






## CODE OF ETHICS AND CONDUCT

CODE OF ETHICS AND CONDUCT

Document Approved

	Responsibility	Name and Signature	Date
Approved by	Chief Executive Officer	 Nelson Fidel Candundo Carrinho	13/03/2024
	VICE - Chief Executive Officer	 Rui Alves Candundo Carrinho	13/03/2024

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 3/24</b>

## TABLE OF CONTENTS

GLOSSARY .....	5
MESSAGE FROM THE BOARD .....	8
SHORT INTRODUCTION .....	9
OUR CULTURE .....	10
GENERAL PRINCIPLES AND DUTIES OF GOVERNANCE OF THE GRUPO CARRINHO.....	10
2.1 Working Environment and Organisational Culture .....	10
2.2. Associates' Conduct and Working Environment .....	11
2.3. Honest and Ethical Conduct .....	12
2.4. Conflicts of Interest .....	12
2.5. Recruitment and Selection .....	13
2.6. Confidentiality and Professional Secrecy .....	13
2.7. Press Interaction .....	14
2.8. Correct Protection of Company Assets, Brands and Resources .....	15
2.9. Gifts and Offers .....	15
2.10. Creating a Culture of Control and Prevention .....	15
2.11. Documentation Register .....	16
2.12. Dress code and Behaviour at Work .....	16
GRUPO CARRINHO LIABILITY TOWARDS ITS EMPLOYEES .....	16
3.1 Corporate Governance.....	16
3.2 Health, Safety Environment at Work.....	17
3.3 Non-discriminatory Behaviour and Equal Opportunities .....	17
4. GRUPO CARRINHO LIABILITY TOWARDS THIRD-PARTIES .....	17
4.1 Customer Interactions .....	17
4.2 Interactions with Public Agents.....	18
4.3 Interactions with Suppliers .....	18
4.4 Interactions with Competitors .....	19
5. DATA PROTECTION.....	19
6. POLITICAL, RELIGIOUS AND TRADE UNION ACTIVITIES .....	20
7. SOCIAL RESPONSIBILITY, COMMITMENT TO THE ENVIRONMENT AND THE COMMUNITY.....	20

7.1 Product Donations and Project Support..... 20

8. HOTLINES AND QUERIES EXCLUSIVE CHANNEL ..... 21


9. COMMUNICATION AND WARNING TOOLS ..... 22

10. ETHICS COMMITTEE..... 22

11. REGULAR REVIEWS..... 22

12. DISCLOSURE ..... 23

13. TERM OF ACCESSION AND COMMITMENT ..... 23

	<b>CODE OF ETHICS AND CONDUCT</b>	PE.009.00
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 5/24</b>

## GLOSSARY

**Assets:** assets are considered to be all tangible or intangible assets and rights held by the Company and to which a monetary value is attributed, including, but not limited to: tangible assets, intellectual property and confidential information.

**Public Agent:** is everyone who provides any type of service to the State or who exercises public functions, also called civil servant.

**Employees:** workers with employment contracts signed with Companies within GRUPO CARRINHO.

**Money Laundering:** is a criminal process that conceals the origin of illicitly obtained goods and income, transforming them into licit ones by disguising their origin or the true owner of the funds.

**Gifts:** is any object, generally of no commercial value, distributed as a courtesy, advertisement, customary promotional action or on the events dates.

**Reporting Channel:** means by which employees and third parties anonymously report any irregular conduct that violates or may violate the Law, the Code of Ethics and Conduct and other regulations.

**Ad hoc committees:** non-permanent bodies, designated to serve specific purposes.


**Ethics Committee:** is an independent, autonomous and impartial body whose purpose is to ensure transparency in decision-making.

**Compliance:** process of being in compliance with laws and regulations.

**Conduct:** expression of behaviour, way of acting (action or omission).

**Conflicts of Interest:** an act or omission committed in pursuit of personal advantages that conflict with the Company's interests.

