

The background of the entire page is a close-up photograph of large, vibrant green leaves, likely from a tropical plant like a Philodendron. The leaves are layered, with some in sharp focus and others blurred in the background, creating a sense of depth. The lighting is soft, highlighting the veins and textures of the foliage.

GenEthics

ETHICS | CONDUCT

This code of ethics and conduct is public. C-MORE reserves the right to update it at any time and without prior notice. The updated version of this document is available on C-MORE's institutional channels, namely on its website and intranet.

The logo for C-MORE, featuring a stylized 'c' followed by 'more' in a lowercase, sans-serif font.

cmore

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1. Introduction

1.1 Definitions and abbreviations

ECOC

Ethics and Code of Conduct.

C-MORE

Company C-MORE SUSTAINABILITY, LDA., registered at the Commercial Registry Office under the single registration and taxpayer no. 516.143.107, with registered office at Avenida Duque de Ávila, no. 64, 7th floor Letter A, 1050-083 Lisbon, or any other company that will be held or managed, directly or indirectly by the said company.

COLLABORATORS

Group of people who (i) belong to C-MORE's management bodies, (ii) have a work contract with C-MORE (Employees) or (iii) represent C-MORE before third parties.

DOCUMENTATION

Any written material, regardless of whether it is physical or digital, which contains any type of information regarding C-MORE or its activities.

ESG

Abbreviation for Environment, Social and Governance - Environmental, Social Sustainability and Governance.

SDG

Sustainable Development Goal, as defined by the UN in the 2030 Agenda and its 17 Sustainable Development Goals for the world. For more information visit: <https://sdgs.un.org/goals>

STAKEHOLDERS

Are people, groups or organizations that may affect, be affected or perceive themselves to be affected by a decision or activity, e.g. Clients, Shareholders, Collaborators, Suppliers, Unions, Government, NGOs, Investors.

1.2 What?

This ECOC contains what C-MORE deems fundamental (its "DNA") to being and doing in the world, namely its mission, values and expected behaviors, as well as key practices that it believes contribute to high productivity and professional and personal excellence.

1.3 For Whom?

This ECOC is public and is intended for:



**All collaborators
of C-MORE**



**Any external third party in
the execution of their
relationship with C-MORE**

1.4 Why?

To ensure that all recipients referred to in the previous paragraph contribute to the respect, promotion, strengthening and fulfilment of this ECOC, namely through the embodiment of its principles and rules in everything they do relating to C-MORE, namely in the elaboration of other high-level instruments, such as strategic plans and policies, thus contributing to sustainable and aligned development.



2 The Purpose of C-MORE | Beyond The Obvious

2.1 C-MORE'S DNA | Mission and Vision

C-MORE is a company of and for ESG, founded by people with a professional (in companies and institutions, e.g. UN and ILO), academic and human background in this area, focused on positively impacting the world, in the light of core human rights, seeking to create the best and most prosperous version of our world for all.

The concept of sustainability is associated with the three pillars of sustainable development - economic, social, and ecological (from the English abbreviation ESG). Only when these three pillars are united, can sustainable development be achieved.

In addition to the 3 pillars of ESG, the founders, because of their humanitarian experience, believe in a 4th pillar: the Individual.

The design of any project and solution must always start from the individual's perspective that we want to impact, their context, their expectations, their problems, promoting an active listening, in a posture of constant empathy.

C-MORE's focus is to help companies, as one of the main actors of impact creation, to integrate ESG concepts, legal and regulatory framework, metrics, and best practices into their strategy:



2.2 Guiding principles, core values and general rules



GUIDING PRINCIPLES

We aim at contributing to a more sustainable world, at the limit of ensuring the materialization of (i) all rights and prosperity enshrined in the Universal Declaration of Human Rights (UDHR) and (ii) the goals defined in the SDGs of the UN Agenda 2030.

In all its activities, professional and private, C-MORE expects its collaborators to be familiar with and promote the principles, values and fundamental rights explained in these key documents, which we consider to be mandatory reading.



