

CODE OF CONDUCT



Document Title	Code of Conduct
Purpose	With this Code of Conduct, START CAMPUS envisages to establish the general ethical and deontological principles, of reference, as well as the structuring values of START in a set of ethical rules that shall guide the behaviour of all personnel in their relations with each other, as well as in their relations with clients, partners, competitors, suppliers, and all other entities that will interact or have an effective relationship with START, which reflects its corporate culture.
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1. INTRODUCTION

With this Code of Conduct, **START – SINES TRANSATLANTIC RENEWABLE & TECHNOLOGY CAMPUS, S.A.** (hereinafter “**START**”) envisages to establish the general ethical and deontological principles, of reference, as well as the structuring values of START in a set of ethical rules that shall guide the behavior of all personnel in their relations with each other, as well as in their relations with clients, partners, competitors, suppliers, and all other entities that will interact or have an effective relationship with START, which reflects its corporate culture.

START conveys its values and commitment also through this Code of Conduct and sets the basic expectations of each other, promoting a culture of safety and compliance, specifically in the context of the General Regime for the Prevention of Corruption (“**GRPC**”), approved by Decree-Law no. 109E/2021, 9 December, and the General Protection Regime for Whistleblowers, approved by Law no. 93/2021, 20 December.

Compliance with the guidelines herein is crucial, not only to ensure protection for all, especially for START from a reputational and financial well-being standpoint, but also to ensure that START is recognized as an example of excellence, responsibility, and integrity, with the respective national and international competitiveness.

Safety, compliance, sustainability (in its triple aspect: for the planet, for the community and for the industry), business ethics and valorisation and empowerment of human resources are the core values and main priority for START, its Board and Shareholders.

As the projects develop, compliance with the guidelines of this Code of Conduct by each and every START employee is of the utmost importance, as all of them are responsible for themselves but also bind START. Thus, each employee is a guardian of START reputation and safety and must always act in compliance with this Code of Conduct.

This is a public document which will be provided to each and all employees, attorneys, representatives, customers, consultants, services providers, contractors, suppliers, and other counterparties with which START does business.

2. SCOPE

This Code of Conduct applies to all START employees, irrespective of their position in the hierarchy, tasks, and responsibilities, as well as officers and members of the Board (hereinafter, “**Employee**” or “**Employees**”).

Trainees are subject to this Code of Conduct in the same conditions as Employees.

It is also applicable to attorneys, representatives, services providers, contractors and suppliers or personnel of third-party entities maintaining relations of any kind with START who are in any way entitled to act on behalf of and/or represent START, whenever deemed necessary and convenient, with the necessary adjustments. Other services providers and suppliers are also invited to read and adhere to this Code of Conduct and its Annexes.

The principles set out herein must, therefore, be communicated and recommended to all the mentioned addressees.



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This Code of Conduct contains the main guidelines and procedures to:

- prevent bribery, corruption and similar offenses;
- prevent money laundering and terrorism financing;
- prevent harassment in the workplace;
- and in general, comply with the applicable laws and regulations when acting on behalf of the Company.

This Code of Conduct includes an Integrity Policy (Section 3.1), a Gifts, Business Meals & Hospitality with Counterparties Policy (Annex A), a Conflict of Interests Policy (Section 15 and Annex B (form)), a Whistleblowing Policy (Annex 18 and Annex C), as well as the Social Media Policy (Section 9, 10 and Annex D).

This Code of Conduct and compliance with it does not prevent or the application of other rules of conduct or ethics, whether legal or otherwise, of any other nature, applicable to certain functions, activities, or professional groups. In the event of a conflict the most restrictive policy or procedure should be followed.

3. CORE VALUES AND PRINCIPLES

All Employees must act in START's highest interest when carrying out their activities, duties and competencies, and especially when they relate to entities - namely supervisory, regulatory, clients and shareholders -, with respect for the following principles and values:

3.1. INTEGRITY

START's aims and purposes must be pursued honestly, fairly and responsibly, achieved through doing good. These are the principles of action that guide the actions of each and all Employees.

3.2. LEGALITY

START has a **zero-tolerance** policy for failure to comply with the law.

START and its Employees must respect and ensure strict compliance with the legal and regulatory standards applicable to its activities.

All Employees must refrain from, on behalf of START and within the scope of their activity, break any legal rule, under penalty of criminal liability.

Criminal liability of the legal person, START, does not exclude the criminal liability of the Employee who binds it, since they are cumulative.

3.3. RESPONSABILITY, DILIGENCE AND PROFESSIONALISM

All Employees must act with care, professionalism and responsibility in the performance of their duties and in their relations with each other and with counterparties.



3.4. TRANSPARENCY

START adopts a policy of absolute transparency in the development of its commercial activity and requires its Employees to adopt the same attitude and, to this end, to provide all true and necessary information about their decisions and behaviour in the performance of their duties.

As such, Employees must be aware that their conduct may have an impact on START's situation, affecting it from a financial or social point of view.

3.5. LOYALTY

All Employees undertake to a commitment of loyalty to START and, by performing their duties in accordance with this policy, are responsible for acting in the best interests of the organization, upholding its values as well as protecting START's credibility and reputation.

Every START Employee must therefore act and make decisions objectively, impartially, reasonably and diligently and with a special sense of responsibility, representing the legal person and its purposes at all times when acting.

3.6. SUSTAINABILITY

START has a strict sustainability policy: as an innovative company in the construction of green ecosystems, with the aim of achieving carbon neutrality, the actions of all START Employees must be conscientious, environmentally friendly and in accordance with the internal social responsibility standards (which prioritize respect for human rights).

3.7. PROFESSIONAL RELATIONSHIPS

All START Employees must refrain from working in professions that are incompatible with the START's interests, fulfilment of their duties or availability to work.

In the event of an interest in combining functions, the Employee must fill in the appropriate form for combining functions contained in the model attached to this Code of Conduct (Annex B) for due consideration and approval and must not engage in other activities before due authorization or 60 days have elapsed since the communication. In particular, Employees shall not engage in any activities that directly compete with the organization's business interests without prior authorization.

3.8. COMPETITION

The actions of all START Employees must prioritize compliance with market rules, fair competition and avoidance of any restrictive practices.

START prioritizes relations with its competitors, operating in a market in which competition is desired to foster the market and improve operating conditions, thereby instilling a culture of mutual respect and honesty.



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3.9. RESPECT

All START Employees must comply with the law, support universal human rights, protect people and the environment, and benefit the communities where they work.

START respects each Employee's individuality and privacy and does not tolerate discrimination, taking great care to respect the people, and cultures and environments of the communities it works with, worldwide.

3.10. NON-DISCRIMINATION

START is committed to providing an inclusive and welcoming environment for all individuals. All START Employees must refrain from discriminatory behaviour (without limiting it to factors such as sexual orientation, religion, race, nationality, gender, age, disability, political beliefs or similar).

4. RESPONSABILITIES AND DUTIES OF START AND ITS PERSONNEL

4.1. INTEGRITY

START and all its Employees must ensure strict compliance with the legal, contractual, and regulatory provisions in force at any given time, refraining from performing any acts contrary to such rules.

Having its reputation as its main asset, START adopts a zero tolerance policy for any situation of corruption, undue receipt or offer of advantage, embezzlement, economic participation in business, concussion, abuse of power, prevarication, influence peddling, money laundering, manipulation, concealment, misrepresentation of material facts, fraud in obtaining or diverting a subsidy, grant or credit or payment of any benefits and unfair practices or dealings contrary to the START's Code of Conduct, the Plan for the prevention of risks of corruption and similar infractions, the policies attached and the laws and regulations of the sector.

START's Employees must:

- a. act honestly, with good manners and respect, in good faith, as well as with responsibility, transparency, loyalty, integrity and professionalism;
- b. perform their functions with diligence, technical accuracy, and efficiency, ensuring compliance with the instructions and respect for the applicable rules and provisions, as well as the appropriate hierarchical channels;
- c. any formal interaction with officials or public/political office holders must comply with the appropriate procedures to ensure the transparency and honesty of these interactions: specifically, but without limiting:
 - i. it should be preceded by an agenda that should be circulated before the interaction between the two parties through official channels;
 - ii. the "four eyes" rule should be applied (interactions should preferably take place in the presence of several employees);



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- iii. a policy should be adopted for internally recording the outcome of interactions, which should also be circulated through official channels.
- d. comply with this Code of Conduct and other policies to be implemented by START;
- e. report non-compliance acts and or practices with the legal, conventional, or regulatory provisions in force at any given moment.

4.2. ETHICS

START is committed to ensuring Employees act with integrity and honesty, and exercise sound judgment. START Employees are entitled to be treated with respect and honesty and shall also contribute to the existence of a safe, healthy, productive, and inclusive working environment, notably through respectful professional relations, striving for mutual collaboration and cooperation.

All employees shall behave responsibly and loyally towards START, to ensure the credibility, good name, and reputation of the Company.

4.3. LEADERSHIP

All START's hierarchical superiors shall adopt an exemplary conduct and attitude towards each of their subordinates, treating each one of them with respect, empowering them through integrity and accountability, reinforcing START's ethical culture through their words and actions and shall be seen as role models to be followed. START's hierarchical senior managers are responsible for directing their employees who have questions on ethical issues or potential violations of START's policies to the correct resource.

