



# Code of Ethics and Conduct Areias do Seixo

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## 1. INTRODUCTION

The Code of Ethics and Conduct of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** sets out the principles and standards of professional ethical behaviour that all its employees, managers, and other collaborators must observe in the performance of their duties — both in their relationships with one another and in their professional dealings with external institutions, whether public or private, as well as with individual citizens.

Accordingly, **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** intends for this Code to serve as a reference throughout all activities carried out by the organisation and as a guiding instrument in all relations conducted on its behalf. Its purpose is to contribute to the progressive and consistent development of a culture that reflects the pursuit of three core pillars:

- a) To establish empathetic relationships with our employees, suppliers, clients, partners, and third parties;
- b) To uphold a rigorous policy of constant teamwork, promoting the sharing of skills and knowledge;
- c) To continuously challenge ourselves in defining and seeking the best possible solutions for the services we provide to our clients, who remain the central focus of all our actions.

### 1.1. OUR FOUNDATIONS

The following Code reflects the values that are an integral part of the identity and mission of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**. It has been created to guide our actions, ensuring that we always act with integrity, responsibility, and respect for the world around us.

#### MANIFESTO

We are explorers on a journey of discovery.

Enchanted by simplicity. Moved by Nature.

Guided by our values and our curiosity.

We exist to be free — to celebrate our essence, which is unique.

To connect with one another.

To share stories. To feel.

In a world that moves so fast, we choose to slow down.

To let the ocean breeze kiss our skin and refresh our minds.

At every moment, we believe in protecting our planet and in shaping our lives in a more sustainable way.

We feel gratitude for the simple things in life.

#### VISION

A magical retreat to celebrate the essence of life in harmony with nature.

**MISSION**

To welcome, with love, within a creative ecosystem of collaborators, partners, the local community, and guests – so that together we may celebrate unique and heartfelt moments while building a sustainable future.

**VALUES**

Simplicity – To simplify so that, in our creations and relationships, we may express our true essence.

Creativity – To give wings to imagination in an inexhaustible way.

Sustainability – To view every action as an environmental, social, and economic commitment.

Trust – To foster bonds of trust among employees and with clients.

Joy – To promote moments of relaxation and happiness.

Determination – To never give up on being ourselves and on fulfilling our vision and values.

**2. PRINCIPLES AND STANDARDS OF GOOD CONDUCT**

**2.1. PRINCIPLE OF LEGALITY**

The employees and managers of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, must act in accordance with the law and applicable regulations, within the scope of their conferred powers and in alignment with the organization's legitimate purposes.

**2.2. PRINCIPLE OF INTEGRITY**

In their conduct, the employees and managers of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** must be guided by personal honesty and integrity of character.

**2.3. PRINCIPLE OF EQUALITY AND NON-DISCRIMINATION**

In their professional relationships, both among themselves and with the public, the employees and managers of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** must ensure equal treatment and non-discrimination. They must refrain from any offensive behaviour or from favouring, benefiting, or disadvantaging any person based on ancestry, race, gender, age, physical ability, sexual orientation, political, ideological or religious beliefs, language, place of origin, economic situation, or social condition.

**2.4. PRINCIPLE OF COOPERATION AND GOOD FAITH**

The employees and managers of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, must act with good faith towards others, providing information and clarification in a clear, simple, prompt, and courteous manner. They should support and encourage initiatives and be receptive to suggestions and feedback.

**2.5. PRINCIPLE OF COMPETENCE AND RESPONSIBILITY**

The employees and managers of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** must perform their duties with diligence and efficiency, showing dedication and constructive critical thinking. They should strive for continuous professional development and maintain up-to-date technical knowledge necessary for the

effective performance of their tasks. They must remain aware that the way they perform their duties reflects upon the image of the organization and therefore should conduct themselves in a manner that promotes public confidence and institutional credibility.