**Corruption (Active):** Crime committed by the person who, by him/herself or through an intermediary, with his/her consent or ratification offers, gives or promises a material or non-material advantage to the civil servant or to a person especially obligated to provide a public

	<b>CODE OF ETHICS AND CONDUCT</b>	PE.009.00
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 6/24</b>

service, or to a third person with their consent, to carry out an act or omission inherent to the duties of the respective office or function.

**Corruption (Passive):** a crime committed by an employee who, by himself or through an intermediary with his consent, solicits or accepts, for himself or a third party, a material or non-material advantage, or the promise thereof, in order to carry out an act or omission inherent to the duties of his office or function.

**Personal details:** any information relating to an identified or identifiable natural person (data subject).

**Due Diligence:** refers to the due diligence or investigation process of a business opportunity or partner in order to assess the risks of the relationship.

**Company:** refers to any of the Companies within Grupo Carrinho, which may be the Holding Company or any of its subsidiaries.

**Ethics:** behaviour that alters or guides the way human beings act, especially those connected with any rule, precept, social and moral norms.

**Financing Terrorism:** the provision or collection of funds by any means, directly or indirectly, intended to finance or promote terrorism.

**Corporate Governance:** is the system by which companies and other organisations are directed, monitored and encouraged.

**Grupo Carrinho (or simply Grupo):** is the expression used to designate the set of companies in the Shopping Centre Universe.

**Confidential Information:** any information of a non-public nature of which the Members become aware as a result of the exercise of their duties within and outside the Company.

**Privileged Information:** any confidential information that may confer advantages through its use, as well as any relevant information regarding the Company that has not been published and that is acquired in an insider manner as a result of the professional or personal connection maintained with third parties (clients and suppliers) due to the condition of Associate, may be considered insider information.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 7/24</b>

**Nepotism:** is the expression used to designate the favouring of relatives or friends to the detriment of more qualified people, especially with regard to recruitment, appointment or promotion to positions.


**Gifts:** any objects or services that have a commercial value.

**Intellectual Property:** all and any material, technique, programme, etc. developed by the GRUPO CARRINHO'S Employees while on duties.

**Shareholders:** refers to a person who owns shares (shareholders) or capitals (partners).

**Stakeholders:** are all persons (natural or legal) who may have some type of interest in the Group's shares.

**Third Party:** persons (natural or legal) not subordinated to GRUPO CARRINHO.

	<b>CODE OF ETHICS AND CONDUCT</b>	PE.009.00
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 8/24</b>

## MESSAGE FROM THE BOARD

Dear Employees and Partners of Grupo Carrinho,

It is with great pleasure that I address you all to share something that I consider fundamental to our continued success as a company. Grupo Carrinho has always been based on solid values: commitment to our customers, respect and appreciation for people and simplicity in our actions. These values are the essence of our corporate culture and the foundation on which we have built our 30-year history of success.

Today, we take another important step on this journey with the introduction of our Code of Conduct and Ethics. This document is a guide to the behaviour and decisions that all of us who are part of Grupo Carrinho must adopt in our day-to-day work. It reflects not only the legal standards we must comply with, but also our corporate values and commitment to integrity in all our actions.

The Code of Conduct and Ethics is a commitment to transparency, honesty and, above all, responsibility. It guides us to always act fairly and ethically, respecting our colleagues, partners, clients and the community in which we operate. This is a commitment we make not only as professionals, but as people dedicated to maintaining the trust and respect we have earned over the years.

I urge everyone to read our Code of Conduct and Ethics carefully and incorporate it into our work routines. It is essential that we all understand and practise the principles it contains, as this will reinforce our culture and help us face the challenges and opportunities that will arise in the future.

I would like to thank everyone for their continued commitment to the values of Grupo Carrinho, a company, a family, and for their daily efforts to maintain excellence in everything we do.


Together, we will continue to build a company that we can be proud of, today and always.