CORE VALUES

To impact society with our mission and vision, we must always keep in mind the 3 fundamental values of C-MORE's approach:

Transparency

We stand for integrity and fairness amongst and towards everyone, so we have nothing to hide. We want to be genuinely scrutinized. At C-MORE we favor the sharing of information, that everyone is aware of everything and of the relevant "whys", promoting through this transparency, trust, but also the demand, agility, excellence, and the overcoming of C-MORE. "Whoever does not owe, shall not fear".

Creativity

The only way we can positively and significantly impact the world is through great transformations and ideas. If we do not create, we will not transform.

Simplicity

We live in a period of exponential acceleration of technological development, sophistication, and complexity of systems and in parallel, of accessibility to owning and implementing them.

Organizations and people easily find themselves involved in systems/environments of enormous complexity, with little efficiency in the use of resources. As such, the human mind alone no longer has the capacity to integrate, process and transform data therein structured and comprehensible information.

The minds that have most impacted the history of humanity, were typically people who were able to reduce highly complex problems and situations, to simple (not to be confused with basic) and easy to understand/implement ideas.

We seek in everything we do, to simplify as much as possible so that it is easy to understand, implement and impact. If it's too complex to understand, it's not well explained.



GENERAL RULES

Compliance with the Law

Preceding the Values and Principles described above, all C-MORE collaborators have the obligation to comply with, uphold and enforce, including with third parties, the laws and regulations in force, as well as any and all commitments undertaken by C-MORE.



Social (social - people)

Despite C-MORE's scope of action and know-how when it comes to sustainability, it was born with a focus on and expertise on the social dimension of sustainability. Therefore, the respect for the individual and human dignity is crucial for us. In the spirit of the UDHR, collaborators should adopt an attitude - and promote the same attitude to be adopted by third party recipients of this ECOC - of respect for others, for the dignity of all human beings, including different groups, cultures, and customs.

Collaborators must actively seek to engage and commit to social responsibility strategies and policies defined by C-MORE, promoting engagement and dialogue with the communities where it operates, with a view to their sustainable development.

Diversity and Inclusion (D&I)

At C-MORE, we want excellent teams, by bringing together different people, in the various dimensions of the human being. Like the importance of diversity in nature, namely regarding the genetic quality and health of species, in the organizational context, this diversity is equally important since it ensures a healthier organization, minimizing biased thoughts and behaviors, and maximizing results, innovation, attraction and retention of talent.

We strive for fairness/equity in the treatment of collaborators, opportunities and conditions provided, and expect appropriate, fair, unprejudiced, and inclusive behaviors from everyone so that this diversity can thrive at C-MORE based on an impartial and meritocratic assessment.

Breastfeeding

C-MORE recognizes that breastfeeding has many benefits for new parents and their children. We support any of our parents, regardless their position or status, in completing their legal rights, parental duties and bonding with their babies.

Unless specified by law, if the baby is breastfed, the parent has the right to a two-hour leave to feed the baby. It can be taken in two different periods and has a maximum duration of one hour each, unless otherwise agreed with C-MORE's management.

Breastfeeding collaborators must not be disturbed with work during the breastfeeding period.

In the use of their leave legitimately, collaborators only need to inform their supervisors that they want to do so. The supervisors aren't allowed to prohibit the leave for breastfeeding.



Environment

Preservation and respect for the environment are essential principles in the actions of collaborators and third-party recipients of this CEC.

Collaborators must have and promote this respect for the environment, striving to preserve it and reduce the impacts of related activities, highlighting the obligation to comply with all legislation applicable to the market where they operate, but also any C-MORE strategies and policies or other requirements in this area, to ensure the sustainable development of C-MORE and the communities where it operates.



Governance

Moreover, collaborators are committed to complying with the other internal rules of C-MORE, namely the implemented policies and procedures.

Transparency and Accountability

All collaborators must act in such a way as to ensure the fulfilment of their duties and promote conditions within the organization so that C-MORE may fully comply with its duty to provide

information, namely in the veracity and accuracy of the data and information that are their responsibility, as well as to alert C-MORE's managers if they detect any relevant error or omission.