4.4. EQUALITY AND NON-DISCRIMINATION

START employees have the right to be treated with respect and honesty and shall also contribute to the creation and maintenance of a healthy working environment.

START employees are entitled to equal and transparent treatment, and any form of discrimination is neither admissible nor tolerable, whether on the grounds of race, ethnicity, gender, age, disability, religion, sexual orientation, political conviction, or trade union membership, as well as any form of sexual or psychological harassment, verbal or physical conduct, humiliation, coercion, or threat.

Regardless of the hierarchical position, role, and responsibilities, START Employees shall at all times maintain relations based on respect for the dignity of others, equality, solidarity, reciprocal collaboration, and cooperation, with a view to promoting a respectful and positive work environment.

5. HARRASSEMENT IN THE WORKPLACE

START is committed to a working environment free of discrimination, bias, prejudice as well as threats, intimidation and harassment. Harassment can take one of two (main) forms: moral or sexual.

Moral harassment takes the form of unwanted and repeated conduct, including that based on a discriminatory factor, committed, either when access to or at the place of work, occupation or training, with the purpose or



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effect of disturbing or constraining a person, affecting his or her dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment takes the form of unwanted and repeated conduct of a sexual nature, in verbal, non-verbal or physical form, with the purpose or effect of affecting a person in the terms referred to above.

However, not every situation should be deemed as a situation of harassment at work. Therefore, it will not constitute moral harassment, situations such as:

- a. decisions concerning the organisation of work, provided that they comply with the legal, conventional and regulatory standards applicable at each time;
- b. the legitimate exercise of authority and disciplinary power;
- c. the normal pressure inherent to the exercise of tasks and roles.

Furthermore, the romantic closeness between work colleagues or involving hierarchical superiors shall not constitute sexual harassment, provided that this is reciprocally accepted or not unwanted.

START shall not tolerate any behaviours, inappropriate or conduct by or against Employees, clients, suppliers, partners or any other individuals who conduct business or seek to do business with START, notably the ones that could be considered as harassment.

6. CONFIDENTIALITY & DATA MANAGEMENT

START's competitive advantage is based on sensitive information of a strategic, technical and commercial nature, for which reason the security and protection of this information is crucial. The loss or unauthorized disclosure of confidential information may harm START and its clients, partners and suppliers.

Security measures shall be taken to protect confidential information in accordance with national data protection laws, which shall be strictly complied with by all Employees, who and unless previously authorised in writing by START, undertake to:

- a. keep confidential all information and matters dealt with in the performance of their functions or because of them, concerning START or any other natural or legal persons related to it, notably managers, directors, other Employees, clients, partners and suppliers, and be good stewards of their financial, personal, and business information;
- b. protect information managed on behalf of START from theft, loss, or unauthorized access or disclosure
- c. not to disclose or make available to any third parties and by any means, information, internal rules, organisational schemes, personal data, programmes, systems or computer applications to which they have access, articles or documents related with START's activity or with any third party;
- d. not to carry out any reproductions, copies, modifications, public communications, distribution, or any other type of assignment, whether free of charge or not, of any documents, including computer software, publications, information contained in databases, on the intranet, in any type of internal communication or computer networks, or any other intellectual material belonging to or concerning START or any third party related to it.



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Working remotely (if applicable) should be considered an extension of the workplace. This entails maintaining the same level of diligence in safeguarding confidential information outside the office environment.

Creating and maintaining complete and accurate records and data is essential for START's ability to meet its business needs, as well as regulatory and legal requirements. Employees are responsible for maintaining the integrity of START's data, and comply with all recordkeeping practices, policies, controls and procedures and to never falsify any data.

Offenses to START's information security policies, procedures, standards and guidelines are considered very serious offenses subjected to disciplinary process that can result in penalties up to termination of employment.

7. HEALTH AND SAFETY IN THE WORKPLACE

START and its Employees shall ensure that there are suitable safety and health conditions in the workplace, and Employees shall follow the procedures related to these matters defined at each moment and report accidents and situations of labour risks to their superiors.

8. PROPERTY ASSETS

All personnel have the duty to make prudent use of the goods and assets owned by START, including intellectual property, physical and financial assets, and shall also ensure their safekeeping and proper use, also protecting them against any acts of vandalism, unauthorised disclosure, cyber-related risk and attack, theft, loss, waste, abusive usage, and disclosure, adopting the measures deemed appropriate to avoid and/or minimise the costs inherent to this use/conservation, avoiding the waste of available resources, finally promoting a more efficient use thereof.

START Employees also have the responsibility to extend the same degree of care to assets entrusted to START by others, including clients, suppliers and partners.

Under no circumstances shall START's material resources be used for personal purposes, except in situations duly authorised by the Company.

9. WHATSAPP USE

This section establishes guidelines for the use of WhatsApp within the organization, ensuring that the platform is used responsibly and professionally.

All Employees must follow the below guidelines:

- a. all communications via WhatsApp should maintain a professional and respect tone. Avoid informal language, slang, or abbreviations that could be misinterpreted or use offensive, discriminatory and inappropriate language.
- b. ensure that the group's objectives are not sent.



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- c. do not share confidential or proprietary information over WhatsApp, for that use the official means of communication, email.
- d. do not share sensitive (customer, personal, legal or financial) information over WhatsApp, for that use the official means of communication, email.
- e. avoid sending messages outside of work hours unless it is urgent, in order to respect the personal time of colleagues.
- f. the group administrators are responsible for maintaining the focus of the group and managing its membership. Ensure that only relevant participants are included in work-related groups.

Any violations of these guidelines should be reported to the Chief Compliance Officer.

10.SOCIAL MEDIA

The Social Media policy is attached as Annex D.

11.RESPONSIBLE COMMUNICATION

START is committed to making sure communications about its business are accurate, while recognizing the need to protect the confidentiality of clients, partners, suppliers' information. START respects the right of its Employees to engage in social, professional and political dialogue outside of work. Employees are expected to use good judgment when making personal statements in public, including on social media, about START, another Employee or client, partner or supplier.

12.ENVIRONMENTAL RESPONSABILITY

START takes on the responsibility and commitment of minimising the direct and indirect effects on the environment.

All Employees must, in their relationship with START's assets, remain aware of the environmental impact of their actions and endeavour to contribute to the protection of the environment by reducing material waste and paying greater attention to recycling processes, taking care of the management of scarce assets.

13.SECURITIES TRADING

This section sets forth START's restrictions, requirements and expectations for ownership and trading of securities for all Employees.

For the purposes of this section, the following capitalized terms have the following meaning:

- a. *Securities*: means any non-deposit financial instrument that is, or is derived from, any equity or fixed come security, including but not limited to stocks, quotas, bonds, debentures, options or equity securities, convertible securities, warrants, derivatives, notes, participation/investment units in funds, exchange traded funds, and in any case only to the extent the Securities are admitted to trading on a domestic or international regulated market.



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- b. *Own, Owning and Ownership*: means all methods by which an Employee may possess an interest in a Security or an account with a financial services institution, including direct ownership and beneficial ownership;
 - c. *Material Information*: means any information that might have an effect on the market for the Securities generally or might affect an investment decision of a reasonable investor, including, inter alia, sales result, earnings or estimates, dividend actions, strategic plans, new products, discoveries or services, acquisition and divestiture plans, financing plans, marketing plans, joint ventures, litigation, liquidation, developments, claims, restructuring, negotiation or termination of major contracts, potential material actions;
 - d. *Non-public Information*: all information is non-public unless it has been publicly disseminated ((including through any of the following methods: public filing with a securities regulatory authority; issuance of a press release; disclosure of the information in a national or broadly disseminated news service; or the issuance of a prospectus).
 - e. *Material Non-public Information*: means to that information that is both Material Information and Non-Public Information.
 - f. *Trade or Trading*: means to any transaction by which a person acquires or divests himself from an interest or position in Securities, including but not limited to purchases, sales, repurchase agreements, short sales, and entering into derivative transactions, including put options, calls and equity swaps as well as liquidating such derivative positions through purchase, sale or exercise.
- I. **General Provision:** All Employees are allowed to Own and/or Trade Securities. Employees are however prevented from Trading Securities issued by entities (whether or not already clients of START) with whom START is in the process of negotiating, or is expected to engage in, a business relationship with START. This restriction remains in effect throughout the negotiation period or until a potential engagement is confirmed or dismissed. All Employees must consult the Chief Compliance Officer before engaging in such transactions to ensure compliance with this Code of Conduct and legal and ethical standards.
- II. **Exception:** The restrictions mentioned in the previous paragraph will not apply to the cases where (i) the Trade is made through collective investment schemes or life insurances and the Employee has no interference in the Trade and the Employee has no more than 1% of the shareholding or the voting rights; (ii) the Trade is made by an asset manager with discretion to direct daily Trading or on a fully discretionary basis in relation to the Securities portfolio and Trading activities; or (iii) the Securities correspond to treasury bonds.
- III. **Reporting:** All Employees must disclose any Trade and/or Ownership of Securities to the Chief Compliance Officer, including if Securities are acquired or otherwise holding takes effect through an inheritance, through an annual declaration of interests. Prior to their employment date starts, all Employees must submit in writing to the Chief Compliance Officer any Ownership of Securities relating to current clients, stakeholders or companies which are involved in transactions or direct business relationships with START. For the purposes of this provision, each Employee must



complete an initial compliance certificate within 30 days of being notified of the requirement. The compliance certificate must include in relation to any Securities:

