


**CODE OF ETHICS
AND GOOD
CORPORATE
CONDUCT**




	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

INDEX

- GOALS AND CORE VALUES 4
- 1 SCOPE 5
- 2 GENERAL VALUES 6
 - 2.1 RESPONSIBILITY 6
 - 2.2 INDEPENDENCE 6
 - 2.3 CONFLICTS OF INTEREST 6
 - 2.4 PROFESSIONAL DEVELOPMENT 6
 - 2.5 CONFIDENTIALITY 7
- 3 ETHICS AND GOOD CONDUCT -GENERAL PRINCIPLES 8
- 4 GOOD CORPORATE CONDUCT POLICY 10
 - 4.1 CONCEPT 10
 - 4.2 GOALS 10
 - 4.3 SCOPE OF APPLICATION 10
 - 4.4 STRUCTURE AND RESPONSIBLE BODIES 11
 - 4.4.1 ETHICS COMMITTEE (ETHICS CHANNEL) 11
 - 4.4.2 COMMITTEE ON CONDUCT 12
 - 4.4.3 AUDIT DEPARTMENT (DAU) 12
 - 4.4.4 RELATIONSHIP WITH GOVERNING BODIES WITHIN THE TAP GROUP 13
- 5 IDENTIFYING AND PREVENTING CORRUPTION RISKS 14
 - 5.1 RISK, RISK LEVEL, AND PREVENTION MEASURES 14
 - 5.2 SPONSORSHIP RULES 14
 - 5.3 REPORTING CORRUPTION CASES 15
 - 5.4 WHISTLEBLOWING SYSTEM - ETHICS CHANNEL 16
 - 5.4.1 INTRODUCTION TO THE QUALIFIED WHISTLEBLOWING SYSTEM 16
 - 5.4.2 CONFIDENTIALITY GUARANTEES 16
 - 5.4.3 SCOPE OF USE OF THE SYSTEM 16
 - 5.4.4 INSTRUCTIONS ON USING THE SYSTEM 17
 - 5.4.5 DESCRIPTION OF THE WHISTLEBLOWING PROCESS 17
 - 5.5 MONEY LAUNDERING AND FINANCING OF TERRORISM 18
- 6 SPECIAL DUTIES 19
 - 6.1 RELATIONSHIP WITH THE MARKET 19
 - 6.2 RELATIONSHIP WITH THE CUSTOMER 19
 - 6.3 RELATIONSHIP WITH COMPETITORS 19
 - 6.4 RELATIONSHIP WITH EMPLOYEES 20
 - 6.5 INTERPERSONAL RELATIONSHIP 20
 - 6.6 PROTECTION OF PERSONAL RIGHTS 20

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

6.7 OCCUPATIONAL SAFETY AND WELL-BEING.....	21
6.8 USE OF COMPANY RESOURCES	21
6.9 ENVIRONMENT	21
6.10 SOCIAL RESPONSIBILITY	22
7 WORKER'S INTERNET ACTIVITY	23
8 APPENDIXES.....	24

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

Goals and Core Values


The TAP Group provides air transportation and related services. It operates in almost all continents as part of an economic activity that employs a significant share of the active population, playing an important role in today's developed and globalized economies, contributing to the creation of wealth, and bringing peoples and cultures closer together.

As part of their specific activities, companies within the TAP Group - Transportes Aéreos Portugueses, SA ("TAP Air Portugal") have set the goal of becoming the most desirable companies for:

- Carrying out one's activities, by providing customers with high-quality services;
- Working, by valuing employees' personal and professional skills;
- Investing, by seeking to provide the best return on investment.