Nelson Fidel Candundo Carrinho

Chief Executive Officer



	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 9/24</b>

## SHORT INTRODUCTION

The fast evolving social and continuous transformation of the business environment, marked by global financial crises, cyber threats, scandals arising from fraud, corruption and disruptive innovations, compounded by the Covid-19 pandemic, has forced organisations to sharpen the focus of their Corporate Governance.

The Code of Ethics and Conduct is undoubtedly the starting point for the implementation of a Corporate Governance plan, which is why this Code of Ethics and Conduct consolidates our mission, vision and values, and it is where it is intended to clearly sustain the principles based on respect for the rules in force and transparency that should guide the conduct of Shareholders, Employees and third parties. It is also intended to highlight the importance of respect for individual differences and increasingly awaken the interest in social responsibility, where GRUPO CARRINHO aims to make a difference.

To this effect, it is crucial that in their action or relationship with the GRUPO CARRINHO, everyone has the discernment to understand the differences between right and wrong, asking themselves the following questions:


- It is ethical?
- It is in accordance with the Law?
- It is in line with our Corporate Culture?
- It will be the best for our Company?

If the answer is "No" to any of these questions, refraining from certain behaviour or acting when due is certainly the most appropriate decision.

For this reason, everyone must read, understand, cultivate and comply with all the defined guidelines and put into practice the organisational culture mirrored in this Code.

## COVERAGE

This Code of Ethics and Conduct applies to Shareholders and GRUPO CARRINHO's Employees and also aims to guide their conduct before third parties.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 10/24</b>

## LEGAL SOURCES

- Constitution of the Republic of Angola;
- General Labour Law;
- Legislation applicable to the corporate purpose of Grupo Carrinho;
- Internal Regulations and Directives.

## OUR CULTURE

The GRUPO CARRINHO's Culture is the set of practices, beliefs and behaviours that form our identity and is reflected through our Mission, Vision and Values.

### Mission

Create an ecosystem that promotes national production, always with a sense of social responsibility;

### Vision

Be the driving force in food and nutritional self-sufficiency in Angola.

### Values:

- ***Simplicity***: we do not believe in extravagance and waste, that is why we operate as economically as possible;
- ***Customer Commitment***: our attention is towards the needs and expectations of our customers, which are Carrinho's baseline;
- ***People***: we believe in the potential and continuous valuing of the human being, inside and outside the organisation.

## GENERAL PRINCIPLES AND DUTIES OF GOVERNANCE OF THE GRUPO CARRINHO

### 2.1 Working Environment and Organisational Culture

GRUPO CARRINHO strictly complies with the legislation in force to safeguard:

- **Promoting a Transparency Environment** - we defend a business vision with respect for the rules applicable to fair competition.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 11/24</b>

- **Promoting a high level of job satisfaction** - We work as multidisciplinary teams to promote, in addition to the individual success of the Members, a comprehensive view on the various issues and thus drive the creation of solutions of collective interest. We act with respect for the dignity of all people, always safeguarding our values. Likewise, it is expected that each of the Employees contribute to the Company and that their performance is rewarded in a fair way.
- **Promoting a climate of shared merit** - we believe that the people who create our success should also reap its benefits. At every level of the Company, our achievements should be fairly recognised and ideas should be encouraged, so we offer our Employees the possibility of continuous development and training to ensure that they have the opportunity to grow personally and professionally.

We always seek to be the best in what we do, through:


- **Building lasting relationships** –we believe in maintaining lasting and mutually advantageous relationships with our members and third parties.
- **Creation of added value in services** - we work hard to improve our services and find new ways to add value within and outside the Company. However, under no circumstances will compulsory or forced labour be used in our operations, we are totally against child labour and other forms of exploitation.
- **Creating Successful Teams** – GRUPO CARRINHO aims to attract, develop and retain qualified and motivated people in an environment of high professionalism. The main responsibility of a leader is to promote the success of his team, aiming to achieve the objectives defined by the Company and the daily living of its values.

