

Code of Ethics and Conduct

Classification: Public

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Message from the Board

The values of excellence and high standards of ethics have been part of TAP Group since its foundation. To be a Group of excellence, we know that, in addition to strict compliance with the law, we must be guided by these values and ethical standards in all our decisions and behaviors, both in the scope of our internal relationships and in the scope of the relationships that, on behalf of the TAP Group, we establish with third parties.

The TAP Group has undergone a restructuring process, currently being composed of public companies, owned solely and directly by the Portuguese State or in which it exerts dominant influence. This circumstance implies changes in the framework of our obligations and in the breadth of our potential criminal liability. It is therefore essential to reinforce our commitment to compliance with a set of ethical principles and values that are common and transversal to the Group, binding everyone, regardless of our nationality, the location where we carry out our activity, and the business area or support to which we belong.

Our Code of Ethics and Conduct ensures that the relationships we establish with our customers, shareholders, suppliers, service providers, business partners, competitors, Employee, and the surrounding community are always supported by values of integrity, responsibility, and respect for all individuals and entities with whom we interact. In this way, we strengthen our ethical dimension and position ourselves as a socially responsible business group capable of thriving economically in a sustainable manner.

The TAP Group's Code of Ethics and Conduct has been reviewed and updated, in light of our new corporate structure, and presents a more accessible configuration, describing clearly and objectively how we should act in the face of possible ethical dilemmas, through practical examples. Thus, the new Code allows everyone to know, incorporate, and consolidate our ethical conduct guidelines into their daily lives.

It is by following the rules and principles described here that all of us, Employees of the TAP Group, as well as our suppliers, service providers, and business partners, generate value for our customers and shareholders and contribute to the economic growth and sustainable development of the regions in which we operate.

It's not just a legal matter. The rules, values, and principles enshrined in the Code of Ethics and Conduct are what we believe should guide the conduct of everyone who is part of the TAP Group. We know that only in this way will it be possible to maintain the standards of excellence and quality that have been part of TAP Group since its foundation and will continue to be so.

It is a duty for all of us.

We appreciate everyone's commitment to observing the guidelines described here, thus honoring the history of the TAP Group, but also its future, which we all together build every day.

What is the Code and what is its purpose?

Among our essential objectives is to conduct our activities with high standards of integrity, valuing and promoting the development of our Employees in personal and professional aspects, to achieve their full satisfaction and thus offer a quality service to our customers and obtain the best possible return on investments made. Additionally, we are guided by criteria of excellence, developing initiatives that promote ethics as a pillar of management and corporate culture.

This Code of Ethics and Conduct (the "Code" or "Code of Ethics and Conduct") presents the principles and main rules that must be observed in conducting our business so that all of us, from the TAP Group, know how to act in the face of an ethical dilemma. As it is impossible to anticipate all situations of daily life, this Code is not, nor does it intend to be, an exhaustive document, but rather our first point of reference in case of doubt.

Our role is to know, understand, and act in accordance with the content of this Code, promoting and respecting its principles in all our activities.

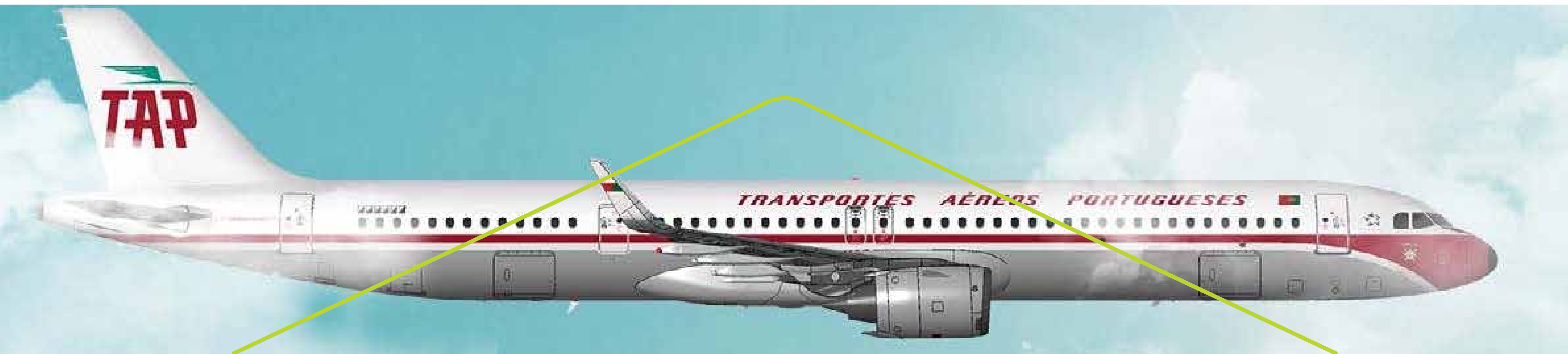
Who is it for?

This Code of Ethics and Conduct applies to all of us who, in any way, are related to the TAP Group including, without limitation, the Administrators and other Employees of the TAP Group.

For the purposes of this Code, the following definitions apply:
"Administrator" refers to any member of the management bodies of any of the Companies of the TAP Group.

"Employee" refers to Administrators, workers, legal representatives, suppliers, service providers, attorneys, consultants, as well as any other employees, internal or external, of any Company of the TAP Group, regardless of their legal relationship with that Company and whether they are natural persons or legal entities.

"TAP Group" collectively refers to Siavilo-SGPS, S.A., Transportes Aéreos Portugueses, S.A., Portugália - Companhia Portuguesa de Transportes Aéreos, S.A., TAPGER - Sociedade de Gestão e Serviços, S.A., UCS - Cuidados Integrados de Saúde, S.A., and TAP Logistics Solutions, S.A. Any of these companies is referred to in this Code as "Company" or "Company of the TAP Group".



» In general, what is expected of Tap Group Employees?



In general, what is expected of TAP Group Employees?

Be an example and act professionally

We must be an example and promote compliance with this Code of Ethics and Conduct in our daily lives, ensuring that its principles are observed in all our daily activities. We demand, especially from our leadership, that they adopt high ethical standards of behavior and ensure that their team also does so.

We must fulfill our duties with zeal, efficiency, rigor, and professionalism, promoting an ethical culture within the TAP Group. Additionally, whenever we represent the Company before our customers, suppliers, service providers, and other business partners, we must adopt a professional attitude aligned with our organizational values, preserving the credibility, reputation, and image of the TAP Group.

Know and respect all Internal Rules of the TAP Group

We must act ethically and in accordance with the principles and rules set forth in this Code, as well as the other internal rules, policies, procedures, and regulations of the Companies of the TAP Group (the 'Internal Rules of the TAP Group'). To do so, it is essential to know the content of this Code and revisit it whenever we encounter an ethical issue or have doubts about how to act in a particular situation.

The Internal Rules of the TAP Group are available for consultation at:

<https://intranet.tap.pt/politicas>

Ask questions and share concerns

Before taking action, we should confront ourselves with the following questions:

- Is the conduct contrary to the law?
- Does the conduct give the impression of illegality?
- Does the conduct disrespect this Code and/or the Internal Rules of TAP Group?
- Do I feel uncomfortable acting in this way?
- Will I feel uncomfortable if, in the future, I have to explain my decision to my team, my leadership, or my family?

If the answer to any of the above questions is affirmative, the conduct is potentially inappropriate and should not be adopted.