### 2.6. PRINCIPLE OF LOYALTY AND COOPERATION

In carrying out their duties, the employees of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** must act with loyalty, solidarity, and cooperation towards their superiors, complying with lawful instructions and respecting established hierarchical communication channels. They must also foster a healthy working environment by adopting a respectful and conciliatory attitude in managing potential conflicts, refraining from hostile or offensive behaviour, and sharing all information necessary for teamwork and collective performance. Furthermore, employees should contribute to the creation of internal value, namely through the sharing of information and knowledge acquired in the exercise of their functions.

## 3. TRUST IN BUSINESS MANAGEMENT

In implementing our business relationships, we always seek to find the best solutions aligned with the objectives and interests of our clients, suppliers, partners, and third parties, maintaining a partnership policy based on respect, timely payment for services rendered, and mutual trust in managing any potential conflicts of interest.

### 3.1. CONFLICT OF INTERESTS

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** fully and impartially undertakes the commitment to identify and map real or potential conflict of interest situations, as well as any sensitive circumstances that may arise in the provision of services before accepting, initiating, or continuing such engagements.

Should a potential conflict emerge that could entail serious commercial, reputational, or relational issues for **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** with clients, employees, partners, or third parties, decisive and assertive action shall be taken to eliminate any situation that could endanger the company's image or good name.

### 3.2. ANTI-CORRUPTION

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** does not tolerate or engage in any form of corruption or bribery. It does not request, accept, offer, promise, or pay any advantage — whether direct or indirect, material or immaterial — including facilitation payments. Such practices are firmly rejected throughout the company. Upon the slightest detection of a possible occurrence of such conduct, **AREIAS DO SEIXO** will act promptly, preventively, and when necessary, repressively. For **AREIAS DO SEIXO**, corruption is defined as any improper payment or incentive, illegal or criminal conduct, or abuse of entrusted power — behaviours that are incompatible with the company's core values.

### 3.3. ECONOMIC CRIMES AND MONEY LAUNDERING

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** firmly rejects and does not tolerate the improper trading or disclosure of privileged information obtained through its business relationships with employees, clients, partners, or third parties.

### 3.4. INDEPENDENCE

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** adheres to a principle of independence in defining its know-how, implementing its service processes, and delivering results to clients. This independence is grounded in a company-wide policy of integrity and objectivity, to which all collaborators commit upon joining **AREIAS DO SEIXO**.

### 3.5. RELATIONS WITH OTHER ORGANIZATIONS AND ENTITIES

All contact with representatives of other organizations or entities must always reflect the values and principles established in this Code. Any partnership or collaboration requested from **AREIAS DO SEIXO** or its representatives shall be provided whenever possible, with due quality, diligence, and professionalism.

### 3.6. POLICY ON POLITICAL CONTRIBUTIONS, CHARITABLE DONATIONS, AND SPONSORSHIP

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** adopts a transparent and ethical policy regarding political contributions, charitable donations, and sponsorships. The company does not make direct or indirect financial contributions to political parties, politicians, or lobbying groups, except when permitted by law and in compliance with ethical standards. All donations, whether monetary or in kind, shall be made transparently, duly documented, and directed toward causes aligned with the company's values. The company undertakes to publicly disclose all such contributions clearly and accessibly, ensuring full transparency and accountability.

### 3.7. SANCTIONS FRAMEWORK

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, does not provide services or market products that may result in a breach of economic sanctions or any applicable laws or regulations. Should it become aware of any such service or product, it will immediately seek to resolve the issue through the competent authorities.

### 3.8. DUE DILIGENCE AND MONITORING

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is committed to monitoring its operations in accordance with this Code of Ethics and Conduct, maintaining high standards of client service and responsiveness.

Whenever relevant, due diligence will be conducted with clients, suppliers, partners, or third parties to identify and mitigate any potential risks inherent to the commercial relationship. This continuous monitoring process is overseen by the Quality Department.

## 4. TRUST AMONG EMPLOYEES

The human resources policy of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is based on full compliance with and respect for working conditions and human rights, as established by national and international standards — particularly the Universal Declaration of Human Rights and the core principles and rights of the International Labour Organization (ILO).

