



Code of Ethics and Business Conduct

17 of January, 2025

Disclaimer

This document is updated annually or, if deemed necessary, whenever there is a need or requirement to do so. This document shall be updated in respect of changes within business requirements or other regulatory changes, changes in the market where the company operates, and internal changes within the company. Any changes to this document are subject to approval by the Board of Directors.

INFORMATION CLASSIFICATION
PUBLIC

IDENTIFICATION

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OBJECTIVES AND SCOPE

The Code of Ethics and Business Conduct aims to share a set of ethical and deontological principles that guide and clarify the standards of a personal and professional relationship of all employees and formal representatives of ebankIT.

This Code of Ethics and Business Conduct applies to all ebankIT's employees and collaborators as also the board of Directors and provides a standard guideline for what is required from everyone at ebankIT.

ebankIT also expects its suppliers, contractors, consultants, and other business partners to follow these same principles when dealing with ebankIT.

This Code is approved by ebankIT's Board of Directors.

If you have any questions or need any clarification regarding this Code of Ethics and Business Conduct, you may contact the Human Resources Coordinator.

CODE OF ETHICS AND BUSINESS CONDUCT

The success of our business is dependent on the trust and confidence we earn from our employees, and other stakeholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.

ebankIT is committed to comply with internationally recognized human rights. ebankIT's approach to respecting human rights is based on the United Nations Guiding Principles on Business and Human Rights as well as Portuguese laws.

The safety of ebankIT's employees and other individuals performing work on ebankIT's behalf is of the utmost important to ebankIT. Environmental, health and safety risk and threats that could cause harm to personnel on duty, on and off-site, are regularly analyzed and controlled by ebankIT.

ebankIT conducts business ethically, treating customers, partners, suppliers, employees, and others with respect and in full compliance with the applicable laws and regulations. Integrate this Code of Ethics and Business Conduct into our business activities and daily operations is of extreme importance to ebankIT.

All ebankIT's collaborators are expected to be fully committed to conduct business ethically and in compliance with the applicable laws and regulations that apply in the markets where ebankIT operates.

Human Resources are responsible for the disclosure and updates of this code of conduct.

This Code is made known to all collaborators on the first day of the current version. It is available on Sharepoint\Human Resources Management and on the ebankit.com website.

VISION, MISSION AND VALUES

VISION

ebankIT wants to shape digital transformation of financial institutions from all over the world by offering an intuitive experience to their customers, while humanizes banking experience.

MISSION

Our purpose is to provide the most adequate user experience within a fully customizable and omnichannel digital banking. By strengthening customer relationships and taking advantage of third-party innovations through open banking possibilities, ebankIT platform accelerates digital transformation and improves member/customer experience, enabling a 360° vision following a customer-centric perspective and providing a truly connected and safe experience.

VALUES

- Customer satisfaction.
- Ethics and social responsibility.
- Initiative.
- Dynamism.
- Innovation.
- Professionalism.
- Honesty.
- Team spirit.
- Respect for the individual.
- Development of our Human Resources.

ETHICAL PRINCIPLES

In line with values stated above, ebankIT expects that everyone:

- a. Act with integrity, openly and clearly, respectfully to each other and responsibly towards society and environment in all business relationships;
- b. Comply with all the laws, rules and regulations and internal arrangements with all details, concerning their job roles;
- c. Treat any non-public information in strictest confidentiality and not disclose it to any third parties;
- d. Use assets and resources of ebankIT with proper care and efficiency;
- e. Report to ebankIT's Board of Directors, Process Owner, Human Resources ombudsman@ebankit.com or <https://www.ebankit.com/reporting-channel> if anonymity is required of any violation to this Code, of legal or regulatory applicable rules;
- f. Consult with ebankIT's Process Owner, Human Resources with any doubt on any ethics or compliance issues;
- g. Not utter any kind of damaging statements against customers and business partners on the media and/or social media with their own or hidden/faked identities;
- h. Never use the intellectual property of any third party without permission or legal right;
- i. Never use or copy software, music, video, publications or other copyright protected content at work or for business purposes unless ebankIT is legally or contractually allowed to use or make copies of such protected content;
- j. Never offer or receive any payment of anything of value that may be considered a form of bribery or corruption.

ebankIT will not retaliate – and will not accept any retaliation, against any individual for reporting a concern in good-faith or complaint to a Director or for participating in the investigation of a concern or complaint. However, we also do not tolerate knowingly false reporting.