Companies within the TAP Group base their actions on criteria of excellence and engagement with local communities. TAP Group companies are involved in several initiatives to promote ethical values as the foundation for corporate management and culture. Therefore, they have also set the following goals:

- To implement high ethical and personal integrity standards;
- To respect the quality of life of the communities in which they are integrated.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

1 Scope

This Code of Ethics and Good Corporate Conduct ("Code") applies to all people who work in or provide services to any company within the TAP Group; regardless of their legal relationship, such people are hereinafter referred to as "TAP Group employees." Throughout this Code, the terms "TAP Group" and "Group" refer to the corporate group comprised of TAP - Transportes Aéreos Portugueses, SGPS ("TAP, SGPS") and all companies directly or indirectly held by TAP, SGPS. Likewise, "Companies within the TAP Group" or "Companies" refers to the companies that make up the TAP Group.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

2 General Values

2.1 Responsibility

TAP Group employees are responsible, before their superiors, for upholding and complying with the values and principles enshrined in this Code.

2.2 Independence


TAP Group employees shall pursue the sole interests of the Group when dealing with third parties, while also respecting and upholding the values of seriousness and impartiality.

2.3 Conflicts of Interest

- a) TAP Group employees may not engage in any actions that are contrary to the Group's corporate interests, jeopardize the reputation of the Group's companies or their relationship with third parties, or interfere with their responsibilities as employees or members of a Governing Body;
- b) TAP Group employees may not compete against TAP Group companies or use their position, influence, information, assets or resources for their personal gain or the benefit of third parties;
- c) TAP Group employees may not use the information discovered through TAP Group assets or their position in the Group's companies for their personal gain;
- d) Whenever a TAP Group employee, in their professional capacity, is called to intervene in or is made aware of any proceedings which in any way involve real or personal interests pertaining to themselves, someone in their family, business partners, close friends, or any public or private organization with which they maintain or have maintained a relationship of a personal or professional nature, including charitable, religious or political organizations, they should take the necessary measures to avoid such intervention and, in all cases, inform their superiors of the situation.


2.4 Professional Development

Throughout their professional career in the company, TAP Group employees must use their best efforts to fulfill the tasks assigned to them and seek to constantly improve and update their knowledge.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

2.5 Confidentiality

- a) TAP Group employees must maintain strict confidentiality with regard to any facts concerning any corporate activities of which they become aware while performing their duties or because of them;
- b) Personal data involving TAP Group employees is subject to confidentiality restrictions and may be accessed only by the respective employee and by those who are responsible for the safety, maintenance and processing of such information, in accordance with the Group's Employee Personal Data Policy and other applicable laws.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020


3 Ethics and Good Conduct - General Principles

TAP Group employees are subject to the ethical and good conduct precepts established by general legal principles, the Group's internal regulations, and the provisions in this Code.

The behavior of TAP Group employees must be guided by a sense of responsibility based on ethically correct rules, values, principles and practices.

In this context, the following duties, based on a culture of responsibility, are deemed to be fundamental and applicable to all TAP Group employees:

- (i) To fulfill all obligations arising from the employment contract and respective rules, as well as from the regulations and guidelines established by the company's Governing Bodies ("Governing Bodies");
- (ii) To respect and treat with civility all co-workers and people they interact with, whether internal or external to the TAP Group;
- (iii) To carry out their duties in a scrupulous, assiduous, and diligent manner;
- (iv) To ensure the rational conservation and careful use of the tangible and intangible assets and resources entrusted or made available to them for the performance of their duties.
- (v) To promote and/or carry out actions aimed at improving the productivity of the company in which they work, while ensuring the quality of the results;
- (vi) To carry out their duties responsibly and not to disclose any information (unless authorized or required to do so in strict compliance with the law) regarding the Group's organization, production methods, business models/plans, investments, financial data, databases, studies, projects, reports or technical expertise, nor any information regarding its employees, customers or suppliers. TAP Group employees shall in all circumstances use and manage information diligently, maintaining its confidentiality and protecting the interests of the TAP Group and of any third parties which are its legitimate owners;
- (vii) To observe high standards of personal conduct and behave in strict compliance with the laws and regulations applicable to their activity;