#### 4.1. HUMAN RESOURCES POLICY

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is committed to providing equal employment opportunities for all, through a careful and objective assessment of candidates' qualifications, without discrimination based on race, ethnicity, age, gender, identity, sexual orientation, disability, family status, economic class, military service, volunteer status, or political affiliation. The company takes pride in selecting its employees and service providers based on merit and the specific requirements of each role (as defined in the HR Manual), always prioritizing individuals who are aligned with sustainability — the guiding principle of **AREIAS DO SEIXO's** mission. The company guarantees a safe, non-discriminatory work environment and invests in the continuous development of its employees through internal and external training programs — a cornerstone of employee growth and corporate innovation.

#### 4.2. SALARIES AND WORKING HOURS

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** complies with all applicable laws and regulations regarding wages, working hours, and overtime, ensuring fair and dignified working conditions.

#### 4.3. HEALTH AND SAFETY

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is committed to ensuring a healthy and safe working environment, in accordance with the Universal Declaration of Human Rights, maintaining a written health and safety policy to minimize accidents and injuries at work. The company firmly rejects and sanctions all forms of workplace harassment, including gender-based harassment, whether by superiors, colleagues, clients, or suppliers (in line with Mod30.PS1 – Code for the Prevention and Combating of Harassment).

#### 4.4. CHILD LABOUR AND HUMAN TRAFFICKING AND MODERN SLAVERY

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** does not tolerate any form of child labour, human trafficking, or slavery. These are absolute conditions for establishing any commercial, employment, or partnership relationship.

#### 4.5. PARENTAL RIGHTS

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** adopts a policy that protects parental rights, ensuring that all employees, regardless of gender, have access to their legal entitlements to maternity and paternity leave, as well as to other family-support measures. The company guarantees that employees are not discriminated against or disadvantaged in their career progression during or after periods of parental leave (Mod81.PS1 – Parental Rights Policy).

### 4.6. FREEDOM OF ASSOCIATION

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, promotes and encourages freedom of association among all employees and service providers, fostering healthy and holistic participation within the community.

### 4.7. CAREER DEVELOPMENT

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, adopts measures to support the professional development of its employees, prioritising internal promotion and offering opportunities for advancement based on merit and dedication. Lateral career movement is also encouraged, and flexible work arrangements — such as part-time transitions — are made available to support work-life balance when required for personal or family reasons.

## 5. TRUST IN THE COMMUNITY: SUSTAINABILITY

A **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is committed to reducing its environmental impact by promoting and implementing the “5 Rs” policy (Rethink, Refuse, Reduce, Reuse, Recycle) across all operations, ensuring environmental responsibility in waste management and efficient use of natural resources.

### 5.1. PROMOTION OF SUSTAINABLE MOBILITY AND REMOTE WORK

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** promotes the use of non-polluting means of transport by its employees, encouraging cycling, public transport, and remote work whenever possible. Employees are also encouraged to implement recycling practices in their home offices, adopt environmentally preferred products, and reduce resource consumption. The company ensures the safe disposal of electronic waste and other hazardous materials associated with remote work, guaranteeing environmentally responsible waste management.

## 6. TRUST IN INFORMATION

### 6.1. CONFIDENTIALITY AND DATA PROTECTION

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** promotes, encourages, and respects the privacy and confidentiality of all information relating to its clients, employees, and partners. The company protects personal data and confidential information, in strict compliance with the General Data Protection Regulation (GDPR).

### 6.2. INTELLECTUAL PROPERTY

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is committed to protecting its intellectual and industrial property rights by registering and patenting its creative projects, production techniques, trademarks, and other protectable assets, while also respecting the legal intellectual property rights of third parties.

**6.3. INFORMATION TECHNOLOGY SECURITY**

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is firmly committed to safeguarding all entrusted information and its physical and technological assets through the development and implementation of robust information security controls.