When anonymity is required, the complaint must be registered in through ebankIT reporting channel in the website.

These principles shall be emphasized in the following rules and actions.

RULES AND ACTIONS

EMPLOYMENT PRACTICES

ebankIT is committed to providing a workplace free of harassment (including sexual harassment) or discrimination based on a personal trait. Personal traits include race, color, ancestry, national origin, religion, creed, age, mental and physical disability, sex, gender, sexual orientation, gender identity or expression, medical condition, genetic information, marital status, or any other characteristic protected by law.

ebankIT is dedicated to maintaining a creative, culturally diverse, and supportive work environment, and do not tolerate discrimination or harassment of employees or non-employees with whom we have a business, service, or professional relationship. This applies to all interactions where an employee represents ebankIT, and includes interactions with other people at ebankIT, customers, suppliers or business partners.

ebankIT ensures fair and equal opportunities for all potential and existing employees. This relates to gender, marital status, family status, age, disability, race, sexual orientation, or religious belief.

Applicants need to be made aware that their employment is dependent on the results of the screening checks where we could look for your relevant qualifications, previous employment history and any misconduct or any conflicts of interest.

Prior to a formal offer of employment being made to a preferred applicant a statement of oath must be completed by the applicant.

RESPECT FOR THE INDIVIDUAL AND ORGANIZATIONAL ENVIRONMENT

We all deserve to work in an environment where we are treated with dignity and respect. ebankIT is committed to keep such a positive and respectful environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

All ebankIT employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Always treat others with dignity and respect.
- Avoid prejudice judgments;

- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.
- Seek out insights from employees with different experiences, perspectives, and backgrounds.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.

ebankIT will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive, or unwelcome.

SEXUAL AND MORAL HARASSMENT

Workplace harassment is a highly reprovved behavior, which will lead to a disciplinary process and may be punished by criminal and civil law.

For the present purposes, "workplace harassment", in case of moral harassment, is considered to be an isolated or repeated and unwelcome behavior based on a discrimination factor, with the aim of disturbing or embarrassing someone, affect his or her dignity, or even create an intimidating, hostile, degrading, humiliating or destabilizing environment.

Sexual harassment means unwelcome sexual behavior, in a verbal, nonverbal or physical form, with the purpose or effect of embarrassing, humiliating or intimidating.

Any practice of moral or sexual workplace harassment is forbidden on ebankIT.

The following conducts are intimidating and harassing behaviors, assuming the concept of moral harassment (non-exhaustive list):

- Insults, intimidations or threats (verbal or written), made or not, in the presence of third-parties;
- Restrictions or limitations to the free speech, opinion or dialogue;
- Attribution of humiliating, temporary or permanent tasks;
- Non-consensual intrusion into private, personal or loving life;
- Repeated opposition and unfounded criticism of the work method and adopted decisions, to persecute and unnecessary public disclosure;

- Dissemination of rumors or false information of any nature;
- Comments, critics or public behavior for the main purpose of humiliating, disparage or ridicule;
- Power abuse (unjustified and disproportionate), by the superior hierarchical over his subordinate.

It is also forbidden the practice of any act of discrimination (direct or indirect) related to race, ethnical nature, sex, sexual orientation, gender identity, age, reduced work capability, disability, chronic ill, economic situation, political or ideologic convictions, religion, or union membership.

It is forbidden to sexually harass other co-workers, costumers, or external persons, such as, the following behaviors (non-exhaustive list):

- Sexual solicitations or advances;
- Requests for sexual favors;
- Invitation for unwelcome meetings;
- Sexual jokes, pictures, written messages or e-mails;
- Explicit and disparaging comments about the appearance;
- Presentation of sexually suggestive images or pornographic content.

Every employee, member of social entity, of administration or board, hierarchical superior or inferior, must refrain from any practice of workplace harassment, ensure a work environment that prevent that type of behaviors, participate on awareness about this theme, discourage other co-workers from practicing any harassment, intimidating e or humiliating behavior, as well as report workplace harassment incidents of which they have been victim, witness or known.

