

inapa

Code of Conduct

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I – Preamble

A transparent and socially responsible relationship between a company and its stakeholders should be based on a set of principles, since principles always stand higher than contractually established rules.

Having approved these “Principles”, Inapa wishes to convey its values as a Group that conducts business in the paper merchanting sector.

Furthermore, the Group also wishes to lay down a set of principles which it expects shall be followed by all its employees, customers, and suppliers.

In this regard, it should not be forgotten that Inapa deals with many customers and suppliers and not all of them are Portuguese. Inapa’s customers and suppliers are subject to many different laws, customs and traditions.

This diversity in the cultural and legal background of Inapa naturally arises from the fact that Inapa is represented in a number markets. Therefore the respect by a set of principles of conduct as a means of abstaining from practices that might counteract the very *raison-d’être* of the diversity it upholds, is very important.

Nevertheless, Inapa considers that certain principles are fundamental and hence it expects and believes that all its stakeholders will respect such principles and promote them, and that they will also apply them to their companies and in all their business dealings.

II – PRINCIPLES OF CONDUCT

1. HUMAN RIGHTS

Inapa and its subsidiaries undertake to:

- **Support and respect the protection of internationally proclaimed human rights;** and
- **Ensure that it is not a party to any violation of the aforementioned human rights.**

2. LABOUR LEGISLATION

Inapa and its subsidiaries uphold:

- **The freedom of association and the recognition of the right to collective bargaining;**
- **The elimination of all forms of forced and compulsory labour;**
- **The effective abolition of child labour;** and
- **The elimination of discriminatory practices** in respect to employment and occupation.

3. Environment

Inapa and its subsidiaries:

- **Uphold a preventive approach to environmental challenges;**
- **Undertake and promote initiatives to greater environmental responsibility;** and
- **Encourage the development and diffusion of environmentally friendly technologies.**

4. Anti- corruption

In the pursuit of its statutory business purposes, Inapa and its subsidiaries shall:

- **Implement all necessary measures to work against all and any form of corruption, including extortion and bribery.**

III - ETHICAL OBLIGATIONS

In the pursuit of their mission, Inapa and its subsidiaries will continue to uphold the dignity of its employees, the social market economy, and corporate excellence by endorsing and implementing practices that conform to the following guidelines:

1. DIGNITY AT WORK

- **Define clear strategic guidelines** in order to thereby abstain from constraining the legitimate expectations of its employees and of all other stakeholders.
- **Adequately and truthfully inform its staff on the Company's developments** and thereby promoting employee involvement in the Company's business in accordance with each staff member's abilities, while maintain a loyal relationship with the staff's representative bodies, if any.
- **Respecting and empowering each employee in their drive to fulfil his or her personal life goals** with particular focus on the staff's family life, while striving to foster the Company's role as a driver for the strengthening of Family as a core element of society and of each individual's personal development – both in terms of skills and of human development.
- **Offering its employees terms of employment** that respect the local labour legislation, dignity, occupational health and safety of the employees, while afford training opportunities to acquire and develop their professional skills and abilities.
- Recruiting employees and following up on each employee's career advancement as a function of the adequacy for the Company projects while **avoid discriminatory practices.**
- **Establish fair remuneration packages** as a function of the performance of the economy, the Company's real capability to afford to pay for the services rendered, and the individual merit and specificity of the duties of each employee.

2. SOCIAL MARKET ECONOMY

2.1. Market economy

- **Respect the legislation of each country where the Group operates.**
- **Respect the sound principles of market economics** in its procurement, sales, and the investments it makes, avoiding all and any practices which may circumvent the rules of fair competition such as, for instance, the development of a parallel economy, being a part of a cartel, or entering into "informal" market sharing agreements with competitors.
- **Promote the practice of fair competition**, in all good faith, in its markets.
- **Avoid from taking unfair advantage of a market leader position** and from any dumping policy as a means of prejudicing competitors but rather setting fair prices.
- **Actively faith all forms of active or passive corruption** by eliminating any practices that resort to bribery, treatment of favour, or complicity as a means of obtaining unlawful advantage, with particular attention being given to all and any forms of corruption such as, for instance, the acceptance of gifts or other such receipts from customers and/or suppliers.
- **Fully respecting property rights**, either of a material or an intellectual nature (i.e., trademark and patent rights and copyright) and actively declining the use of any product copies, forgeries, or other deceitful offerings.
- **Selecting solutions that safeguard social justice in its investment decisions or under similar circumstances**, whether such decisions have immediate or delayed impact.

