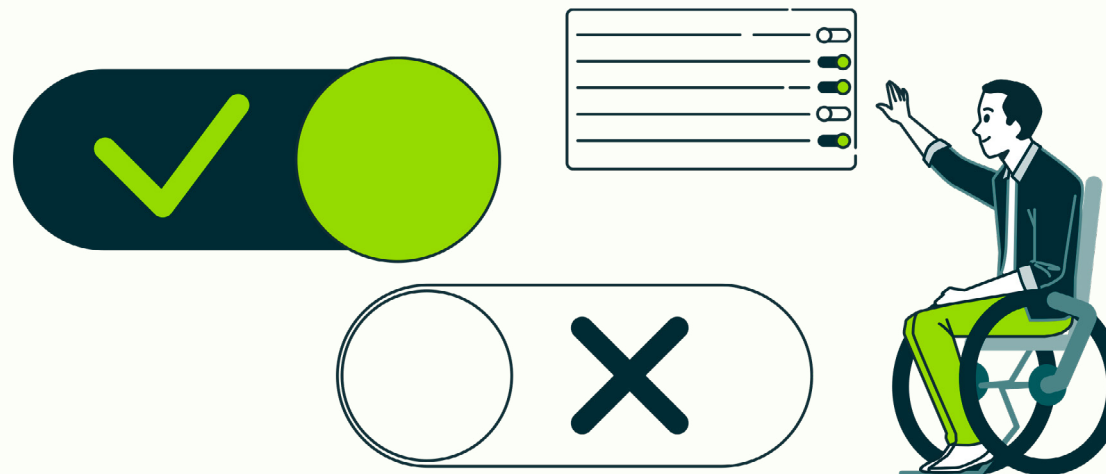
In this context, Nextbitt is committed to adopting measures aimed at preventing situations in which personal interests conflict with the interests of the organization.

“(...) preventing situations in which personal interests conflict with the interests of the organization.”

Therefore, members of the Executive Committee, Employees and Subcontractors are prohibited from:

1. serving as a member of the Board of Directors or executive director of a competitor, client or supplier of Nextbitt;
2. hold shares in any form in a company that competes with Nextbitt;
3. develop business relationships on behalf of Nextbitt with close people (family, friends, etc.) either directly or indirectly (controlled company), unless expressly authorized by the Board of Directors;
4. perform their duties at Nextbitt and carry out a commercial or technical activity that competes with it.





WE MUST:

- Consider the risk of ethical malpractice when analyzing and managing the organization's strategic risks, and implement appropriate mitigation measures,
- Know the procedures for preventing, identifying and resolving conflicts of interest,
- Guarantee and promote the transparency of activities, providing an accessible whistleblowing channel for reporting situations of non-compliance with ethical values and/or situations of illegality, such as corruption and related infractions.



WE MUST NOT:

- Agree to take part in processes that may generate potential situations of conflict of interest (e.g. selection of suppliers...),
- Use information, to which we have access in the course of carrying out our activities, to obtain advantages for our own interests, those of friends or family members,
- Harm Nextbitt's activities and interests by negotiating on our own behalf or on behalf of competing companies.

2.3.2. Relations with customers and suppliers

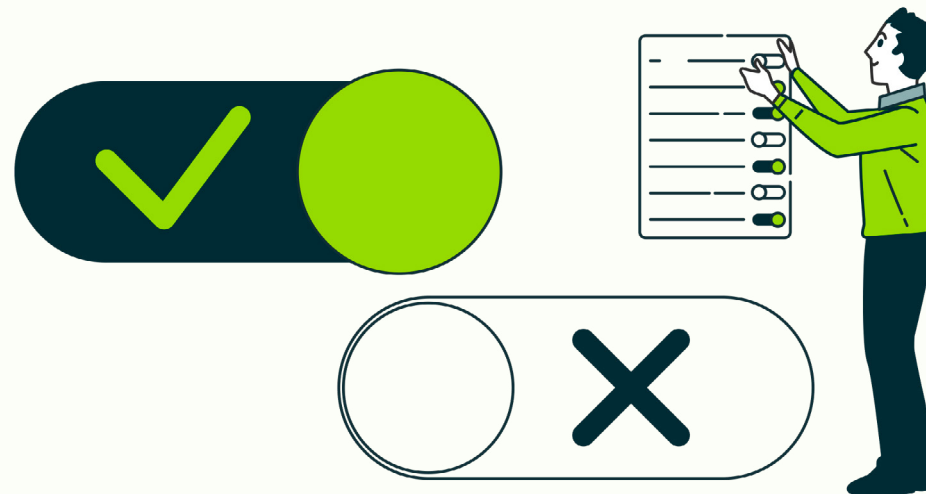
The business relationships established between Nextbitt and its partners are fair, just and comply with competition rules.