## 2.2. Associates' Conduct and Working Environment

In their activity the Employees shall promote a cooperative, mutually respectful and productive environment.

To this end, relationships between Employees must not interfere with decision-making, case or career management, the performance of tasks and instructions assigned by superiors, as well as transparency and personal dealings.

GRUPO CARRINHO does not approve any illicit behaviour such as physical or verbal offenses, threats, intimidation, harassment, the use of position or function to coerce the provision of favours or personal services to subordinates. Likewise, it disapproves any

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 12/24</b>

intrusion in the intimate sphere of private life between Members with regard to their family situation, state of health, sexual orientation, religion, political, ideological or philosophical convictions.

### **2.3. Honest and Ethical Conduct**

We expect our Shareholders, Employees and third parties to behave loyally, properly and with dignity, safeguarding the prestige of GRUPO CARRINHO and its values and assets.

Ethics and mutual respect are principles to be followed by all Members, preserving the integrity, honour and good image of others. Thus, acting ethically means that each of us becomes aware of the responsibility of our actions or omissions, understanding that our decisions may affect those who do not have the opportunity to participate in them.


Therefore, it is important to act and refer to the Company with responsibility and respect, and in line with the principles and culture of GRUPO CARRINHO.

### **2.4. Conflicts of Interest**

There will be conflicts of interest, whenever, Shareholders or Employees have or may come to have private or personal interests in a certain matter that may influence, directly or indirectly, or apparently influence the impartial and objective performance of their respective functions.

Shareholders or Employees shall not participate in deliberations or decision-making, nor vote on matters where they have interests in conflict with the company, safeguarding the duty of loyalty and good corporate practices defined by law and interests of GRUPO CARRINHO. All decisions shall aim the Company's interests free from influence, personal needs, third parties or public entities.

GRUPO CARRINHO respects the interests or activities of the Employees provided that they do not interfere with their daily performance or compete with the interests and activities of the Group or third parties and that they result in divided loyalties. Therefore, all Employees must act in the best interests of the Company, its customers, refraining from any potential conflict of interest. Nevertheless, aiming to prevent conflicts of interest and mitigate actions that may harm the GRUPO CARRINHO, all Employees must:

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 13/24</b>

- Avoid personal activities during working hours, which may interfere with day-to-day responsibilities;
- Use the equipment and materials provided by the Company only for professional purposes. Only in cases of urgency should use be for personal purposes, and always with the authorization of the hierarchical superior;
- To prevent all types of actions generating personal benefits or undue advantages for third parties.

Transactions between GRUPO CARRINHO and any organization, which is influenced or may appear to be influenced by the activity or personal or commercial interest of one of its Employees, are prohibited.

In order to prevent conflicts of interest, internal procedures and control mechanisms must be adopted to minimise the possibility of conflicts of interest arising.

## **2.5. Recruitment and Selection**


The recruitment and selection process for new Members shall be in accordance with the Recruitment and Selection Procedure and in compliance with the principles of competence and suitability.

GRUPO CARRINHO is against any discriminatory practices in the act of recruitment and selection, definition of promotions or choice of candidates and professionals linked to any department.

## **2.6. Confidentiality and Professional Secrecy**

Confidentiality underlies respect for the value and ownership of information gathered as a result of professional relationships, which should be safeguarded unless there is a legal or professional right or duty to disclose, and cannot be used for personal or third-party advantage.

Professional secrecy applies to all Shareholders, Employees and third parties, who must always act with consideration in relation to the facts and information to which they have access in the course of their duties. The Employees are required not to disclose to people outside the Company, during the period of time they are bound to it and even after they leave it, any confidential information or documents to which they have access or which were

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 14/24</b>

drawn up in the performance of their functions, and they must keep them in the strictest confidence.