2.2. Corporate transparency

- **Seek to fulfil the Company's mission in a clear and effective manner** while abstaining from using the Company as a "front" for the conduct of other business, purposes, or missions.
- **Avoiding all forms of power abuse** and of the use of such powers for personal benefit or for the benefit of family members or unrelated third parties.
- **Try to protect the more** financially and/or psychologically **disadvantaged** not taking any advantage of their circumstances or from using such people as a means of securing competitive advantage.
- **Developing advertising and marketing campaigns based on truthful content** both with regard to the Company's intentions, to the messages it broadcasts, and to the media used.
- **Rejecting all advertising and marketing of a content that is deemed to be debasing, undignified, manipulative, or abusive** namely by not linking the advertising and Company's name with program of an ethically damnable nature.

2.3. Level of service

- **Clearly and loyally setting out contractual terms and conditions** while abstaining from intentionally obscuring the meaning of any contractual clause or giving rise to doubts on the interpretation thereof as a means of deriving benefits from such actions.
- **Fully complying with agreed terms and conditions** as concerns the quality of each product or service, where such terms and conditions are not clearly stipulated, assuming the application of the best market practices.
- Following **the principle of reasonable precaution** when dealing with matters that concern innovation in developing new products, namely by fully analysing all possible risks arising.
- **Responsibly assessing the consequences of a possible faulty delivery** of its products and services by taking initiatives to redress any damages it may cause to parties who or which relied on the Company's deliveries.

2.4. Conducting business in global markets

- When conducting business in markets where **human rights are not fully upheld, abstaining from condoning such practices** and, on the contrary, actively promoting, the uphold of those rights.
- When conducting business in countries featuring different cultural traits, **conducting such business in full respect for such cultural differences and laws** but without compromising its abidance by laws or rules of conduct that violate its principles of conduct .
- **Duly weighing the social and human impact of any decisions to relocate any of its business operations** by avoiding from relying on the optimisation of its investment decisions as an overriding decision-making criterion.
- **Do not explore instances of dependence and economic and social underdevelopment arising in particular markets** but rather viewing such underdevelopment as a concern to be taken into account in its corporate responsibility action.

2.5 Communication

- **Making reasonable use of its power to influence the media** namely by respecting human dignity and each individual's and organisation's right to an honourable name, on the one hand, while granting to those whose dignity it may have put in question or compromised the right to claim compensation for such damages, on the other, as basic criteria to be followed in the conduct of its business.
- **Do not use or divulge restricted information on matters that are under judicial restricted.**
- Abstaining from disclosing or disseminating information on individuals or organisations with the goal of promoting its own media business interests without a prior strict investigation to ascertain the truth of all alleged facts and promotional claims carried in the media it avails, always taking due care to consider the potential damages and moral distress that the publication of such information may cause to third parties.

3. ETHICS AND CORPORATE EXCELLENCE

- **Forming opinions according to ethically clear criteria and values.**
- **Performing daily duties in the search for excellence at all times**, through technical and interpersonal skills and the dedication and commitment put into the performance of our duties.
- **Promoting organisational excellence and excellence as a goal to be pursued by every subsidiary**, as responsibility criteria to be followed by every staff member of the Group and as a moral corollary to each individual's talents and to the opportunities afforded to all and everyone by the organizations of which the Group is member.
- **Congregate the search for excellence with humane criteria** that strive to prevent worker exhaustion at the workplace.