- i. The name of the entity;
 - ii. Date of acquisition or Ownership.
- IV. **Taking of Divesting Decisions:** If, in the reasonable and grounded opinion of START, any Ownership or Trade results in a conflict with START's core value and principles or otherwise implies any breach by the Employee of any of the provisions of this Code of Conduct or other provision set out by any policy from START, as approved from time to time, the Employee undertakes to take any action deemed necessary to clear the relevant conflict, including but not limited to take a divesting decision in the period time requested by the Chief Compliance Officer.
- V. **Stakeholders:** unless previously waived in writing by the Chief Compliance Officer, the Employees are forbidden from entering in any type of association, ventures, business or joint-venture or otherwise hold Securities in any of the clients, partners, competitors, suppliers, and all other entities that will interact or have an effective relationship with START.
- VI. **Insider Trading:** Notwithstanding the provisions above, all Employees are always forbidden from engaging in any Trade of Securities while in possession of Material Non-Public Information or in cases where the Trade may result in a market abuse event. The prohibition on Trading remains in effect until three business days after the information has been widely disseminated to the public;
- VII. **Waiver:** under certain limited circumstances, the Chief Compliance Officer may grant written waivers of the Reporting, Trading or Ownership restrictions imposed upon Employees. Waiver requests must be made in writing and should include all relevant facts in support of the waiver request. Requests must be submitted by the Employee for approval. If the Chief Compliance Officer approves the request, it must then be submitted to the Board of Directors for consideration. The Employee is bound by the restrictions in this section unless and until the Chief Compliance Officer approves the waiver request. In those cases, in which the Chief Compliance Officer grants a waiver of the Trading or Ownership restrictions with respect to a particular issuer, the Employee still will be precluded from participating in any Insider Trading activities for that issuer. In situations in which a waiver relating to one or more aspects of this section is granted, the Employee will still be subject to the other provisions of the Code of Conduct. Under no circumstances would a waiver authorize an Employee to violate Insider Trading or other applicable laws.

14.COMPLYING WITH ANTI-BRIBERY AND ANTI-CORRUPTION

START, its Employees and business partners must comply with anti-bribery and anti-corruption laws everywhere they do business, namely the Decree-Law no. 109-E/2021, of 9 December, and the Portuguese Criminal Code.

Zero tolerance: START condemns all forms of bribery or corruption, as well as similar offenses regardless of the sector (commercial, private, or public) or whether the recipient is a government official or a private businessperson. For all intents and purposes, related offenses shall comprise:



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- a. receiving and offering an undue advantage;
- b. embezzlement;
- c. economic participation in business;
- d. abuse of power;
- e. prevarication;
- f. influence peddling;
- g. money laundering; or
- h. fraud in obtaining or deviating a subsidy, grant or credit.

START condemns any conduct of facilitation or support of financial crimes comprising money laundering, terrorist financing, and tax evasion or facilitation of tax evasion.

This zero-tolerance policy follows the guidelines set out in this Code of Conduct and the attached policies, which must be regularly consulted for all relevant purposes.

14.1. ABSOLUTELY FORBIDDEN

Under any circumstances, must an Employee:

- a. request, suggest, accept, give or promise payments, services, gifts, business hospitality or other advantages¹, directly or through an intermediary, or act in such a way as to:
 - i. Favor their own interests or those of third parties with any external entities, private or public, namely civil servants or political office holders, customers or suppliers;
 - ii. to improperly influence the obtaining or retaining of business;
 - iii. to give or gain a business advantage or to secure or speed up routine, nondiscretionary, legal government actions, such as issuing permits or releasing goods held in customs (there is a zero-tolerance policy regarding “facilitation” payments);
- b. accept or provide gifts, donations, gratuities, presents or any other offers, whenever there are suspicions that they are intended to fulfil goals contrary to the principles and provisions of this Code of Conduct, namely when they constitute attempts to influence any decision or behaviour, or that could be misinterpreted, or suggest the appearance of something improper
- c. (even when there is no improper intent). These must be refused;
- d. accept or provide offers with an economic value that exceeds the limits considered reasonable by social custom and, in any case, exceeding EUR 150.00 (one hundred and fifty euros);
- e. accept or provide offers in breach of the respective policy approved and attached hereto as
- f. Appendix A);
- g. practice any form of corruption or related offenses, regardless of the public or private sector;
- h. make contributions to political parties, either in kind or in cash;
- i. accept or provide information through illegal means and/or confidential information.

¹ This includes any type of advantages such as cash, loans, gifts, jobs, tuition, scholarships, contracts, entertainment, travel, contributions. Intangible benefits – for example, hiring someone’s relative as a favour to the recipient or donating to their favourite charity.



14.2. ABSOLUTELY REQUIRED

All Employees must:

- a. defend the interests of START's shareholders and maximizing the value of START;
- b. comply with the core values and principles as defined in this Code of Conduct;
- c. trust and respect hierarchical structure, collaborate proactively, sharing knowledge and information;
- d. promote team spirit as well as correctness, respect, cordiality and courtesy in relations among Employees;
- e. collaborate with the regulatory and supervisory authorities and respect them;
- f. choose suppliers, and all parties with whom START relates, according to impartial and transparent criteria, without granting privileges or favouritism and avoiding, whenever possible, situations of exclusivity. The choice of suppliers, service providers and all parties with whom START relates, not only takes into account the economic and financial indicators, commercial conditions and quality of products or services, but also the ethical behaviour of the supplier and, namely adherence to this Code of Conduct and the core values and principles set herein;
- g. promote trust in their relations with suppliers, customers, competitors or any other public or private entities with which START relates, as well as all the other general principles that guide the actions of all those bound by this Code of Conduct;
- h. keep accurate and complete record of all business, transactions, decisions and relevant acts in general for purposes of binding START;
- i. ensure that any information provided to external entities, including the media, is correct, informative, truthful and dignifies START's image.

Breaching anti-bribery and anti-corruption laws is a serious offense and a violation of employment obligations. Breaching these laws risks significant reputational and financial harm and may result in imprisonment. Even just a perceived breach of anti-bribery or anti-corruption laws can damage START's reputation.

Failure to prevent bribery, corruption, or the practice of any similar offenses by someone acting on its behalf may result in START committing an offense.

15. CONFLICT OF INTEREST

A situation of conflict of interest will be that in which an Employee, while performing his or her duties, directly or indirectly has a personal, social, financial, political, or other type of interest, from which he or she may obtain advantage for him or herself, for a relative or kinsman, for friends or acquaintances or potentially interfere with their duty of loyalty to START.

As a rule, the Employees must avoid situations that may constitute cases of personal and professional conflicts of interest (as even the appearance of a conflict of interest may harm START) notably and without limiting:

- a. performing any other professional activity, even if unpaid, on their own account or on behalf of a third party, under an employment contract, service provision contract, performance of functions in corporate positions or any other type of contract, by themselves or through a third party, in Portugal



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or abroad, competing with the activity of START and which impairs, in quantity or quality, that which they perform in START's benefit, except when duly authorized in accordance with clause 3.7. above and the respective form;

- b. accept any commissions, bonuses or gratuities from any third parties with whom START maintains commercial, professional or partnership relations, it being absolutely forbidden to accept offers from third parties, including gifts, with a market value in excess of EUR 150 (as per the Gifts, Hospitalities and Meals Policy);
- c. participation in a recruitment and selection process of a relative or close friend as an employee, consultant, amongst other situations; and
- d. investments or becoming a member of the board of directors in other projects or companies that potentially interfere with their duty of loyalty to START (without prejudice to the exclusivity clauses if applicable).

START's Employees must promptly inform the management of the occurrence, potential or effective, of a situation of conflict of interest, with the purpose to adopt appropriate measures to the case (Annex B). Conflicts of interest can usually be resolved to everyone's satisfaction, but it always requires careful consideration, disclosure and due register.

START shall be attentive to this type of situation and shall take immediate and appropriate measures to resolve or manage any cases of conflict of interest that may arise.

Not disclosing a conflict may be a breach of your contractual obligations with START and could lead to disciplinary liability.

In case of doubt or concern regarding possible bribery, even in relation to commissions, bonuses, gratuities, or gifts from third parties, START employees should contact the Compliance Officer, and shall refrain from discussing such matters with any third party.

Help: doubts as to if you're in a conflict of interest? Ask:

- i. How would the situation be perceived by co-workers, outsiders, customers and the START's shareholders?
- ii. Is the situation going to affect any decisions making for START?
- iii. How would it be perceived by the media?

16. NON-COMPLIANCE

The breach of the Code of Conduct and other binding policies by any START's Employees may result in disciplinary action, which may constitute a serious infraction preventing the continuance of the employment relationship (or other) under the legal, contractual and regulatory terms applicable at any time.



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A breach of this Code of Conduct and other binding policies by other suppliers, service providers, contractors (or subcontractors), attorneys, representatives or other third parties who have adhered, may result in the reassessment of the terms of these relationships.

Failure to comply with this Code of Conduct, the Policies attached (Appendix A), B), C) and D)) and other binding policies may constitute criminal, administrative or civil liability and result in the imposition of penalties, fines, compensation to START or any third parties for the material and/or moral damage suffered and ancillary sanctions.

For each breach, a report is drafted with the violated rules identified, the respective sanction and the measures adopted or to be adopted.