Confidentiality is a fundamental principle within the Company, applicable to any information not accessible to the public or received from a third party for an express business purpose.

The Company's financial information is classified as confidential, unless it has been disclosed through reports published in newspapers or other media. Not included in this classification is information requested by Public Bodies and made available with the prior approval of the Directors or competent person for the effect.

Under these terms, all members of GRUPO CARRINHO are obliged to:


- a) Maintain confidentiality about any information, facts and/or operations carried out by the Company and partners;
- b) Not to leave the Company's premises with any material containing information about customers and partners;
- c) Not to copy, transcribe or reproduce any type of material with information from customers and partners;
- d) Keep and be responsible for the security of partner-related documents (locked in drawers or protected in archives);
- e) destroy entirely any confidential papers and documents no longer required;
- f) not to leave confidential papers and documents on tables, printer or copiers, exposed to service providers in transit through the Company;
- g) take the necessary precautions to prevent unauthorised access. Everyone should safeguard passwords and other means of access to systems and documents.

The violation of the duty of confidentiality will result in the associate having disciplinary, civil and criminal responsibilities, under the terms of the legislation in force.

## **2.7. Press Interaction**

GRUPO CARRINHO observes the fundamental rights set forth in the Constitution of the Republic of Angola and other legal instruments, namely access to the information, freedom of press and expression as well as disclaims any illegal practice or criminal conduct.

Advocates transparency with regard to the media, safeguarding secrecy and preserving confidential information within the Group's interests. Communication to the press aims to

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 15/24</b>

ensure asymmetries' access to information, with full respect for applicable legal and regulatory standards, avoiding deception (incorrect information), exaggeration and concealment of relevant information.

Everyone shall avoid disclosing any information about the Group's Companies and activities that has not been previously and duly authorised.

Only Shareholders, Employees or authorised persons are entitled to make statements or give interviews on behalf of the Company.

Shareholders, Members or authorised persons shall restrict themselves to making necessary or strictly technical comments, avoiding value judgements, personal opinions or statements of a discriminatory nature.

## **2.8. Correct Protection of Company Assets, Brands and Resources**

The commitment of all Shareholders, Employees and partners shall be to promote the correct use and protection of GRUPO CARRINHO's assets and resources. To this end, the properties made available must be used cautiously and strictly within the scope of carrying out business activities, ensuring that they are well preserved, without using or allowing others to use them for purposes other than those defined.


## **2.9. Gifts and Offers**

Gifts and offers can be corrupt and criminally liable and can subject the Company to lengthy and costly litigation. For this reason, our Shareholders and Employees shall not give or take it for their own benefit, gifts, hospitality, favours, make promises or any act of payment with the purpose of achieving any advantage from clients, suppliers or competitors who have had or intend to have business relations with GRUPO CARRINHO, including public officials.

However, exceptionally and in the interests of good commercial relations with our partners, the occasional exchange of gifts of insignificant value is acceptable provided that they are symbolic or in accordance with the Gifts and Offers Policy in force.

## **2.10. Creating a Culture of Control and Prevention**

It is paramount that all Shareholders, Members and third-parties are aware that being excellent implies, above all, effort in defining the best work processes and procedures.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 16/24</b>

However, we must be efficient in complying with the procedures of control and prevention of assets.

Control should come from everyone, so it is essential to prevent situations that put at risk the good name and loss of patrimony.

We comply with all national and international Laws and Regulations applicable to all transactions, especially anti-corruption, bribery, Prevention of Money Laundering, Terrorism Financing and Proliferation of Weapons of Mass Destruction.

### **2.11. Documentation Register**

The documentation register ensures the control of the Company's business. Members must keep GRUPO CARRINHO's records, including data, information, documents and emails, in a complete and rigorous manner, ensuring the guidelines set out in internal rules and the Data Protection Act. The files must be properly organized and systematized effectively ensuring easy identification and handling.