2. Collaborating at C-MORE

At C-MORE we believe that the individual should act autonomously and be self-motivated, managing their resources in the best way to achieve the outlined goals.

The role of top management is to remove the obstacles that teams and individuals cannot tackle alone.

To this end C-MORE promotes the right environment of mission, values, strategy, tools, and people, whom we trust and support, to create an outstanding organization in all areas.

This is particularly important as C-MORE and its teams, due to the specificity of the business, work mostly asynchronously and remotely.

Although we often collaborate remotely and de-centrally, collaborators must never forget that they are using, managing, or impacting equipment, assets, and investments, both tangible and intangible, which are not their property and which, in their actions, directly and indirectly affect a wide range of stakeholders.

Collaborators are expected to act in a sustainable manner, minimizing waste, and with care in the use of equipment and assets, tangible, or intangible, whether of C-MORE or third parties.

Despite C-MORE's decentralized operation, we want teams and collaborators who help each other because they are empathetic and have no problem leaving their comfort zone or functional area to help and work towards a common goal.

We want to be an agile team, therefore sustainable, in the sense that we are united by agile and simple processes, which promote high productivity and efficient use of resources of all parties involved, starting with time.

THEREFORE:

- 01 People and relationships are more important than procedures and tools. The latter should work on the former and not the reverse;
- 02 Quickly deliver simple and functional solutions to the client rather than extensive and complex solutions and documentation;
- 03 We collaborate with the client and with those who understand the business, more than doing mere contract management;
- 04 We are proactive, and armed with the value of Creativity, we change and transform to address changes to plans/requirements. If it is for the sake of improvement, we welcome it!
- 05 Simplicity is essential, to ensure that we only do the fundamental. We avoid what adds little or no value;
- 06 Thus, prioritization is key, to ensure focus and implementation on what can maximize impact on the business and the world, reducing waste on what adds little or no value.
- 07 We constantly self-assess as individuals and as a team, to become better, to the limit and more sustainable.

We want to have focused individuals and teams, so collaborators should not engage in any outside professional activity that conflicts with C-MORE's interests and obligations.

Likewise, collaborators should not intervene in any processes, or maintain an operational or hierarchical dependency relationship internally, in which their direct or indirect personal interest may affect their assessment and decision-making capacity.

Collaborators must promote their own personal and professional development, training, and fulfilment, as well as that of other collaborators who may depend on them.

Collaborators are also asked to pay special attention to the following rules, so that they comply with them and ensure that they are complied with by the third parties to whom this ECOC is addressed

- Not to use and repudiate the provision of work by minors under the legally permissible age;
- To prohibit and repudiate forced or compulsory labor and any other forms of labor exploitation and slavery;
- Provide adequate conditions of hygiene, comfort, safety, and health in all work-related aspects
- Ensure the right to freedom of association and collective bargaining. C-MORE does not discriminate against anyone because of their membership or non-membership in unions;
- To ensure the protection of personal data, the privacy and the rights, freedoms and guarantees of the collaborators;
- Not to exercise any type of discriminatory action based on ancestry, age, gender, sexual orientation, gender identity, marital status, family situation, economic situation, education, origin or social condition, genetic patrimony, reduced work capacity, disability, chronic disease, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological convictions and union membership;
- Not to practice, tolerate or encourage any kind of verbal, nonverbal or sexual harassment, namely on any of the personal threats or situation referenced above;
- To ensure equal opportunities and equal treatment between men and women, namely as regards access to employment, professional training and promotion or career and working conditions;
- Enforce legislation and regulations applicable to the duration and organization of working time, namely rest periods and mandatory holidays;
- Promote personal fulfilment and conciliation between workers' work life and family life, as well as the exercise of rights to parental protection;
- To encourage that workers are paid in accordance with the applicable legislation and in compliance with the applicable collective labor regulation instruments.

2.3 Communication

At C-MORE, communication among collaborators is intended to be informal, but always respectful. We avoid the use of titles and linguistic formalisms.

With third parties, Collaborators must respect the client's market and business culture and adjust their language accordingly.

