



CODE OF ETHICS AND CONDUCT

Fundamental Principles

Preventing and Combating Sexual Harassment in the Workplace

Whistleblower Protection Policy

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Preamble

On March 8, 2022, BIKiNNOV – Bike Value Innovation Center – Association was established. Formally recognized by the National Innovation Agency (ANI), BIKiNNOV is a Technology and Innovation Center which purpose is to provide technical and technological support to companies in the two-wheel sector, promoting the use of technology and innovation as tools to improve business competitiveness, to increase added value and to the qualification of the offer, in particular, of small and medium-sized enterprises (SMEs).

BikinnoV is dedicated to the production, diffusion and transmission of knowledge oriented to companies and to the creation of economic value, contributing in the pursuit of public policy objectives, guiding its action towards market needs, seeking to fill in existing gaps and contributing to the response to societal challenges.

It was born from the ambition to provide a more global and qualified response than the one currently given by the Laboratory of ABIMOTA – National Association of the Two Wheels Industry, investing decisively in the innovation of processes and products.

BIKiNNOV has the following vision:

“Being on par with the best that exists worldwide in the scope of soft mobility in terms of research and development, combining and developing the capabilities that already exist in Portugal”.

Its mission is to *“give companies the conditions to be able to innovate and develop their products, in the area of soft mobility, in an adequate way in terms of research and development, combining development with existing capacities in Portugal”.* In order to fulfill its mission, it seeks to be recognized by its associates, customers and partners as:

Reliable, Competent, Cooperating and Innovative.

BIKiNNOV governed its performance by the following guiding principles:

- Contribute to the implementation of public policies and European and global strategies in terms of decarbonization, circular economy, sustainable mobility and digital transition.
- Promoting an integrated scientific-technological offer of excellence, that drives the economic evolution of the two-wheel and soft mobility sector.
- Work closely with the business fabric, boosting applied research and innovation, promoting the qualification and certification of the business offer.
- Promoting the internationalization of the economy, in order to enhance external competitive capacity through the improvement of the quality of products, services and processes and the respective certification.
- Encourage the participation of business associations and companies in promoting and guiding research and development (R&D) activities.
- Contribute to the technical and technological training of companies, through highly qualified staff, training and qualification of management processes.
- Fertilize endogenous resources, in order to differentiate, qualify and increase the added value of the national offer of its activity clusters.
- Adopt the best conduct practices and ethical standards, fundamental and recognized in its area of activity, including social and environmental responsibility, respect for gender equality, the use of public funding in accordance with the principles of economy, efficiency and effectiveness.

Promote forms of extended cooperation, through participation in national and international associations and networks, for the creation and dissemination of knowledge.

BIKiNNOV and its employees govern their activities, guided by the following values:

- **Accuracy;**
- **Transparency;**
- **Excellence;**
- **Innovation; and,**
- **Sustainability.**

Scope

This Code of Ethics and Conduct applies individually and collectively to all employees of BIKiNNOV – Bike Value Innovation Center-Association, as well as to all those who directly or indirectly carry out activities within it, whether permanently or occasionally.

It is an instrument of internal cohesion, competitive differentiation and healthy relationships with all associates, customers and potential customers, partners and competitors of the Technology and Innovation Center (CTI).

BIKiNNOV and its employees, regardless of their function or hierarchical position, are committed to promoting the dissemination of the Code of Ethics and Conduct and defending the values on which it is based.

BIKiNNOV and its employees are committed to rule their conduct in accordance with this Code of Ethics and Conduct, whether in the exercise of their duties as an employee, or in their personal lives that have a connection with the Technology and Innovation Center.

The existence of this document does not exclude the use of other specific codes and manuals of conduct for certain functions, activities and/or professional groups, as well as the general and legal rules in vigour.

Any violation of the Code of Ethics and Conduct constitutes a serious misconduct, which may lead to the initiation of disciplinary proceedings in accordance with current legislation, and could result in sanction against the offenders.