If the answer is not obvious or if we continue to have doubts about how to act, we should share the issue with:

- Our leadership; or
- Any other person in a leadership position in the TAP Group; or
- The Legal Compliance department; or
- The Human Resources department; or
- The Legal department; or
- The Labor Legal department.

The way we handle the issue or whom we share it with will depend on its nature and severity. Regardless of the solution adopted, the TAP Group will always seek to ensure that the issue is addressed by the most appropriate individuals, with discretion and confidentiality.

» In general, what is expected of TAP Group Employees?

Reporting inappropriate conduct

The TAP Group encourages the reporting of disrespectful, inappropriate, fraudulent, unethical, or illegal behavior. If we witness or become aware of any conduct that violates the law, this Code, or other Internal Rules of the TAP Group, we should report it, providing all information that may assist in investigating the situation, through the **Whistleblowing Channel** on the [Intranet](#), [Channel Portugalia](#), and on the [Channel UCS](#).

The TAP Group ensures confidentiality and non-retaliation regarding all reports made in good faith, so don't hesitate to speak up!

Please refer to our **Whistleblowing Channel Policy** on the [Intranet](#), on the [TAP Air Portugal](#) website or/and [here](#).

Collaborating with investigations

We must cooperate with all internal investigations. When making a report, our cooperation may be necessary for the TAP Group to resolve the issue. The TAP Group area, responsible for conducting and/or managing internal investigations, may, in certain cases, request additional information from us.

» Valuing our Employees



Workplace Safety and Well-being

We value human life and, above all, the well-being of our Employees. The TAP Group takes its safety and well-being responsibilities very seriously and expects the same level of commitment from all of us in this matter. Therefore, it is our duty to know and follow all Internal Rules of the TAP Group related to safety and well-being.

In this way, the TAP Group:

- Creates conditions for us to actively participate in the prevention of occupational hazards;
- Ensures the necessary conditions for TAP Group Companies to assess and inform their Employees about the specific requirements of their jobs and respective occupational hazards, in order to optimize and adapt our performance and safeguard our health and well-being;
- Ensures the conditions for proper and responsible operation of occupational safety and health services, aimed at reducing occupational hazards.

If we identify any unsafety situation regarding our Employees, we must report it to obtain its resolution as quickly as possible. We must take all concerns regarding the safety and well-being of our Employees seriously, resolving them with the appropriate sense of priority.

Practical example (1):

A: How should I perform a maintenance task safely?

R: Whenever performing a maintenance task, I must bear in mind that it may pose risks to my physical integrity, so I must prepare myself by adopting a preventive attitude before starting it. I must also observe the following steps: (i) assess the safety conditions of the location where I will perform the task; (ii) properly select and verify if the tools and equipment I will use are in proper condition; (iii) check the stability of the access means and their safety elements; (iv) use the personal protective equipment appropriate to the risks present; and (v) leave the area clean and tidy after completing the task.

Practical Example (2):

A: The plane is about to depart, and it's necessary to access above the plane's wing to perform a small task, but there is no fall protection equipment available on-site. Can I still access it taking extra precautions?

R: No. Under no circumstances should I access risky locations without all safety conditions in place to perform any task, no matter how quick. In this case, I must still adhere to safety rules and use appropriate fall protection equipment before accessing the location, even if it results in a delay in the plane's departure. An accident is always waiting for an opportunity to happen, which could be caused by external factors or a sudden, uncontrollable event.

Share your concerns

In case you have an issue related to Safety and Well-being in the workplace, talk to your leadership, the Health and Safety at Work department or the Human Resources department, or report the situation through the **Whistleblowing Channel** for assistance and guidance.

In terms of Safety:

TAP's safety policy (available [here](#)) includes managing risks associated with aviation activities, directly related to or supporting aircraft operations, ensuring they are reduced and controlled to an acceptable level. If you identify a condition or object with the potential to cause or contribute to an aircraft incident or accident, you should report it through the **Incident Communication System** (IQ SMS - <https://tap.asqs.net> or Intranet - [here](#)). Management of these incidents is handled independently by TAP's Safety & Security department.

Respect in Interpersonal Relationships

We promote and value conduct and interpersonal relationships based on the principles of cordiality, trust, and mutual respect.

We advocate for behaviors that safeguard reputation, integrity, and human dignity.

We do not tolerate the practice of harassment, abuse of power, or any other inappropriate behavior that may lead to intimidation, humiliation, or offense of another person.

Examples of inappropriate behaviors that may constitute harassment include:

- Offense or insult;
- Humiliating or disrespectful treatment;
- Threats, intimidation, or persecution;
- Intentional and repeated exposure to embarrassing situations;
- Display of offensive material or offensive or disrespectful jokes about race, color, age, sex, religion, belief, political affiliation, union membership, disability, sexual orientation, origin, nationality, or marital status;
- Retaliation or threat of dismissal or loss of promotion without just cause, inconsistent with our principles of meritocracy; or
- Repeated yelling directed at an individual.

Examples of inappropriate behaviors that may constitute sexual harassment include:

- Unwanted demonstrations of affection;
- Unwanted physical contact of a sexual nature;
- Repeated unwanted requests for social meetings;
- Unwanted and repeated contact through phone calls, text messages, or voice messages unrelated to work;
- Sending, obtaining, or displaying sexually suggestive, obscene, and/or indecent images or other materials; or
- Suggesting that a particular decision related to an Employee's or candidate's professional situation may be affected by the acceptance or rejection of sexual initiatives.

Practical example:

A: My leadership is very demanding and frequently provides feedback to the team regarding the quality of our work. Does this behavior constitute a form of moral harassment?

R: The fact that your leadership is demanding and frequently provides feedback on the quality of your team's work does not constitute moral harassment. If the feedback is provided in a respectful, constructive, and well-founded manner, there is no issue of moral harassment. However, if this feedback is given disrespectfully or with threats, intimidating the team, it is advisable to discuss this situation with your leadership and ask them to change this approach. If this does not resolve the issue or if you do not feel comfortable discussing it with your leadership, you can share the issue with the People and Culture department and/or report it through the **Whistleblowing Channel**.

Please refer to our **Good Conduct Policy for Preventing and Combating Workplace Harassment** on the [Intranet](#) and/or on the [TAP Air Portugal](#) website.

Share your concerns

In case you have an issue related to respect in Interpersonal Relationships, talk to your leadership, the Legal Compliance department, the Human Resources department or the Labor Legal department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Valuing our Employees

Equality, Diversity and Inclusion

We provide equal treatment regardless of race, color, age, gender, religion, belief, political affiliation, union membership, sexual orientation, origin, nationality, marital status, or any other conditions protected by law.

We value a culture of openness, collaboration, diversity, tolerance, and inclusion, where everyone is treated fairly and respectfully, and where everyone has the opportunity to contribute.

We are committed to hiring and evaluating Employees based on their professional competencies and performance.

Share your concerns

In case you have an issue related to Equality, Diversity and Inclusion, talk to your leadership, the Legal Compliance department, the Human Resources department or the Labor Legal department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Practical example:

A: In order to ensure diversity within the TAP Group, should I favor minority groups over other candidates during recruitment?

R: No. During recruitment, while we should always be open to considering the most diverse set of candidates possible and respect equality in treating all of them, we should select our Employees based on their professional competencies.

Please refer to the **Diversity and Inclusion Policy (D&I)** on the [Intranet](#).