Any deviation, non-compliance, or breach of the provisions of this Code of Conduct is unacceptable.

17. CRIMINAL LIABILITY

17.1. START CRIMINAL LIABILITY

START may be held criminally liable for crimes committed by a person in a leadership position or by someone acting under their authority as a result of a breach of supervisory or control duties.

START criminal liability may be excluded when employees have acted against the express orders or instructions of those in authority, such as, and without limiting, this Code of Conduct, the attached policies, the prevention plan and risk map and other binding policies. Thus, all these instruments must be understood and accepted by all employees as non-derogable instructions.

The following penalties may be applicable to START: i) fines; ii) winding-up penalties; iii) penalties in lieu of admonition; iv) a bond of good conduct and judicial supervision; v) accessory penalties of judicial injunction; vi) prohibition of the exercise of activity; vii) prohibition of entering into certain contracts or contracts with certain entities; viii) deprivation of the right to subsidies, grants or incentives; or ix) closure of the establishment and publicity of the conviction.

17.2. START'S EMPLOYEES CRIMINAL LIABILITY

People holding a leadership position in START are subsidiarily liable for the payment of fines and indemnities to which such companies are sentenced, in relation to crimes (i) committed during the period of their office, without their express objection; (ii) committed previously, when it was their fault that the company's assets became insufficient for the respective payment; or (iii) committed previously, when the final decision to impose them was notified during the period of their office and the failure to pay is attributable to them.

START's criminal liability does not exclude the individual liability of employees, nor does it depend on their liability.



18.REPORTING AND CLARIFICATIONS

It is important to understand and report non-compliance with the Code of Conduct, attached policies or other rules in force, as well as any behaviour that may put at risk the name, image, and reputation of START.

Employees may seek clarification from their direct manager, the human resources area or the Compliance Officer (through the following channel: compliance@startcampus.pt).

Anyone² who witnesses or has actual knowledge of an act or situation likely to constitute a misconduct - harassment or breach - in the scope of professional activity must promptly report the occurrence and shall be protected against acts of retaliation³, such as those that, occurring in a professional context and motivated by the report, cause or may cause the whistleblower patrimonial or non-patrimonial damages.

Reporting is a responsibility of all: misconduct concerns must be reported through internal channels implemented by START, anonymously or not, in accordance with START's Whistleblowing Policy (Annex C)) and Law no. 93/2021, 20 December.

The communication of these situations may be made through any of the following channels:

Whistleblower Channel: [Whistleblower \(complylog.com\)](https://complylog.com)

Email: compliance@startcampus.pt

Address: Start Campus | Avenida Engenheiro Duarte Pacheco, Amoreiras Tower 1, 13th floor,
1070-101 Lisbon

Reports should always be made in writing and in a clear, detailed, and consistent manner, supported by evidence (if any), identifying, whenever possible, the author(s) of the misconduct, as well as the circumstances of manner, time, and place of the misconduct.

START is obliged to investigate the report and assure that no form of retaliation takes place against whistleblowers.

On receiving a report, the Compliance Officer shall immediately inform the management, which, after analysing the case, may determine the start of an internal investigation process and ultimately take disciplinary action or complaint with the competent authorities.

² Meaning shareholders, members of corporate bodies, managers, directors, senior officials, employees, service providers, suppliers, contractors, subcontractors, volunteers, interns, clients or other stakeholders of START or third parties, regardless of whether the reports are based on information obtained in a professional relationship that has since ended, as well as during the recruitment process or during another phase of pre-contractual negotiation of an established or not constituted professional relationship.

³Retaliation may include dismissal, demotion, suspension, threats/intimidation, exclusionary behaviour, or raising issues in bad faith.



All decisions to proceed or not with an investigation following a report shall be registered and their archiving duly justified. The decision not to proceed with an investigation shall not prevent the case from being reopened, re-analysed and giving rise to an investigation process when new information on the reported situation is received and provided that within the legal time limits for that purpose.

Reprisals against any Employee, notably for reporting a harassment situation, are strictly forbidden, unless the employee has acted maliciously and/or calumniously, which shall determine competent disciplinary action.

START shall keep a record and ensure the confidentiality of any reports received, in compliance with the applicable data protection regulations.

19. ENTRY INTO FORCE AND DISCLOSURE

This Code of Conduct will remain in force indefinitely. The Code of Conduct and its annexes may be freely revised at any time by START.

The Human Resources area and the Chief Compliance Officer are responsible not only for making the Code of Conduct and other applicable policies available, but also for any clarifications or questions raised by recipients.

The Code of Conduct is communicated internally and externally via the intranet and Internet platforms.

START will include in its training programme, whenever appropriate, content relating to prevention within the scope of this Code of Conduct and its annexes.

This Code of Conduct must be revised every 3 years or whenever there is a significant change that justifies its revision.

ANNEXES TO THE CODE OF CONDUCT

- A. Gifts, Meals and Hospitality Policy;
- B. Conflict of Interests Policy – Form;
- C. Whistleblower Policy; and
- D. Social Media Policy



ANNEX A

GIFTS, HOSPITALITIES AND MEALS POLICY



Document Title	Gifts, Hospitalities and Meals Policy
Purpose	Establish the terms and conditions applied to Courtesies, Hospitalities and Meals
Owner	Chief Compliance Officer
Version	2
Original Date of approval	22 of May of 2024
Status	Approved and in force
Confidentiality	Public

Rev	Date	Reason for change	Author	Approved by	Effective date
01	22/05/2024	N/A	<i>Chief Compliance Officer</i>	Board of Directors	22/05/2024
02	20/11/2024	Comments from the Board	<i>Chief Compliance Officer</i>	Board of Directors	20/11/2024

1. PURPOSE AND SCOPE

The purpose of this policy ("**Policy**") is to establish objective and clear criteria and guidelines regarding the offering or receiving of Gifts, Meals, Hospitality, and any similar (hereinafter "**Offers**"), involving potential or actual business partners or, generally, entities, public or private, to whom **START – SINES TRANSATLANTIC RENEWABLE & TECHNOLOGY CAMPUS, S.A.** (hereinafter "**START**") engages with (both, hereinafter "**Counterparty**" or "**Counterparties**").

Donations, gratuities, gifts, presents, benefits, gifts, payment of expenses, entertainment, acts of hospitality or participation in events shall be considered subject to this Policy and the limits that result from it.

This Policy applies to all START employees, irrespective of their position in the hierarchy, tasks, and responsibilities, as well as officers and members of the Board (hereinafter "**Employees**"). Trainees are subject to this Policy in the same conditions as Employees.

This Policy is a part of the rules and guidance provided in the Code of Conduct as Annex A) and is therefore governed by the provisions of the latter in all matters that it does not specifically address.

2. KEY-PRINCIPLES

In many cases, Offers are common business practice, being legitimate and justified.

However, these Offers may also, in certain cases, be undue or unjustified. Such Offers can also be misinterpreted or suggest the appearance of something improper, even when there is no improper intent.

It is the responsibility of each employee, as steward of START's interests and reputation, as well as that of its clients, to ensure that the Offers are compliant and legal notably, with the core values and principles as described in START's Code of Conduct and in the Plan for the prevention of risks of corruption and similar offenses.

START has a **zero-tolerance policy** regarding the attempt to influence a decision by offering personal benefits to a Government / Public Official or any other Counterparty or influence a decision by accepting undue benefits.

Decision-making must be impartially and exempt, thus no Offers should be made to any Counterparty or accepted from any Counterparty:

- a. involved in or that could influence a tender or competitive bidding process.
- b. in exchange for preferential treatment in any business or in return for or in anticipation of receiving benefits in return.
- c. in cash or cash equivalent, such as a bank cheque, money order, investment securities, gift certificate/card, or negotiable instrument.

Offers to or from Counterparties are allowed if they obey the **four golden rules**, as follows:

2.1. LEGITIMATE

There must be a "*good business reason*" for the Offer granted, this meaning that the benefit must be granted in support of a business purpose or for building a business relationship.

2.2. OCCASIONAL

Meals or hospitality with the same Counterparty on a standard or consistent basis (i.e., weekly, biweekly) are not occasional and must be avoided.

2.3. REASONABLE

In terms of price, the Offer must follow benchmarked criteria or rated price.

For this purpose's gifts, meals and hospitality follow strict guidelines and thresholds approved under Section 3 below.

2.4. TRANSPARENT

Each offer must be appropriately recorded, ensuring transparency.

Forms for requesting/displaying Offers - gifts, hospitality, meals or other types - must be filled in and handed in, safeguarding the duty of internal communication and registration and ensuring that trust and transparency are strengthened and deepened (a model Offers form/request is hereby approved as Annex A. to this Policy).

These forms must be filled in with a brief objective explanation of the circumstance and its admissibility, of the reason why the offer is appropriate in the context of conducting normal course of business.

Personally paying for, or otherwise concealing the Offer, giving or receiving of benefits is not transparent and would be viewed as a 'work-around' of this Policy.

All Employees, and trainees, are responsible for ensuring custodians of the START's well-being.

3. SPECIFIC GUIDELINES

3.1. OFFERS: HOW AND WHEN?

Personal hospitality is not admissible and must always be provided on behalf of START in compliance with the criteria defined by the company and the provisions of this chapter.