In the execution and conservation of records, Employees must choose to use content and language that conforms to our corporate standards, and it is prohibited to alter or destroy records without the prior permission of the Company or its holder.

### **2.12. Dress code and Behaviour at Work**

Our image is one of our main business cards, which is why it is important to maintain our image, avoid extravagant and inappropriate behaviour, good humour and an ethical and courteous attitude among Employees.


The professional attitude encompasses not only the way we behave and relate to people in our workplace, but also the way we present ourselves. The professional attitude and dress code should reflect the values of GRUPO CARRINHO.

## **GRUPO CARRINHO LIABILITY TOWARDS ITS EMPLOYEES**

### **3.1 Corporate Governance**

The management of the Company is based on accurate, transparent communication, compliance with the Laws, Directives and other guidelines that define the principles of good Corporate Governance and ensure the efficiency of the Group's activities and performance.



	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 17/24</b>

When creating a solid Corporate Governance structure, we always take into consideration the Company's growth, the confidence of investors, its consolidation within the Market, transparency in compliance with national and international standards.

### **3.2 Health, Safety Environment at Work**

Health, hygiene and safety at work are non-negotiable premises. For this reason, we recognise and expect everyone to play an active role in promoting a safe and healthy environment, in compliance with applicable legislation, the Internal Rules of Health and Safety at Work and the Management Procedure for Accidents at Work. We therefore actively promote awareness and training on health, hygiene and safety among our Employees and third parties involved in our activities.

### **3.3 Non-discriminatory Behaviour and Equal Opportunities**

The Company provides the same opportunities for personal development without depreciating the merit of each one, and expects from its Employees and partners a non-discriminatory conduct. It is against any act of discrimination on the basis of sex, race, colour, ethnic origin, social position, language, religion, political beliefs, disability, age, sexual orientation or other.

## **4. GRUPO CARRINHO LIABILITY TOWARDS THIRD-PARTIES**


In the relationship with third-parties, GRUPO CARRINHO promotes the same opportunities without privileging or disadvantaging any partner, supplier or entity that intends to develop any business or relationship, including those in a competitive relationship.

In this way, the Company is proud on serving the interests of her customers, suppliers and service providers, seeking maximum satisfaction and recognition from them, through the implementation of simplified Due Diligence processes in order to reduce to a maximum the exposure to the risk of corruption and fraud.

### **4.1 Customer Interactions**

Customer satisfaction is one of the main foundations of the existence of GRUPO CARRINHO, being our priority to serve you with quality, innovation, environmental, social and corporate responsibility and with full respect for the Laws and Regulations.

In relations with customers, we should:

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 18/24</b>

- Understanding and meeting their needs;
- Serve them with courtesy and efficiency;
- Do not offer illicit advantages to obtain any kind of favour;
- Respond in a timely manner to all customer requests;
- Providing accurate and transparent information, without, however, exercising any form of persuasion that may damage the Group's image;
- Honouring agreements made.

#### **4.2 Interactions with Public Agents**

All shareholders, Employees and third parties must act in close obedience to the rule of law, respecting ethical principles and integrity in all interactions with the public authorities.


All are expected to comply with the rules set out in the Angolan Criminal Code, the Public Procurement Act, the Act approving the Legal Framework for Counterparties, the Act to Prevent and Fight Money Laundering, the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction, the Regulations on the Declaration of Assets and Income, the Declaration of Interests and the Declaration of Impartiality, confidentiality and independence in the formation and execution of public contracts, avoiding the commission of crimes at national and international level.

#### **4.3 Interactions with Suppliers**

GRUPO CARRINHO undertakes to contract its suppliers of goods and services based on competitive and transparent processes, in which the competitors are treated according to non-discriminatory rules, and their conduct, professionalism, commitment to environmental and social requirements, compliance with tax obligations and social contribution are assessed, in addition to the commercial conditions and technical skills.