» Relationship with Third Parties

Relationship with Third Parties

Relationship with our Customers

We maintain a transparent relationship with our customers, employing business practices that respect the customer's freedom of choice and adopting advertising messages that comply with the law.

In our relationship with our customers, it is mandatory to respect the following 10 principles (except in cases beyond the control of the TAP Group):

- Serving the customer is our priority;
- Always deliver what is promised;
- Listen to the customer;
- Be proactive in finding solutions;
- Provide clear and transparent information;
- Always maintain a positive attitude;
- Be available and approachable;
- Smile and show empathy;
- Be efficient; and
- Make the customer feel unique.

Our success is measured by the value we create for our customers. For this reason, we must strictly adhere to the principles listed above, while always paying attention to and respecting the legitimate interests of the TAP Group.

Practical example:

A: I have a friend who is going to travel. Can I ask someone I know that manages the reservations to make a free reservation for him?

R: No, customers must be treated equally and in accordance with the rules in force in the Company, and no advantages can be given to friends/family in violation of the defined rules, including rules applicable to ticket facilities.

Share your concerns

In case you have an issue related to Relationship with our Customer, talk to your leadership, the Legal Compliance department or the Legal department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Relationship with Third Parties

Relationship with Our Suppliers, Service Providers, and Other Business Partners

We engage with our suppliers, service providers, and other business partners in an ethical and transparent manner, and we expect them to uphold the same values in their interactions with the TAP Group.

Our suppliers, service providers, and other business partners must uphold values and behaviors consistent with our values, the principles and rules outlined in this Code, the Supplier Code of Conduct, and the provisions of other Internal Rules of the TAP Group.

Above all, we expect our suppliers, service providers, and other business partners to fully comply with the law.

We promote competition and treat our suppliers, service providers, and other business partners with impartiality, respect, and good faith.

Please refer to our **Supplier Code of Conduct** on the [Intranet](#) and/or on the [TAP Air Portugal](#) website.

Practical example:

A: I was informed, confidentially, that one of our business partners is under investigation for suspected acts of corruption. The business partner in question never informed me of this situation and apparently has always had an excellent reputation in the market. Should I ignore these rumors?

R: We should not ignore this type of rumor. We must investigate, starting by involving the Legal Compliance department to assist us in handling this situation in the best way possible.

Share your concerns

In case you have an issue related to Relationship with our suppliers, service providers and other business partners, talk to your leadership, the Legal Compliance department or the Legal department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Relationship with Third Parties

Relationship with our competitors

We fully respect competition laws and the functioning of a market economy.

We compete fairly with our competitors, and our actions are based on competitive value centered on performance, merit, and the quality of our offering. We do not resort to unfair competitive means, nor do we promote or share false or misleading advertising messages.

The Company's participation in any anti-competitive conduct is prohibited, and we must not accept situations that appear to or may result in violations of applicable legislation or regulations.

Our Employees engaged in commercial activities, with contacts in the sector, participating in meetings of commercial or industrial associations, or having access to sensitive information of the TAP Group, must be especially aware of the obligations arising from competition law standards.

Examples of agreements (formal or informal) and anti-competitive practices among companies, as such, prohibited and unacceptable by the TAP Group, are:

- Price collusion or fixing;
- Division of customers or markets;
- Fixing terms or conditions of purchase or sale;
- Price discrimination or other conditions;
- Limiting or controlling production, distribution, technical development, or investments; or
- Exchange of information among competitors about prices, sales conditions, market allocation, costs, customer allocation, profits, profit margins, or other information that may limit competition.

Practical example:

A: In a meeting of a trade association with companies in the aviation sector, a representative of a TAP competitor informs that they intend to increase airfares next year and asks if the TAP Group also plans to do the same. What should I do?

R: Competing companies cannot exchange information about their future pricing plans, as it is a violation of competition law. In this case, we must immediately state that both the comment and the question are inappropriate and leave the meeting, noting our objection and departure from the meeting in the minutes. If it is not possible to record this in the minutes, you should immediately contact the Legal department so that necessary measures can be taken to safeguard the position of the TAP Group.

Share your concerns

In case you have an issue related to Relationship with our Competitors, talk to your leadership, the Legal Compliance department or the Legal department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

» Ethics and Integrity in Business



Ethics and Integrity in Business

Conflict of Interest

As Employees of the TAP Group, we are bound by a duty of loyalty to the Company, and we must act in good faith and with transparency. When a personal interest conflicts with the interests of the TAP Group, we risk violating our duty of loyalty. Therefore, we must avoid situations where our personal interests may collide with the interests of the TAP Group.

A potential conflict of interest arises when we find ourselves, directly or indirectly, in situations that may influence or appear to influence our professional decisions.

Therefore, whenever in the performance of our duties we are called upon to intervene in a process that, in any way, involves personal interests, whether our own or those of a family member, someone with whom we have an emotional relationship, partners, friends, or any public or private entity with whom we have a labor, professional, or other relationship, including, without limitation, entities with a social, religious, or political scope, we must take necessary measures to avoid such intervention and, in any case, communicate this conflict of interest situation to the Legal Compliance department, by completing the **Conflict of Interest Declaration** form, which is available on the Intranet under “My Area”.

Examples of conflict of interest:

- A friendship with a supplier of the TAP Group that prevents us from making impartial decisions as an Employee of the TAP Group;
- I am responsible for the final decision in a process for the acquisition of a service/product for the TAP Group and the owner of one of the companies participating in the procurement process is a family member/friend;
- Having another professional activity that affects our performance in the companies of the TAP Group or implies the use of TAP Group resources;
- Engaging in external activities that involve the use of TAP Group information that should not be disclosed; or
- Involvement in external activities competing with the activities of the TAP Group.

Examples of potential conflict of interest:

- A family member/friend works for a major competitor of the TAP Group;
- I am an Employee of the People and Culture department of the TAP Group, and a family member/friend is participating in a recruitment process; or
- I have a family relationship or an emotional relationship with another Employee of the TAP Group or with an Employee of a supplier, service provider, or other business partner of the TAP Group.

The TAP Group is committed to promoting internal mechanisms for preventing, identifying, and resolving conflicts of interest situations and ensuring a high degree of transparency and objectivity in managing operations with related parties.

Practical examples:

A: My brother wants to apply for a position that opened up at the TAP Group. Is this a conflict of interest situation?

R: Not necessarily, but it's crucial that you have no involvement in the recruitment process. If, through your duties, you are required to participate in the said process, you should take necessary measures to avoid such involvement and, in any case, promptly report this Conflict of Interest situation to the Legal Compliance department, which form is available on the Intranet under “My Area”.

Please refer to the **Conflict of Interest Prevention and Management Policy** at:

<https://intranet.tap.pt/politicas>.

Share your concerns

In case you have an issue related to Conflict of Interest, talk to your leadership, the Legal Compliance department, the Human Resources department or the Legal department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Ethics and Integrity in Business

Corruption

TAP Group has a zero-tolerance policy regarding any violation of anti-corruption laws. Such violation can damage our image and reputation, and may result in civil and criminal liability for TAP Group companies and the involved Employees. Therefore, it is our responsibility to know and comply with these laws.

Anti-corruption laws have a broad scope. For this reason, it's possible for a company or an individual to be held responsible for a practice whose illegality they were unaware of.

As Employees of the TAP Group, it is prohibited to promise, offer, request, or accept, directly or indirectly, anything of value (improper benefit), whether material or immaterial, for ourselves or for a third party, with the intention of inducing someone to act or refrain from acting in any way (action or omission).