All employees must safeguard Nextbitt's good image by demonstrating total transparency, honesty and impartiality.

The relationships we maintain with our partners (clients and suppliers) are aimed at creating added value through our experience and interpersonal skills, always working fairly, honestly and impartially with all of them.

We also expect our partners to act in the same way, in compliance with all legal and ethical requirements. The Purchasing Policy sets out the internal criteria with which to comply when selecting suppliers.





WE MUST:

- Systematically enter into service agreements with customers and suppliers,
- Establish proximity and maintain clear and effective communication, always with respect and professionalism,
- Continuously evaluate and promote our performance with clients,
- Select suppliers in line with our internal policies and procedures, identifying selection criteria as well as the risks inherent in contractual relationships,
- Evaluate the performance of our suppliers and accompany them, whenever possible, to continuously improve their practices.



WE MUST NOT:

- Establish and/or maintain relationships with suppliers who do not comply with legal requirements and Nextbitt's ethical principles,
- Not give feedback to our suppliers on their performance,
- Fail to comply with the contractual requirements established with customers and/or suppliers.

2.3.3. Relations with colleagues, staff and peers

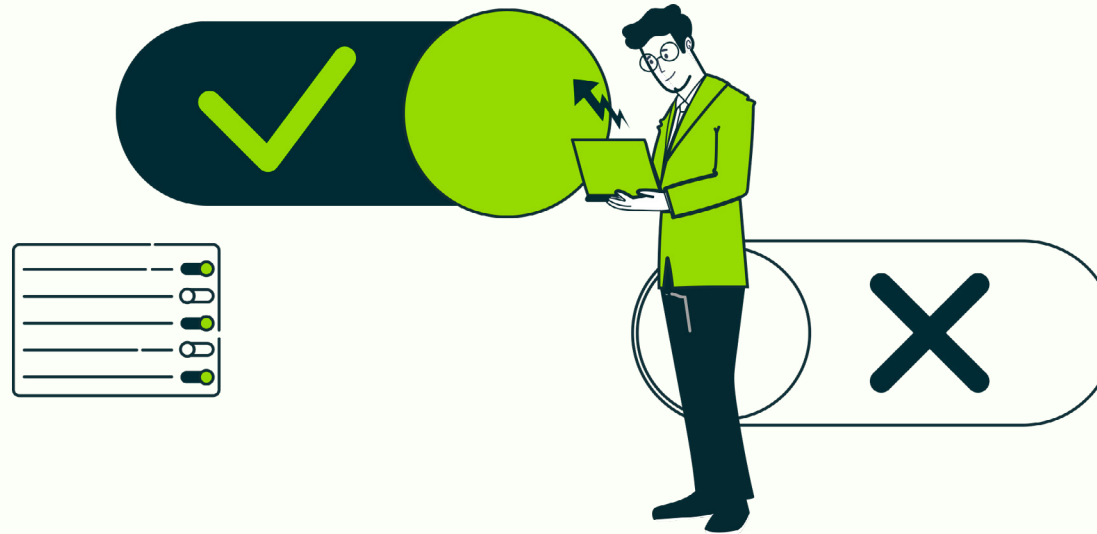
Respect for people and their dignity is one of Nextbitt's fundamental values. All Nextbitt employees, at all levels, must:

- promote relationships based on respect for the dignity of all those involved,
- treat others with respect, courtesy and tact,
- maintain a good working environment, thus building trust and unity,
- respect everyone's privacy,
- avoiding and actively discouraging all forms of harassment, abuse, intimidation, lack of respect, lack of consideration, or any other type of verbal, non-verbal or physical violence, offensive or inappropriate conduct. These practices are absolutely forbidden and constitute a serious offense with associated criminal liability.