Guidelines and thresholds:

- a. The Offer must be occasional, reasonable and socially adequate.
- b. The Offer must be duly and completely recorded (in writing), ensuring transparency.
- c. The economic value of any kind of offer cannot exceed EUR 150.00 (one hundred and
- d. fifty euros) per person;
- e. The Offers must not imply or appear to imply any form of pressure or influence on business relationships;
- f. The Offers must show no ambiguity and show no risk of being misinterpreted or suggest the appearance of something improper (even when there is no improper intent).
- g. The Offers must not be intended to obtain improper or unjustified advantages or influence an entity's decision.

3.2. LEGITIMACY OF THE OFFERS

As mentioned, Offers must be justified according to a good business reason. Some examples of a good business reason are:

- a. Marketing or information purposes with clients or potential clients (e.g. with low-value promotional products);
- b. Publicize START's activities and business and improve or maintain reputation (e.g. distribution of goods to those who can evaluate them or to prominent personalities who can use or publicize them);
- c. To reinforce and foster relationships (e.g. low-value gifts at specific times, like Christmas);
- d. Celebrating successes with clients or suppliers (e.g. a low-value gift to celebrate the completion of a project or to thank a supplier).

3.3. SOCIAL APPROPRIATE OFFERS

The following Offers may be understood as in accordance with custom and practices and thus be acceptable:

- a. Occasional Offer of meals of a reasonable value and in any case under EUR 150.00 (one hundred and fifty) per person;
- b. Occasional Offer of tickets to artistic or sporting events;
- c. Occasional travel expenses for business partners;
- d. Low-value gifts, such as merchandising or small promotional items.

3.4. ABSOLUTELY FORBIDDEN OFFERS

Requesting, soliciting or suggesting Offers is absolutely forbidden by any Employee.

It is also absolutely forbidden to offer or accept Offers when:

- a. Offers are accepted or offered in cash or cash equivalents;
- b. The Offers are not deemed socially reasonable or adequate or, irrespective of that, in any case when exceeding EUR 150.00 (one hundred and fifty euros) per person;
- c. Offered or accepted in the context of the negotiation or revision of contracts or in tendering procedures in which START is involved;
- d. They have been requested by the recipient;
- e. Are accepted or offered on a reciprocal basis;
- f. Are aimed at or from political parties, officials, political officeholders or their close family members.

If any of the above situations described in paragraph 3.4. occur or the conditions for offering or accepting discounts are not fulfilled, the Employee must reject the offer immediately or return it, notwithstanding the report obligation to the Chief Compliance Officer through the institutional email compliance@startcampus.pt by filling in the form according to the model approved under this Policy (Annex A.).

With reference to all acts, all Employees must carry out an assessment of the risk of exposure. Any doubt regarding the acceptability or reasonableness of Offers should be clarified, before a decision is undertaken, with the Chief Compliance Officer.

4. THRESHOLDS, RECORDING AND APPROVAL REQUIREMENTS

OFFERS	REQUIRES PRE- APPROVAL BY BOARD	REGISTER AND ARCHIVED
GIFT	Above EUR 150.00.	Regardless of any value.
HOSPITALITY	Above EUR 150.00.	Regardless of any value.
BUSINESS MEAL	Above EUR 150.00.	Regardless of any value.

All Offers – gifts, hospitalities, business meals or similar – must be duly and clearly recorded, identified and justified, at all times, with appropriate supporting documentation and the relevant form (Attached to this Policy as Attachment A.1) must be completed for all purposes.

5. ENTRY INTO FORCE AND DISCLOSURE

This Policy will remain in force indefinitely.

The Compliance Officer is responsible not only for making the Policy available, but also for any clarifications or questions raised by recipients.

The Policy must be reviewed every 3 years or whenever there is a significant change that justifies its revision.

ANNEXES TO THE POLICY

Annex I – Registration form for Offers

Annex I

Registration form for Offers

Department	
Employee	
Offer (description)	
Value	
Subject to approval / Approved	
Description of context	
<i>Good business reason</i>	
Stakeholders (participants / who offered / to whom it was offered)	
Frequency	
Reimbursement request	
Observations	

Date: _____
Signee

Chief Compliance Officer

ANNEX B

CONFLICTS OF INTEREST/ ACCUMULATION OF FUNCTIONS (form)



REGISTRATION AND/OR APPROVAL FORM

Department	
Employee	
Category	
Description of Conflict of Interests / Accumulation of Functions	
Risk mitigation measures proposed	
Date submitted for approval	
Date of approval/not approved	
Justification for approval/non-approval	
Observations	

Date: _____

Signee

Chief Compliance Officer

ANNEX C

Whistleblower Channel Policy



Document Title	Whistleblower Channel Policy
Purpose	Defines the procedures for accessing the Whistleblowing Channel
Owner	<i>Chief Compliance Officer</i>
Version	2
Original Date of approval	22 of May of 2024
Status	Approved and in force
Confidentiality	Public

Rev	Date	Reason for change	Author	Approved by	Effective date
01	22/05/2024	N/A	Chief Compliance Officer	Board of Directors	22/05/2024
02	20/11/2024	Revised version	Chief Compliance Officer	Board of Directors	20/11/2024

1. PURPOSE

This Whistleblower Channel Policy aims ensuring (i) the definition of the processes to use the Whistleblower Channel, (ii) the compliance with the applicable regulations and (iii) the ethical values of the Start Campus Group.

This Procedure applies to Start Campus:

- **START - Sines Transatlantic Renewable & Technology Campus, S.A.**, with registered office at Avenida Engenheiro Duarte Pacheco, Amoreiras Tower 1, 13th floor, room 1, 1070-101, Lisboa, VAT No. 515 949 841.

This Procedure is evidence of Start Campus' determination against behaviours that run counter to Start Campus' values and demonstrates the commitment to continuously reinforce culture of integrity and ethical conduct and is intended to ensure that Start Campus complies with the obligations of the European Directive (UE) 2019/1937 on the protection of persons who report violations of EU laws of October 23, 2019, and with Law no. 93/2021, of 20 December which establishes the General Regime for the Protection of Whistleblowers, and other applicable legislation ("**Applicable Legislation**").

Start Campus values its prestige, resulting from the good work of its people, as a paramount asset.

However, this prestige, garnered over time, may be jeopardized or damaged by an inappropriate or irregular deed by a single employee, officer, director, manufacturer, supplier or third party with whom Start Campus is engaged in a direct employment, commercial or professional relationship. To prevent these behaviours, Start Campus requires from anyone with whom it may have a direct or indirect employment, commercial or professional relationship, that they carry out their business pursuant to the prevailing rules and regulations in force and its internal regulations, namely, the Code of Conduct. Likewise, the collaboration of said persons in detecting and preventing irregular or unlawful conducts which may jeopardize Start Campus' reputation or entail a violation of applicable statutory provisions or of Start Campus' internal regulations and commitment to protecting Human Rights, is essential.

Situations where Start Campus' prestige may be damaged may include, but are not limited to:

- Criminal activity.
- Danger to health and safety.
- Damage to the environment.
- Bribery and corruption.
- Facilitation payments.
- Influence peddling.
- Money laundering.
- Theft.
- Harassment or bullying.
- Discrimination.
- Fraud.
- Undisclosed and relevant conflict of interest.
- Financial mismanagement.
- Negligence.
- Tax evasion.

- Non-compliance with competition and State aid regulations, with public procurement regulations, with consumer protection regulations and with personal data protection regulations.

Additionally, according to Portuguese law, legal persons may become liable for such conducts committed by their employees, officers, and directors in the performance of their duties, it is recommended to set a number of measures to prevent, as much as possible, the commission of the above referred offences, including setting up communication and Whistleblower Channel. Likewise, pursuant to the most exacting international standards in the field of Compliance and Human Rights, Whistleblowing lines constitute a key element to detect and manage potential risks of noncompliance and thus support the Start Campus's commitment to promoting and respecting the corporate ethics culture.

For such purposes, Start Campus relies on this Procedure, which proceedings are hereunder described. Upon implementing such Whistleblower Channel, Start Campus has taken into account the Portuguese and European Union regulations on data protection, which are at the basis of the principles and commitments covered in its internal regulations on personal data and privacy.

In any case, Start Campus will respect and comply with any other applicable regulations or provisions, whether of a criminal or employment-related nature, or any other applicable regulations in the markets where it operates.

2. SCOPE OF APPLICATION

Start Campus makes available the Procedure to all its employees, manufacturers, suppliers or third parties with whom it has a direct relationship and a lawful business or professional interest (the **"Relevant Parties"**), at all levels. The Whistleblower Channel is a confidential channel to:

- **give notice of any breach of the Codes of Conduct of Start Campus as well as of any other internal conduct regulations.**
- **give notice of any act or omission that are being carried out breaching the applicable Laws.**

Queries and notices (jointly referred to as **"Concerns"**) reported through the Whistleblower Channel shall never relate to any sphere other than those referred to above.

The Relevant Parties shall only provide such specific and objective information that is required to determine whether the object of their Concern falls within the scope described. They must also refrain, unless this is essential to understand the scope of the Concern, from providing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of the Relevant Parties, the Reported party or any other natural person.

The Whistleblower Channel is a supplementary tool that does not replace any of the usual communication channels between Start Campus and its employees, manufacturers, suppliers and other third parties with whom it has a direct employment, commercial or professional relationship. In this regard, the Relevant Parties shall attempt, and Start Campus shall encourage, to the extent possible, use of such internal channels prior to resorting to the Whistleblower Channel. Likewise, the Whistleblower Channel shall not detract access by the Relevant Parties to any other court or out-of-court grievance mechanisms.