An employee that has been a victim of workplace harassment, carried out by any co-worker, member of social entity, of administration or board, hierarchical superior or inferior, costumer, or other external persons shall report the situation through available reporting channels. The reports should include details of what happened and if possible, have mains of proof, and even witnesses if there are any.

ebankIT provides specific, independent, and anonymous channel that adequately ensure the reception, processing and filing of communications related to any violations of the legislation and regulations in force and of the ethical procedures and principles of the company.

The whistleblower and witnesses of workplace harassment will be protected against retaliation and cannot be subject to disciplinarily sanctions/procedures related thereto, unless they act with intent, based on statements or facts contained in the judicial, administrative or administrative proceedings, triggered by harassment until final

decision, final and unappealable, without prejudice to the exercise of the right to contradictory.

The preferred internal whistleblowing channel is <https://www.ebankit.com/reporting-channel> in writing or in person with a request for a meeting, but with the need to register with the internal whistleblowing channel, in accordance with the "Reporting Channel" policy available internally on SharePoint and on the ebankIT website.

In case of workplace harassment, ebankIT guarantees celerity and confidentiality in the investigation.

COMPLY WITH LAWS, RULES AND REGULATIONS

ebankIT is committed to ensuring compliance with applicable laws, rules and regulations. Each employee must ensure an understanding of the company's policies, laws, rules and regulations that apply to their specific roles.

If we are unsure of whether a contemplated action is permitted by law or ebankIT policy, you should seek the advice from Compliance office (compliance@ebankit.com).

CONFLICT OF INTERESTS

In carrying out their duties, ebankIT employees must act in such a way as to avoid any situation of actual, potential or apparent conflict of interest. Whenever there is any doubt about the existence of a conflict of interest, the employee should contact the Compliance and Continuous Improvement department at compliance@ebankit.com.

ebankIT has established an Anti-Corruption and Conflicts of Interest Policy-PSA.0063, which is available internally on SharePoint, on the ebankIT website, and should be read and understood as an integral part of this code of conduct.

A situation of conflict of interest arises whenever an employee engages in an activity or sustains a personal or private interest in a certain matter that may influence the impartial and objective performance of their duties, jeopardizing both the activity and the reputation of ebankIT.

All employees, regardless of their contractual relationship or hierarchical position, are obliged to refrain from carrying out acts contrary to the company's interests with the aim of personally benefiting or favoring third parties, directly or indirectly.

ebankIT is committed to vigorous, legal and ethical competition, free from anti-competitive practices. Approaching markets and selling ebankIT products is done on the basis of merit, quality, innovation and price. Each proposal and business decision is made independently: ebankIT does not agree sales prices, coordinate proposals with other competitors or engage in fraudulent bidding.

ebankIT does not make illegal payments or contributions of any kind in order to guarantee the sale of its products, nor does it agree to engage in illegal boycotts of specific clients.

Below, we provide guidance in several areas where conflicts of interest often arise:

- a. personal investments;
- b. outside employment, advisory roles, or outside own businesses;
- c. business opportunities found through work performed at ebankIT;
- d. friends and relatives and co-worker relationships;
- e. accepting gifts, entertainment, and other business courtesies.

Complement the interpretation of these situations by reading the Anti-Corruption and Conflicts of Interest Policy-PSA.0063.

The employees must refrain from participating or developing any activity that may cause conflict with the performance of their duties or compromises the standards or their ability for decision-making at ebankIT.

ANTI MONEY LAUNDERING, ANTI-BRIBERY AND CORRUPTION POLICIES

ebankIT encourages its employees to maintain and build relationships of trust with their interlocutors, whether they are clients, suppliers or other partners, always in compliance with the law and this Code.

ebankIT has established the Anti-Money Laundering Policy-FIN.0013 in order to ensure scrupulous compliance with the applicable legislation on preventing and combating money laundering and corruption, adopting internal measures in order to eliminate any practice that could damage the company's reputation as an upstanding organization.

