



Benecar[®]

Cidade do Automóvel



CODE OF ETHICS AND CONDUCT



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I – BENECAUTOMÓVEIS, S.A. FRAMEWORK

In today's global and competitive environment, an organization's public recognition is not solely based on its economic performance.

Social responsibility, ethics, morality, and respect for values increasingly influence how companies are perceived by the community in which they operate. These criteria are examined by the community or society in general and are replicated as key determinants of success or failure.

BENECAUTOMÓVEIS, S.A., which has over 30 years of history in the automotive market, conducts its business according to high-quality standards, aiming to strengthen its competitiveness and efficiency, and with full respect for the principles of social responsibility and sustainable and structured growth.

Adopting ethically appropriate behaviour is a fundamental standard both internally and in relationships with clients, suppliers, and the community at large.

The Code of Ethics and Conduct establishes a set of values and normative principles that define behavioral standards, shape the core identity of the company, are the foundation of its organization, and consequently a guarantee for all those who directly and indirectly interact with it.

In this area, BENECAUTOMÓVEIS, S.A. adopts the following fundamental principles:

- To satisfy customers with the highest quality standards;
- Actively and consistently value its employees;
- To be guided by high ethical values and personal integrity;
- To respect, value, and support the promotion of quality of life in the communities where it is located and operates.

In institutional relations, regulatory bodies, and oversight bodies, BENECAUTOMÓVEIS, S.A.:

- Acts in accordance with the organization's general guidelines and complies with tax regulations and other mandatory requirements.
- It ensures that all supervisory bodies receive accurate, clear, and appropriate information.
- It provides supervisory bodies with all the cooperation within its reach, fulfilling requests made to it in the context of its responsibilities.

These principles require all BENECAUTOMÓVEIS, S.A. employees to adhere to rigorous ethical and professional standards of conduct, embodying these principles as a

firm benchmark in internal work relationships, in how tasks should be performed, and in their behavior as company assets. The following chapters elaborate on the above.

As a socially responsible private entity, BENE CAR AUTOMÓVEIS, S.A.:

1. Positions itself as a leading company in the national automotive market, particularly in vehicle sales, repair services and car rental market, aiming to fully satisfy its customers in accordance with the highest quality standards.
2. Ensures that the quality of information about products, services, and prices provided to customers is rigorous, efficient, complete, and clearly presented, thus supporting the decision-making of all customers who require its services.
3. Respects customer privacy, preserving all confidential information in accordance with the law, implementing appropriate measures to prevent the leakage, improper sharing, or misuse of personal data.
4. Promotes the implementation of a culture of continuous improvement in the management of processes and services it provides.
5. Ensures that the marketing actions initiated by the Company respect the values and principles evoked in this document.
6. Selects suppliers rigorously and impartially.
7. Fully honors the commitments made to its customers, suppliers, employees, the State, and banks.
8. Promotes the well-being of the community within its area of influence, fostering health and culture through support for cultural, sporting, and social institutions and individuals.
9. Acts ethically, respecting the environment and promoting the social development of the communities in which it operates.
10. Acts impartially and objectively in all actions and decisions, ensuring that they are not influenced by personal or external interests, in order to maintain the integrity, trust, and pursuit of the Company's interests.

II – COMPANY VISION AND MISSION AND ITS FUNDAMENTAL VALUES

1. BENECAUTOMÓVEIS, S.A. aims to continue being a leading reference in the Portuguese car sales market, focused on the customer and on meeting their expectations of quality and safety, basing its actions on criteria and objectives of efficiency and competitiveness.
2. Its mission is the sale of automobiles, vehicle rental, and workshop services, with a focus on innovation and continuous improvement in the services it provides.
3. The Company's fundamental values are: a) Excellence in service, based on quality, rigor, respect, professionalism, and courtesy; b) Truth, honesty and transparency; c) Integrity; d) Quality of work, efficiency, equal treatment and opportunities between genders, non-discrimination and harmonization between professional, family and personal life.
4. The values expressed are guiding behavioral principles of this Code of Ethics and Conduct, which are expected to be assimilated by all employees.