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

- (viii) To adopt an objective, righteous and impartial conduct. TAP Group employees must seek to be unbiased in their judgments and opinions and act with independence and impartiality regarding all organizations and individuals with which they establish a relationship by virtue of their duties, pursuing the sole interests of the company for which they work;
- (ix) To adopt a responsible, discerning and discreet conduct that honors both them and the TAP Group, preventing any actions that may compromise the reputation of the company for which they work;
- (x) To adopt a professional conduct by ensuring the quality of the services they provide and promoting efficiency in the performance of their duties;
- (xi) The TAP Group's policy on offering and accepting courtesies (gifts, travel, accommodation, meals and entertainment) should be complied with, ensuring legal compliance and that no courtesy is offered or received in order to obtain any undue advantage or to unduly influence any action;
- (xii) To carry out their duties diligently, transparently and accurately, providing the Group's Governing Bodies (in particular the Board of Directors) with the information they require for their decision-making processes in a timely manner;
- (xiii) To act with courtesy in their interactions with third parties and establish a relationship which, in the assumption of its good faith, contributes to providing fair and equal opportunities for the exercise of their rights and the fulfillment of their duties;
- (xiv) To refrain from any involvement in practices that may constitute acts of corruption;
- (xv) To refrain from intentionally or negligently providing material or moral assistance to someone else's acts of corruption;
- (xvi) To report any evidence of corruption or related offenses to the Ethics Committee (Ethics Channel), whose contacts are available at www.flytap.com.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

4 Good Corporate Conduct Policy

4.1 Concept

Good corporate conduct is a pivotal element in the strengthening and consolidation of the TAP Group. In addition to contributing to enhancing its reputation, it is also responsible for achieving high levels of trust among the various stakeholders, for the Group's prestige among customers and business partners, and for its social integration and acceptance - aspects that have a positive impact on the Group's sustainability.

4.2 Goals


The goals of the good corporate conduct policy are:

- (i) To define, establish and implement guiding principles for the conduct and activities of TAP Group employees by championing a culture of rigor, integrity and transparency, by promoting an ethical and responsible commercial policy, and by prioritizing compliance with the laws, regulations, standards and guidelines that govern the Group's activity in all countries where it operates,
- (ii) To ensure the clarification and harmonization of reference standards for the Group's activity, helping decision-making processes in the face of ethical dilemmas and promoting the adoption of best corporate governance and ethical conduct practices.

4.3 Scope of Application

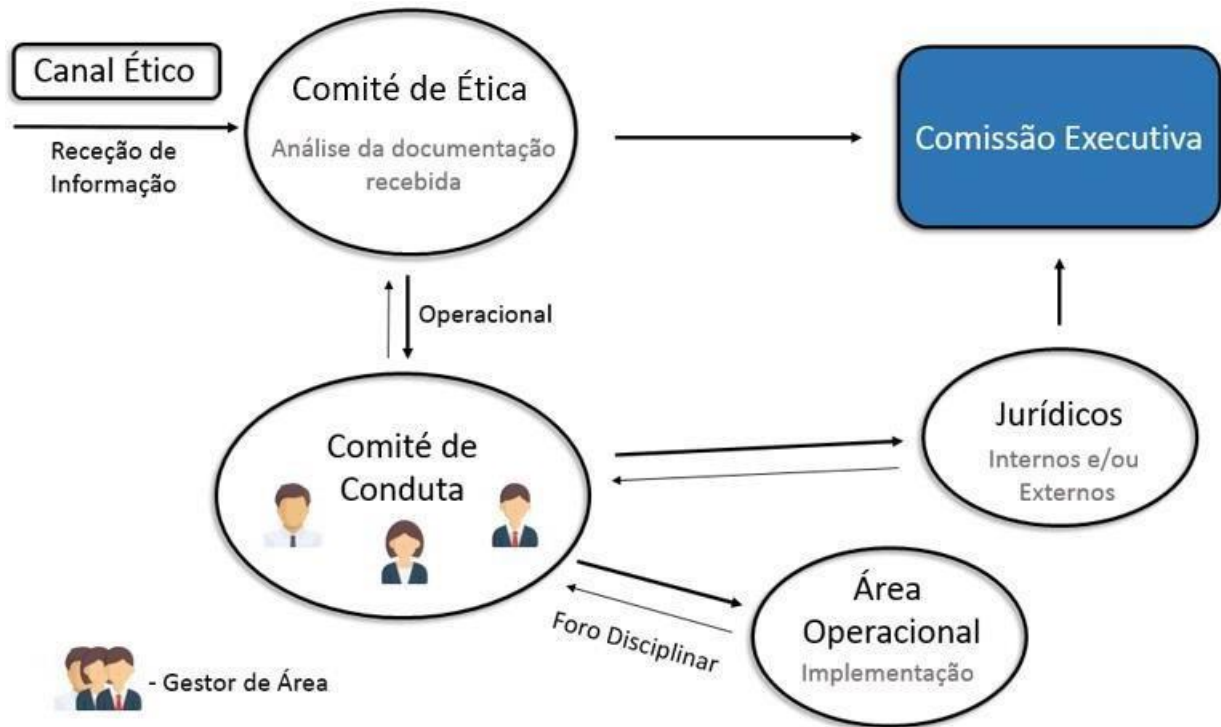
The Group's corporate conduct guidelines described in paragraph 4 must be applied in all daily decisions, actions and interactions, and are applicable to:

- (i) Members of Governing Bodies;
- (ii) TAP Group employees and service providers working in Portugal or abroad;
- (iii) TAP Group employees with legal relationships of a different nature than those mentioned in subparagraph (ii) above;
- (iv) Any third party acting on behalf of one or more companies or on its own behalf;
- (v) Public or private stakeholders;
- (vi) Other stakeholders directly or indirectly related to TAP Group companies.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

4.4 Structure and Responsible Bodies

Risk management organization pertaining to good corporate conduct is as follows:




4.4.1 Ethics Committee (Ethics Channel)

The Ethics Committee consists of 1 Chairman and 2 Members appointed by the Executive Committee. All TAP Group employees are informed of the appointment by means of an internal memorandum.

The duties and functioning of the Ethics Committee are as follows:

- (i) To decide in a timely manner on the appropriate follow-up for reported situations that may constitute a violation of good corporate conduct practices, as described in this Code;
- (ii) To make use of specialized internal or external advisory services for clarification, support and consultation, depending on the specificity and/or complexity of the identified or reported situations;

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

- (iii) To submit to the Committee on Conduct all cases which, due to their complexity or seriousness, make this action necessary;
- (iv) To propose to the Executive Committee or, in its absence, to the Board of Directors of the company in question, corrective measures or ethical pedagogy procedures to be adopted in that company, as well as any amendments to this Code. To prepare, in collaboration with the Audit Directorate, an Annual Report on Good Corporate Conduct within the TAP Group.

4.4.2 Committee on Conduct

The Committee on Conduct is comprised of members of the Executive Committee and, as permanent members, of the Human Resources Director and the Labor and Legal Director. Depending on the cases under discussion, the directors of the departments involved may also be called.

The Committee on Conduct examines in a fair and unbiased manner all reported cases of non-compliance with good conduct rules involving TAP Group employees.

The duties of the Committee on Conduct are as follows:


- (i) To analyze all cases reported by the different departments or submitted by the Ethics Committee;
- (ii) To define guidelines for an unbiased treatment of practices that violate corporate conduct rules;
- (iii) To follow-up on the evolution of proceedings.

It is the duty of the directors of each department of each company within the TAP Group to immediately inform the Committee on Conduct of any situation occurring in the departments under their responsibility.

4.4.3 Audit Department (DAU)

The Audit Department (DAU) is the one existing in the current TAP Group organization chart. In addition to the duties currently entrusted to it, it also has the following functions, inherent to the Compliance area:

- (i) To define, propose and/or implement guidelines, measures and methods for the identification and monitoring of corporate conduct risks, as well as to assess compliance with the Group's corporate conduct guidelines and policy;