This document is prepared in accordance with the provisions of article 127, paragraph 1, subparagraph k) of the Portuguese Labor Code, approved by Law no. 7/2009, of February 12th.

I - Fundamental Principles

BIKiNNOV, as a legal person, and its employees, in the exercise of their activities, functions and competences, are committed to acting in the interest of the institution, its associates and in the fulfillment of its public mission, in accordance with the fundamental values of the institution and strict compliance with the law.

In this context, BIKiNNOV and its employees are committed to carrying out their professional acts in accordance with the fundamental principles of ethics and conduct adopted by the association, as well as with the legal and regulatory standards, national and international, applicable to its activity.

In addition, the Center for Technology and Innovation bases its work on respect for the law, political and religious beliefs, the guarantee of confidentiality of data and information collected about its associates, partners, workers, customers and suppliers of goods and services, as well as respect for diversity, guaranteeing equality and non-discrimination.

BIKiNNOV and its employees are exempt from perform any omissions or acts contrary to such precepts, either on behalf of BIKiNNOV, or on their own behalf, provided that in circumstances that directly or indirectly involve it.

Fundamental principles of everyone who relates professionally with BIKiNNOV:

1. Protection of member's interests

According to the BIKiNNOV Statutes, members can have different typologies: founders, adherents, observers, and honorary members.

As a non-profit association governed by private law, constituted for an indefinite period, which results from the association, by complementarity of interests, of private companies and/or business associations, entities of the scientific and technological system and other public entities relevant to its intervention. BIKiNNOV and its employees are committed to always act in order to protect the interests of its associates, as well as the public interest according to its mission.

2. Safeguarding Assets

In accordance with BIKiNNOV's statutes, the association's assets are variable and consist of units of participation (UPs). In addition, it also has physical, financial, informational assets and industrial/intellectual property rights, means and services available.

a) Physical Assets

BIKiNNOV employees are pledge to ensure the protection and conservation of the physical assets of the institution, refraining from illegitimately using, for their own benefit or for the benefit of third parties, any assets of the Technology and Information Centre, even after ceasing their collaboration with BIKiNNOV, as well as preventing others from doing so.

b) Financial Assets

The income of BIKiNNOV is derived from: community or multilateral funds resulting from participation in national and international funded projects; provision of services to third parties; subscription of Participation Units; donations, inheritances or legacies; among others.

BIKiNNOV employees, in accordance with their functions and position in the hierarchy, undertake to strive to protect the institution's financial assets, refraining from using them for their own benefit or for the benefit of third parties, even after ceasing their collaboration with BIKiNNOV, as well as preventing others from doing so.

c) Information Assests and Intellectual and Industruial Property Rights

Confidentiality is a fundamental principle of BIKiNNOV's activity, and it is therefore deeply committed to ensuring the confidentiality of all third-party information to which it has access in the context of its relations with associates, clients and potential clients and partners.

The employees of BIKiNNOV are committed to maintaining strict confidentiality of all the information of which they become aware while carrying out their duties, whether it is the property of BIKiNNOV or belongs to associates, clients, potential clients or partners of the Technology and Innovation Centre. Additionally, they are committed not to use such information for personal or third parties benefit, during and after their association with BIKiNNOV.

All employees are obliged, even after leaving the institution, not to use, exploit or patent any product, process, good or service resulting from the development of their activity at BIKiNNOV or resulting from the activity of others to which they have access.

The copyrights will be safeguarded even after the employees's bound with BIKiNNOV has ended, but the intellectual property of the same remains with the association.

d) Available equipment, means and services

Employees are committed to not use BIKiNNOV infrastructures, including communications equipment, means and services, for personal purposes without the proper authorisation by their superiors and, when authorised, to restrict it to the minimum possible.

The use of vehicles obeys to the principle of shared responsibility, where the employee must ensure that the vehicle is in operational conditions so that it can be used by another user.