Communication (and its speed and quality) is one of the main levers of collaboration for the progress and prosperity of mankind, therefore:

- Within the scope of the Transparency value, it is intended that teams maintain correct communication among themselves and with those who understand the client's business whenever necessary, favoring "face-to-face", even if by video or voice.
- Any collaborator, whenever he or she feels it is necessary, can contact any other collaborator. It should be noted that the communication flow is independent from the hierarchical flow, i.e. any collaborator may communicate freely with any other collaborator, regardless of his/her hierarchical position and the department to which he/she belongs.
- Although there are rules to be followed regarding communication and information, we favor an uncomplicated flow throughout the organization.



SOCIAL COMMUNICATION



Given the impact it may have on C-MORE and its stakeholders, collaborators should be especially cautious when contacting the media on any matter related to C-MORE and should always liaise with C-MORE management.

2.4 Collaborative Tech(nological) Tools

C-MORE has thought of, invested in and made available to its collaborators and third parties with whom it carries out its activities, technological tools aiming to promote productivity of individuals and teams.

In this way, collaborators are expected to use the IT tools advised by C-MORE in the exercise of their professional activities to ensure agility and compliance, namely:

PURPOSE	SOFTWARE	OBSERVATIONS
Collaborative HUB	Office 365	Digital Office Module
CRM	WIP	CRM Module
Communication (Video and chat)	MS Teams Slack (with external collaborators)	May be adjusted depending on stakeholder external to C-MORE
Document and file repository	C-MORE Cloud on Microsoft 365	Personal documents on MS One drive and C-MORE documents/data on MS Sharepoint.

2.5 Documentation and Information Management



DOCUMENTATION

All collaborators are committed to the correct transmission, filing and maintenance of documentation containing relevant information about C-MORE or its activities.

Correct document management is fundamental in the sense that it ensures the agility and excellence of the organization. If we have the right documents in the right places, we reduce friction and disruption in our daily operations, as well as errors and their propagation within C-MORE and beyond. Unnecessary communication and questioning is avoided. If a collaborator detects any erroneous or missing documentation, they must promptly resolve the error or lack of documentation.

Document management is also fundamental for compliance reasons and may even have serious legal implications. Documentation can take many forms:

TYPES	DEFINITION	LOCATION
Public information	Public information, accessible to all collaborators as well as to all C-MORE stakeholders	Website and internal cloud, in an area accessible by all collaborators
Project documentation	Internal documents relating to projects developed with clients	MS 365 (Sharepoint and Teams)
Policies, Manuals, Processes and Procedures	Documents with internal processes, procedures, and instructions, as well as manuals and other documentation for the client/user	MS 365 (Sharepoint and Teams)
Documents of a legal nature	Legal documents such as contracts with clients, employment contracts, certificates	DocuSign – contracts MS Sharepoint - others
Loose documentation	Other documents with information on C-MORE or its activities	In any place and format



The C-MORE Cloud and its folder "0. Official Documentation" is the source where all collaborators should always get up-to-date presentations, minutes, and other Templates.



The Cloud service by MS Sharepoint is where all collaborators should keep all relevant files of their activity at C-MORE. Never make personal use of them. For that purpose, use MS Onedrive.



INFORMATION

Confidentiality

Collaborators must comply with the duties of confidentiality and secrecy inherent to their positions and never use information obtained during their activities for their direct or indirect personal interest.

Collaborators must use the information they obtain about C-MORE's business, clients and third parties only for the performance of their duties and may not pass on or use such information when it may be considered confidential, namely technical, and commercial elements of products and services, strategies, budgets, planning, research, and investigation results, among others.

Personal data protection

Collaborators must respect and uphold the regulations and legislation in force, as well as the internal rules on the protection of personal data to which they have access in the course of their duties.

2.6 Growing at C-MORE (careers)

C-MORE prioritizes the development and growth of all its collaborators, investing in everyone, rewarding and promoting those who perform well.

A promotion may be a move to a higher position, responsibility, or salary, within the same or another department.

