

CORPORATE CODE OF ETHICS

OSIRIS TRAVEL - VIAGENS E TURISMO, LDA.

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1. OBJECTIVES

This Corporate Code of Business Ethics (hereinafter referred to as "Code") establishes a set of principles, rules and values that govern the internal and external relations of Osiris Travel - Viagens e Turismo, Lda. and its subsidiaries (hereinafter referred to jointly as OSIRIS) and was created with the fundamental purpose of sharing these principles, rules and values, as well as promoting and encouraging their adoption.

2. SCOPE OF APPLICATION

The Code applies to all board members, workers and employees of OSIRIS, regardless of their employment status (hereinafter referred to as Employees). It is also intended for third parties contracting with OSIRIS or acting on its behalf, namely suppliers and partners.

3. PRINCIPLES

The corporate and professional behaviour of the entities and actors covered by this Code should respect the following principles:

- Principle of legality - acting in strict compliance with the constitutional and legal framework in force in each of the places where OSIRIS operates;
- Principles of justice and impartiality - to treat, in all cases, in a fair and impartial manner all citizens and other entities and organisations with which they have dealings, preventing arbitrary practices or decisions and conduct that result in illegitimate benefits or losses;
- Principle of equality - to act in such a way as not to benefit or harm any person, entity or organisation on the basis of their ancestry, gender, race, language, political, ideological or religious beliefs, economic situation or social status, or any other factor that may give rise to any inequality of opportunity or treatment, and to ensure that identical situations are treated equally;
- Principle of proportionality - acting in such a way that one's conduct is appropriate and proportional to the objectives to be achieved and the tasks to be performed;
- Principles of collaboration and good faith - they must collaborate with any persons, entities or organisations with which they relate in order to achieve the most appropriate result possible for the fulfilment of their mission and must act in such a way as not to create unjustifiable obstacles or difficulties for those persons, entities or organisations;
- Principle of providing quality information - providing any information that is requested of them or that they must provide to the recipients of OSIRIS' activity in the most complete, true, current, clear, objective and rapid manner possible, always taking into account the respect for the law and regulations in force;
- Principle of loyalty - to act loyally, with solidarity and cooperatively, both among themselves and with the people and entities, public and private, with which they relate in the context of OSIRIS activity;
- Principle of integrity - to conduct themselves according to criteria of personal and professional honesty, and not to adopt any acts that may harm other Employees or people or entities with whom they have dealings with;
- Principles of competence and responsibility - they should act in a responsible and competent, dedicated and critical manner, striving for professional enhancement and rigorous compliance with their mission;

- Principle of politeness - treating everyone with whom they relate in a cordial, respectful and considerate manner, favouring a healthy working environment and a conciliatory and cooperative relationship with other people and entities.

4. RELATIONS WITH AND BETWEEN EMPLOYEES

OSIRIS' relationship with and between its Employees shall be based on the fulfilment of the following commitments:

- Respectful treatment and prohibition of discrimination: OSIRIS takes responsibility for maintaining a workplace free of all discrimination and improper conduct of a personal nature; all Employees shall be treated fairly and with respect by their superiors and colleagues; any abusive, hostile or offensive conduct, whether verbal or physical will not be tolerated.
- Equal opportunities: all Employees will enjoy equal opportunities for career development; OSIRIS is committed to establishing an effective equal opportunities policy for its Employees to develop their professional activity based on merit; OSIRIS Employees will respect the equal opportunities policy in their professional environment and support the personal and professional education of their colleagues.
- Health and safety at work: OSIRIS shall provide its Employees with a safe and stable workplace and undertakes to continuously update measures to prevent risks at work, as well as to comply with the applicable regulations in all places where it carries out its activities; all Employees shall strictly comply with health and safety standards.
- Respect for the intimacy and confidentiality of information: OSIRIS undertakes to request and only use the data from Employees which is necessary for the efficient management of its business and those that are required by applicable regulations; Employees who, by reason of their function, have access to confidential information must respect the same principles and are responsible for the same information;
- Fostering personal and professional balance: OSIRIS will encourage a balance between the personal and professional lives of its Employees; OSIRIS values and encourages benefits that imply the existence of a balance between the Employee's professional and personal responsibilities.