BIKiNNOV is not responsible for any infraction under the Highway Code or municipal traffic regulations.

Access to the internet available on the premises or peripheral equipment provided, may not be used to transmit or exchange offensive content, such as inappropriate images, nor contrary to the law or this Code of Ethics and Conduct.

In order to guarantee security in the operation of BIKiNNOV's it resources, employees are committed to applying the established good practices.

3. Loyalty

BIKiNNOV employees must, at all times of their activity, behave in an honest and dedicated manner, and respect their commitments towards the association, other employees and their superiors.

They commit to unconditionally put their working and creative capacity at the service of BIKiNNOV.

As part of their duties of loyalty, employees are forbidden to make statements to the media without superior authorisation or publications on social networks that may harm BIKiNNOV or its image/reputation.

4. Avoidance of Potential Conflicts of Interest

BIKiNNOV and its employees are committed to scrupulously avoiding situations that may generate conflicts of interest in their dealings with associates, clients and partners, which may jeopardise the principle of impartiality. In this sense, BIKiNNOV informs its interlocutors of interests and connections that may raise doubts about maintaining impartiality and separation of interests.

Likewise, the employees of BIKiNNOV undertake to avoid any situation that may give rise, directly or indirectly, to a conflict of interest with the Technology and Innovation Center.

Employees are committed to informing their superiors of any interests or connections that may be considered as potentially influencing their impartiality, particularly if they intend to pursue any professional activity for another organisation.

5. Prevention of Corruption

BIKiNNOV and its employees are committed to combat corruption in all its forms, including extortion and bribery, and are committed to promoting fair competition and free enterprise in the Marketplace.

For this reason, the association has developed and adopted a Global Antitrust Policy (www.bikinnov.pt) to prevent anti-competitive business practices, ensure compliance with the laws and preserve its reputation.

BIKiNNOV is dedicated to conducting its business with honesty, integrity and the highest possible ethical standards and to acting in compliance with all antitrust laws.

In this context, they are committed to combating any acts in which compensations or benefits are offered, demanded or accepted to influence behaviour so as to obtain personal or institutional advantages.

6. Safety and Well-being at Work

BIKiNNOV and its employees are obliged to comply with and induce compliance with safety and hygiene rules in the workplace. The employees also undertake to inform their superiors of any irregular situation that could compromise the safety of the people, facilities or association's equipment, adopting the practices prescribed in the Quality Management System Manual, which still a work in progress.

BIKiNNOV's employees benefit from a Medicine System at Work, as a way to prevent illnesses arising from work and to promote the employee's health and quality of life, a basic condition for well-being at workplace.

7. Environmental Commitment

BIKiNNOV is committed to the environment, the future and the new generations by monitoring its ecological footprint.

The association and its employees actively contribute to sustainable development and the preservation of the environment by respecting good practices and applicable legislation on environmental management and eco-efficiency.

This commitment involves not only their technical and technological interventions, but also the way they use the simplest resources such as paper, energy, water, in their daily commute to work. They also commit to disseminating these principles, urging the adoption of such practices.

8. Relationship with clients, associates, suppliers, competitors and other entities

To ensure the highest level of customer satisfaction, BIKiNNOV employees are committed to providing a professional and courteous relationship with associates, customers, potential customers, partners, and suppliers. They pledge to meet the highest standards of quality and efficiency in the execution of their duties and work with diligence and promptness.

Additionally, BIKiNNOV employees are committed to maintaining a respectful and fair relationship with competitors and other entities, adhering to the principles of good faith,

transparency, and ethical behavior in all their business dealings. They strive to contribute to a high standard of service and to exceed the expectations of their customers.

9. Interpersonal Relationship

BIKiNNOV promotes an organisational culture based on stimulating and participative work methods, encouraging a spirit of harmony, cooperation and mutual help among its collaborators, making space for a plurality of opinions, respecting diversity, regardless of employee's hierarchical situation, education, health and socioeconomic condition.