Labour and human resources management issues of Start Campus should not be reported through the unless they fall within the scope of application above. Such issues shall be reported through the ordinary channels of Start Campus, such as the Human Resources Department.

At any rate, Start Campus shall observe and comply with any other applicable regulations or provisions, whether criminal or employment-related, or any other applicable regulations in the markets where it operates.

This Procedure shall be available to all Start Campus employees on [Whistleblower](#) or [SC - Home \(sharepoint.com\)](#). Likewise, this Policy shall be subject to the appropriate circulation, training and awareness-raising proceedings, to ensure its understanding and enforcement.

3. HOW TO REPORT A CONCERN

The Whistleblower Channel may be contacted through any of the following means:

- E-mail sent to: compliance@startcampus.pt
- Ordinary post addressed to: Avenida Engenheiro Duarte Pacheco, Amoreiras Tower 1, 13th floor, room 1, 1070-101, Lisbon
- Internal channel: [Whistleblower](#) or [SC - Home \(sharepoint.com\)](#)
- Concerns can also be reported verbally to a member of the designated team. This can be done either by telephone or through a physical meeting.

Only those individuals specifically appointed for the regular management of the Whistleblower Channel, as part of their internal control and compliance duties, shall have direct access to such addresses and to the contents of the Concerns, exclusively.

The Head of HR, Compliance and Legal Team are responsible for promoting the necessary investigations, and proposing, as the case may be, the relevant remediation, prevention and awareness raising measures.

The Head of HR, Compliance and Legal Team shall act independently, doing its utmost efforts to ensure the confidentiality of the Concerns received, the Relevant Parties, and the documentation created, as the case may be.

4. CONTENTS OF CONCERNS

For the purposes of ensuring that investigations are accurate, and that Concerns are processed in a confidential manner, they shall include at least, and as the case may be, the following details:

- Identification details of the person who reports the Concerns, such as, name and surname, contact details and, as the case may be, details of the employee (job position or employee number).

Notwithstanding the foregoing, to ensure that the Whistleblower Channel is properly run, and that the privacy of the Relevant Parties is protected, Start Campus will also manage ex-officio such Concerns where the identification of the Relevant Parties is not provided, as they are anonymously reported.

- Association of the Party concerned with Start Campus and, as the case may be, with the affected company of Start Campus or of a third party.
- Identification details of the person or persons to whom the alleged non-compliance is attributed.
- Fact or facts of the breach, specifying as far as possible, the violation of the regulations observed.
- Supporting documentation of the breach, where possible.

5. GUARANTEES AND PROTECTIVE MEASURES

5.1. CONFIDENTIALITY

Start Campus guarantees the absolute confidentiality of the Concerns received through the Whistleblower Channel, and of the identity of the Relevant Parties, including the information from which the identity of the Relevant Parties can be directly or indirectly inferred, which will not be revealed to the Reported party or to the rest of Start Campus, without the consent of the Relevant Parties. All the individuals who are apprised of the Concern shall be compelled to keep the Concerns strictly confidential, in all their terms, including the data of the parties.

These confidentiality obligations shall not apply where Start Campus is compelled to reveal and/or make available information and/or documentation relating to its proceedings, including the identity of the parties involved, at the request of a competent court or administrative authority.

5.2. NON-RETALIATION AND PRESUMPTION OF INNOCENCE

Acts or retaliation against anyone who reports through the Whistleblower Channel an actual or suspected breach are strictly forbidden, as are acts of retaliation against anyone who may collaborate with the investigation or help resolve it (facilitators) as well as third persons who are connected with the reporting persons and who could suffer retaliation, such as work colleagues or relatives, and legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context, provided that the Concerns are reported in good faith, and having a serious basis to believe that the information is true at the time of reporting.

Should Start Campus confirm that any Party concerned, acting in good faith and with the serious belief in the truthfulness of the Concern, has been subject to any punitive measure or retaliation,

those responsible for such measures shall be subject to investigation and to the relevant disciplinary action if necessary.

Start Campus shall ensure the appropriate protection of privacy, honour and personal data, the presumption of innocence and the right of defence of the Reported parties, especially in case of unfounded, false Concerns, or Concerns reported in bad faith, against which the relevant action shall be taken.

5.3. RIGHT TO BE HEARD

Pursuant to the provisions of section 6.4. below, Start Campus shall guarantee that in the course of the investigation of the Concern, the Party concerned, and the Reported Party shall enjoy the right to be heard, being entitled to defend themselves and to put forward arguments, written or in other forms, plead, and submit evidence, as appropriate.

5.4. TRANSPARENCY AND MINIMIZATION RELATING TO THE USE OF PERSONAL DATA

Start Campus guarantees observance of the principle of transparency and minimization relating to the use of personal data in the Whistleblower Channel, through the information provided to the Relevant Parties and the Reported parties in Annex I – Information about use of personal data of Relevant Parties and Reported parties.

6. HANDLING AND INVESTIGATION CONCERNS

6.1. RECEPTION AND ACCEPTANCE OF CONCERNS

Concerns reported through the Whistleblower Channel shall be received by the Head of HR, Compliance or Legal Team who will contact the Party concerned acknowledging receipt, and informing of the requirements, competent authorities, ways and possibilities to proceed with the external report of the breaches, within 7 days of reception thereof.

Upon receipt of the Concern, Start Campus shall verify first whether it falls under the remit of the Whistleblower Channel; if such was the case, Start Campus will launch proceedings and refer the matter to the relevant department or area to take the actions described in the paragraphs below. Otherwise, if the Concern falls outside of the Whistleblower Channel's remit, and/or it is not duly grounded, or fails generally to fulfil the requirements of accuracy and clarity, Start Campus will order the immediate closing of proceedings. At any rate, Start Campus will apprise the Party concerned of the decision made regarding the Concern (whether it has been admitted or closed) as well as the grounds thereof, no later than 3 months of acknowledgment of receipt, or failing such acknowledgement, Start Campus will have 3 months to inform the Party concerned of its decision upon expiry of seven days of reception of the Concern.

6.2. LAUNCHING OF PROCEEDINGS

Where, further to the review of the facts disclosed in the Concern, Start Campus considers that there are reasonable signs of a breach, as described in section 2 hereof, it will resolve to launch proceedings and the relevant internal investigation, referring the matter to such department(s) or area(s) which will be charged with the investigation, in accordance with the type of affair.

In parallel to the launching of the proceedings and of the investigation by the relevant area or department, Start Campus may take additional urgent measures to prevent jeopardizing the

investigation, or which may be required to protect the Party concerned, with the support of the relevant departments or areas.

6.3. INTERNAL INVESTIGATION REGARDING THE CONCERN

Upon conducting the internal investigation, Start Campus and/or any parties specifically appointed to take part or collaborate in the investigation, may gather the information and documentation they deem appropriate from any department, area, or company of Start Campus, or from third parties, considering in each case the relevance and the nature of the facts reported. Likewise, as many investigations as are deemed necessary in light of each specific case, can be launched, for the purposes of determining the certainty or plausibility of the facts or signs reported.

Start Campus will answer the Concerns reported, meeting the deadlines of the investigation, under local regulations. Upon whistleblower's request, Start Campus informs of the internal investigation results up to 15 days after its conclusion.

Start Campus shall take the relevant measures to ensure at all times the objectivity of the investigation, for the purposes of determining the certainty or plausibility of the facts or signs reported.

Likewise, should any member of the Head of HR, Compliance or Legal Team, and/or anyone appointed to collaborate with the investigation be directly or indirectly subject to any Concern, they shall refrain from taking part in the investigation and resolution thereof.

Notwithstanding the foregoing, Start Campus may entrust an external facilitator with the investigation, in such cases where, given the nature, seriousness, complexity or the identity of the parties involved in the facts, this is recommended to properly resolve the Concern.

Start Campus expressly reserves the right to take the necessary monitoring and control measures on the software tools and equipment that the Company makes available to its employees, including the contents of communications and devices, always in compliance with the applicable laws in the field and guaranteeing the principle of proportionality and dignity of employees.

6.4. INFORMATION AND RIGHT TO HEAR THE PARTIES

The natural or legal person(s), whose behaviour is suspected of allegedly being irregular in the Concern, shall be apprised by the Head of HR, Compliance and Legal Team of such circumstance and of the data processing and its purposes, where this is permitted considering the status of the proceedings and at any rate, within one (1) month of the date when the Concern was received, provided that the investigation of the facts reported is not hindered, in which case the information may be postponed.

Additionally, through the exercise of the right to hear the parties, Start Campus shall guarantee the right of the Party concerned and the Reported party to raise in writing arguments, plead and provide evidence, as appropriate.

6.5. FINDINGS AND COMPLETION OF THE INVESTIGATION

Based upon the conclusions drawn further to the internal investigation, the relevant department or area in charge will send a report to the Head of HR, Compliance and Legal Team.