III – SCOPE OF APPLICATION

1. This Code of Ethics and Conduct applies to all BENECAUTOMÓVEIS, S.A. employees, regardless of the nature of their employment relationship or hierarchical position.
2. For the purposes of this Code of Ethics and Conduct, an employee shall be understood as any person who provides services to BENECAUTOMÓVEIS, S.A., whether under an employment contract or another type of contract, in the execution of a mandate in the respective statutory bodies, or who, in any way, acts on their behalf.

IV – PRINCIPLE OF LEGALITY

BENECAUTOMÓVEIS, S.A. and all its employees operate in accordance with current legislation and regulations.

V - EMPLOYEES AND THE COMPANY

1. Employees must conduct their activities in accordance with the principles of rigor, fairness, transparency, integrity, dignity, and impartiality.
2. Employees are bound by a duty of confidentiality with respect to all information to which they have access in the performance of their duties.
3. Employees must keep themselves constantly informed about matters relevant to the performance of their duties, particularly by being familiar with the Procedures Manual and with the applicable reporting hierarchy.
4. Employees must act in a manner consistent with BENECAAR AUTOMÓVEIS, S.A.'s internal principles, values, standards, and regulations, always bearing in mind that they should respect and comply with decisions made by their superiors, regardless of whether or not they agree with them.
5. Employees should contact the Company directly, particularly their immediate supervisor, to ask any questions, request clarifications, and report any irregularities, especially those that may constitute a violation of the rules of this Code.
6. It is the duty of all employees to choose responsible practices, avoid waste, care for natural resources, and comply with environmental regulations.
7. Employees are obligated to promote the measures and behaviors necessary to uphold the principles by which BENECAAR AUTOMÓVEIS, S.A. is governed.

VI - THE COMPANY AND ITS EMPLOYEES

Within the scope of its responsibility, BENECAR AUTOMÓVEIS, S.A.:

1. Respects the rights of employees, within the framework of current constitutional and legal norms.
2. Guarantees equal treatment and opportunities between genders.
3. Ensures respect for the fundamental principle of equality based on sex, religion, race, economic status or other factors.
4. Develops measures that promote harmony between professional, personal, and family life.
5. Adopts a personnel management policy appropriate to creating an internal environment consistent with this Code of Ethics and Conduct.
6. It actively encourages and promotes the professional development of its employees through properly scheduled internal and external initiatives.
7. Provides adequate health, safety, and hygiene measures to prevent and mitigate the risks of workplace accidents and occupational diseases.
8. Raises awareness among employees so that they adapt their actions and behaviors in order to uphold the principles by which BENECAR AUTOMÓVEIS, S.A. is governed.

VII – CONFLICT OF INTERESTS

The relationship between employees and BENECAR AUTOMÓVEIS, S.A. must be governed by rigor and transparency.

1. BENECAR AUTOMÓVEIS, S.A. employees who are called upon to participate in decision-making processes that directly or indirectly involve entities with which they have had or currently have professional ties, entities of which they are partners or members of their respective governing bodies, and also persons to whom they are linked by ties of kinship or affinity, de facto union or former spouse, must, a priori, communicate this fact to their hierarchical superior.
2. BENECAR AUTOMÓVEIS, S.A. employees undertake not to engage in any external professional activity that interferes with the Company's activities, except if there are no incompatibilities in the exercise of such activity as stipulated in specific legal clauses, or, ultimately, if authorized by a superior.

**VIII – GENERAL REGIME FOR THE PREVENTION OF CORRUPTION (RGPC) –
WHISTLEBLOWING CHANNEL**

BENECAR AUTOMÓVEIS, S.A. is governed by the highest ethical standards of honesty and integrity. In this sense, the Plan for the Prevention of Corruption and Related Offenses (PPRCIC) is an essential document that complements and reinforces the guidelines established in the Code of Ethics and Conduct.