All are committed to actively collaborate in the continuous learning of the other employees and in the integration of trainees and new employees, providing them with relevant updated information to carry out their work, respecting the confidentiality commitments, the present Code of Ethics and Conduct and the good practices of the activity.

10. Career Management Mechanisms and Human Resources

BIKiNNOV is an organisation that strives for excellence in management, that invests in the continuous improvement and empowerment of its teams and in the personal and professional development fulfilment of all its employees, seeking to ensure career progression perspectives and to stimulate the enhancement of training and qualification levels, in order to meet their expectations and needs and so they can carry out their activity in an efficient and integrated manner, within a context of lifelong learning. The organization believes that only with motivated employees, it's possible to have cohesive teams focused on achieving its mission.

In the Human Resources career management, BIKiNNOV has established non-discriminatory practices that ensure access to vocational education, training and career progression.

Annually, records are made of all employees participations in professional training courses of seminars and workshops to support professional development and retraining.

The employee recruitment process is based on principles of meritocracy, equality and transparency.

11. Non-discrimination

Any form of discrimination in hiring, remuneration, access to training, promotion, termination of contract or retirement, based on race, nationality, religion, disability, gender, sexual orientation, age, membership of association, union, political ideology, or for any other reason prohibited by applicable law, shall not be accepted at BIKiNNOV.

BIKiNNOV offers the necessary conditions for people with disabilities visit its facilities: Priority Service and Accessibility. Efforts in communication, either physical and digital, also will be made to promote the accessibility

BIKiNNOV and its employees are also committed to this principle when select suppliers to purchase goods and services or when establishing partnerships.

12. Promoting the reconciliation of professional, personal and family life

Achieving a good work-life balance is a challenge for all workers and employers. There must be found ways to get work done while trying to reconcile family or care obligations.

In order to promote the conciliation of personal, family and professional life, BIKiNNOV offers its employees flexible working hours, subject to agreement.

It is attentive to employees with children under the age of 12, or regardless of age, with a child with a disability or chronic illness, allowing flexible working, in accordance with the provisions of article 56^o of the Portuguese Labour Code.

Whenever justified and possible, employees are given all the conditions to carry out their work through teleworking.

13. Social Responsibility

The OECD uses the term "Responsible Business Conduct", to define the positive contribution to economic, environmental and social progress, with a view to achieving sustainable development and avoiding/combating adverse impacts related to a company's direct and indirect activity, products or services, obliging it to be in tune with the development of awareness in societies and markets, resulting from the evolution of individual and corporate citizenship models, which aim

to encourage the construction of more inclusive and sustainable companies, promoting diversity and focused on respect for human rights and environmental preservation.

BIKiNNOV and its employees embrace the OECD concept and are strongly committed to contributing to the progress and well-being of the communities in which it operates, striving for and promoting sustainable social development.

In its relationship with economic operators, it prioritize those with social responsibility instruments and good practices.

14. Compliance with the General Data Protection Regulation (GDPR)

BIKiNNOV, as responsible for the processing of personal data, is committed to the provisions of Law No. 59/2019 of 8 August, which transposes the European Union Directive (EU) 2016/680 of the European Parliament and the Council of 27 April 2016, this includes ensuring the confidentiality of any personal data it processes through the use of secure and resiliente dataprocessing systems and services, as well as the implementation of all necessary and timely security measures to comply with the obligations under this regulation.

BIKiNNOV imposes on its employees the strictest duty of confidentiality, as well as to respect all procedures that BIKiNNOV implements to comply with GDPR.

BIKiNNOV requires that the third parties hires for activities involving access to personal data to ensure that they comply with all obligations for the processing of such data arising from the applicable legislation.