	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

- (ii) To preemptively assess corruption and related risks in all the markets in which the Group operates, as well as any risks associated with the different activities of its companies;
- (iii) To control and monitor transactions carried out by and on behalf of the various companies within the TAP Group, adjusting their performance in order to ensure compliance with good conduct rules according to a prior risk assessment analysis.
- (iv) To report situations that may involve corruption practices or related infractions to the Ethics Committee, whether they are directly identified by the DAU or reported by employees and third parties, and to inform the Executive Committee of such situations, or, in its absence, the Board of Directors of that particular company;
- (v) To ensure that the Group's companies' procurement departments are provided with relevant (domestic and international) information regarding any corruption or related risks involving the organizations/markets with which they plan to make contracts;
- (vi) To identify possible conflicts of interest and propose preventive or corrective measures through the internal mechanisms at its disposal;
- (vii) To collaborate with public authorities and provide, in a timely manner, any information which is requested pursuant to legal provisions.
- (viii) To represent TAP Air Portugal in external organizations whose goal is to mitigate and manage corruption risks;
- (ix) To promote, when applicable, the harmonization of best corporate conduct practices among all TAP Group companies.
- (x) To collaborate with the Ethics Committee and the Committee on Conduct in the performance of their duties.

4.4.4 Relationship with Governing Bodies within the TAP Group

All Governing Bodies of all companies within the TAP Group are subject the provisions of paragraph 4.4 and committed to the values and procedures laid out in this Code.

All Governing Bodies must collaborate with and assist the Ethics Committee, the Committee on Conduct and the Audit Department in carrying out their specific missions, providing all the information requested from them and promoting the implementation of the guidelines, rules and procedures laid out in this Code.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

5 Identifying and Preventing Corruption Risks

5.1 Risk, Risk Level, and Prevention Measures

Risk management is a methodical analysis of the risks that inhere to the Group's activities, as well as of their respective relevance and appropriate prevention measures. It is the duty of the Audit Department to prepare and keep the Risk Management Handbook updated, submitting it to the appreciation of the TAP SGPS Executive Committee.


5.2 Sponsorship Rules

The purpose of a sponsorship is to combine brand advertisement with the development and improvement of social, sporting or cultural events. In this context, funds and other kinds of support are granted to the organizers of the events, which in turn are required to promote the TAP brand among those who attend a particular event.

This situation creates potential corruption risks and may prove to be negative, especially when the granting of the sponsorship is conditional on obtaining or maintaining other business deals that could cause a distortion of competition or damage third-party interests.

The following principles must therefore be respected:

- (i) Sponsorship agreements may not be used as a means of exerting influence or pressure on any commercial decision on the part of the beneficiary organization, nor may they conceal any other kind of business or corporate relationship. The granting of sponsorships must be transparent, rigorous, consistent and maintained within the reasonable limits of what is socially acceptable.
- (ii) The Boards of Directors of TAP Group companies, or their Directors and Executive Committees with powers to act in this regard, shall establish their own internal policies regarding the granting of sponsorships, which shall include:
 - The social, scientific, sporting or cultural areas which the company undertakes to sponsor;
 - An up-to-date record of all organizations to which sponsorships have been granted, including the justification for said sponsorships;

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

- To be particularly careful with regard to sponsorships involving public entities, private organizations with public functions, or private organizations with commercial relations with that particular company;
- To favor initiatives that are explicitly related to the company, albeit in symbolic terms;
- To favor entities with a socially relevant target audience and/or whose activities reflect the company's internal or social policy;
- To offer, whenever possible, in-kind sponsorships, in particular by providing air tickets and time-limited benefits, using the company's unused capacity.

5.3 Reporting Corruption Situations

Criminal complaint


In all situations which, due to their nature and/or seriousness, require notification to the authorities, the proper procedure established by law shall be applied.

Corruption is a public crime. As such, the authorities are required to investigate it as soon as they become aware of any such case, whether following a complaint or otherwise.

Procedure

Without prejudice to the provisions of paragraph 5.4 (Whistleblowing System), any situation or circumstance that may involve corruption practices or related offenses shall be reported in one of the following ways:

1. Through the Ethics Channel;
2. To the hierarchical superior, except when said situation or circumstance involves that hierarchical superior;
3. To the relevant public authorities.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

5.4 Whistleblowing System - Ethics Channel

5.4.1 Introduction to the Qualified Whistleblowing System

The TAP Group has adopted a Whistleblowing System, along with other measures within the scope of article 127.1 (k) of the Labor Code (Adopting codes of good conduct for the prevention and combating of harassment in companies with more than seven employees, the 'Whistleblowing System' or 'System'), which is one of the methods for reporting situations associated with violations of this Code, suspected fraud, corruption and related offenses (Ethics Channel).