**6.4. SOCIAL MEDIA**

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** is committed to using social media platforms responsibly, ensuring courtesy and respect in all public online communications.

**7. DUTIES AND RESPONSIBILITIES**

**7.1. DUTIES**

In performing their duties, all employees and managers of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, must:

- a) Refrain from any action or omission, whether directly or through third parties, that could be interpreted as an attempt to unduly benefit another individual or entity;
- b) Reject any offer or advantage in exchange for action, omission, influence, or decision-making;
- c) Refrain from using, or allowing others to use, company resources or assets provided for their professional functions for unreasonable or socially inappropriate purposes.

**7.2. RESPONSIBILITIES**

The provisions of this Code do not exclude or replace any other forms of liability — including criminal, disciplinary, or financial — applicable under the law.

**8. REPORTING VIOLATIONS**

Whenever employees or managers of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** become aware of, or have reasonable grounds to suspect, acts of corruption or related offences in the course of their duties, they must immediately report the situation to their superior or through available whistleblowing channels.

**AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** provides several whistleblowing channels, which may be used anonymously or otherwise, enabling employees and stakeholders to report any complaints or breaches related to this Code of Ethics and Conduct.

|                      |  |   |
|----------------------|--|---|
| <b>Verbal Report</b> | In-person meeting, upon request of the whistleblower | An in-person meeting will only take place in situations where it has been specifically requested by the whistleblower. To that end, the meeting must be |
|----------------------|--|---|

|                       |        |   |
|-----------------------|--------|---|
|                       |        | scheduled in advance through any of the contact methods listed below.                             |
| <b>Written Report</b> | Email  | Reports or complaints should be sent to the following address: <b>denuncias@areiasdoseixo.com</b> |
|                       | Letter | Reports may be placed in the <b>ABs box</b> , which is secured with a lock.                       |

These channels are designed to ensure that all violations or inappropriate behaviours are identified and handled transparently, impartially, and responsibly.

Where senior management or compliance officers become aware of or suspect acts of corruption or related offences, they are legally obliged to report such cases to the competent authorities, ensuring accountability and full enforcement of the law. The company undertakes to investigate all reports thoroughly and to apply appropriate sanctions where irregularities are confirmed.

### 9. CRIMINAL AND DISCIPLINARY SANCTIONS

Committed to upholding this Code of Conduct and all legal obligations, **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA** applies the following sanctions for breaches, without prejudice to any civil and/or financial liability:

- Verbal reprimand
- Written reprimand
- Loss of holiday days
- Suspension from work without pay or seniority
- Dismissal for just cause, without compensation

Additional criminal and/or administrative liability may apply, in accordance with the relevant legislation. Pursuant to Article 7(2) of the **General Scheme for the Prevention of Corruption (Decree-Law No. 109-E/2021, of 9 December)**, the following private-sector criminal offences are applicable under the **Portuguese Penal Code (Decree-Law No. 48/95, of 15 March, as amended)**:

- Breach of trust / Mismanagement
- Passive corruption in the private sector
- Active corruption in the private sector
- Improper receipt or offer of advantage
- Unlawful economic participation in business
- Money laundering

### 10. ADHERENCE TO THE CODE OF ETHICS AND CONDUCT

This Code of Ethics is more than a set of rules — it reflects who we are and what we represent. By embracing this Code, we safeguard the essence of our mission, vision, and values, and contribute to a sustainable, joyful, and meaningful future. Together, we lead with integrity, making choices that honour our principles and bring our vision to life every day.

We hereby declare that we have read the Code of Ethics and Conduct of **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, and agree to comply with its requirements and expectations, to provide complete and accurate information to facilitate due diligence by **AREIAS DO SEIXO, EMPREENDIMENTOS HOTELEIROS, LIMITADA**, and to respect all applicable laws and regulations in the countries in which we operate.

**Place and date of issue:** A dos Cunhados, 2 December 2024

**Tax Identification Number:** 507451813

**Date of last revision:** 04 November 2025

**Signature of legal representative (with signing authority):**