If any of the above principles is violated and is detected or is known to an employee, they must report the situation to any Nextbitt representative and/or use the whistleblowing channel, without disciplinary consequence, unless they act in bad faith.



WE MUST:

- Respect others, regardless of their position or role within society,
- Report any situation of harassment, abuse or lack of respect at work, as a victim or witness,
- Promote unity, listening and respect for others.



WE MUST NOT:

- Tolerate, fuel or minimize situations of moral or sexual harassment at work.

2.3.4. Quality and excellence

Nextbitt is committed to creating innovative physical asset management solutions that contribute to a more sustainable world.

Innovation, sustainability, efficiency and agility are characteristics that define us, as well as our constant concern to add value, guarantee customer satisfaction and continuously improve our practices and offerings.

"Innovation, sustainability, efficiency and agility are characteristics that define us."

2.4. Commitment to Sustainability

2.4.1. Involvement with the community in which Nextbitt operates

Nextbitt assumes its social responsibility towards all stakeholders and its proximity to the communities in which it operates, aiming to be an active agent in building progress and well-being, both within the company and in society.

In this sense, Nextbitt is committed to:

- Promoting a society based on mutual respect and equal opportunities;
- Adopt and implement social responsibility practices to make a positive contribution to the quality of life of employees and their families;
- Implement community support initiatives, involving Employees and Partners.



2.4.2. Environmental responsibility and concern for sustainability

Sustainability is an essential pillar of Nextbitt employees' decisions and behaviour, and is recognized as a responsibility shared by all.

Nextbitt is committed to integrating the concepts of sustainability and social responsibility into its business, assuming the commitment to: :

- Conduct its activity in line with the principles set out in the Sustainability Strategy and Policy, which are fundamental to the implementation of a sustainable development model focused on social progress, environmental balance and economic development, with the aim of creating long-term value and prosperity for all stakeholders;





- Adopt the best environmental practices, minimizing the environmental impacts of the activity, through the rational use and efficient management of natural resources, the promotion of the circular economy, the reduction of GHG emissions in its own operations and in the value chain;
- Promote the Sustainability Policy internally, with its partners and other stakeholders;
- Promote and collaborate to achieve the United Nations Sustainable Development Goals.

3. Compliance Checklist

In order to ensure compliance with this Code of Ethics, Nextbitt employees can ask themselves the following questions:

- Is my action compatible with the principles and legal aspects of Nextbitt's Code of Ethics?
- Is my behavior consistent with the ethical and professional principles of the Code of Ethics?
- Does my decision reflect "right behavior?"
- Is my decision based on sound professional judgment?
- Would I feel comfortable if I had to justify my decision in public?

4. Consequences of not acting ethically

Failure to comply with the principles set out in this Code of Ethics may result in disciplinary action being taken, as well as civil and criminal sanctions.

When triggered, the disciplinary process can lead to the suspension or dismissal of the employee.

5. Doubts about certain behaviors

If you have any doubts or notice any behavior that does not comply with this code of ethics, you can talk to your manager, the People & Culture department or any member of the Executive Committee.



6. Whistleblowing

6.1. Reporting irregularities

If a Nextbitt employee, in the course of carrying out his or her duties, becomes aware that a law, regulation or any of the principles set out in this Code of Ethics has been violated, he or she may freely report this irregularity through the whistleblowing channel.

The whistleblowing channel is managed by Nextbitt's People & Culture and Quality & Compliance areas.

6.2. Whistleblower protection

Under the terms of the law, Nextbitt undertakes to adopt the necessary measures to protect the whistleblower, guaranteeing confidentiality, impartiality, efficiency and speed of the process.

However, reports must comply with criteria of good faith and truthfulness. Any report that is defamatory, abusive or made in bad faith could lead to disciplinary or even legal sanctions.



6. Documental control

Code of ethics approved by members of the Executive Committee.

Version: 1.0

Date: 27/05/2024

Reference: PO2309



Nextbitt

Sustainable Asset
Management