It is also prohibited, as Employees of the TAP Group, to request or accept anything of value, whether material or immaterial, that is not due to us, and exceeds 150 Euros (one hundred and fifty Euros), even if such request or receipt is not intended to induce us to act or refrain from acting in a certain way.

Examples of "thing of value" or "improper benefit" include":

- Money (whether in cash, bank transfer, or other means);
- Gifts;
- Travel, accommodations, meals, or beverages;
- Tickets for entertainment activities: sports events, concerts, etc.; or
- Intangible benefits (personal favors, preferential treatment for hiring and internships, etc.)

Examples of actions or omissions include:

- Preferential treatment;
- Contract award;
- Disclosure of confidential information;
- Waiver of customs duties; or
- Waiver of penalties (e.g., fines).

Practical examples:

A: During an inspection by the "Authority for Working Conditions" at TAP's engine workshop, a violation of the safety and health measures defined for welding work is detected. Upon discovering this, the Inspector suggests that, to avoid an administrative offense procedure against TAP, I offer him a flight so that the Inspector can visit his family in Spain. Can I promise this flight to the Inspector?

R: No. Offering this flight to the Inspector with the intention of avoiding the initiation of an administrative offense procedure against TAP constitutes the crime of active corruption.

A: A friend promised me a dinner if I reveal confidential information from TAP to him. Can I accept?

R: No. In addition to the disclosure of confidential information constituting a disciplinary offense, accepting this dinner constitutes, among other things, the crime of passive corruption.

TAP Group has zero tolerance for any type of violation of anti-corruption laws, which can, in fact, damage our image and reputation, as well as generate civil and criminal liability for both TAP and the involved Employees.

Please refer to our **Anticorruption Policy** on the [Intranet](#) and/or on the [TAP Air Portugal](#) website.

Share your concerns

In case you have an issue related to Corruption, talk to your leadership, the Legal Compliance department or the Legal department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Ethics and Integrity in Business

Gifts, travel, accommodations, meals, and entertainment activities (courtesies)

Gifts, travel, accommodations, meals, and entertainment activities are, in some cultures, courtesies that help strengthen relationships between companies.

TAP Group allows, as a rule, the offering and acceptance of certain courtesies, provided they are not intended to improperly influence the recipient.

For the purpose of applying this rule, the following maximum values are permitted per recipient, per calendar year, unless more restrictive provisions are established by local legislation:

- Europe and other unspecified countries: €150 (one hundred and fifty euros);
- Brazil: R\$400 (four hundred reais);
- United States of America: US\$150 (one hundred and fifty dollars);
- African countries: €50 (fifty euros) or the equivalent in local currency.

With the primary objective of ensuring compliance with the law and guaranteeing that no courtesy is offered or received to obtain any undue advantage or to improperly influence any action, we must, before offering/giving/promising any courtesy to a third party or accepting/receiving any courtesy from a third party — even if its value does not exceed the limits indicated above, whether for oneself or for another — observe TAP Group's Internal Rules on the matter.

Employees of UCS - Integrated Health Care, Inc. must comply with the specific regime for accepting offers defined in the legal and regulatory diplomas directly applicable to them.

Practical example:

A: I am part of the TAP Procurement team, and a process is underway to select a supplier to provide services to the TAP Group. The sales director of a supplier candidate has just returned from vacation in France and offers me a bottle of wine from a vineyard he visited. Can I accept this offer?

R: No. Any offer, regardless of its value, made during a procurement process is inappropriate and therefore should be rejected.

Please refer to our **Policy on Offering and Accepting Courtesies** at:

<https://intranet.tap.pt/politicas>

Share your concerns

In case you have an issue related to Courtesies, talk to your leadership or the Legal Compliance department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

» Ethics and Integrity in Business

Money Laundering and Terrorism Financing

TAP Group is absolutely committed to preventing any acts that may constitute money laundering or terrorism financing crimes.

Money laundering is the process by which individuals involved in criminal activities conceal the origin of unlawfully obtained assets and income (benefits) by transforming the liquidity resulting from these activities into legally reusable capital, by concealing the origin or the true owner of the funds. Terrorism financing, on the other hand, involves using money or other assets of any kind to finance terrorist groups or activities.

Therefore, we must comply with all laws and regulations regarding money laundering and terrorism financing applicable to TAP Group.

We must also only engage with customers, suppliers, service providers, and other business partners engaged in legitimate commercial activities and who use funds obtained lawfully.

Practical example:

A: We have a long-term customer who has always honored their contractual obligations without any delays. However, this month the customer has been delayed and contacted us to apologize and inform that they will fully settle the outstanding payment to TAP Group, amounting to 20,000 Euros, in cash, next week. Can we accept this form of payment?

R: We should not accept this form of payment as it violates the money laundering prevention rules that TAP Group is absolutely committed to complying with. Payments made in cash, regardless of the amount, should be avoided and refused whenever possible, as they may indicate inappropriate behavior. Payments should be made as contractually defined and in accordance with the law. In case of doubt, always contact the Legal department or the Legal Compliance department for clarification.

Please refer to our **Policy on Prevention of Money Laundering and Terrorist Financing** at: <https://intranet.tap.pt/politicas>.

Share your concerns

In case you have an issue related to suspect of Money Laundering and Terrorism Financing, talk to your leadership or the Legal Compliance department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Ethics and Integrity in Business

Economic Sanctions

For reasons of foreign policy and security, it is possible that commercial embargoes and economic sanctions may be imposed, limiting commercial freedom regarding certain countries, companies/regions, and/or individuals.

It is imperative to comply with national and international regulations regarding financial operations and the import and export of products, services, technology, and information, and in accordance with these regulations, to observe the import and export restrictions imposed, keeping this concern in mind whenever TAP Group transacts with countries, companies, and individuals that may pose a risk in terms of economic sanctions.

Practical example:

A: I am negotiating a contract with a potential client located in a country that is considered to be of moderate risk in terms of the possibility of being subject to economic sanctions. Can I sign the contract?

R: Before signing the contract, it is important to conduct a know your client (KYC) procedure to verify if this potential client is part of any existing sanctions lists, as well as to confirm the integrity of this client in financial and ethical terms. If the result of this KYC procedure confirms that this potential client is not part of any existing sanctions lists and does not present known financial or ethical risks, the contract may be signed.

Share your concerns

In case you have an issue related to Economic Sanctions, talk to your leadership or the Legal Compliance department or Legal Department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Insider Trading

Insider Information refers to any precise information, not yet made public, that relates directly or indirectly to the TAP Group, its clients, suppliers, service providers, business partners, or other third parties, and which, if made public, would be likely to significantly influence the market price of securities issued by TAP Group companies and admitted to trading on a regulated market "Insider Information").

Examples of Insider Information, depending on the specific case, may include:

- Profits or losses from a significant contract;
- Government investigations or materially relevant legal proceedings;
- Significant management changes;
- Serious risks and incidents of information security and/or personal data breaches;
- Commercial cooperation agreements with material significance;
- Relevant merger and acquisition agreements;
- Unannounced financial results or information;
- Unannounced products; or
- Plans and strategies, including investments.

Employees and individuals related to them are not authorized to make any investment decisions based on Insider Information, nor to disclose or provide Insider Information to third parties. To ensure compliance with the law by TAP Group companies, as well as transparency and accurate information to the market and investors of TAP Group, it is essential to observe the Internal Rules of TAP Group regarding the identification and disclosure procedure of Insider Information.

