



Welcome
to a family of dreams,
principles, means and
endless innovations.

# Code of Ethics and Conduct

DOCUMENT HISTORY		
Date	Edition	Description / Modifications
		This document replaces the code MAN 002 RHU   EDITION 02   2024/02/26.
2025/04/23	00	Overall review of the code to include the entire group, namely Fundação
		Mendes Gonçalves (Foundation Mendes Gonçalves).





May the non-conformists, the restless, those who want to challenge themselves and learn to live in fullness with their happiness, come in.

We are Fundação Mendes Gonçalves and Casa MG, committed to our *stakeholders*. We assume our role in the Food Industry and in the foundational sector with integrity and transparency. We believe that this is the only way for us to achieve our commitments: ethics, transparency, dialogue and respect for our *stakeholders*, for the well-being, for the personal and professional development of our teams, and for the satisfaction of those we serve. To these commitments we combine innovation, creativity and the will to make progress every day.

We fully subscribe to the Declaration of Human Rights, and if something is not in compliance or with any applicable legal provision, we ask you to report through the Whistleblowing Channel available at https://integridade.casamg.pt/

We count on the whole family and on our *stakeholders*, so that together, we can enforce this Code of Ethics and Conduct that we share here.





# We are a Foundation of values, for the future of all

We always act according to our values, with the energy that moves us and with our very own way of doing things. We want these to be the values of all those who "live" alongside us:

### **Family**

We were born from the unbreakable bond between our founder, Carlos Mendes Gonçalves, Casa MG and the community of Golegã. A relationship based on proximity, trust and care for this big family of ours and with the desire to make it grow, around the world.

#### **Restlessness**

We are defined by the restless attitude of those who dare to dream of infinite possibilities, respond to challenges and tirelessly seek new actions and collaborations for the future of all.

### **Empowerment**

We seek to contribute to transforming lives in a positive and sustainable way. We create opportunities, promote solutions and seek to empower people and the community to build a future of well-being, individual and collective.

### **Equity**

We believe in equity and ensuring opportunities for all, from the first 1000 days and throughout the entire life cycle. We want, therefore, to plant seeds of equity in Golegã and beyond.

### Innovation

We want to innovate and do things differently, transforming new ideas and transferring scientific knowledge to actions that promote well-being and development. We study, document and share practices, we come together and inspire.

### **Transparency**

We act with responsibility, integrity and transparency, seeking to go beyond legal obligations and sharing every step of our way to cultivate and strengthen trustworthiness in our practices and, from them, in the practices of others.

#### Legacy

We honour and wish to carry our founder's vision far, promoting values, regenerating and nurturing futures in our community and in the World. A future for all is and will be our legacy for those who will follow us.





### **Our Mission:**

Nurturing Futures to Regenerate Legacies.

### What moves us:

### Educating, with quality, changes the World

Caring for the beginning of life is caring for all life - and building a future for all.

### Nourishing is more than feeding

It is an essential part of living a full life and a source of flourishing and well-being.

### Regenerating is possible

Towards more inclusive and sustainable ways of production and consumption, which develop ecosystems and preserve the Planet.

## Our way of doing / approach to change:

### **Proximity Philanthropy**

Act locally, collaborate and inspire globally.

### **Co-creation**

Promote and contribute to strategic alliances and empower communities.

### **Evidence and Impact**

Obtain scientific validation and monitor and evaluate impact.

### **Literacy and Knowledge Transfer**

Make knowledge accessible and multiply/scale it.

### **Advocacy and communication**

Influence public policies and disseminate good practices.





# We are a House of values with a family that we value

We always act according to our values, with the energy that moves us and with our very own way of doing things. We want these to be the values of all those who "live" alongside us:

### **Ethics of care**

We take care of each other, laugh, cry, agree and disagree, but always with an unbreakable bond of trust.

### **Humbleness**

We act with simplicity. Each person takes responsibilities, without arrogance, presumptuousness or vanity.

### **Curiosity**

We listen with curiosity, we question and we are questioned. We foster curiosity as a discipline and learn from everything and everyone.

#### Restlessness

We look for new things and solve challenges. We have a restless attitude, with which we look at the infinite possibilities.

### **Our Mission:**

To be a reference in the food of the Future, with rigor and high standards, positively impacting our people, society and the environment.



### What moves us:

### **Impossible**

The everything and the nothing - nothing is impossible, everything is possible.

### Industrial soul, house of brands

We have the courage to take risks, to enter new businesses, to create new brands, knowing that our capacity for innovation, differentiation and achievement will always take us further.

### **Syntropy**

Our people, brands and processes are "positively" interconnected, growing together towards the same goal.

## Our way of doing things:

### **Tailor made**

It is Casa MG's way of doing: the unique ability to solve with flexibility, innovation and happiness.