5. COMMITMENTS TO THIRD PARTIES AND TO THE MARKET

OSIRIS and its Employees shall base their relations with clients and suppliers, competitors and partners, investors and all market players on the following commitments:

- Fair competition: OSIRIS prohibits any action that amounts to the exercise of illicit practices and unfair competition and undertakes to control and monitor compliance with the applicable antitrust laws in the places where it carries out its activities;
- Quality: OSIRIS is committed to the perceived quality of its services by all those who interact with it; OSIRIS will always seek the best satisfaction of its clients' expectations and will make an effort to anticipate their activities and needs;
- Confidentiality of information to third parties: OSIRIS will guarantee the confidentiality and privacy of the data of third parties to which it has access; OSIRIS undertakes to preserve the confidentiality of the data it has from third parties, except in the case of legal, administrative or judicial obligations that involve the obligation to deliver them to entities or persons or to make them public; OSIRIS Employees, in the performance of their professional activity, shall keep the data confidential in the terms referred to above and shall refrain from any inappropriate use of this information; whenever personal data is concerned, OSIRIS and its Employees shall fully comply with the applicable regulations related to the protection of personal data;
- Transparency, value creation and Corporate Governance: OSIRIS assumes as a core principle of its business behaviour towards all stakeholders and the market in general, the dissemination of truthful, complete information that expresses the loyal image of the company and its business activities and strategies; the business action and strategic decisions of OSIRIS are guided by the creation of value for its clients, suppliers and partners, transparency in management and the adoption of best practices in corporate governance;
- Protection of corporate assets: OSIRIS and its Employees shall always seek the best protection of the goods and rights that constitute the assets of the company and its partners, preserving the confidentiality of their information, which may only be used within the scope of the company's activity; OSIRIS Employees are responsible for protecting the assets of the company and its partners and for preventing any loss, damage, theft, illegal or dishonest use of the same;
- Use of OSIRIS-related information: OSIRIS requires its Employees to make discreet and professional use of company information to which they have access in the course of their work, and to limit its use to company business.

6. GIFTS AND COMMERCIAL OFFERS

OSIRIS does not encourage the practice of giving or receiving gifts and commercial offers. Employees must not accept, for their own benefit, goods, services or any advantages with an individual value over € 100 (including Christmas gifts) from clients, suppliers, service providers, partners or any other individual or collective entity that has had, has or intends to have business relations with OSIRIS. However, if it becomes unfeasible or inadvisable not to accept or return it, the gift must be previously approved by OSIRIS' Management, and its reversion to company property may be decided, in which case the Employee must hand it in to the Human Resources Manager. The value of gifts shall be counted when calculating all gifts from the same person or entity over the course of a calendar year.

The above restriction does not apply to gifts or payments for goods or services, such as travel, meals, accommodation or shows, which are given by third parties to the employee due to performing his/ her role, within the scope of his or her representative duties and in the interest of OSIRIS. The exceptions described above must be communicated in advance to the superior.

The offer of goods to any external entity, made by an OSIRIS employee, is only admissible provided that, cumulatively, it is made on behalf of the company, is related to its activity and corresponds to the custom or usual practices of the sector, and must be previously approved by the respective hierarchical superior.

It is forbidden to offer or receive, under any circumstances and regardless of its value, cash, cheques and other legally restricted goods.

7. CONFLICTS OF INTEREST

Employees must behave loyally towards OSIRIS, avoiding any situation or activity that may lead to a conflict of interest or harm professional performance and refraining from intervening in decision-making processes that may result in a potential conflict of interest.

For the purpose of this Code, a conflict of interest exists whenever an OSIRIS employee has a personal or private interest in a particular matter that could influence, or appear to influence, the impartial and objective performance of his or her duties.

Personal or private interest is understood to mean any potential advantage for oneself, one's spouse or person with whom one lives under similar conditions as one's spouse, relative or kinship, as well as one's circle of friends and acquaintances.

OSIRIS Employees who, in the course of their duties, are faced with a situation that may constitute a conflict of interest, must inform the management of OSIRIS of its existence and declare that they are prevented from performing the conflicting activity or task, or

request excuse from it. If it is impossible to refrain from intervening in these situations, they may only intervene if previously authorised in writing by the management of OSIRIS.

OSIRIS Employees shall also refrain from participating or holding office in entities or organisations in which the activity to be carried out may conflict with the performance of their duties at OSIRIS or whose purposes may be contrary to those of OSIRIS.

8. NON COMPLIANCE

Failure to comply with the provisions of this Code may, once the respective legal requirements have been verified, give rise to disciplinary or criminal liability.

9. DISCLOSURE

This Code is published on the OSIRIS website (www.osiris.pt) and on the company intranet, as well as through other internal means.

10. ENTRY INTO FORCE

This Code shall enter into force following its approval by the OSIRIS Management.