Ethics and Integrity in Business

Practical example:

A: I was told confidentially that a TAP Group Company is about to acquire a publicly traded company. It seems to me that this operation will greatly increase the value of the shares of this publicly traded company. Is it correct for me to proceed with the purchase of shares of this company?

R: No. Such conduct may be classified as a crime against the market for insider trading or market manipulation, punishable by imprisonment under applicable law.

Please refer to our **Insider Trading Policy** at <https://intranet.tap.pt/politicas>

Share your concerns

In case you have an issue related to Insider Trading, talk to your leadership or the Legal Compliance department or Legal Department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Books and Records

All financial transactions carried out by TAP Group Companies must be reflected in their records, in a complete, correct, precise, and transparent manner, and must be supported by all necessary documentation.

All of us, regardless of the Company and area in which we work (whether in finance or any other area), are responsible for ensuring the quality and accuracy of the Company's records, as well as for securely archiving its confidential records, in order to maintain the reputation of integrity of the TAP Group before all entities with which it interacts.

Examples of records of TAP Group Companies include:

- Sales records;
- Invoices;
- "Time card" lists;
- Expense and travel reports;
- Performance evaluations; or
- Refund requests.

Practical examples:

A: I can't find all the receipts needed to request reimbursement for professional expenses. Can I include other unrelated receipts in the reimbursement request just to reach the total amount of those professional expenses? I imagine there shouldn't be a problem since I won't receive more than what I'm owed. Is my understanding correct?

R: No. We cannot submit incorrect expense reports, as this would result in inaccurate accounting records. We must keep all receipts for professional expenses, as they are the only valid means to obtain reimbursement for the amounts owed to us.

Share your concerns

In case you have an issue related to Books and Records, talk to your leadership, the Legal Compliance department or Legal Department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

» Ethics and Integrity in Business

Political Contributions

TAP Group does not make any contributions in cash or in any other form to political organizations.

TAP Group respects the right of Employees to participate as citizens in political activities. However, we must never use the name of TAP Group to support a political activity or a political party, nor can we use TAP Group resources to make a political contribution.

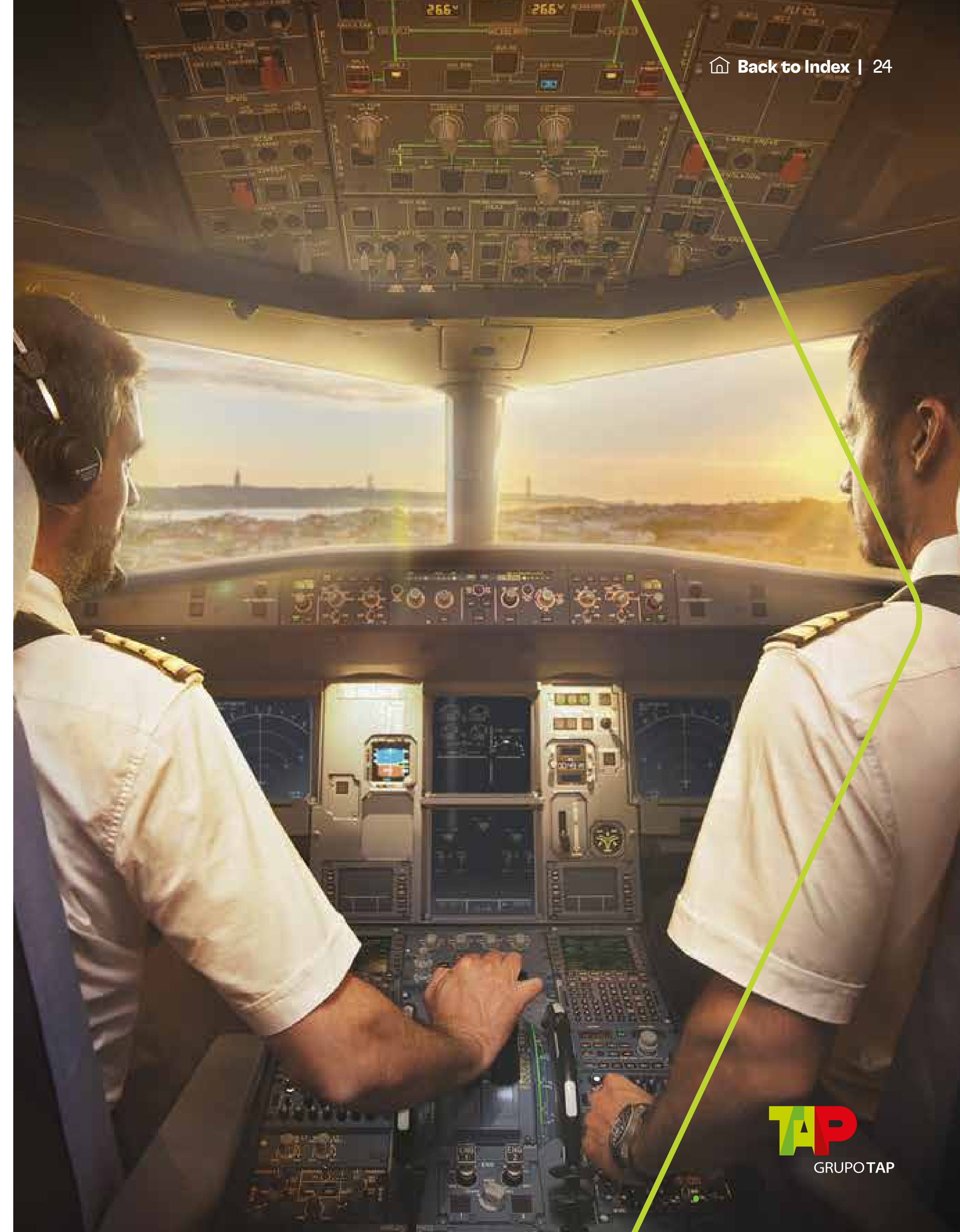
Practical example:

A: Can I offer any assets of TAP Group, such as furniture and office supplies, for free, to help a political party?

R: No. Donations of this nature should not be made, even if they are not made in cash, to political parties, as such conduct may be wrongly interpreted as TAP Group supporting a political party, which is not allowed.

Share your concerns

In case you have an issue related to Political Contributions, talk to your leadership or the Legal Compliance department, or report the situation through **Whistleblowing Channel** for assistance and guidance.



» Our Assets and Third Party Assets



Our Assets and Third Party Assets

Proper use of assets

We must safeguard TAP Group's assets as if they were our own. We use assets and services prudently and take necessary measures to prevent or avoid waste, losses, damages, thefts, or improper or illegal use of these assets or services.

The appropriate use of these assets contributes to better cost control and improved outcomes. In addition to physical assets (aircraft, onboard materials, tools, parts, facilities, equipment, computers, phones, mobile devices, photocopiers, vehicles, materials, among others), we also protect TAP Group's intangible assets (name, brand, and other intellectual property rights, reputation, confidential information, among others).

We must also exercise caution and care when using electronic resources provided by TAP Group, adhering to all internal rules regarding the matter.

We respect the assets of our clients, suppliers, service providers, and other business partners, and expect the same level of respect for our assets from them.

Practical example:

A: It has happened to me before needing information and, as I wasn't near a computer, I called someone I trust to enter my password into the Company's application that I needed to access. Given it was an urgent situation, is it appropriate to do so?