The Head of HR, Chief Compliance Officer and Legal Team will consider the terms of such report and prepare a resolution which shall at least address:

- A brief description of the investigation.
- The facts proven in the course of the investigation.
- The findings, which may consist, as the case may be:

In declaring that a breach exists, in which case, the Head of HR, Chief Compliance Officer or Legal Team may resolve:

- The immediate cure of such breach and the adoption of the measures to repair the damage caused and to prevent any future breach, if appropriate.
- Disciplinary measures, ranging from a mere admonishment or warning to dismissal.
- Referring the resolution to the relevant department which will be charged with taking and at any rate applying the remediation measures which may be necessary. Such remediation measures shall be reported to the Head of HR, Chief Compliance Officer or Legal Team.

Closing of proceedings, where further to the internal investigation, the Head of HR, Chief Compliance Officer or Legal Team finds that no breach whatsoever has occurred.

As a guarantee, Start Campus shall only disclose the terms of the resolution and the type of measures taken, if any, to the head of the relevant department or area, to the Relevant Parties and the Reported parties, and, where disciplinary measures are required, to the Human Resources department, for the purposes of scheduling and implementing the same.

7. MAINTENANCE, CUSTODY AND FILING INFORMATION

Start Campus shall keep an updated registry of all Concerns received and, where appropriate, of the internal investigations carried out and of the measures taken, for the periods permitted by law, under applicable regulations.

Such registry, and the processing made by those involved in handling the Concerns received through the Whistleblower Channel, shall fulfil the appropriate technical and Start Campus measures to ensure an appropriate level of security of personal data considering the risk and, as the case may be, those provided in applicable data protection regulations.

Regarding the information that shall be kept recorded, it shall be updated at all times and shall include the following data:

- Date when the Concern was received.
- Means used to send such Concern.
- Details of the Reported party and of the Party concerned.
- A summary description of the type of Concern and of the facts regarding which a breach is observed.
- Dates of information to the Reported party and the Party concerned.
- Documentation used upon investigating the Concern.
- Status of the investigation.

Personal data gathered within the scope of the internal investigation shall be erased when they are no longer necessary and relevant and at any rate, within 5 years of the date when the Concern is registered, unless legal or administrative proceedings remain in progress.

Personal data regarding any Concern which fall outside the scope of the Whistleblower Channel, are not necessary to conduct the investigation and/or are not subject to any investigation, shall be erased without any delay, except for the transfer thereof to any Public Administration and/or Law Courts, where this is necessary to attend to any potential liability during the relevant forfeiture terms. Such data shall be subsequently physically destroyed.

8. DISCLOSURE OF PROCEDURE

This Procedure will be available on Start Campus' intranet to all the employees, and it will be available to all the stakeholders of the Company on the corporate website. Likewise, the Procedure shall be subject to the relevant disclosure, training and awareness-raising proceedings for the appropriate understanding and implementation thereof.

9. UPDATE AND REVIEW OF PROCEDURE

This Procedure shall be reviewed and updated, where applicable, for the purposes of encompassing any changes which may arise in the business model or in the context where Start Campus operates, ensuring at all times the effective implementation thereof.

ANNEXES TO THE WHISTLEBLOWER CHANNEL

Annex I - Information about use of personal data of Relevant Parties and Reported parties

Annex II – Standard Form of Concern

ANNEX I

INFORMATION ABOUT USE OF PERSONAL DATA OF RELEVANT PARTIES AND REPORTED PARTIES

1. DATA CONTROLLER AND CONTACT OF THE DATA PROTECTION OFFICER

Pursuant to the regulations on data protection, the data controller is Start Campus:

- **START - Sines Transatlantic Renewable & Technology Campus, S.A.**, with registered office at Avenida Engenheiro Duarte Pacheco, Amoreiras Tower 1, 13th floor, room 1, 1070- 101, Lisbon, VAT No. 515949841.

Relevant Parties may contact the Data Protection Officer at privacy@startcampus.pt

2. CATEGORIES OF PERSONAL DATA

The following categories of data can be gathered in the framework of a Concern:

- Identification data, such as name and surname, contact details, and the details of the Reported Party and the party concerned relating to their status as employee, such as position or employee number.
- Relationship with Start Campus or other affected third parties.
- Reported breaches.
- Documentation in support of reported breaches.

3. PURPOSES AND LEGAL BASIS OF PROCESSING

Data shall be processed for the purposes of detecting, investigating, and legally assessing suspected breach of the laws identified in the scope of this procedure, from time to time in force.

Facts or processing reported need to be effectively associated with the employment, business or professional relationship directly linking the Reported party with Start Campus.

Likewise, processing of personal data provided in the Concern takes place in the framework of the employment, business or professional relationship with the entity of Start Campus with which the relevant employment, commercial or professional agreement, has been negotiated and/or executed.

Therefore, the lawful basis for personal data processing shall be compliance with Law no. 93/2021, of 20 December 2021 and act in the event of violation of applicable laws in the scope of that legal act. We have a legitimate interest in pursuing and preventing any proceedings contrary to internal policies. Major international organizations, such as the EU and the OECD, have highlighted the importance of good corporate governance principles for the effective functioning of organizations. A whistleblowing channel supports these principles by providing a secure and confidential mechanism for employees to report irregularities and questionable practices. This not only promotes a culture of accountability and integrity but also ensures that potential issues are promptly identified and addressed, thereby reducing the risk of misconduct. Therefore, the implementation of a whistleblowing channel is a

legitimate interest of Start Campus, as it aligns with recognized international standards and best practices for corporate governance, ultimately safeguarding the interests of all stakeholders and contributing to the organization's overall stability and trustworthiness.

4. DATA OF REPORTED PARTIES

Likewise, under applicable regulations, the Reported parties shall be apprised of the violation they have been accused of, of the departments and third parties with whom such information can be shared, and of how to exercise their rights regarding their personal data, in accordance with data protection regulations. Start Campus will proceed with the immediate deletion of all personal data that are not manifestly relevant for the processing of the Complaint. At any rate, the Reported party's right of access shall be limited to his/her own personal data exclusively, without the exercise of such right extending to the personal data of the Party concerned.

At any rate, the period allowed to inform the Reported party shall not exceed one (1) month from receipt of the Concern. Nonetheless, Reported Party's information rights, as well as the rights identified in section 8 hereunder, may be restricted, whenever informing the Reported Party or allowing him/her to exercise these rights may hinder the investigation of the facts reported, or the circumstances of the Concern would not otherwise permit it; in such case, the information can be postponed until disappearance of the risk.

5. STORAGE PERIOD

Personal data gathered through the Whistleblower Channel shall be stored in accordance with the provisions of applicable laws, as described in section 7 above. Namely, data will be stored for as long as it is necessary to decide on whether or not the facts reported should be investigated. However, should personal data need to be processed for a longer period, in order to continue the investigation, or because a decision has been made to take legal action, data will be stored in a different environment outside the Whistleblower Channel, should this be necessary to complete the investigation or for Start Campus to bring the relevant court proceedings.

6. RECIPIENTS OF PERSONAL DATA

To fulfil the processing purposes above referred, Start Campus will give access to personal data to service providers, such as external advisors and collaborators who provide support with the handling or, as the case may be, the investigation of the Concerns received through the Whistleblower Channel, and potentially, where action needs to be taken as a result of the investigation, the relevant areas/departments/entities of Start Campus which will be involved in the investigation and the potential action to be taken regarding the reported behaviour in question.

Likewise, data may also be transferred to judges, law courts, the Office of the Public Prosecutor or competent public administration, as a result of the investigation which may be launched.

7. INTERNATIONAL TRANSFERS

In this regard, some entities both of Start Campus Group and outside, above referred, may be found outside the European Economic Area and therefore, not be subject to a level of protection equivalent to the one provided in the European Union.

In such cases, we inform you that we transfer your data with adequate safeguards and always keeping your data safe, using the most convenient international data transfer tools, for example the Standard Contractual Clauses and any relevant supplementary measures. You may consult the content of such Standard Contractual Clauses through the following link:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outsideeu/modelcontracts-transfer-personal-data-third-countries_en.

8. RIGHTS

As stated in the Data Protection Policy, Start Campus must allow data subjects to exercise certain rights in relation to their personal data. These include:

- Right of access: the Party concerned is entitled to obtain from Start Campus confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, to request access to personal data. Access data include, without limitation, the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed. They can obtain a copy of the personal data undergoing processing.
- Right to rectification: right to obtain from Start Campus the rectification of inaccurate or incomplete personal data concerning him or her.
- Right to erasure (right to be forgotten): right to obtain from Start Campus the erasure of personal data concerning him or her.
- Right to restriction of processing: right to obtain from Start Campus restriction of processing of his/her personal data; however, Start Campus will carry out a review on a case-by-case basis, to determine whether or not the exercise of such right shall apply.
- Right to object: where certain circumstances are met, right to object to Start Campus' processing of his/her personal data.

The Relevant Parties and the Reported parties will be entitled to exercise their rights by sending a

letter to the registered office, or an email to the following email addresses:

compliance@startcampus.pt and privacy@startcampus.pt identifying the right they wish to exercise.