II - Preventing and Combating Sexual Harassment in the Workplace

BIKiNNOV and its employees are committed to preventing and combating workplace harassment, taking into account the definitions contained in paragraphs second and third of Article 29 of the Portuguese Labour Code, respectively, of:

- **Workplace Harassment** as unwanted conduct, including that based on a discriminatory factor, occurring on the occasion of access to or at the place of employment, occupation or training with the purpose or effect of disturbing or embarrassing a person, affecting his/her dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Sexual Harassment** as unwanted behaviour of a sexual nature, in verbal, non-verbal or physical form, may include attempts at disruptive physical contact, requests for sexual favours with the purpose or effect of obtaining advantages, blackmail and even the use of force or strategies to coerce the other person's will. They are usually repeated, and may also be explicit and has a threatening nature. Sexual harassment is characterised by: sexual insinuations; unwanted sexual advances; physical contact and sexual assault; and, inducement.
- **Moral Harassment** set of behaviors perceived as abusive, practiced persistently and repeatedly, which may consist of a verbal attack with offensive or humiliating content or subtle acts, which may include psychological or physical violence. It aims to lower the self-esteem of those targeted and ultimately to undermine their attachment to the workplace. The victims are involved in situations in which they generally find it difficult to defend themselves. Moral harassment is characterized by: social isolation, professional persecution, intimidation and personal humiliation.

1. General Principles

BIKiNNOV is committed to promoting a work environment among its employees, at all levels, free from situations of violence at work; with the promotion of awareness and information actions for employees to maintain a working environment free of harassment at work, both in hierarchical relations and among all employees; with the dissemination to employees, through the appropriate internal communication channels, of information that may be useful on the subject of harassment at work.

BIKiNNOV employees are committed to abstain from any practices of harassment at work, to ensure the existence of a healthy working environment either in hierarchical relations or among employees, to collaborate within BIKiNNOV and among each other, aiming at a working environment that prevents situations of harassment at work and to participate in awareness raising and/or training actions that include the issue of harassment at work.

In order to prevent and combat the specific practice of sexual harassment, it is now forbidden to access, post and use sexual content in the workplace.

BIKiNNOV employees are committed to report situations of harassment at work of which they are victims or witnesses, under the terms of point III of this Code of Ethics and Conduct.

2. Employer's responsibilities

In the event of a situation of harassment in the workplace, BIKiNNOV has the following duties:

- a) Abstain from any behaviour that harms the employee's physical and moral integrity;
- b) Initiate disciplinary proceedings whenever it becomes aware of alleged situations of harassment at work;
- c) Adopt codes of good conduct to prevent and combat harassment at work, introducing any necessary corrective measures;
- d) Liability for the reparation of data arising from occupational diseases resulting from the practice of harassment.

3. Harassment victims Rights

The victim of the practice of harassment has the following rights:

- a) a) Right to compensation for material and non-material damage suffered as a result of harassment.
- b) The victim will be presumed to have been unfairly dismissed if the dismissal occurs up to one year after the complaint or other exercise of rights relating to equality, non-discrimination and harassment.
- c) Terminate the contract for just cause based on the practice of harassment, as it is considered an offence to physical or moral integrity, freedom, honour or dignity.

III – Whistleblower Protection Policy

BIKiNNOV embrace, as a legal obligation and with institutional satisfaction, taking into account the principle of transparency on which its conduct is based, the Law No. 93/2021, of 20 December, which established the General Regime for the Protection of Whistleblowers, transposing into national law Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019 on the protection of complainants on violations of European Union law, consequently making a public commitment to ensure compliance with what is defined below as its whistleblower protection policy.

BIKiNNOV has established internal and external whistleblowing channels, as set out in point 4 of this chapter. The function of these channels is to provide the persons listed below with the means to report possible infringements of European Union law by granting them the status of whistleblowers and, by granting them this status, guaranteeing them and third parties identified in their reports adequate protection, materialised in the conditions of security, secrecy, confidentiality of identity or anonymity granted by BIKiNNOV.