We strive to be a meritocracy and so, we will promote workers based on their performance and conduct, considering criteria such as experience, recent performance evaluations, skillset for new roles and personal motivation and aspirations.

C-MORE does not tolerate promotions based on subjective opinions, performance evaluations or metrics, discrimination, fraternization, or favoritism.

Managers must keep good records of their promotion evaluation process, as well of any internal or external hiring, including the criteria with which they rejected/hired an internal candidate.

Promotions may happen when:

- A job opening is advertised internally as well as externally.
- An opportunity opens unexpectedly, and our company wants to fill it from within.
- A worker has consistently good performance evaluations and their manager deems them ready for the next step in their career.
- A worker acquires a credential (licensure, degree etc.) that allows them to advance.

C-MORE reviews performance every end of year, considering possible promotions, receiving, and giving feedback to the collaborator, including about personal development plans. Nevertheless, we encourage constant feedback on performance between employees, so more than one performance evaluation/feedback meeting during the year may occur.

We prioritize internal hiring and will only post a job opening externally when management considers no internal profiles fit the role or position. Nevertheless, the external job postings will be communicated internally and any collaborator may file an application for the process.



3. Collaborating With Third Parties

2.7 Public Entities



INDEPENDENCE

To act independently from public entities, their collaborators, and political agents, always acting with integrity and transparency, rejecting any illegal act, or act that could illicitly influence any decisions or constitute corruption or any other type of favor.



COLLABORATION

Providing the supervisory and oversight authorities with all the collaboration that is required, answering diligently to the lawful requests that are solicited, in coordination with C-MORE management.



MONEY LAUNDERING AND TERRORIST FINANCING

Actively fight potential money laundering attempts by refusing to participate in any act, facilitation or advice that may be associated with such, under the legal and regulatory standards in force. Collaborators must act in such a way as to prevent C-MORE's activity from in any way providing, collecting, or holding funds or assets that could be used for the financing and support of criminal activities, namely terrorism.

2.8 Clients and Suppliers

We fulfill our obligations and simultaneously demand the fulfilment of our rights or the obligations of others. We act and expect everyone to act with integrity, fairness, good faith, and common sense, to overcome the difficulties, mistakes and changes that inevitably come our way.

We are sometimes faced with challenging problems, missions, and goals, but we always approach clients and suppliers with respect. Likewise, we demand and ensure such respect from others, whether for ourselves or for anyone else.



SELECTION CRITERIA

The decisions of clients and C-MORE in selecting suppliers or partners must follow objective, technical, and professional selection criteria aimed at the sustainability of the entities they represent, rejecting any criteria that favor personal or diffuse interests, as well as any acts that constitute abuse of power, position, or corruption.

Diversity and Inclusion (D&I) is an important responsibility in everything that we do. We consider that supplier diversity is a strategic business advantage and a component of our D&I strategy.

There we aim to integrate supplier Diversity and Inclusion in our procurement, with the objective of establishing and maintaining excellent relationships with Diverse Suppliers in the communities where we act, participating in programs or initiatives to support such suppliers.



CONFLICTS OF INTEREST, CORRUPTION AND WHISTLEBLOWING

Collaborators must act - and encourage the external addressees of this CEC to act as well - in the assessment of possible conflicts of interest, avoiding them, as well as in the prohibition of any corruptive behavior, including facilitation payments or receipts, or the creation, maintenance or promise of irregular or favorable situations.

Collaborators are bound to report - and ensure that external recipients of this CEC also do so - information on any actions that constitute improper behavior, including those that constitute possible illegal or illicit practices in financial and accounting matters, fraud, corruption, and money laundering, as well as any actions related, directly or indirectly, with entities that may constitute or support terrorist practices.

2.9 Competition

Competition is a natural and healthy market force, contributing to a sustainable development of societies, as it fosters excellence, efficiency of organizations and making accessible products and services at the best price and quality for all people.

In this sense, collaborators must adopt a truthful and committed posture towards C-MORE competitors, always in accordance with the law and the applicable internal rules.