### **Complicity**

The complicit proximity and work in cooperation with all partners (customers and suppliers), where every opportunity is a "yes".

### Happynovation

Happy employees, customers and suppliers, innovating.





## What is the code of ethics and conduct?

It is a document that defines our values, our norms and our standards of ethical behaviour.

## Who is it for?

To all employees of Fundação Mendes Gonçalves and all entities of Casa MG (Holders of the Governing Bodies and Departments, and people at the service of both under employment contracts, internship contracts or of any other nature) and all theirs stakeholders (Partners, Customers and Beneficiaries, Suppliers and Service Providers, and Funders).

# Where does it apply?

In all jurisdictions in which Fundação Mendes Gonçalves and Casa MG carry out their activity, including all jurisdictions in which their operations, branches, subsidiaries and any other entity under their control or with which they maintain business relations are located.





# Principles of the Code of Ethics and Conduct

We strive to create a healthy and safe environment, one that promotes the well-being of all our people and the achievement of our goals. To maintain and continuously improve the work environment, we are committed to providing a workplace that is:

- Safe, healthy and free from harassment or discrimination.
- Fair, transparent and equitable.
- Open ino seeking information from the team for suggestions and improvement.
- Promotes teamwork, commitment and mutual respect.
- Encourages care, diligence and professionalism towards others and towards work.



### To ensure safety and health at work

Guarantee employees a safe and healthy work environment that enables a high level of well-being.

Take appropriate measures to prevent accidents and damage to their health, minimizing the causes of danger and risk inherent to the work environment.



### To ensure dignity at work

Reject slavery and human trafficking in all forms. Reject forced, and/or involuntary labour and any form of child labour. Act ethically and with integrity and transparency in all our activities. Implement effective systems and controls to protect against any form of modern slavery occurring within the organisation or value chains.



### To create a safe and inclusive environment

Prevent any discrimination in labour, institutional or commercial relations, particularly in terms of remuneration, opportunities for personal and professional development based on: ethnic origin, social class, nationality, religion, physical or mental disability, gender, age, sexual orientation, union membership or political affiliation.



### To ensure safeguarding of all employees

Ensure that everyone can work free from discrimination, bullying and sexual or other harassment. Prohibit any form of sexual harassment, whether it takes place on or off our premises, including at social events, work trips, trainings or conferences organised or sponsored by us.







### To ensure fair treatment

Do not support the use of corporal punishment, mental or physical coercion and verbal abuse. Promote respect for the human condition in the organisational culture.

Promote cordial conduct and correct relationships among all employees and between them and our stakeholders.



### To ensure respect for freedom of association

Respect the right of employees to associate or unionise, with this right not resulting in any prejudice or different treatment.



### To guarantee fair remuneration

Agree on remuneration with employees, guaranteeing at least the national minimum wage or that defined by the salary table of the Collective Labour Agreement. Do not deduct wages from employees without prior disciplinary support or adequate legal basis.



### To fight corruption and money laundering

Do not accept or propose to third parties any benefits that may give rise to any expectation of favouritism in relations with the Fundação Mendes Gonçalves and Casa MG. Do not participate in any behaviour of corruption, fraud or bribery. Offerings that exceed courtesy or symbolic value should be declined.

Comply, in the case of the Fundação Mendes Gonçalves, with all legal obligations applicable to the prevention of money laundering and terrorist financing, including the specific duties of non-profit organisations.



### To ensure respect for the environment

Encourage environmental awareness through responsible and sustainable management of resources, namely water, energy and materials, waste reduction, circular economy, fighting climate change, decarbonization and regeneration. Assessing, minimising and managing the environmental impact of organisations' activities and facilities.

Ensure the dissemination of this code among employees and with stakeholders.

### To prevent conflict of interest

Avoid situations that could lead to conflicts of interest.

Do not perform any functions outside the organisation, whenever such activities compromise the duties as an employee or conflict with organisations's interests. Always act in the best interest of organisations.





### To ensure confidentiality

Make a commitment of loyalty to Fundação Mendes Gonçalves and Casa MG, safeguarding their good image and credibility.

Employees, even after leaving their functions in the organisations, are subject to professional secrecy, particularly in matters that, due to their objective importance, by internal decision or by force of law, should not be common knowledge.



### To ensure data protection

Comply with current legislation regarding the processing of the data of employees and all stakeholders.



### To prevent disclosure of internal information

Do not disclose relevant information on social networks or other media that may harm or interfere with the rights of the organisations, their employees and other stakeholders. Do not disclose information on our own initiative or at the request of the media without prior authorisation from the Administration.



### To ensure property protection

Ensure the promotion and protection of property rights. Protect the intellectual property of Fundação Mendes Gonçalves and Casa MG against plagiarism and theft, through national registration in an entity accredited for this purpose.