To reinforce these guarantees, BIKiNNOV ensures that the above-mentioned complainants and third parties identified in the respective complaints are prevented from accessing the complaints made by unauthorised persons, undertaking to adopt the appropriate procedures for this purpose. With this framework of guarantees, BIKiNNOV aims to pursue the objective of providing whistleblowers with a means of expressing their views on certain matters they deem to be irregular, provided that certain requirements are met, ensuring at all times that there will be no possibility of retaliation.

BIKiNNOV also guarantees whistleblowers the right to know how their complaint is handled, unless they expressly request otherwise or this knowledge could compromise the protection of their identity.

The following are considered offences, under the terms and for the purposes of the application of the Law already duly identified above:

- The act or omission contrary to European Union rules in the areas of: public procurement; transport safety; environmental protection; food safety for humano and animal consumption; animal health and welfare; public health; consumer protection; and the protection of privacy, personal data, network security and information systems;
- The act or omission contrary to internal market rules, including competition and state aid rules, as well as corporate tax rules;

- The act or omission that contradicts the purpose of the rules or norms covered by the previous points.

1. Whistleblowers

Individuals who report or publicly disclose potential infringements based on information obtained in the course of their professional activity or at BIKiNNOV will be considered whistleblowers:

- Employees;
- Service providers, contractors, subcontractors, suppliers or any other persons acting under their supervision and direction;
- Members of the corporate bodies;
- Volunteers or trainees;
- Those who, having had a relationship with BIKiNNOV, meanwhile terminated, report potential infringements of which they became aware during that relationship;
- Those who, having not entered into any relationship with BIKiNNOV, have been in a phase of pre-contractual negotiation with it and, as a result of this, have become aware of potential infringements that wish to report.

In addition to the protection of whistleblowers, this policy also includes the protection of those who in some way relate to them, namely:

- A person who is assisting in the complaint, including trade union representatives or workers' representative;
- Third parties connected to whistleblowers, such as work colleagues or family members who could be the target of retaliation in a professional context and legal persons or similar entities controlled or owned by the whistleblowers.

Whistleblowers who, in good faith and having serious grounds to believe that the information is, at the time of whistleblowing or public disclosure, true, report or publicly disclose a potential infringement, will benefit from the protection provided for in this policy.

2. Prohibition of retaliatory acts

This policy prohibits the practice of acts of retaliation against any whistleblower. An act of retaliation is considered an act or omission, including threats and attempts, which, directly or indirectly, occurring in a professional context and motivated by an internal or external whistleblower, or with public disclosure in an unjustified manner, cause a material or non-material damage.

The following acts are presumed to be acts of retaliation, until proven otherwise and when committed up to two years after the denunciation:

- Changes in working conditions, such as the functions performed, working hours, workplace, remuneration, non-promotion of the employee or failure to fulfil work duties;
- Suspension of employment contracts;
- A negative performance evaluation or negative reference for employment purposes;
- Non-renewal of a fixed-term employment contract;
- Dismissal;
- Termination of the supply or service contract;
- The revocation of an act or the termination of an administrative contract as defined under the Administrative Procedure Code.

The disciplinary sanction applied to the whistleblower up to two years after the report or public disclosure is presumed to be abusive.

Those who commit an act of retaliation are obliged to compensate the respective complainants for the damages caused to them, regardless of their civil liability, they may request the appropriate measures according to the circumstances of the case, in order to avoid the occurrence or expansion of such damages.

3. Support measures for whistleblowers

As support measures for whistleblowers, they will be entitled to:

- a) Legal protection;
- b) Benefit of witness protection measures in criminal proceedings;
- c) Necessary assistance and collaboration from the competent authorities and other authorities to guarantee the protection of the whistleblower against acts of retaliation,

including through certification that the whistleblower is recognised as such under Law No. 93/2021, of 20 December, whenever he/she requests so;

d) Provide information by the The Directorate-General of Justice Administration (DGAI) about the protection of whistleblowers on the Justice Portal;

e) Take advantage of all guarantees of access to the courts to defend their legally protected rights and interests.

