



CODE OF ETHICS AND CONDUCT

TITLE

Code of Ethics and Conduct

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1. INTRODUCTION

Tectex® Performance Fabrics is the technical textile brand of the company Foot by Foot – Revestimentos Têxteis Lda (hereinafter referred to as Tectex).

Located in Felgueiras, Portugal, it is a company with more than 20 years of experience in the development, production and sale of innovative coated and laminated textiles. We specialize in combining different materials in a single structure, creating multifunctional textiles that offer exceptional performance in the most demanding applications.

Since the beginning, continuous investment in innovation and solid business principles have made Tectex grow from a small company that provided coating and lamination services for the Portuguese footwear industry, to a company that produces technical and functional textiles that can be found in many areas such as home textiles, footwear, fashion, sports, protective clothing and in many other industrial applications.

Tectex is today a company with extensive international activity and sales to over 30 countries. Good management, ethics and compliance with the law have guided our conduct and actions. These principles must be even more present in our current organization, as business in the XXI century is very different from that of several decades ago.

2. CORPORATE CULTURE

2.1. MISSION

Develop and produce coated and laminated textiles with high technical and functional performance.

2.2. VISION

Advancing Into The Future

Our vision is to be a leading company in the coated and laminated textile market, recognized for our ability to create textiles with high technical and functional performance.

We are focused on innovating to add value to our customers and making them think about Tectex® Performance Fabrics when they want to develop the textiles of the future.

2.3. VALUES



Passion

We are customer focused thinkers! Our dedication to technical textiles allows us to truly understand their challenges and needs.



Innovation

Creativity and exploration of new paths, are a key element of our success in the creation of performance fabrics.



Responsibility

Our business is conducted in accordance with environmental, ethical and social standards. We provide value to all our stakeholders.



Partnership

We aim to build long term partnerships because they are the basis for repeated successes.



Excellence

Determined to stand out for the high quality of our products and excellent customer service, we strive to get better every day.

3. CODE OF ETHICS AND CONDUCT

3.1. OBJECTIVE AND SCOPE

This document establishes a set of rules, principles and values that aim to clearly and assertively define the ethical and professional behavior that must guide the conduct of the company and the people who work for it.

This document aims to lead to honesty, ethics, professionalism and transparency in our relationships with customers, suppliers, employees, owners and society in general.

It applies to all Tectex employees and their relationships with the company's stakeholders.

3.2. NON-COMPLIANCE

A Code of Conduct establishes the minimum behavior requirements and by itself is not able to indicate all the requirements for all the behaviors, therefore, in cases omitted in this code, one must always act in accordance with the best judgment and common sense.

In case of doubt, advice and help should be requested directly from hierarchical superiors, the Human Resources department or, if necessary, Management via the email compliance@tectex.pt.

Those who violate the Code and/or the policies and procedures of Tectex will be subject to disciplinary measures proportional to the offense, and will be punished to the full extent allowed by the current regulations.

Sanctioning disciplinary measures will also be taken directed at any person who orders or approves infractions or is aware of them and does not act immediately to remedy them.

3.3. TERM AND DISCLOSURE

Tectex will make this code known to all company employees, posting it on the company website and delivering a copy to each employee.

All Tectex employees must subscribe to the knowledge of referred document, assuming that they have read it and that they will be governed by the rules contained in this Code.

The Code of Ethics and Conduct comes into effect the day after it is approved by Tectex's Management.

4. OUR COMMITMENT

We are committed with the Values that guide the company's behavior and after more than 20 years guided by quality, creativity and innovation, we continue to **Advance Into The Future** and contribute to the development of the economy and society.

We are determined to create a sustainable future and work on the impact of our activity on the environment, people and the community in which we operate.

The main aim of this Code is to ensure ethical and responsible behavior when running our business and it is everyone's responsibility to act in accordance with the rules presented.

4.1. RELATIONS WITH EMPLOYEES

4.1.1. Interpersonal relations

In the exercise of their functions, employees must be professional, responsible, honest, loyal and cooperative, favoring a good environment, respect and good personal treatment, both with colleagues and with hierarchical superiors, and these with their subordinates.

In professional relationships, employees must promote the exchange of information, cooperation and foster team spirit.

Employees must implement the decisions of their hierarchical superiors in accordance with the organization's plans and motivate their subordinates in their work post.

Employees must be able to listen and interact with each other, being open to criticism and other people's points of view, assuming a constructive and proactive posture in solving problems.

Any conflicts between employees should preferably be managed and overcome by themselves with the utmost respect and cordiality, so that there is a calm and trusting environment, essential to the image of rigor and excellence at Tectex.

