

Code of Conduct

Last update: December 2024

TO REPORT ANY VIOLATION OF THIS CODE, PLEASE CONTACT:

 report@nearshoreportugal.com

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About NEAR.PORT - NEARSHORE SERVICES PORTUGAL, S.A.

NEAR.PORT - NEARSHORE SERVICES PORTUGAL, S.A. (hereinafter referred to as “NEAR.PORT,” the “Company,” or the “Organization”) is an integral part of DevelopX, a leading company in Digital Transformation Consulting headquartered in Hamburg, Germany. With a proven track record of success in over 23 startups and years of experience in top management consulting, the DevelopX Group brings a vast wealth of knowledge to support our clients in building and growing their digital businesses.

NEAR.PORT has specialized in Information Technologies since 2006, contributing to major projects in Portugal and Europe, connecting ambitious projects with highly qualified teams, and providing top-tier nearshore services in Information Technology, including project management, software development, mobile, and website development.

From a highly strategic location, NEAR.PORT offers dedicated resources and cost-efficiency while maintaining cultural, linguistic, and time zone proximity.

Portugal has been recognized as a leader in providing technological services, with a comprehensive technological offering and a level of expertise and training acknowledged by European companies. NEAR.PORT has a team of over 150 professionals. By connecting our clients with the right innovative solutions, we create greater impact, quality, and efficiency in their businesses, resulting in numerous satisfied clients and successful partnerships.

Vision, Mission, and Values

Mission: To provide high-quality technological solutions through nearshore services, connecting local talent with global companies. We are committed to delivering innovative and efficient projects, ensuring client satisfaction and the continuous development of our employees.

Vision: To be recognized as the leading nearshore company in Portugal, standing out for excellence, innovation, and commitment to quality. We aspire to create an inclusive and collaborative work environment where our employees can grow and thrive, contributing to our clients' success and global technological advancement.

Values:

- 1. Excellence:** Striving for perfection in everything we do, ensuring the highest quality in our services.
- 2. Innovation:** Encouraging creativity and innovation to deliver advanced technological solutions.
- 3. Commitment:** Dedication to achieving our clients' goals and supporting the professional development of our employees.
- 4. Transparency:** Maintaining open and honest communication with clients, employees, and partners.
- 5. Sustainability:** Promoting sustainable practices that benefit society and the environment.

Scope of Application

This Code of Conduct applies to all employees, staff, and collaborators of NEAR.PORT, hereinafter referred to as Employees, regardless of their contractual status, roles, or hierarchical position. It governs their interactions with individuals, the media, and public or private entities, both national and international, that are associated with NEAR.PORT.

The provisions of this Code of Conduct establish the principles of conduct and professional ethics

that must be observed by NEAR.PORT, binding all its Employees. This includes, but is not limited to, the collection, processing, use, and security of personal data.

Furthermore, the provisions of this Code of Conduct extend to the relationships between NEAR.PORT and all its clients, trainees, apprentices, employees, suppliers, or service providers, as well as the Company's interactions with any other corporate entities it engages with.

This Code and its compliance serve as a formal and institutional reference for the personal and professional conduct of all Employees, complementing other legal and regulatory provisions that must also be observed.

It is also intended that these guiding principles be known and embraced by all those who collaborate or engage with NEAR.PORT, including service providers and partners.

Personal Data Protection

NEAR.PORT respects your privacy and ensures the protection of all personal data, guaranteeing compliance with all rights and safeguards in accordance with the applicable legislative provisions.

In this regard, NEAR.PORT is committed to processing personal data in compliance with Law No. 58/2019, of August 8, which implements, in the national legal framework, Regulation (EU) 2016/679 of the European Parliament and the Council, dated April 27, 2016 (the "General Data Protection Regulation," hereinafter referred to as GDPR). This regulation concerns the protection of individuals regarding the processing of personal data and the free movement of such data, as well as any other applicable Portuguese legislation on this matter.

Internal Operations

Professionalism, Attendance, and Work Arrangements

Employees must perform their professional tasks with the utmost diligence, dedication, and competence, always acting in the best interests of NEAR.PORT while adhering to the laws and internal procedures governing their activities.

NEAR.PORT emphasizes a culture of personal and social responsibility, as well as professionalism among its Employees. Attendance and adherence to working hours are fundamental requirements for all Employees.

In cases where attendance is not possible, the Employee must notify and justify their absence as soon as possible to the relevant Supervisor and/or the Human Resources Department.

Currently, NEAR.PORT operates under a Flex/Remote work model, allowing Employees the freedom to choose the most suitable work arrangement, except in cases where a different agreement was initially established. Employees are always welcome to work from our offices.