The identity of whistleblowers, as well as any information that directly or indirectly allows their identities to be deduced, are of a confidential nature and access is restricted to the persons responsible for receiving and investigating complaints at BIKiNNOV.

The complaint or public disclosure of potential infringements, carried out in accordance with the requirements imposed by Law No. 93/2021, of 20 December, does not constitute, in itself, grounds for the disciplinary, civil, administrative or criminal liability of the whistleblowers.

This Whistleblower Protection Policy does not affect any rights or procedural guarantees recognised, under general terms, to the persons who, in the complaint or in the public disclosure, are mentioned as authors of the potential infringements or are associated to them, namely the presumption of innocence and the guarantees of defence to criminal proceedings, being also recognised the confidentiality of their identities.

This Whistleblower Protection Policy adopted by BIKiNNOV seeks to reflect the provisions of Law No. 93/2021, of 20 December, so that if any doubts arise or any omissions are detected in its application, the Law shall apply, and potential whistleblowers are advised, always, to read the law carefully, which, for this purpose, can be found on the BIKiNNOV website.

4. Channels for requests for clarifications and complaints

Law 93/2021, which transposes Directive (EU) 2019/1937, entered into force on 18 June 2022, establishing the obligation for public or private legal persons with more than 50 employees to provide an internal reporting channel that allows for anonymous and/or confidential reports.

BIKiNNOV stand for that all organisations need to have a safe space where employees, customers, partners, associates can feel comfortable to report corrupt, discriminatory or ethically questionable behaviour, increasing transparency and compliance.

Given the diversity of complaints, BIKiNNOV provides the following communication channels:

- **Direct Email** – participe@bikinnov.pt where the complaints are addressed to the Board, which delegates to the Executive Director to analyse and deal with them, taking any action deemed appropriate according to the facts exposed.
- **BIKiNNOV Website** – where the whistleblower has a channel for submitting their complaint, following the same procedures as above.
- **Letter** – send the letter to the BIKiNNOV head office, with 'Confidential' marked on the outside of the letter.
- **In Person** – by a meeting requested to the Executive Director or the Board.

Complaints must be accompanied by the evidence available to the complainant, including an indication of probable witnesses.

The victim of harassment can also complain to the Working Conditions Authority (ACT), at the following address:

[https://www.act.gov.pt/\(pt-PT\)/Itens/QueixasDenuncias/Paginas/default.aspx](https://www.act.gov.pt/(pt-PT)/Itens/QueixasDenuncias/Paginas/default.aspx)

BIKiNNOV employees are committed to reporting situations of non-compliance with this Code of Ethics and Conduct.

The Board of Directors of BIKiNNOV is committed to a quickly and adequate follow-up of complaints, through the appropriate measures and/or decisions, namely the exercise of disciplinary power if the legal requirements are met, regarding duly circumstantiated situations of non-compliance.

The confidentiality of employees who file a complaint is guaranteed and they will not suffer any retaliation as a result, being assured of their normal participation in the life of BIKiNNOV and protection against any kind of pressure or harassment.

Aplication

The present version of this Code of Ethics and Conduct was approved by the Board of Directors of BIKiNNOV on March 6th 2023 and made publicly available on the association's website and information panel for employees, and will come into effect the day after its approval.

BIKiNNOV undertakes to ensure all employees are aware of their commitments under this Code of Ethics and Conduct, including it in the documentation to be delivered to all new employees upon their hiring.

BIKiNNOV takes this Code of Ethics and Conduct as the privileged tool in the resolution of ethical and conduct issues, and is committed to maintaining compliance with existing regulations and laws

This Code of Ethics and Conduct is published in portuguese and english.