4.1.2. Child labour

Child labour and the exploitation of children and young people are prohibited.

Compliance with the prohibition of child labour and the restriction on the employment of young people must be ensured.

The minimum age for employment must not be below the age at which compulsory school attendance ends and must not be below the age of 18 unless this is explicitly permitted by the exceptions of the ILO.

4.1.3. Non-discrimination

Discrimination occurs when people receive different and less favorable treatment for reasons unrelated to merit or job requirements.

Tectex promotes multiple and equal opportunities at work regardless of race, ethnicity and social origin, nationality, sexual orientation, gender, age, physical characteristics, religion or any other legally foreseen or protected statute.

Tectex shall base decisions concerning hiring, salary, benefits, advancement, termination or retirement solely on the employee's ability to do the job, with no distinction, exclusion or preference made on other grounds.

4.1.4. Freedom of association

Employees must have the freedom to join associations of their own choice without fear of reprisal.

The employees shall be protected from any discriminatory treatment in connection with their employment and which is directed against the freedom of association.

If the right of association and the right to collective bargaining are restricted by domestic laws then alternatively, at the very least, the right of employees to freely and independently associate for the purpose of conducting negotiations must be guaranteed and permitted.

4.1.5. Forced labour

It is prohibited to use work or services that are extracted from any person under menace of any penalty, and for which that person has not offered himself or herself voluntarily – e.g., slavery, bonded labour, or other exploitative practices.

No employee may be directly or indirectly compelled to work through force and/or intimidation.

Employees may only be employed if they have voluntarily declared their availability for work.

4.1.6. Working hours

Tectex shall ensure that the working hours of the employees are in compliance with legally set working hours or with relevant ILO Conventions. In general, however, the number of weekly working hours cannot exceed 40 hours, with the exception of cases provided for by law.

Overtime must take place on a voluntary basis.

The employee is entitled to at least one day off per week.

4.1.7. Health and safety

Tectex adopts measures to prevent accidents at work and damage to health. While accidents are difficult to prevent, it is important that Tectex makes every effort to prevent accidents and continue to improve employee safety.

With that in mind, Tectex has established systems capable of detecting and preventing possible risks to the health and safety of its employees. Risks are periodically assessed, adopting control measures in order to minimize or eliminate the risks associated with work, as well as assessments of the working environment conditions.

Compliance with safety rules is everyone's obligation.

It is the duty of employees to inform their hierarchical superiors or the responsible services in a timely manner of the occurrence of any irregular situation likely to compromise the safety of people, facilities or company equipment.

4.1.8. Wages and payments

Tectex is responsible for ensuring that the wages paid correspond to what is provided for by law, contractually stipulated or collective bargaining. Regardless of such a condition, each salary must be intended to fairly compensate the worker for the work performed as well as to meet their respective basic family needs.

Tectex should not proceed to retentions and/or wage deductions without any motive unpredicted on the legislation or without expressive authorization from the respective worker.

Tectex should provide to all employees: written, detailed and understandable information during the recruitment process regarding their salary; guarantees concerning the payment of their wages and other benefits or subsidies without delay and ensuing applicable laws.

All payments should adopt the methodology that most beneficiates the employee.

4.1.9. Work harassment

Tectex has a zero-tolerance attitude towards these behaviors and practices, and any conduct of this type is not tolerable.

These behaviours can be grouped into two types: moral harassment and sexual harassment.

Moral harassment is an undesirable behaviour, performed with some level of reiteration and aims to affect a person's dignity or to create and intimidating, hostile, degrading, humiliating

and destabilized working environment. It may include verbal attacks with offensive and humiliating nature, physical or more subtle ones, which can entail physical or psychological violence targeting to reduce that person's self-esteem.

It is considered moral harassment, among others, any of the following acts:

- To promote social distancing between colleagues or subordinated.
- To ridicule, directly or indirectly, any physical or psychological trait of a colleague or subordinate.
- To make recurrent threats.
- To despise, ignore or humiliate colleagues or co-workers, enforcing their seclusion from other colleagues or superiors.
- Systematically disperse rumours, harsh comments or critics directed to co-workers, supervisors, or subordinates.
- Steadily comment about one's personal life and insinuate that such individual has mental or familiar problems.
- Frequently jest about offensive content.

Sexual harassment translates as an undesired sexual behaviour, either visual, verbal or physical and can include (although not limited to), unwanted sexual development, sexual favours or request do dates not appreciated, suggestive or undesired contact, explicit sexual language, sexual jokes, written text messages or emails, suggestions, explicit sexual comments regarding appearance, insinuations, suggestive looks or exhibit of sexual suggestive or pornographic content.