IV – KEY PRINCIPLES OF CONDUCT IN CUSTOMER RELATIONS

1. TRANSPARENCY

Inapa Group undertakes to act with transparency in its dealings with customers, existing and potential. Inapa Group shall:

- **Not tolerate the practice of any form of corruption**, either active or passive.
- **Act with loyalty** in its dealings with its customers and require them to act likewise. Loyalty will mutually imply fair treatment thorough the observation of confidentiality of the information that each party has access and through the observation of intellectual property rights.
- **Respect the principle of equal treatment** I in the relationship with all customers;
- Avoid situations of **conflict of interest** within the organisation;
- **When necessary**, demand from its employees with customer relationship a **statement confirming they have no personal or property interests at stake.**
- **Implement the best market practices in clearly defining business terms and conditions in its dealings with all customers;**
- **Fulfil all its undertakings on the quality of the products it sells and the services it renders;**
- **Provide its customers with all information they may reasonably request** while assuring its customers that dedicated staff will be available to address their enquiries at all times.

2. QUALITY AND EFFICIENCY

Inapa Group undertakes to guide its actions by principles that aim to achieve maximum quality and efficiency in relationships with its clients.

Therefore, the Inapa Group shall:

- **In its effort to meet the needs of its customers, offering only the best and most adequate products** rather than only products that feature the best prices or afford the best margins;
- **Simplify procedures** with a view to reduce bureaucracy and thereby eliminate unnecessary costs;
- **Comply with all commitments assumed**, avoiding delays or deficiencies of compliance;
- **Seeking to avoid disputes**, solving any differences amicably so as to avoid having to resort to legal actions.

3. RESPECT FOR THE ENVIRONMENT

The Inapa Group hereby undertakes to:

- **Adopt measures viewing the protection of the environment and** to comply with the legislation and regulations in force with respect to environmental matters;
- To set **in place internal controls** allowing the compliance to the aforementioned legislation and regulations;
- **Appoint a responsible person** with specific duties and responsibilities on the matter of protecting the environment.

V – KEY PRINCIPLES OF CONDUCT IN SUPPLIER RELATIONS

1. Fairness

Inapa Group undertakes to act with fairness with regard to all its suppliers, current or potential. Inapa Group shall:

- **Not grant privileges to or be partial** towards any supplier;
- **Act with loyalty** vis-à-vis its suppliers and required them to act likewise. Loyalty will mutually imply fair treatment, through the observation of confidentiality of the information to which each party has access and through the guarantee of intellectual property rights;
- **respect the principle of equal treatment** of all suppliers;
- **Avoid situations of conflicts of interests in its** internal organisation;
- **When necessary**, demand from its employees working in the area of supplier relationships a **statement confirming the absence of any personal or property interests**.

2. TRANSPARENCY

Inapa Group undertakes to provide adequate information to its suppliers. Inapa Group shall:

- **Provide all information concerning any supply tenders of future supply possibilities;**
- **Indicate, where appropriate, the criteria used for selecting each supplier;**

- **Provide all reasonable information required in the course of the supply relationship, ensuring that each supplier has contact with person in its internal organisation.**

3. QUALITY AND EFFICIENCY

Inapa Group undertakes to steer the choice of its suppliers by a principle of quality and to seek to obtain maximum efficiency in the relations established.

Inapa Group shall:

- Seek to choose **the best suppliers and not only those offering** the lowest costs;
- **Simplify procedures** and seek to reduce bureaucratic load viewing a reduction unnecessary costs;
- **Pay its suppliers on due time** and as a contractually agreed;
- **Comply with all commitments assumed, avoiding** delays or deficiencies of compliance;
- **Establish a close relationship with its** suppliers seeking to avoid disputes or to solve any differences amicably so as to avoid having to resort to legal action.

4. Respect for the environment

The suppliers of the Inapa Group hereby undertake to:

- Adopt **measures in their companies viewing the protection of the environment, and** to comply with the legislation and regulations in force with respect to environmental matters;
- To set **in place internal controls** permitting to gauge and confirm compliance of the referred legislation and regulations;
- **Appointing a** person at internal levels for matters to the defence of the environment.

5. Conditions of employment

The suppliers of the Inapa Group undertake to comply with the following fundamental duties:

- To have no form whatsoever of **child labour**;
- To comply **with local legislation on safety, hygiene and health at work**;
- To **guarantee decent work conditions** to all their employees.
- **To make no discrimination** based on race, colour, religion, political beliefs, ascendency, sex or nationality.