R: No. The passwords we use at TAP Group are personal, non-transferable, and should never be shared under any circumstances. It is recommended to use different passwords from any others used in personal life.

Allowing another person, even if trusted, to access TAP Group's computer systems (e.g., Reservations, Clients, Human Resources, Crew, Aircraft, Operations, etc.) or emails, documents, or other information assets of TAP Group through our credentials is a serious violation of the duty to preserve the confidentiality of this information and, therefore, of the duty of proper use of TAP Group's assets.

Share your concerns

In case you have an issue related to a Proper Use of Assets, talk to your leadership, the Digital & Technology Services (DTS), the Data Protection Officer of the TAP Group (DPO), the Legal Compliance department or the Legal Department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Our Assets and Third Party Assets

Confidentiality

For the purposes of this Code, "Confidential Information" shall mean any and all information relating to any Company within the TAP Group and/or any of its shareholders, direct or indirect, as well as any other information to which an Employee has access in the course of their duties, including, without limitation, information relating to customers, suppliers, service providers, and other business partners of Companies within the TAP Group, which is not public or does not become public domain for a reason other than its disclosure, to the public or to third parties, in violation of the confidentiality obligation provided for herein or in a contract.

We must maintain confidentiality over all facts related to the Companies within the TAP Group that we become aware of in the course of our duties or because of them, even after the termination of our relationship (employment, contractual) with the Company in question. This means protecting Confidential Information from any unauthorized access or disclosure.

Examples of Confidential Information:

- Information about the strategies of Companies within the TAP Group (investment and expansion plans, merger and acquisition projects, business management policies and practices, etc.);
- Know-how, trade secrets, patents, software, and products developed by the TAP Group;
- Information related to recruitment and selection, progression, and remuneration;
- Personal information about our Employees; or
- Information provided by customers, suppliers, service providers, or other business partners of Companies within the TAP Group that these latter have committed not to disclose.

Examples of conduct that protect Confidential Information:

- Not discussing business in public;
- Keeping documents in locked files;
- Destroying documents before disposing of them;
- Using a password for access to files on the computer; or
- Not sharing passwords for access to computer systems.

Practical example:

A: I'm going to have dinner with a colleague from the TAP Group, and inevitably, we'll talk about our activities. Is this conduct appropriate?

R: It's permissible to discuss work, provided we take some precautions, such as (i) not disclosing confidential information in public places and (ii) ensuring our conversation isn't overheard by third parties.

It's important to pay the same attention during phone calls and during the use of laptops in public spaces.

Share your concerns

In case you have an issue related to Confidentiality, talk to your leadership, the Legal Compliance department or Legal Department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

Our Assets and Third Party Assets

Personal Data Protection

For the purposes of this Code, "Personal Data" shall mean any information that can be associated with an identified or identifiable individual (for example: name, address, email address, credit card numbers, phone number, frequent flyer number, PNR, medical information, image, etc.).

TAP Group respects the privacy of its Employees and customers and only requests, obtains, and uses Personal Data to the extent necessary for the efficient management of its business, in compliance with laws, regulations, and TAP Group's Internal Rules on the matter.

It is our obligation to know and comply with the provisions of TAP Group's Internal Rules on data protection.

TAP Group aims to ensure the protection of Personal Data and requires its Employees - especially those who, in the course of their duties, access personal information - to be aware of the legal requirements applicable in this matter. Employees who, as part of their duties at TAP Group, access Personal Data may only use it for professional purposes, ensuring, in all cases, its confidentiality.

Practical example:

A: I received an email with personal information about other Employees that was sent to me by mistake. What should I do?

R: As soon as you become aware of this fact, you should not read the contents of the file (if you haven't already) and cannot use that information. You should delete the received email and immediately inform the person who sent it of the said mistake, so that they can take the necessary steps to correct the situation (if still possible) and prevent it from happening again.

Please refer to the **Employee Personal Data Protection Policy** at:

<https://intranet.tap.pt/politicas>

Please refer to the **Privacy Policy** on the [FlyTAP](#) and/or on the [UCS](#) website.

Share your concerns

In case you have an issue related to Personal Data Protection, talk to the Data Protection Officer of the Group TAP, Human Resources department or report the situation through **Whistleblowing Channel** for assistance and guidance.

Our Assets and Third Party Assets

Social Media

Social media plays a relevant role in our relationship with our customers, partners, and Employees. In order to leverage the use of these channels, it is essential that we all contribute to their correct usage. Some Companies of the TAP Group is present on social media, including Facebook, LinkedIn, Instagram, and YouTube.

Social media encompasses all platforms for communication and sharing information via the Internet, including newspapers, websites, messaging platform groups, and personal blogs.

Employees of TAP Group who use these or other social media platforms should adhere to the following principles that should govern their conduct and interactions on these social networks:

- **Confidentiality and Accuracy:** It is the responsibility of all Employee to protect the company's information. Commercial information, technologies, ideas, financial data, marketing strategies and prices, business plans, among others, are fundamental assets, and protecting this information and its confidential nature is part of each individual's ethical duties. Confidentiality and secrecy are inherent in their employment relationship, even on social media. Employees should not share false or misleading information, prioritizing accuracy and always respecting copyright;
- **Kindness:** When identified with TAP Group, Employee should always be kind and courteous, regardless of the medium.
- **Diplomacy:** Diplomacy is a golden rule of social media. Criticizing competitors, TAP Group companies, or any employee on social media is never acceptable. Employees should refrain from participating in discussions related to the company on social media, even if they have a strong opinion or firsthand knowledge of the matter.

- **Security:** Any disclosure of details (including photos or videos) of restricted areas of the company is not allowed. This includes, but is not limited to, interiors of aircraft, hangars or other maintenance areas, passenger areas, cockpit, baggage areas, among others, unless duly authorized.
- **Ambassadorship:** All Employee are ambassadors of the company. When posting something online, even in an individual capacity, they have an increased responsibility because they are identified as Employee. Therefore, they should refrain from publishing and/or sharing information that may harm the company's image. The image they convey – and consequently, the company's image – should always be positive.

Employees cannot use social media on company equipment and/or let them interfere with professional responsibilities, except in cases where the employee's role involves managing the company's social media. For the official response to questions about TAP Group companies on social media, there is a dedicated and qualified team.

If Employee wish to intervene or provide additional information on this matter, please contact socialmedia@tap.pt.

Interventions on social media not only do not bind or directly hold the company responsible but can, if offensive to the company or its Employee, constitute a practice susceptible to disciplinary proceedings under contractual and legal terms.

In addition to the principles mentioned above, when using the internet and social media, Employee must respect the other principles and rules outlined in this Code, the provisions of other Internal Rules, and applicable legislation.

» Our Assets and Third Party Assets

Practical example:

A: Can I mention the activities I perform at the Company on social media?

R: Employee are allowed to share on social media the position they hold in the Company, as well as the activities they engage in, as long as it is in strict adherence to truth, accuracy, and with respect for the confidentiality of the Company's information, of the Employee, of our clients, suppliers, service providers, and other business partners. Additionally, it is important to remember that, unless previously and duly authorized for that purpose, no employee should speak on behalf of TAP Group or represent it on social media.

Share your concerns

In case you have an issue related to Social Media, talk to your leadership, Corporate Communication & External Relations or the Legal Compliance department, or report the situation through **Whistleblowing Channel** for assistance and guidance.