The System prevents all possible conflicts of interest in the reception and processing of any such reports, as well as in the control of the ensuing actions. This System should be used by following the instructions described herein; any doubts that may arise should be clarified.

The System may be used by TAP Group employees who want to report situations that fall under its scope.


All reports must be submitted to the Ethics Committee, whose duties and responsibilities are described in paragraph 4.4 of this Code.

5.4.2 Confidentiality Guarantees

With the implementation of this Whistleblowing System, the TAP Group ensures full confidentiality in the handling of any reported situation.

5.4.3 Scope of Use of the System

This System is applicable to situations in which there is a justified suspicion of practices that breach the provisions of this Code. TAP Group employees should report situations outside this scope to their superiors.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

5.4.4 Instructions on Using the System

The report must be addressed to the Ethics Committee.

Improper practices can be reported through any of the channels available for that purpose. In order to avoid duplicate records, only one of the channels should be used:

- Email channel: An email message identified as 'Confidential' and addressed to: canaletico@tap.pt
- Postal channel: By letter, in a sealed envelope, identified as 'Confidential' and addressed to Aeroporto de Lisboa, Rua C, Edifício 25 - 1º Andar, Sala 137, 1704-801 Lisboa, c/o Ethics Channel or Ethics Committee.
- Intranet channel: By accessing the TAP Group Intranet: <https://newuptodate.tap.pt/CorpCom/Pages/CanalEtico.aspx>.


The report must describe the situation in as much detail as possible, providing all the information that can help investigate said situation. The whistleblower should also state if they are available to provide further clarification if necessary.

Reports may include additional information. Such additional information can be sent in standard formats.

As established in the Labor Code, employees who make unfounded complaints with malicious intentions shall be held criminally liable.

5.4.5 Description of the Whistleblowing Process


Once the report has been received, it will be stored in a centralized repository. Only the Audit Department and the Ethics Committee will be able to access it. These two bodies will be responsible for analyzing and, if necessary, processing the report. If necessary, they shall also inform the Committee on Conduct. The Ethics Committee (Ethics Channel) may, within the scope of its duties, resort to internal and external organizations whose intervention is necessary or justified, to evaluate and follow up on the complaints received by the System.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

5.5 Money laundering and financing of terrorism

The TAP Group is committed to preventing any act which may constitute a money laundering or terrorist financing crime. Therefore, TAP Group employees must:

- (i) Comply with all laws and regulations on money laundering and terrorist financing applicable to the Group's activity;
- (ii) Engage solely with customers, suppliers and business partners who carry out legitimate business activities and use legally obtained funds;
- (iii) Report to the Audit Department and/or Ethics Committee - whose contacts are available at <http://www.flytap.com> any suspicions of money laundering, terrorist financing or breach of applicable legal and regulatory requirements of which they become aware while performing their duties.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

6 Special Duties

6.1 Relationship with the Market

Companies within the TAP Group shall operate in a transparent manner and in fair competition, seeking greater transaction efficiency and customer satisfaction.


6.2 Relationship with the Customer

TAP Group companies shall maintain a transparent relationship with their customers, based on the following principles:

- a) Accurate and thorough information about the services they provide;
- b) Business practices that respect the customer's freedom of choice;
- c) Advertising messages that respect the principles of accuracy, identification and truth, in strict compliance with third-party rights;
- d) Complaint services with an efficient response to customer requests;
- e) Timely response to the questions posed by their customers, providing clear and adequate information.