To ensure this, all suppliers must be selected through transparent, pre-determined processes that guarantee the best cost-benefit ratio. We believe in long-lasting relationships, without prejudice to the principles of free initiative and fair competition.

The Company encourages its suppliers to guarantee, know and comply with all legislation applicable to their activity.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 19/24</b>

#### **4.4 Interactions with Competitors**

The competitiveness of services must be exercised on the basis of free and fair competition.

GRUPO CARRINHO encourages the respectful treatment of its competitors and expressly reprimands any behaviour, verbal or written declaration that may affect the image of competitors or contribute to the dissemination of false information about them, their products or services.

### **5. DATA PROTECTION**


In recent years, several events related to data privacy scandals have happened, which has put pressure on many changes by companies, especially in relation to how the collection, processing and storage of the personal data of Employees, customers and suppliers they have access to is done on the various pretexts or needs.

The personal information that the Company, through its Employees, has access to, processes or stores is protected by law, which is why the conduct of each Associate is essential to ensure its integrity and protection.

The exposure of personal data is one of the main ways to cause damage to the privacy or personal life of others. Thus, GRUPO CARRINHO expects its Employees to properly handle documents and information, confidentiality of transactions, ensuring that personal data made available to them are protected with maximum responsibility and respect for the Law on the Protection of Personal Data, the Law on the Protection of Computer Networks and Systems, the African Union Convention on Cyber-Security and Protection of Personal Data and other related legal diplomas, such as the Law on Video-Surveillance and others.

Personal data must be handled appropriately, avoiding making it public, either inside or outside the workplace. Similarly, passwords and access to the Company's electronic systems are personal and non-transferable, and it is the responsibility of each Associate to protect them, so their shared use is strictly prohibited.

In suspected cases of leakage or misuse of restricted or confidential information, it is mandatory to immediately report to the Compliance Department or use the Exclusive Channel for Questions and Complaints.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 20/24</b>

## **6. POLITICAL, RELIGIOUS AND TRADE UNION ACTIVITIES**

GRUPO CARRINHO respects the right to free political, religious and trade union association within the limits established by the Constitution, the Law and International Labour Conventions, for which reason it recognises and respects freedom of choice, as well as the structures of political or collective representation.

The Employees shall not be prejudiced by the fact that they are part of or hold office, political, religious or membership of any trade union.

## **7. SOCIAL RESPONSIBILITY, COMMITMENT TO THE ENVIRONMENT AND THE COMMUNITY**

It is GRUPO CARRINHO's mission to be the driving force for food and nutritional self-sufficiency in Angola.

It maintains its social commitment to guarantee food stability, quality and safety in Angola, creating and sharing value with society as a whole, continually investing in improving its environmental performance, and therefore believing that it is a shared responsibility that requires the cooperation of all segments of society.

The Company believes in sustainability as a tool for transformation, which contributes directly to the social, environmental and economic balance, and with the continuity of the business. Thus, the mutual benefits of developing and building relationships with local communities where the Company carries out its activity are recognised.

Through the Company's activities, we seek to contribute to sustainable development and preservation of the environment, giving priority to the application of non-polluting techniques, environmental monitoring and energy and water rationalisation, among others.

### **7.1 Product Donations and Project Support**

All donations of products and sponsorship, made by GRUPO CARRINHO in Favor of social institutions must comply with the Policy of Donation of Products and Support for Projects as well as the rules on patronage.

All donations must be made with the opinion of the Compliance and Tax Department to ensure the useful use of tax incentive means and the quality of the Group's Patronage.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 21/24</b>

The areas responsible for social actions in the Company should, with the approval of shareholders, approve and support all social and environmental projects, as well as approve and supervise all donations to be made by the Group.

## **8. HOTLINES AND QUERIES EXCLUSIVE CHANNEL**

The exclusive channel for questions and complaints is useful both internally and externally, ensuring absolute secrecy and anonymity for the whistleblower.