➤ Sustainability

Environment

TAP Group recognizes the importance of Sustainability as a cross-cutting axis to its performance and competitive position in the market, defining its lines of action with a focus on efficient management of natural and social resources.

Thus, TAP Group embraces the following guiding principles:

- Develop its activities sustainably, aligned with the main strategic objectives established in the short and medium term;
- Promote stakeholder engagement to ensure that initiatives developed are aligned with the expectations and concerns of all interested parties;
- Promote continuous improvement of its environmental performance, ensuring the financial resilience of the business;
- Ensure the management and optimization of the fleet, promoting energy efficiency and reducing greenhouse gas emissions;
- Foster a culture of sustainability within the Group.

Practical example:

A: As a TAP Group employee, what actions can I take to assist TAP Group in its environmental awareness initiatives?

R: As examples of measures we can adopt to assist TAP Group in promoting environmental awareness initiatives, we have: (i) avoid printing, but if absolutely necessary, opt for double-sided and black and white printing, (ii) turn off lights when leaving a room, (iii) separate waste and dispose of it in the appropriate containers, and (iv) whenever possible, refrain from using air conditioning.

Share your concerns

In case you have an issue related to Environment or Social Responsibility, talk to **Sustainability department** for assistance and guidance.

Social responsibility

The social responsibility of the TAP Group is aligned with fulfilling its commitment to the planet and society, seeking to generate added value for workers, customers, and stakeholders simultaneously.

Therefore, the TAP Group adopts the following guiding principles:

- Promote initiatives that develop social responsibility, both internally and externally.
- Participate, directly or indirectly, in social intervention projects, ensuring one of the relevant strategic pillars for the Company.
- Respond appropriately to critical events, whether humanitarian, health-related, or economic in nature.
- Provide its expertise in community projects, including through volunteer activities.
- Develop initiatives in line with the principles of the circular economy, benefiting the communities it serves and aiming to make the TAP Group more environmentally and socially sustainable.

To ensure that these actions are carried out transparently and aimed at supporting legitimate initiatives, we must ensure that the TAP Group's internal rules on the subject are fully observed.

Practical example:

A: A non-profit organization proposes to TAP the donation of miles from TAP Miles&Go customers to support a project not included in the scope of the TAP Donate Miles Program, requesting that the miles in question be credited to the individual TAP Miles&Go accounts of the institution's board members. What should I do?

R: The donation of miles from TAP Miles&Go customers is made exclusively to the account of partner entities of the TAP Donate Miles Program and in accordance with the terms and conditions of that program. In any circumstance, the crediting of miles to individual TAP Miles&Go accounts of the board members of TAP's partner entities should be refused.

Share your concerns

In case you have an issue related to Environment or Social Responsibility, talk to **Sustainability department** for assistance and guidance.

➤ **Specific Provisions applicable to UCS**



Specific Provisions applicable to UCS

Introduction

UCS – Cuidados Integrados de Saúde, S.A. ("UCS"), as a Company within the TAP Group, is obliged to comply with the Group's Code of Ethics and Conduct, with its Employees being bound to strict adherence to all principles and rules defined herein. However, considering the specificities of UCS's activity as a healthcare service provider, it is necessary to include in this Code of Ethics and Conduct the objectives, fundamental values, and specific duties related to the activity of healthcare services, which the Employees of this Company must also observe.

Therefore, in this Chapter, the objectives, fundamental values, and specific duties related to the activity of healthcare services are defined, which are applicable to all UCS Employees, whether permanently or temporarily linked to the Company, regardless of their contractual relationship or hierarchical position, without prejudice to other rules that professionals may be required to comply with by virtue of their duties. This Chapter also applies to trainees, students, and interns of UCS.

Objectives and Fundamental Values

Customer Satisfaction

Putting the customer first at all times, prioritizing responsiveness to their needs and expectations, offering differentiated and quality services.

Efficiency and Competence

Developing skills to act in accordance with best practices, identifying key success and sustainability factors, setting goals and indicators, evaluating results, and implementing improvements.

Safety

Promoting awareness and control of factors that may jeopardize the safety of employees and customers, either individually or within the context of client company operations.

Team Spirit

Enhancing individual commitment to teamwork to achieve the goals set by the Company and improve Employee satisfaction.

Specific Provisions applicable to UCS

Professional Competence

UCS Employees should seek to continuously develop and update their knowledge and skills to ensure the highest quality of services provided.

The quality of services provided by UCS and efficiency in performing their duties should, alongside the effectiveness of care provided, be one of the main objectives of its employees.

UCS Employees should demonstrate competent, correct, and highly professional behavior in all circumstances in pursuit of continuous improvement.

Individual responsibility of the professional and the team

UCS Employees must adopt responsible conduct that reflects positively on both themselves and UCS. They should exercise restraint, civility, and discretion, and prevent actions that may tarnish or compromise the good reputation of the company.

Employees must fulfill their obligations in a responsible and diligent manner, striving for accuracy, technical support, and performance excellence.

In cases where responsibility for a procedure or process should be assumed by a group or team rather than an individual employee, this should be stipulated in the operating rules (clinical standards) and be known to all team members.

The essentials of all preventive, diagnostic, or treatment procedures must be documented, with identification of the employee or group, as appropriate.

Autonomy of decisions of the client/patient, properly informed

The relationship of the healthcare professional with clients is subject to the standard of informed consent, in accordance with legal provisions and guidelines issued by the DGS.

In all interactions with the client, the healthcare professional must always be mindful of the need to inform them about the recommended clinical actions, using appropriate and clear language.

Respect for life and the dignity of the human person

Respect for life and the dignity of the human person are fundamental principles for all employees involved in the process of providing healthcare, both in technical aspects and in acts of welcoming, guiding, and directing clients.

Impartiality and neutrality

UCS Employees must be impartial in their judgments and opinions and independent of political, economic, or religious interests in their decisions.

Specific Provisions applicable to UCS

Integrity

UCS Employees must conduct their activities according to criteria of personal honesty and integrity of character, transparency, loyalty, rigor, and good faith, refraining from creating or maintaining situations of favoritism or irregularities in any form. In the course of their professional activities, all their actions and operations must be guided by compliance with these requirements in the information they use, and by the clarity and truthfulness of supporting documents.

Corruption in all its active and passive forms, whether through acts and omissions or through the creation and maintenance of favorable or irregular situations, is strictly prohibited.

UCS Employees commit to not engaging in any external professional activity that interferes with the activity they carry out at UCS.

Practical example:

A: A doctor serving UCS is visited by a representative from a pharmaceutical company who offers him a scholarship to the Medical School of Zanzibar. Can the doctor accept this offer?

R: No. The doctor should consult the Code of Ethics for Physicians issued by the Medical Association, which defines the rules for relationships with the pharmaceutical industry and others. As a general rule, the doctor cannot request or accept offers of any kind from the pharmaceutical industry or other suppliers of medical equipment. However, this Code includes some exceptions, such as offers that have no intrinsic value; scientific and technical reference books; information for educational purposes; and funding for participation in internships, conferences, and scientific meetings, provided that, among other requirements, they are accredited by the Medical Association. This Code also determines that doctors may accept scholarships or scientific awards, provided they are publicly awarded by an independent jury of recognized integrity.

Share your concerns

In case you have an ethical or regulatory issue, talk to your leadership, the **Legal Compliance department of Group TAP** or consult the **Technical and Pedagogical Council of UCS** (Conselho Técnico e Pedagógico da UCS) for assistance and guidance.