6.3 Relationship with Competitors

- a) TAP Group companies shall adopt fair competition practices in their relationship with all companies in general and the aviation industry in particular, accepting and respecting both market economy rules and competition law.
- b) TAP Group companies shall be governed by the principles of transparency and correction, seeking competitive growth predicated on performance, merit and the quality of their services, and eschewing both unfair customer diversion methods and false or misleading advertising messages.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

6.4 Relationship with Employees

The directors of TAP Group companies shall implement policies that ensure:


- a) Individual dignity, not allowing discriminatory practices or practices which in any way go against the personal and professional integrity of employees;
- b) Common-ground platforms to reconcile the flexibility resulting from competitiveness requirements and their employees' safety and employability;
- c) Respect for their employees' quality of life, recognizing merit as a driver of productivity and professional growth;
- d) Investment in human capital, offering continuous training to all employees and promoting free initiative;
- e) The recruitment, selection and improvement of employees based on transparent, objective and technically sound criteria, ensuring that those processes are conducted by professionals from their respective areas;
- f) The encouragement of employees to adopt a culture of quality and productivity in which they are constantly required to search for opportunities to improve their performance.

6.5 Interpersonal Relationship

- a) To promote and maintain amicable interpersonal behavior and relationships;
- b) Any conduct which is unwarrantably harmful to the reputation of coworkers, including prejudiced judgments, rumors or unsubstantiated information, shall be unacceptable. No intimidation, discrimination, threats and moral or sexual harassment shall be tolerated within the TAP Group.

6.6 Protection of Personal Rights

- a) Efforts will be made to ensure equal opportunities for all those who work for the Group's companies, and no form of discrimination shall be tolerated.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

- b) The principle of non-discrimination shall be observed, namely with regard to ancestry, disability, gender, sexual orientation, ethnicity, language, geographical origin, religion, political beliefs, and trade union membership.
- c) The right to privacy shall be respected in all situations.
- d) Employees with non-contagious diseases shall remain in the workplace for as long as their health and the job's requirements so allow.
 - i. Compliance with EU Regulation no. 2016/679, dated April 27, 2016 (General Data Protection Regulation - GDPR), as well as with complementary laws for the protection of personal data about employees and third parties, shall be observed in all cases.


6.7 Occupational Safety and Well-Being

The TAP Group shall seek to foster a healthy and safe work environment, aiming at its employees' professional growth and well-being, while also promoting trust, respect, justice, and an innovative spirit. Therefore:

- a) It shall create the conditions to offer TAP Group employees an environment that facilitates active participation in the prevention of occupational risks;
- b) It shall create the conditions for the companies' services to evaluate and report on job requirements and occupational risks, thereby optimizing and adapting the performance of TAP Group employees to their duties while ensuring health monitoring according to the risks they are exposed to;
- c) It shall ensure the proper and responsible functioning of health, safety and hygiene services in order to reduce occupational risks, improve overall quality, and increase productivity.

6.8 Use of Company Resources

- a) The resources of TAP Group companies exist to pursue their business goals and shall be used for the purposes they establish;
- b) TAP Group employees must use the assets and services at their disposal in a responsible manner and avoid waste and misuse.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

6.9 Environment

The TAP Group believes that sustained growth depends on reconciling economic performance with social and environmental responsibility. It also acknowledges that environmental protection is a responsibility of all, and therefore seeks to integrate environmental concerns into all its activities.


Thus, the TAP Group adopts the following guiding principles:

- a) To promote the continuous improvement of the Group's environmental performance by preparing and implementing an environmental management plan;
- b) To adopt eco-efficient practices and technologies that reconcile growth with environmental protection;
- c) To adopt an approach geared towards prevention in regard to environmental issues;
- d) To prevent pollution at the source by reducing waste and promoting its recovery/recycling;
- e) To promote information and awareness-raising initiatives for employees and suppliers.
- f) To champion environmental quality in all company activities.

6.10 Social Responsibility

TAP Group managers and employees shall devote particular attention to sustainability, citizenship and corporate social responsibility issues:

- a) By implementing corporate policies aimed at the development of social responsibility in both its internal and external dimensions;
- b) By participating, directly or indirectly, in social intervention projects and in civic, social and cultural activities within the communities where TAP Group companies operate.
- c) By seeking to lend their skills to community projects, most notably through volunteering.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

7 Activity of Workers on Social Networks


Social networks play an important role in the relationship with our customers. In order to be able to leverage its growth, it is essential that we all contribute to a correct use of these resources. The TAP Group is present on social networks, specifically through its activity on Facebook, Twitter, Instagram, LinkedIn and YouTube.