The Company ensures the conditions for the operation of a means to facilitate the clarification of doubts and the submission of denunciations on violations to the guidelines of the Code of Ethics and Conduct, in close compliance with the fundamental rights, as well as the confidentiality, secrecy and protection of the Whistleblowers and related persons.

It is forbidden to carry out acts of retaliation against the Complainant.

An act or omission shall be deemed an act of retaliation if, directly or indirectly, occurring in a professional context and motivated by an internal or external accusation or public disclosure, it causes or may cause the accuser, in an unjustified manner, to suffer pecuniary or non-pecuniary damage.


If the complainant and the person reported coincide in the same workplace, an assessment should be made as to whether there is a need to adopt any measure aimed at separating these people.

The Complainant has the right and shall be protected against any retaliatory measure or reprisal, which is being exercised or which there are reasonable grounds to believe may be exercised following the complaint.

The Ethics Committee should ensure compliance with this safeguard principle.

The duty of protection shall not, however, cover situations where, in the course of investigations, it is discovered that the complainant:

- a) Was involved in the irregularities object of the Complaint;
- b) Acted in bad faith;
- c) Committed himself/herself any type of irregularity not related to the irregularity which has been reported and which has not been previously identified;

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 22/24</b>

- d) Has committed a breach of professional duties, within the scope of the subject of the complaint, which implies or may imply the application of disciplinary measures.

Whenever questions arise, the immediate superior, the Compliance Department or the Ethics Committee may be consulted. Additionally, in case of possible violations of the code, the associate can expose the situation by sending an e-mail to [compliance@carrinho-sa.com](mailto:compliance@carrinho-sa.com).

## **9. COMMUNICATION AND WARNING TOOLS**

The Company ensures the sharing of information and news through the existing communication channels.

Other means of communication should be created so that all Members and third parties are constantly well informed and trained.

## **10. ETHICS COMMITTEE**

The Ethics Committee is an independent and autonomous body, with the following responsibilities:

- Promote and encourage understanding of the Code of Ethics and Conduct;
- Conduct the processes of investigation of issues related to bribery, fraud, financial crimes and other misconduct;
- Deciding on the communication of facts to the competent authorities;
- Conflict mediation;
- Appointing ad hoc committees;
- To ensure the right of the complainant and the accused.

## **11. REGULAR REVIEWS**

This Code is subject to reviews and changes in order to ensure that it is always in accordance with all the essential assumptions of the GRUPO CARRINHO 's ethical culture.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 23/24</b>

## **12. DISCLOSURE**

This instrument will be disclosed on the portal and website of the Cart Group, being accessible to all members.

## **13. TERM OF ACCESSION AND COMMITMENT**

This Code will be available to all Members who are associated with GRUPO CARRINHO, so they must sign the Adhesion and Commitment Term. Thus, every Associate is obliged to know, understand, comply and ensure compliance, and will not be accepted under any circumstances, or under any argument, the claim of ignorance of its guidelines. It is the responsibility of each Member to keep up to date with this information.

	<b>CODE OF ETHICS AND CONDUCT</b>	<b>PE.009.00</b>
	<b>Integrated Management System (IMS) - GRUPO CARRINHO</b>	<b>Página: 24/24</b>

### Code of Ethics and Conduct Adhesion and Commitment Term

I, \_\_\_\_\_, An employee of \_\_\_\_\_, with the rank of \_\_\_\_\_, I hereby declare that I have received, read and understood the contents of the Company's Code of Ethics and Conduct and undertake to comply with it in full in all my actions in the performance of my duties and to respect it outside the workplace.

I also declare that I understand and acknowledge that any violation of the Code of Ethics and Conduct may result in disciplinary action, including termination of employment.

Registration No.: \_\_\_\_\_, Unit/ Area: \_\_\_\_\_

Signature: \_\_\_\_\_

Lobito, \_\_\_\_ of \_\_\_\_\_ of 202\_\_.