Any and all corrupt practices are forbidden to ebankIT employees, in order to protect the company's activity and guarantee fair competition between the various operators in the market. ebankIT condemns any corruptive conduct, regardless of the market in which it

operates, and subscribes across the board to the anti-corruption standards in Portuguese law.

All ebankIT representatives (directors, managers, representatives and, in general, all company employees) must refrain from accepting or offering bribes from any individual or entity, public or private.

Any bribe or practice that violates anti-corruption laws must be rejected. The exchange of gifts or hospitality that potentially influences business decisions must also be rejected.

ebankIT employees must act with extra care during periods of negotiation or competitive bidding, in order to guarantee the transparency of each and every deal. Special care is required when contact is made with public entities: payments, donations or gifts of any kind will not be tolerated under any circumstances.

Whenever there is any doubt as to whether a particular business decision may violate the legislation and internal anti-corruption policy, the employee should contact the Board of Directors or the Compliance and Continuous Improvement department at compliance@ebankit.com.

GIFTS AND BENEFITS

The acceptance of gifts and benefits is expressly prohibited if ebankIT's interests could be affected or the professional independence of its employees could be jeopardized.

Acceptance of gifts and other benefits will, however, be permitted if the following conditions are met:

- The value of the gifts does not exceed the amount of 150.00 euros in accordance with the provisions of the Anti-Corruption and Conflicts of Interest policy, (gifts, whatever their value must be communicated to the hierarchical superior);
- This amount includes all offers, invitations or benefits received from the same client, supplier or third party during the calendar year;
- Gifts in excess of this amount, which cannot be refused within the framework of the business relationship, must be donated to charity;
- Invitations to business lunches and dinners can generally be accepted.

Regarding invitations to non-business events (such as concerts, plays or sporting events), you should check that your participation in such an event is in line with usual practice. This usually means that the host will also be present, that participation is not often

repeated and that the associated cost (of travel, accommodation or other) is not covered by the inviting party.

To ensure that employees do not accidentally find themselves in a dubious or reprehensible position in relation to the performance of their duties at ebankIT, they should consult both their line manager and the Compliance and Continuous Improvement department regarding offers, invitations or any other approach from customers, suppliers or third parties who are not in the situations mentioned above.

For more details on this subject, please consult the Anti-Corruption and Conflicts of Interest Policy-PSA.0063, available on ebankIT's Sharepoint.

Employees who identify a conflict of interest, or who become aware of suspicious practices, including potential violations of anti-corruption legislation, should formally report it via e-mail to the area manager, hierarchical superior according to the existing organizational structure or via <https://www.ebankit.com/reporting-channel>.

INTELLECTUAL PROPERTY

ebankIT's intellectual property rights (ebankIT's trademarks, logos, trade secrets, copyrights, "know-how") are among ebankIT's most valuable assets. Unauthorized use or misappropriation can lead to their loss or serious loss of value.

All ebankIT's employees and collaborators are expected to respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. No ebankIT's logos, brands or other protected information or property can be used in any business or commercial venture without the approval of ebankIT.

We strongly encourage all ebankIT's employees and collaborators to report to Compliance office (compliance@ebankit.com). any suspected misuse of ebankIT's trademarks, logos, software or other ebankIT intellectual property infraction.

It is of great importance to ebankIT to respect the intellectual property of other Parties. Inappropriate use of third Parties' intellectual property may expose ebankIT and the person who inappropriately used such intellectual property to criminal and civil liability.

ebankIT employees, whenever in doubt, should seek advice from the Compliance and Continuous improvement department before requesting or accepting the use of third-party intellectual property or allowing ebankIT's intellectual property to be used or accessed, such as source code or applications incorporated in the product, installation of software without the use of appropriate licenses, among others.

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ebankIT Intellectual propriety principles are specified on each employment contract.

CONFIDENTIAL INFORMATION

One of ebankIT's greatest assets is information about its products, services and customers.