Confidentiality

The information obtained while working for NEAR.PORT is privileged and confidential. It may only be used by Employees, regardless of their contractual relationship, in the performance of their duties and must not be used for personal gain or to benefit third parties.

The confidentiality obligation stated above shall remain in effect even after the termination of employment or contractual agreements, regardless of the reason for termination, and for as long as legally required.

During the employment relationship with NEAR.PORT and for the legally stipulated period after its termination, absolute confidentiality must be maintained regarding any information related to NEAR.PORT or any other associated individuals or entities, including but not limited to:

- Personal data or other privileged information;
- Information about business opportunities or ongoing projects;
- Information on technical expertise, work methods, and project management practices developed by the Company;
- Information related to any projects or products completed or in development, where access is restricted to NEAR.PORT Employees due to their professional roles;
- All Employees of NEAR.PORT, regardless of their contractual status, who handle personal data are required to maintain strict confidentiality and may not disclose or use such data, except when legally required or ordered by a court ruling. Any projects or products developed or under development, restricted to NEAR.PORT Employees due to their professional roles.

All Employees handling personal data are required to maintain confidentiality, refraining from disclosing or using such information unless legally mandated or ordered by a court.

Integrity and Loyalty

NEAR.PORT Employees must conduct themselves properly and professionally, safeguarding the reputation of Nearshore Portugal, Clients, and other Stakeholders.

Employees must avoid any practices that could raise ethical concerns, particularly concerning gifts to or from third parties.

Training

NEAR.PORT provides appropriate training for its Employees to enhance their professional skills, competence development, and workplace safety.

To support career progression, NEAR.PORT conducts an annual performance review for each Employee to identify strengths and areas for improvement.

Employees should also actively seek continuous knowledge updates to maintain or improve their

professional abilities. The Company offers an annual certification and provides free, unlimited access to its training academy.

Non-Competition

Employees must remain loyal to NEAR.PORT and protect its interests, avoiding involvement in activities that directly or indirectly compete with NEAR.PORT's business.

Equal Opportunities, Discrimination, and Harassment

NEAR.PORT upholds the principle of equal opportunities and does not differentiate based on factors unrelated to individual professional performance.

The Company does not tolerate any form of discrimination that is incompatible with human dignity, including but not limited to discrimination based on origin, ethnicity, gender, age, political beliefs, social class, religion, sexual orientation, disability, or any other factor. Similarly, NEAR.PORT does not accept any form of sexual harassment, moral harassment, abuse of power, or any other conduct that undermines human dignity.

Any form of abusive behavior is strictly prohibited, and the right to privacy and personal integrity must always be respected.

Consumption of Alcohol, Tobacco, and Drugs

NEAR.PORT does not permit Employees to be under the influence of alcohol and/or drugs during working hours or in the workplace environment. All Employees must adhere to these rules to ensure compliance with workplace safety, hygiene, and health regulations.

Smoking is strictly prohibited within the Company's premises, except in designated areas. Employees must uphold safety and hygiene standards and show respect for their colleagues at all times.

Protection of Company Assets

All Employees must respect and safeguard the Company's assets (both tangible and intangible) and must not allow their use by third parties unless expressly authorized by their direct supervisor.

The workplace belongs to everyone, and therefore, all Employees have a duty to respect it, ensure its maintenance and cleanliness, and have the right to benefit from it.

Employees entrusted with NEAR.PORT property for their professional activities, such as technological equipment and other materials, must ensure their proper use and maintenance, in accordance with the Terms of Responsibility. These assets must not be used for personal benefit unless expressly authorized by a direct supervisor.

Company assets made available to Employees must be used exclusively for their intended purposes while strictly adhering to security regulations to prevent accidents and avoid damage to individuals or property.

Use of IT and Communication Equipment

Computers, mobile devices, software, and other IT and communication-related equipment or services must be used in accordance with the following rules:

- Do not access, store, or deliberately share images, texts, or materials that promote violence, hatred, religious intolerance, or any other legally protected characteristic.
- Do not install or use unauthorized or prohibited software.
- All equipment and devices must be kept in good working condition, as outlined in the Terms of Responsibility.
- Any issues with equipment or devices must be reported immediately to the Helpdesk via helpdesk@findmore.pt.
- Employees must not attempt to fix equipment and/or device issues themselves under any circumstances.
- The email account provided by NEAR.PORT must be used exclusively for professional purposes.

- NEAR.PORT follows a policy of always including someone in cc when sending emails.
- Email is the official communication channel; all official matters must be communicated through this medium.
- NEAR.PORT uses Slack as its primary daily communication tool (with plans to migrate to Teams).
- Employees must actively monitor Email and Slack (Teams) for important communications.