Sexual Harassment is illegal and Tectex employees are strictly forbidden of taking part in any behaviour of sexual harassment.

If anyone is subjected to discrimination or harassment, such person must immediately report the situation.

However, not all situations should be seen as harassment, it is important to mention whether or not there is intentionality in each act.

It should be noted that exercising legit hierarchical or disciplinary power, within referred limits and within the organization premises, does not constitute any kind harassment.

4.1.10. Corruption and bribery

All forms of bribery and corruption are prohibited. All Tectex employees shall conduct themselves in a manner that does not give rise to any personal dependencies, obligations or influence.

The basis of the business relationship should be characterized by fairness and adherence to the national and international standards and laws in force at any given time.

It is expressly prohibited, to all Tectex employees, to practice any kind of corruption, either in passive or active form; omission or creation and maintenance of irregular situations.

Tectex employees compromise to:

- Refuse to receive or to issue any offer that may be considered as an attempt to influence to obtain unlawful advantage. In case of doubt the situation must be communicated, by written message, to the employee's hierarchical superior. The offer must be refused if it is disproportioned or if someone's intentions are not obvious.
- Respect, in its relationship with employees and public entities, for the exemption duties to which they are subjected to, withdrawing from offering any type of benefit that does not apply to them.

4.1.11. Gifts and hospitality

Tectex provides guidelines for accepting and offering gifts, presents and hospitality.

We understand that giving and receiving gifts or hospitality can help build goodwill in business relationships, but are only appropriate in limited circumstances.

We prohibit the offering or acceptance of gifts in the form of cash, checks, bank transfers or similar. Business lunches or dinners under normal professional circumstances do not qualify as gifts or hospitality.

Tectex employees must not accept, for own benefit, goods, services or any other kind of advantages whose value exceeds 50€ (including Christmas Presents) from clients, suppliers, service providers or any other entity, individual or collective that has had or purposes to have commercial relationships with Tectex.

The offering of goods performed by Tectex employees towards any external entity is only applicable when, cumulatively, such presenting is made under Tectex representation, related to the organization activity and correspondent to the sector's good practice.

4.1.12. Confidentiality and data protection

Tectex ensures that confidential information is only transmitted internally to employees who need it to carry out their duties and who are also authorized to receive it.

Tectex keeps the personal data of all employees and other interested parties confidential, maintaining restricted access to this information and not disclosing or assigning them to any type of entity, being only used for the purposes applicable by law.

Employees who access data relating to natural or legal persons are obliged to respect the legally established provisions regarding the protection of such data, and cannot use them except for the purposes imposed or inherent to the functions they perform at Tectex.

Tectex employees must adopt a behavior of confidentiality and secrecy regarding confidential or protected internal information that may jeopardize the company's objectives or operation.

Confidential information from or about suppliers, customers, consultants or other business partners must also be protected in accordance with legal provisions and contractual agreements, if applicable.

The confidentiality requirement remains in effect not only during the employment relationship, but also after its termination.

4.1.13. Conflict of interests

All employees, inside and outside the company, must avoid situations susceptible of generate conflicts of interests, such as, for example, intervening in decision-making processes that directly or even indirectly involve entities with whom they collaborate or have collaborated or people with whom they are or were connected by ties of kinship or affinity ties of any nature, as well as ties of friendship.

All employees must abstain from performing any role in companies other than Tectex when such positions may compromise their performance and dedication to the company. All external activities by employees must be kept away from the work performed at Tectex.

They must also refrain from exercising functions in any type of organization, institute or entity whose objectives may collide with or hinder those stipulated by Tectex.

All employees are prohibited from using their position in the company to obtain advantages in negotiating any contracts or transactions for personal purposes.

If a conflict of interests situation arises, or if an employee is faced with a situation that may involve or lead to a conflict of interests, they must immediately report it to management in order to resolve the situation in a fair and transparent manner.

4.1.14. Use of company resources

The company's resources must be used efficiently, with a view to achieving the defined objectives and not for personal or other purposes outside the functions of each employee in the company.

All employees are prohibited from using Tectex's name, logo, information, equipment, time or other resources to enroll in activities that have not been approved by Tectex management.

All employees must ensure that Tectex's buildings and equipment are kept in good condition, using resources efficiently and avoiding waste.

Tectex's information systems, which include computers, e-mail accounts, internet access, cell phones and voice mail, are Tectex's property and should therefore only be used for professional purposes.