### To ensure heritage protection

It is the duty of all employees of Fundação Mendes Gonçalves and Casa MG to protect the assets of the organisations, preserving the facilities and equipment made available.

Behaviours or actions that jeopardize the organisations's property and assets, such as stealing, damaging or negligent misuse, will not be allowed.



### To ensure good governance and transparency at the Foundation

Assume, especially with regard to Fundação Mendes Gonçalves, a commitment to guarantee the good management of the funds entrusted to it (through, in particular, the voluntary application of the public procurement regime), as well as the participation in internal decision-making of the various stakeholders (with transparency, impartiality and without abuse of powers), while also guaranteeing transparency in the rendering of accounts and disclosure of financial information.





## Our partners,

that we always welcome with open arms, the authorities, with whom we collaborate, and the competitors, whom we respect in the market.

### **Clients and Beneficiaries**

Fundação Mendes Gonçalves and Casa MG and their employees have a duty to treat their customers and/or beneficiaries with professionalism, with the aim of providing a safe and quality product and/or service, in accordance with their expectations.

### Suppliers and service providers

Fundação Mendes Gonçalves and Casa MG understand that their suppliers and service providers should share their vision regarding ethical standards. The selection of suppliers and service providers is carried out based on safety and product/service quality criteria, but also on ethical and social criteria.

We require our suppliers and service providers to comply with the legislation in force and to commit to this Code of Ethics and Conduct.

## Regulators and public authorities

Fundação Mendes Gonçalves and Casa MG recognize the importance of acting in a transparent manner, always observing the legal and regulatory rules that regulate their activity and the principles established in this Code of Ethics and Conduct, when interacting with regulators and public authorities in the exercise of their activity.

We guarantee the provision of all necessary clarifications and the presentation of the documents requested by these entities.

### **Companies competing with Casa MG**

Casa MG and its employees respect and favour the existence of fair and healthy competition. We are always cordial and cooperative with our competitors, in the national and international market in which we operate.

Casa MG and its employees refrain from any allusions that jeopardize the good name of its competitors, and do not issue any comments, including in any media channels, public or private, that aim or have the consequence of denigrating the image of Casa MG or its competitors.





### **Foundation Funders**

Fundação Mendes Gonçalves understands that its Funders should share its vision regarding ethical standards, just as the Foundation undertakes to respect those of its Funders.

We require that all those who contribute funds to the Fundação Mendes Gonçalves refrain from the practice of acts or allusions that harm the good name or values of Fundação Mendes Gonçalves and Casa MG, and, whenever applicable, respect and apply the fundamental values promoted by us.





# Prevention of corruption and related offenses

Fundação Mendes Gonçalves and Casa MG, in line with the National Anti-Corruption Strategy 2020-2024 and in compliance with the General Scheme for the Prevention of Corruption, have approved a Compliance Program (PCN) and are committed to combating corruption crimes and related offenses, as defined in the Law and described in their Plan for the Prevention of Risks of Corruption and Related Offenses (PPR).

The PCN of Fundação Mendes Gonçalves and Casa MG is composed of this Code, the aforementioned PPR, a Training Plan in this matter, the Whistleblowing Channel, the appointment of Compliance Officer(s) (RCN), the Corruption Prevention Manual and an Evaluation and Control System of their compliance.

Fundação Mendes Gonçalves and Casa MG identify the following as best practices to be adopted by their employees in the fight against these crimes:

Not offering, giving, promising to give or receiving values, gifts, hospitality or other types of benefits, directly or indirectly through third parties, with the intention of obtaining an undue commercial advantage for Fundação Mendes Gonçalves and/or for Casa MG.

Fundação Mendes Gonçalves and Casa MG admit that values, gifts, hospitality or other types of benefits may be received by employees that are in accordance with the uses and customs and that do not exceed EUR 200 (two hundred euros), per person. Gifts, hospitality or other types of benefits of superior value or different nature may exceptionally be accepted or offered with the authorization of the RCN(s), which will consider the specific circumstances, customs or different cultures in which the refusal to receive it may be considered offensive or inappropriate.

Fundação Mendes Gonçalves and Casa MG are permitted to make non-monetary gifts to their activity partners in order to strengthen institutional and commercial relations, such as invitations to events of an institutional / commercial nature, organized by themselves or by third parties, with the aim of aligning institutional / commercial strategies, launching products and promoting Fundação Mendes Gonçalves and Casa MG. Fundação Mendes Gonçalves and Casa MG do not allow contributions to political parties.

Any offer or acceptance must be communicated to the RCN(s). In the event of any doubt, the RCN(s) should be consulted.