Despite all the prevention and control mechanisms in place and the cross-cutting concerns about compliance that are in effect and constantly being updated, no organization is immune to the possibility of illegal activities occurring which, if not promptly identified, can seriously harm not only the organization and any individuals involved, but also the public interest itself.

People who work in organizations or who have professional relationships with them are often the first to detect the existence of illegal activities or, at least, to suspect this possibility. It is important that these people feel encouraged to report these types of situations without fearing any kind of reprisal.

In pursuit of this objective and in compliance with the provisions of Law No. 93/2021, of December 20, BENECAR AUTOMÓVEIS, S.A. has implemented its internal reporting channel for infractions, encouraging all those who are aware of irregularities in the context of the development of their professional relationship with the Company to report these situations, which would otherwise go undetected.

BENECAR AUTOMÓVEIS, S.A. is committed to ensuring the confidentiality of whistleblowers' identities, protecting them against any retaliation, investigating all complaints submitted, and subsequently acting diligently to put an end to any irregular situation that may be identified.

Following the publication of legislation establishing the general regime for the prevention of corruption, BENECAR AUTOMÓVEIS, S.A. has updated its present Code of Ethics and Conduct regarding professional ethics, providing access to all necessary information on this important topic. This includes information on disciplinary sanctions that may be applied in case of non-compliance with the rules, and identifying criminal sanctions associated with acts of corruption and related offenses.

BENECAR AUTOMÓVEIS, S.A.'s reporting channel can be accessed simply and securely through the following portal: <https://benecar.workky.com/portal-denuncias> .

This notice informs all BENECAAR AUTOMÓVEIS, S.A. employees and managers of the measures implemented regarding compliance with the general anti-corruption regime. Failure to comply with the principles, values, and rules of conduct regarding professional ethics, contained in this document, by employees or managers, will result in disciplinary proceedings and the consequent application of disciplinary sanctions, as provided for in Article 328 of the Labor Code. Acts of corruption and other related offenses committed by BENECAAR AUTOMÓVEIS, S.A. employees or managers will subject the offenders to the criminal penalties associated with acts of corruption or related offenses, as contained in the applicable criminal legislation.

For the purposes of corruption and related offences, reference may be made to the criminal offences of corruption, unlawful solicitation or offering of an undue advantage, embezzlement, economic participation in business, extortion, abuse of authority, malfeasance, influence peddling, money laundering, and fraud in the obtaining or misappropriation of subsidies, grants, or credit, as established under the Penal Code, annexed to Decree-Law No. 48/95 of 15 March, as currently in force; under Law No. 34/87 of 16 July, as amended; under the Military Justice Code, approved in the annex to Law No. 100/2003 of 15 November; under Law No. 50/2007 of 31 August, as amended; under Law No. 20/2008 of 21 April, as amended; and under Decree-Law No. 28/84 of 20 January, as currently in force.

It is expressly forbidden for any employee, regardless of their duties or professional category, to engage in any acts that may be considered corruption or related offenses, under penalty of criminal and/or disciplinary action. If an employee has doubts as to whether an act they intend to commit may be considered corruption or another related offense, they must report the situation in writing to their supervisor.

IX - FINAL PROVISION

This Code of Ethics and Conduct will be subject to regulations that the Board of Directors deems necessary for its proper application. All updates to the content of this document are announced digitally through internal communication channels, which are available to all company employees, and an updated physical copy is also available for consultation at each time clock.

X - VALIDITY AND REVISION

This Code of Ethics and Conduct will be reviewed every three years or whenever there is a significant change in the organizational or corporate structure, or in the functional content of BENECA AUTOMÓVEIS, S.A..

Revision history

Version	Date	Created by	Approved by	Changes
1.0	FEB2025			
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