Text messages, e-mails and other types of communication, sent or received by Tectex employees during their duties, can be accessed by Tectex, within legal limits, if such information represents a need.

4.2. RELATIONS WITH CUSTOMERS AND SUPPLIERS

4.2.1. Professionalism and respect

All Tectex employees must ensure the utmost professionalism whenever they represent functions on behalf of the company. In their relationship with customers and suppliers, they are obliged to guide their conduct in an ethical and respectful manner, in order to promote a positive and prestige image of the company.

Under no circumstances are Tectex employees authorized to issue comments on any legal matter in which Tectex may be involved in such a way that they are not considered official company comments. Any comments made on this matter must be forwarded to Tectex management.

4.2.2. Ethics and values

The supplier selection and contracting process must comply with unequivocal, fair and impartial criteria, monitoring not only commercial conditions but also ethical and professional behavior. Tectex undertakes not to establish or maintain relationships with customers or suppliers that are not in line with Tectex's principles or values, and to actively sensitize its employees to take appropriate and necessary measures whenever conduct of ethical disapproval occurs.

4.3. RELATIONS WITH THE COMMUNITY AND SOCIETY

4.3.1. Social responsibility

With this document, Tectex makes public its commitment to the guidelines in the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, Children's Rights and Business Principles and the guidelines and principles of the International Labor Organization (ILO).

We follow our social policies and community commitments and do not engage in business practices that pose a threat to the welfare of our communities.

4.3.2. Environment

Tectex's business strategies and success are based on environmental responsibility and sustainable production. This is done through environmental protection policies, adopting behaviors that allow the reduction, reuse and recycling of waste.

We also minimize the use of chemical and harmful substances in the manufacture of our products, and we are increasing the manufacturing of more sustainable products with higher levels of recycled, bio-based and biodegradable materials.

In addition, we focus on reducing energy and water consumption of in order to contribute to a more sustainable development.

4.4. RELATIONS WITH PUBLIC AUTHORITIES

4.4.1. Legal requirements

Tectex and its employees are obliged to act in compliance with the current national and international laws and regulations.

Conventions of the ILO and the UN as well as any other relevant provisions must be observed.

In addition, Tectex employees must comply with all internal rules and regulations, when required in a given situation.

5. TRANSPARENCY CHANNEL

The Transparency Channel is the official channel made available by the company to all employees of Tectex and also to people outside the organization. It can be used to send any complaints and/or reports under the scope of this Code of Ethics and Conduct.

5.1. WHAT IS CONSIDERED APPROPRIATE TO REPORT?

In general, any violation, omission, legal or moral attitude that goes against any of the values, commitments or principles contained in the text of Tectex's Code of Ethics and Conduct, as well as any violation of applicable legislation.

Any type of threat or reprisal against anyone who, in good faith, reported possible violations or requested clarification on the application of this Code.

Additionally, also considered as an infringement will be the behavior of anyone who in bad faith accuses other people of conduct or omissions and/or misuses this channel without any grounds for that, with the sole purpose of personally or professionally harming a person.

5.2. COMMUNICATION OF IRREGULARITIES

All stakeholders are encouraged to bring forward their concerns, and it is everyone's responsibility to report any suspected misconduct.

Anyone who makes a complaint can identify themselves by sending an email to compliance@tectex.pt informing their personal data and a description of the irregularity and/or violation of the Code. If you wish to do so anonymously, you can access <https://tectex.pt/transparency-channel-2/> providing only information about the irregularity and/or violation of the Code.

Any person making a report can identify himself, providing all the necessary details, or do so anonymously, providing only the data of the person reported.

However, the confidentiality of the whistleblower's identity and the information provided is always guaranteed, preventing any other person from having access to data that could identify him.

5.3. PROCEDURE FOR HANDLING A REPORT OF INAPPROPRIATE CONDUCT

Communications regarding irregularities or violations of the code are only received by the Management, which, based on the data or information provided, is responsible for deciding whether a complaint is valid and, if so, the complaint is handled in accordance with the defined procedure.

Tectex's response to violations of this code will depend on a number of factors, including whether an individual's behavior constitutes illegal conduct.

If the complaint is well founded and an alleged violation of this Code is found, management will initiate a disciplinary process to determine the circumstances of the alleged violation of the Code. The disciplinary process may culminate in the application of a disciplinary sanction to the offender when such conduct is considered a violation of the aforementioned Code.

All hierarchical chiefs, by force or according to their attributions, may also be the target of disciplinary action if it is proven that they were aware of the misconduct and did not control or report the misconduct practiced by their subordinates.