Collaborators shall therefore assume - and encourage third party recipients of this CEC to assume as well - the commitment to scrupulously respect market and competition rules, truthfully acting in a serious and loyal way, avoiding restrictive, unfair, cartel practices or abuses of dominant position, and shall ensure that C-MORE relates with competing entities in a healthy way, in good faith and promoting mutual respect.

4. Collaborating With C-MORE

In their activities with C-MORE, third party recipients are expected to comply with this CEC, as well as any other policies or rules in place and duly communicated to stakeholders.

C-MORE collaborators, in the course of their duties, will act to institutionally implement and externally uphold this CEC, and will have the full support of C-MORE to do so.

5. Compliance and Monitoring

2.10 Compliance

This CEC is applicable to all C-MORE collaborators, who should be aware of it, comply with it and promote and disseminate it in all their activities related to C-MORE, namely to other collaborators and third parties.

Non-compliance with the CEC may result in disciplinary procedures for collaborators who fail to comply with it, as well as in the filing of possible complaints, including by legal means, and possible reports to the competent authorities, in relation to all collaborators who fail to comply with it.

2.11 Monitoring and whistleblowing

This CEC is public and is made available on its website, and those responsible for it should ensure access to it whenever requested.

Collaborators and third-party recipients are responsible for ensuring compliance with this CEC, disclosing it, invoking it in their defence, applying it and claiming its application from their superiors, including by themselves, as well as reporting any irregularities, mismanagement, corruption, illegal activity or other wrongdoing. Any irregularities identified should be reported through the whistleblowing channel made available for this purpose on the company's website.

C-MORE guarantees the confidentiality of the reports received, the absence of any reprisals against whistleblowers for good faith reports, the protection of the personal data of the whistleblower and the suspected offender, and to keep the whistleblower informed of the progress where appropriate and permitted.

Reprisals against whistleblowers are condemned by C-MORE and may give rise to disciplinary proceedings against the perpetrators and the persons who allowed these reprisals to take place.

2.12 Conflict and Grievance Resolution

At C-MORE we value and promote a positive working environment between all collaborators and management. We believe that the better a collaborator feels at work, the better flow, collaboration and performance will have. And so does C-MORE.

However, we are aware that problems often arise at work that may sometimes cause uncomfortable situations. Whenever a collaborator feels a grievance must be dealt with, the following steps and options should be observed.

01

Deal with the matter informally: If you feel comfortable in doing so, approach the involved in your grievance, explaining how their actions affected you, and that you expect behaviours to change in the future.

02 ***Speak with your manager:*** If you do not want to speak to the person directly, you can tell your manager about the conflict. They are obliged to inform you about your options. They may approach the person complained about and talk to them informally about your grievance or they may decide to take more formal action.

03 ***Make a formal complaint.*** In case you decide to make a formal complaint, this can be done by putting the complaint in writing and reporting it to your manager or to the CHRO. The written complaint should contain a description of the incident, time and date of the incident, names of the individuals involved, your signature, and date of the complaint. Alternatively, you can also use the whistleblowing channel.

When a formal complaint is filed, grievances will be treated with confidentiality (except where C-MORE deems it is necessary to disclose the complaint for the purpose of dealing with it effectively; disclosure will be no wider than is strictly necessary). C-MORE commits to:

- Handle seriously and impartially any grievance;
- Always protect collaborators from victimization;
- Deal with conflicts immediately, taking into account all the circumstances.





INVESTIGATION

When a grievance cannot be resolved informally, and the company deems an investigation is required, the matter will be investigated by a designated person, chosen by C-MORE's management. How the investigation is to be conducted is at the complete discretion C-MORE.

01 *If the complaint is substantiated*, appropriate action will be taken;

02 *If the complaint is unsubstantiated*, you will be given an explanation as to why that finding was made;

03 *If the complaint is found to have been fabricated*, appropriate disciplinary action may be taken against you up to and including termination of employment.



ALTERNATIVE RESOLUTION CHANNELS

If you are not satisfied with the way in which your grievance was handled, you have the option of raising your complaint by following the appropriate legal mechanisms.



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