# Avoid, by all means, any situations that might lead to conflicts of interest between themselves and Fundação Mendes Gonçalves and/or Casa MG.

A conflict of interest occurs whenever an employee's personal or private interest in a given matter, interferes, or is likely to interfere, with the duties of loyalty, impartiality, equality and integrity that should guide the exercise of their duties at Fundação Mendes Gonçalves and Casa MG. For the purposes of the previous point, personal or private interest is understood to be any advantage, whether or not pecuniary, even if merely potential, for the employee and/or his/her relatives or other persons related to him/her.

The employees of Fundação Mendes Gonçalves and Casa MG cannot represent it, participate in or influence decision-making when, directly or indirectly, they have a personal interest in the matter.

If it is not possible to avoid the occurrence of a conflict of interest, this must be reported promptly to the RCN(s).

### Ensure careful recruitment and selection processes, free of external influences.

Fundação Mendes Gonçalves and Casa MG strive to ensure that, during the recruitment and selection process, the principle of equality is respected, insofar as applications are evaluated based on universal criteria within the same vacancy and hiring results from a merit-based decision, free from undue influence or conflict of interest. In this sense, the selection process is designed to make it possible to check that the application matches the personal and technical characteristics required for the position, including professional experience and qualification.

### Avoid using any property, equipment, tools or facilities for unauthorized purposes.

Any assets, equipment, tools or facilities (including IT-related) allocated to the activity of employees at Fundação Mendes Gonçalves and Casa MG must be limited to the performance and exercise of the activity, under the legal and contractual terms in force, observing the appropriate and applicable rules of use and maintenance according to the respective context and technical requirements.

Employees must ensure and refrain from any action that constitutes or may lead to the use of assets and equipment for unlawful, unauthorizes or improper use or access by themselves or third parties, loss or damage, whether directly or indirectly, related to their activity.





Not taking advantage of commercial relationships, business opportunities or confidential information, for one's own benefit or that of third parties.

Fundação Mendes Gonçalves and Casa MG promote an organisational culture of respect, loyalty, cooperation, trust, transparency and integrity, prohibiting their employees from:

- taking advantage of inside information acquired in the context of commercial relations in which they intervene during their duties;
- disclosing confidential information obtained through their work, including knowhow, intellectual property, and other intangible assets owned by them or third parties;
- promoting, facilitating, participating in or concealing any type of money laundering operation;
- intermediating the payment of undue amounts or advantages, including those relating to clients, public officials or persons related to them.





# Implementation of the code of ethics and conduct

The Administration is responsible for approving this Code of Ethics and Conduct, as well as the other Policies and Procedures of Fundação Mendes Gonçalves and Casa MG, ensuring the existence of means of disseminating this Code of Ethics and Conduct to whom it is addressed and verifying the existence of internal mechanisms for reporting irregularities, ensuring that they comply with the legal standards regarding confidentiality, treatment of personal data and information and banish any retaliation against participants.

The Administration must also ensure the necessary procedures are in place to respond to questions posed by employees, partners or third parties through the Whistleblowing Channel, available at <a href="https://integridade.casamg.pt/">https://integridade.casamg.pt/</a>.

### **Compliance verification**

Fundação Mendes Gonçalves and Casa MG and their Compliance Officer (s) assume legal compliance with the principles of this Code of Ethics and Conduct in order to provide greater protection to their employees. They authorise their customers and/or beneficiaries, or third parties on their behalf, to monitor compliance with this code.

This Code of Ethics and Conduct will be reviewed every 3 years or whenever there are changes to the organisational structure, legislative and regulatory changes or occurrences that justify it.





# Disciplinary and criminal consequences of non-compliance

The violation of the rules provided for in this Code by employees is an infraction punishable under the applicable disciplinary regime if verified in a labour context, without prejudice to the civil, administrative or criminal liability that may result before Fundação Mendes Gonçalves, Casa MG or third parties.

Any violation of the duties provided for in this Code by an employee of Fundação Mendes Gonçalves and Casa MG will be punished, in the exercise of disciplinary power, according to the seriousness of the violation, the degree of culpability of the offender and the consequences of the act. The disciplinary sanction to be applied will therefore be graded on a case-by-case basis and as a result of disciplinary proceedings conducted in accordance with the applicable legislation and regulations, corresponding, in order of severity, to one of the following sanctions:

- Reprimand;
- Recorded reprimand;
- Financial penalty;
- Loss of vacation days:
- Suspension of work with loss of remuneration and seniority;
- Dismissal without indemnity or compensation.

The violation of the rules contained in this Code may also give rise to the determination of criminal liability, as a result of the practice of crimes of corruption and related offenses, which are intended to be prevented with the adoption of this Code and the implemented PCN, which are punished under the terms of the law with imprisonment and/or fine.