Access and Authentication in IT Systems

- Use strong and memorable passwords.
- Keep passwords confidential at all times.
- Regularly update passwords, even on systems that do not require it.
- Do not enable automatic password saving in systems or websites.
- Do not use the same passwords for NEAR.PORT systems, client systems, and personal accounts.
- Lock computer sessions whenever leaving the workstation.
- Do not make copies or store confidential documentation outside of its professional context.

Conflicts of Interest

A Conflict of Interest arises when an Employee's personal interests or those of a third party compete with the interests of NEAR.PORT. In such situations, it may be challenging for the Employee to act entirely in the best interest of the Company; therefore, Employees must avoid conflicts of interest whenever possible.

If a conflict of interest arises or if an Employee encounters a situation that could lead to a conflict of interest, they must immediately report it to their direct supervisor and/or the Human Resources Department so that the matter can be addressed fairly and transparently.

Internal Relations

Relationships with Colleagues

All Employees of NEAR.PORT have the duty to contribute to a positive work environment, team spirit, and mutual support. Workplace relationships must be based on mutual respect and integrity.

Behaviors that cause disruption, discomfort, or embarrassment to colleagues, compromise their dignity, or create an intimidating or destabilizing work environment will not be tolerated. Such inappropriate conduct will be subject to disciplinary action.

External Relations

Media and Social Media

NEAR.PORT communicates with Clients and stakeholders through its website, Instagram, LinkedIn, and other platforms. Employees must refrain from engaging or making statements on behalf of NEAR.PORT unless expressly authorized.

Employees wishing to express personal opinions regarding NEAR.PORT should consult their supervisor or management, avoiding any online behavior that could harm the Company's image, Clients, or other stakeholders.

Relations with Clients, Partners, and Others

All interactions with NEAR.PORT Stakeholders must adhere to this Code, ensuring integrity, respect, and professionalism while upholding the Company's values.

Corruption, Bribery, and Related Crimes

NEAR.PORT strictly prohibits any form of corruption, bribery, or related crimes. Employees must never offer or promise personal or financial advantages to gain or retain business or favors from third parties in public or private sectors.

Employees must also avoid any actions that could create suspicion or suggest improper conduct.

Corruption, Bribery, and Related Crimes

NEAR.PORT strictly condemns any form of corruption, bribery, or related crimes. Employees must never offer or promise, directly or through intermediaries, any type of personal or financial advantage to obtain or maintain business or other benefits from a third party, whether in the public or private sector. Likewise, they must not accept any advantages in exchange for preferential treatment from a third party.

Additionally, Employees must avoid:

- Any activity or behavior that could create the appearance or suspicion of engaging in or attempting to engage in improper conduct.
- Offering, delivering, or receiving inappropriate benefits, which includes anything of value to a third party, such as service or consultancy contracts benefiting close associates.

Strictly Prohibited Practices:

- Corruption in all its forms, both active and passive, whether through acts or omissions or by creating or maintaining favoritism or irregular situations.
- The receipt or offering of undue advantages.
- Embezzlement.
- Unlawful economic participation in business activities.
- Abuse of power.
- Influence peddling.
- Money laundering or fraud related to obtaining or misusing subsidies, grants, or credit.

Sanctions

Failure to comply with this Code or committing any of the aforementioned offenses may result in:

Disciplinary proceedings and applicable sanctions under labor law;

Criminal proceedings, punishable by fines and/or imprisonment under the Portuguese Penal Code.

Contact Point

Employees must immediately report any violations of this Code, such as harassment, discrimination, conflicts of interest, or bribery, via email at report@nearshoreportugal.com or anonymously through the form at www.nearshoreportugal.com.

NEAR.PORT will investigate and address the matter transparently and discreetly.

Non-Compliance

It is the responsibility of each Employee to ensure full compliance with all the terms of this Code of Conduct and to seek guidance from their direct supervisor or the Human Resources Department whenever necessary. In case of doubt, Employees should always be guided by the fundamental principles established in this Code.

Before taking any action, Employees should ask themselves:

- Is it legal?
- Does it comply with this Code?
- Is it in the best interest of NEAR.PORT, our clients, or suppliers?
- Have the risks and possible consequences been considered?
- Would I feel comfortable if my action were made public internally or externally?

If the answer to any of these questions is “no”, or if any doubts remain, Employees must seek guidance from their direct supervisor or the Human Resources Department.

This Code of Conduct must be reviewed every three years and has been approved by the NEAR.PORT Administration.



Contacts

REPORT VIOLATIONS OF THIS CODE

 report@nearshoreportugal.com

WEBSITE

www.nearshoreportugal.com

ADDRESS

Av. D. João II, Edifício Mythos
Lote 1.06.2.1A, 1º Piso,
1990-095 Lisboa