The employees of the TAP Group who use these or others social networks should keep the following general principles in mind, and which should govern their attitudes and interventions on these social networks:

- a) **Confidentiality:** all employees of the TAP Group are responsible for protecting the information of the Companies within the TAP Group: sales information, technology, ideas, financial data, marketing strategies, prices and business plans, among others, are fundamental goods of the TAP Group and protecting this information and its confidential nature form part of everyone's ethical duties. Confidentiality and secrecy are inherent to labour relations;
- b) **Courtesy:** in publicly representing the TAP Group, we should be always courteous and cordial, in all situations;
- c) **Diplomacy:** one of the golden rules of social networks is diplomacy. We should never criticise the competition, the TAP Group itself or colleagues on social networks. Do not participate in discussions on social networks, even if you have a very strong opinion or knowledge of the subject;
- d) **Safety:** the disclosure of details (including photos or videos) of restricted areas of the Companies of the TAP Group is not permitted. This includes aircraft interiors, or inside hangars or other maintenance areas, passenger areas, cockpit and luggage areas, among others, unless duly authorised;
- e) **Ambassador:** we are all ambassadors of the TAP Group. When we publish something online, even if in a personal capacity, we have greater responsibility in identifying ourselves as employees of the TAP Group. The image we portray – and, in addition, the image of the TAP Group – should always be positive.

A dedicated, qualified team is available to provide an official response to issues raised about the TAP Group. If you wish to intervene or require further information on this matter, please contact socialmedia@tap.pt.

Besides the principles established in this chapter, employees of the TAP Group, when online, should respect all other principles defined in this Code, in internal regulations and in applicable legislation.

	CODE OF ETHICS AND GOOD CORPORATE CONDUCT	Page 2 to 24
		Version 1.2
		Effective Date: February 19, 2020

8 Appendixes

Appendix 1 - Applicable Legislation

▪ *In Portuguese Penal Code*

CORRUPTION

- Undue advantage (Article 372^o)
- Passive Corruption (Article 373^o)
- Active Corruption (Article 374^o)
- Aggravating Circumstances (Article 374^o-A)
- Penalty Waiver or Mitigation (Article 374^o-B)

RELATED BREACHES (EQUIVALENT TO CORRUPTION)

- Breach of Secrecy (Article 195^o)
- Influence Peddling (Article 335^o)
- Money Laundering (Article 368^o - A)
- Mismanagement in the Public or Cooperative Sector (Article 235^o)
- Embezzlement (Article 375^o)
- Misappropriation (Article 376^o)
- Graft and Corruption (Article 377^o)
- Abuse of Power (Article 382^o)
- Undue Advantage (Article 379^o)
- Graft and Corruption (Article 377^o)

LAW NO. 20/2008, DATED APRIL 21, 2018

- (with the amendments introduced by Law no. 30/2015, dated April 22, 2015)
- Criminal sanctions for corruption in international trade and in the private sector

IN TAP SGPS STATUTES

- Ethics and Incompatibilities (Article 12^o)

LAW NO. 34/87, DATED JULY 16, 1987

- (with the amendments introduced by Law no. 108/2001, dated November 28, 2015; Law no. 30/2008, dated July 10, 2008; Law no. 41/2010, dated September 3, 2010; Law no. 4/2013, dated January 14, 2013; Law no. 30/2015, dated April 22, 2015)
- Crimes involving Holders of Political Positions

DECREE LAW No. 133/2013, DATED MARCH 10, 2013 (WITH SUBSEQUENT AMENDMENTS)

- Legal Framework for the Public Business Sector

LAW No. 29/2008, DATED JULY 4, 2008

- (with the amendments introduced by Law no. 42/2010, dated September 3, 2010)

LAW No. 83/2017, DATED AUGUST 18, 2017

- Measures for combating money laundering and terrorist financing

LAW No. 52/2003, DATED AUGUST 22, 2003 (with subsequent amendments)

- Anti-terrorism law