All ebankIT's collaborators are expected not to disclose any sort of confidential information, including, operational, financial, trade-secret, or other business information without verifying with ebankIT's Directors whether such disclosure is allowed under the applicable law, agreements to which ebankIT is a part of, or appropriate. Even inside ebankIT, confidential information should only be shared on a need-to-know basis.

ebankIT's collaborators will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to EbankIT, its business operations, plans, financial condition, results of operations or any development plan.

ebankIT should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Customers, partners, suppliers and other third parties with whom ebankIT does business may disclose confidential information to ebankIT. All people at ebankIT are responsible for protecting and maintaining the confidentiality of any information entrusted to ebankIT, classified as such. Compromising that trust may damage our image and our relations with third parties, as it can result in criminal and civil liability for ebankIT and to the person who breached its confidential duties.

Employee's confidentiality principles are specified on their employment contracts. If you have any question regarding this point, please contact the Compliance and Continuous Improvement Department.

USE OF COMPANY RESOURCES - INFORMATION SECURITY

ebankIT will provide to all employees and collaborators a set of policies and procedures related to information security management system, available on our internal network.

Company resources, including time, material, equipment, and information, are provided for company business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace.

Generally, we will not use company equipment such as computers, copiers, and fax machines in the conduct of an outside business or in support of any religious, political, or other outside daily activity, except for company-requested support to nonprofit organizations.

Employees and those who represent ebankIT are trusted to behave responsibly and use good judgment to conserve company resources.

ebankIT will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to Information Security Manager.

DATA PROTECTION

ebankIT is committed to comply with all applicable laws related to his business activities and therefore we take personal data and privacy very seriously. ebankIT aim is to ensure that all personal data processed should be kept safe and always secured, and that the personal integrity is respected.

Internal Privacy Policy defines our compromise with the principles of the GDPR (General Data Protection Regulation) and how we seek to protect personal data and ensure that our personnel understand the rules governing their use of personal data to which they have access in the course of their work.

MEDIA INQUIRIES

ebankIT is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. To ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Human Resources and Marketing Directors.

No one may issue a press release without first consulting with the Human Resources and Marketing Directors.

SOCIAL RESPONSIBILITY AND SUSTAINABLE DEVELOPMENT

Sustainability is at the core of our business and it has therefore been vital to all of us.

ebankIT wants to have a positive impact on society and is committed to doing its best to provide good conditions for its employees, minimize the environmental impact and thus positively shape the world in a sustainable way.

Through our business activities, we want to be economically successful, create value for society and avoid generating subsequent costs for society.

CODE OF ETHICS AND BUSINESS CONDUCT MONITORING AND REPORT

ebankIT encourages all who become aware of potential violations of this Code, relevant laws and regulations, or ebankIT governing documents to report the situation to ombudsman@ebankit.com or <https://www.ebankit.com/reporting-channel> if anonymity is required.

Each one of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy.

If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Human Resources Coordinator. ebankIT provides specific, independent, and anonymous channel to treat any violations regarding this code.

All employees and Board of Directors are expected to be vigilant and to play an active part.

INTERNAL AUDIT

ebankIT will ensure the compliance with this policy promoting awareness sharing sessions to maintain a culture that fosters a positive and constructive attitude.

At least annually this code is revised and whenever necessary ebankIT will perform specific internal audits.

TRAINING

To raise awareness of Code of Ethics and Business Conduct issues, sharing sessions are regularly performed to foster knowledge of the obligations arising from the law.

All employees are required to complete annual Ethics and Business Conduct form to review and certify their understanding of this Code and depending on results or work responsibilities, may be required to participate in additional mandatory trainings on specific topics such as money-laundering, bribery and anti-corruption.

In the case of new employees, ebankIT provides upon admission, appropriate training on policies, procedures and internally defined controls.

DISCIPLINARY REGIME

Violation or non-compliance with the general rules contained in this document constitutes a disciplinary infraction punishable under the terms of the legislation in force, without prejudice to any civil, administrative, criminal or other liability that may arise.

Breaches of the duties set out in this code will be punished according to the seriousness of the breach, the degree of guilt of the offender and the consequences of the act.

Note: The identification of associated infractions is provided for in the Anti-Corruption and Conflicts of Interest Policy-PSA.0063, as well as in the Corruption and Related Infractions Risk Plan-PSA.0048.

UPDATING OF CODE OF ETHICS AND BUSINESS CONDUCT

This Code of Ethics and Conduct shall be updated annually or whenever necessary. Updated versions will be approved by the Board of Directors.