Safety

The safety of Employees and customers is a top priority of the Company. All Employees must be familiar with and comply with occupational health and safety regulations, as well as report any observed non-conformities.

The clinical safety of customers/patients is a paramount value to be observed by all Employees, in which they must be committed and contribute to the adoption of safe practices and a safety culture in accordance with the UCS Patient Safety Policy.

Please refer to **UCS Patient/Client Safety Policy** at:

<https://campus-ucs.tap.pt/Qualidade/PoliticaSeguranca>

Specific Provisions applicable to UCS

Occupational Health

Occupational health professionals should not access personal information of workers that is not relevant to the protection of their own health in the workplace.

The results of health surveillance examinations should be communicated to and explained to the worker, as well as their fitness for work.

The results of workers' medical examinations will be communicated to the client company exclusively in terms of their ability to perform the specific job function, through the Medical Fitness Record, which may include recommendations for limitations on the performance of the job. In this case, a proposal for adapting tasks and working conditions to the worker's capabilities and limitations may be developed.

In cases where the worker's health status and the nature of the work pose a danger to the safety of others, the worker must be clearly informed of this. In particularly hazardous circumstances, the applicable procedures for each situation should be initiated.

Aggregate health data and information about the workforce, provided that individual identification is ensured to be impossible, may be provided to employing companies for the purpose of assisting them in their obligations regarding the protection of workers' health and safety.

Work-related accidents and illnesses must be reported to the competent authorities in accordance with applicable national legislation.

Share your concerns

In case you have an ethical or regulatory issue, talk to your leadership, the **Legal Compliance department of Group TAP** or consult the **Technical and Pedagogical Council of UCS** (Conselho Técnico e Pedagógico da UCS) for assistance and guidance.

Aeronautical Medical Certification

UCS Employees involved in the regulatory aeronautical medical certification process must be properly identified with the relevant authority, respecting the confidentiality and secrecy of data in all certification procedures, including regulatory interaction with applicable licensing authorities, as also advocated in aeronautical regulations. They must ensure that all candidates for the certification process have previously authorized the circulation of their personal data as required by regulations. They should not access information about candidates that is not relevant to the regulatory certification process.

Specific Provisions applicable to UCS

Professional Secrecy

All UCS Employees are bound by the ethical duty that prohibits the disclosure of clinical and personal information in order to ensure clients' right to privacy and compliance with the duty not to disclose or use information about facts and individuals, except with their express authorization or in cases provided for by law.

They are also required to adequately safeguard and archive clinical information in order to ensure its use only by duly authorized persons, complying with the strictest legal standards and guidelines of competent entities regarding the protection of personal data in accessing, managing, and processing clinical information.

In accordance with current legislation on professional secrecy, all healthcare professionals and others who, through their functions and in their relationship with clients/patients, have access to their personal information, whether clinical or otherwise, must ensure its strict confidentiality.

They should also not access this information outside the strict scope of the purposes of their functions and, more specifically, of the specific service they are providing at any given time.

Healthcare professionals may use existing clinical records for scientific publications, provided they are collective, non-identifiable data and within the current assumptions of medical and scientific ethics. In the case of case reports or other similar works involving individualized data, the identification of subjects (patients/users) should not be included, and prior authorization from the individuals specifically for the intended purposes should be obtained. In either case, prior favorable approval of the research protocol (or equivalent) by the Technical and Pedagogical Council of UCS must be obtained.

The duty of professional secrecy incumbent upon UCS Employees does not cease with the termination of functions or services rendered.

➤ Final Considerations



What happens if we violate the Code and/or other Internal Rules of the TAP Group?

Violation of the principles and rules set forth in this Code or any other Internal Rules of the TAP Group may constitute a disciplinary offense and/or criminal offense, punishable, under the law, with disciplinary and/or criminal proceedings against the offending Employee.

Specifically, depending on the seriousness of the infraction(s) and the culpability of the offending Employee, the following disciplinary sanctions may apply: (i) warning; (ii) recorded warning; (iii) pecuniary penalty; (iv) loss of vacation days; (v) suspension from work with loss of pay and seniority; (vi) dismissal without compensation.

Regarding criminal liability for the commission of corruption and related crimes, the offending Employee may be subject to imprisonment from 1 month to 16 years, fines ranging from 10 to 600 days (€ 50,00 to € 300.000,00), or prohibition from holding certain positions.

Additionally, the TAP Group, for the commission of such crimes by its Employees, may also be subject to fines ranging from 10 to 1920 days (€ 1.000,00 to € 19.200.000,00) or dissolution penalties, as well as ancillary penalties, including prohibition of certain activities, prohibition from entering into certain contracts, or publication of the convicting decision.

In case of damages to the TAP Group resulting from such violation, the offending Employee will also be civilly liable for the damages caused.

In the case of an Employee external to the TAP Group, their actions, in addition to being subject to civil and/or criminal liability, may result in the termination of the contractual relationship that they or the company to which they belong have with TAP Group Companies.

Violation includes, among other things and without limitation:

- Acting contrary to what is stipulated in this Code and/or other Internal Rules of the TAP Group;
- Soliciting or encouraging others to engage in conduct that violates the Code and/or other Internal Rules of the TAP Group; and
- Sanctioning or harming those who have reported a potential or actual breach of this Code and/or other Internal Rules of the TAP Group.

Final Considerations

Approval, Publication, and Effectiveness

This Code was approved by the Board of Directors of Transportes Aéreos Portugueses, S.A., Siavilo-SGPS, S.A., Portugalá – Companhia Portuguesa de Transportes Aéreos, S.A., TAPGER – Sociedade de Gestão e Serviços, S.A., and TAP Logistics Solutions, S.A. on December 19, 2023, and by UCS – Cuidados Integrados de Saúde, S.A. on December 20, 2023. It enters into force upon its publication on the Internet and Intranet.

Useful Links

Websites

TAP: <https://www.tapairportugal.com>

UCS: <https://www.ucs.pt>

PGA: <https://www.portugalia-airlines.pt>

Code of Ethics and Conduct

Intranet: https://intranet.tap.pt/politicas_en

FlyTAP: <https://www.tapairportugal.com/pt/sobre-nos/manuais>

UCS: https://firebasestorage.googleapis.com/v0/b/whistleon-eu.appspot.com/o/4dba091a-5df6-42bb-aa24-83ff24101cc4%2Fdocuments%2FC%C3%B3digo%20de%20C%C3%89tica%20e%20Conduta_fev.2025_PT%20-%202025-02-10T11%3A10%3A12.542Z?alt=media&token=98a0ce5f-beab-41a3-8714-febea028919c&lang=pt-PT

Rules, policies, procedures, and internal regulations of TAP Group Companies

<https://intranet.tap.pt/politicas>

PGA Intranet

<https://campus-pga.tap.pt>

UCS Intranet

<https://campus-ucs.tap.pt/>

Whistleblowing Channel

Transportes Aéreos Portugueses, S.A.: <https://channel.whistleon.com/tapairportugal>

Portugalá Companhia Portuguesa de Transportes Aéreos Portugueses, S.A.: <https://channel.whistleon.com/portugalia>

UCS - Cuidados Integrados de Saúde, S.A.: <https://channel.whistleon.com/ucs>



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1	19.12.2024
1.1	28.02.2024
1.2	10.02.2025
1.3	16.05.2025

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