ANNEX II

STANDARD FORM OF CONCERN

PROCEDURE – START CAMPUS

FORM OF CONCERN

[NOTE: all data are mandatory unless otherwise stated herein]

IDENTITY OF THE REPORTING PARTY		
Name		
Surname		
Email		
Telephone n.º		
Association with Start Campus (check the appropriate box)	Director	
	Employee (please state your position, department or employee number)	
	Manufacturer	
	Supplier (please state the type of services provided to Start Campus)	
	Customer	
	Others	

IDENTITY OF THE REPORTED PARTY		
Name		
Surname		
Email		
Telephone n.º		
Company/Start Campus		
Association with Start Campus (check the appropriate box)	Director	
	Employee (please state your position, department or employee number)	
	Manufacturer	
	Supplier (please state the type of services provided to Start Campus)	
	Customer	

	Others	
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PURPOSE OF CONCERN

(please briefly state the purpose of your query or report)

Query	
Report	

INFORMATION ABOUT THE CONCERN

Note: Unless it is essential to understand the scope of the Concern, you should refrain from providing personal revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of a natural person.

Objective description of the query or facts regarding which a breach is observed

--

Approximate date when facts occurred

--

Start Campus's company(es) affected

--

Supporting documentation/ evidence in support of the facts and additional evidence

--

Additional remarks

--

- ☐ I represent that I report this Concern in good faith and that all details reported are true, except for any unintentional mistake or omission.
- ☐ I am aware of the processing that personal data herein included may undergo and which is summarised below.

Basic information on data protection	
Data controller	START - Sines Transatlantic Renewable & Technology Campus, S.A and Start Campus Energy, Unipessoal Lda (wherein the Head of HR, Chief Compliance Officer and Legal Team is included).
Purposes and legal basis of processing	We are entitled to process the data as we have a legal obligation to establish internal reporting channels under Law no. 93/2021, of 20 December 2021 and a legitimate interest in pursuing and preventing any proceedings contrary to internal policies.
Recipients	<i>We share data with service providers and collaborators within and outside the European Economic Area, and with the relevant authorities.</i>
Rights	You have the right of access, right to rectification or erasure, and, occasionally, the right to object to processing, as explained in the additional information. You also have the right to file a complaint with the competent Data Protection Supervisory Authority – Comissão Nacional de Proteção de Dados - https://www.cnpd.pt/
Additional information	For further information please refer to Annex I of the Whistleblower Channel Procedure of Start Campus.

ANNEX D

Social Media Policy



Document Title	Social Media Policy
Purpose	Establish the rules for using social media
Owner	<i>Chief Compliance Officer</i>
Version	1
Original Date of publication	20 of November of 2024
Status	Approved and in force
Confidentiality	Public

Rev	Date	Description	Reason for change	Author	Approved by	Effective date
01	20/11/2024	N/A		Chief Compliance Officer	Board of Directors	20/11/2024

1. OBJECTIVE

Improve stakeholder engagement, increase brand visibility and optimize Start Campus' and the SINES Project's Social Media, namely LinkedIn and Instagram, presence with this comprehensive guide. With clear guidelines on tone, content and communication strategies, we aim to foster right-sized stakeholder engagement, strengthen our brand identity and increase our visibility within the industry in a timely manner.

2. POLICY

2.1. PURPOSE

This policy is intended to give a clear framework on social media use to the company, as well as those who use it privately, and set out the appropriate, results-oriented strategy. Applicable to shareholders, employees, service providers, consultants and contractors of Start Campus.

Its primary purpose is to effectively communicate the company's core principles and initiatives, fostering a culture of responsibility and integrity in online engagement.

This document aims to facilitate effective communication of the company's core principles and initiatives on social media, ensuring a clear, respectful and engaging tone across multiple platforms, with posting regularly and strategically in line with Start Campus' social media strategy.

It also frames engagement with audiences within the established guidelines, "volume" and designated community owners. It also lays out how to promptly address any incidents or claims that affect Start Campus' reputation.

2.2. SCOPE

The only approved social media channel deployed by Start Campus currently is LinkedIn and Instagram, it is not permitted to have any other professional social media. No other social media platform is official nor active at this time. The reference to social media and/or LinkedIn and Instagram in this policy document is interchangeable.

This policy is applicable until formally reviewed and a revised policy is shared. Reviews will take place every 3 years.

2.3. SOCIAL MEDIA POSTING

All social media activity by the company needs to be approved by the Corporate Communication Working group (Community Owner, Start Campus senior management, Start Campus Chief Marketing Officer, the Legal Team and all external communication advisors) before being posted. This is to ensure consistent messaging which does not cut across other activity and is legally compliant.

The content strategy is to support the business case and (re)frame the company and its corporate positioning within the B2B universe; specifically with the customer and partner/supplier community. The content strategy is not, at this time, to support the broader narrative and messaging relating to talent or community.

2.4. MANAGING SOCIAL MEDIA COMMUNITY/ACCOUNT

1. Establishing a Start Campus social media presence

The operation of the Start Campus LinkedIn or Instagram account will be closely aligned with the prescribed communication plan (Strategic Comms Plan, March 2024) and content strategy. The designated account must provide business value to Start Campus. Its intended use is to be in line with Start Campus' social media strategy, branding guidelines and communication policies. Its continuity must be ensured and the requirements for monitoring, moderation and record keeping must be met.

2. Ownership and administration

The Start Campus LinkedIn or Instagram account should always be overseen by a Community Owner¹.

The Community Owner will be responsible for approving and gatekeeping, ensuring alignment with corporate objectives and coordinating content from various departments such as Legal, HR, Design and Construction, Environmental, Community, Marketing, and Sales).

The Community Owner is primarily responsible for managing the Community/Account in accordance with the guidelines set out, including:

- a. Link each account to the company's social media legal terms and monitor compliance;
- b. Ensure the accuracy and correctness of published content and monitor dialogue and activity within the community/account
- c. Ensure that only nominated, approved and trained staff manage and engage with the community/account
- d. Escalating to the Comms working group and Compliance any incidents or claims arising from the community/account that could affect Start Campus' reputation
- e. Maintaining social media posts and communications and archiving relevant records
- f. Maintaining a minimum of 2 and optimally 3 people able to update and edit posts

3. Group LinkedIn and Instagram strategy

The Community Owner, within the Corporate Communications Working Group is responsible for the global strategic direction of Start Campus' social media campaigns including content, engagement activities and timing. Business units, marketing as well as the Communications Working Group, propose and plan social media events as part of their ongoing communications activities and programmes, following the rules and principles set out and governed by senior management. The Community Owner deploys the approved Start Campus social media (LinkedIn and Instagram) programmes and campaigns.

2.5. OPERATING A SOCIAL MEDIA

1. Publication standards

Posts are subject to guidelines: only authorised Community Owners can publish them, and they should be validated by relevant team members for each topic, business unit and, depending on the type of post and regional requirements, compliance.

¹ Community Owner is a person responsible for the Start Campus social media community or account, i.e. ensuring that the Start Campus social media community is operated and managed within the boundaries of the relevant policies and guidelines, ensuring that the approved operational concept is adhered to and that the community or account is in line with the strategic direction of Start Campus. The person will also be responsible for sourcing content, ensuring its correctness and accuracy, obtaining necessary approvals, securing the involvement of relevant parties and providing details of distribution. They must not speak and/or engage with the community on behalf of Start Campus unless they are an authorized spokesperson.

Key considerations include:

- a. Each post should be validated by the relevant team member responsible for its accuracy, obtaining necessary approvals from relevant stakeholders and coordinating distribution details.
- b. Posts must adhere to channel-specific formatting guidelines and meet current Start Campus' brand standards.

2. Dialogue

Only authorized Community Owners are allowed to engage and interact with the audience on Start Campus social media/LinkedIn.

When incorporating images and third-party information, it is essential to comply with the relevant association's policies and guidelines.

3. Record storage and archiving

Ensure a traceable history: the need for maintaining a traceable history by archiving relevant records of social media interactions and associated materials for future reference.

2.6. COMMUNICATION GUIDELINES

1. Unified messaging

Ensure consistent messaging across all LinkedIn and Instagram communications, aligned with broader organisational narratives and goals to maintain consistency and credibility. There is no other official social media platform active at this time. Veracity of fact is required.

2. Transparency

Honesty and transparency in all communications ensures that messages authentically reflect the organisation's values and commitments.

3. Timeliness and responsiveness

Timely responses are to be offered to queries or concerns raised on LinkedIn or Instagram, demonstrating the organisation's commitment addressing issues promptly. For this, the Corporate Communication Working Group and Legal & Compliance (L&C) at legal-dl@startcampus.pt are promptly notified of external inquiries or concerns raised, to ensure a coordinated and legally correct response.

4. Escalation Procedures

Escalate to the Corporate Communication Working Group any assessment in order to move from reactive to proactive action.

5. Policy Compliance

Ensure that all LinkedIn and Instagram communications adhere to organisational policies, including privacy, confidentiality and L&C guidelines*, to mitigate potential risks.

6. Tone, attitude and guidelines for communication

Messages should be delivered clearly without being misleading, while also creating an atmosphere of respect, understanding and empathy. Refer strictly to the facts and data.

- a. Do not speculate.
- b. Do not provide confidential information.
- c. Do not give an opinion or make judgments about Start Campus decisions.
- d. Remember that as a digital spokesperson for the company, everything said in LinkedIn or Instagram is considered and construed as "official".

7. Handling negative feedback and crisis management

Follow a clear protocol that outlines responsibilities for monitoring social media channels, how often feedback should be monitored, and how quickly to respond to negative comments.

- a. Immediate handling: Mandate immediate action with agencies upon negative activity on social media platforms to quickly mitigate any potential reputational damage.
- b. Ensure professionalism: Avoid engaging in arguments or defensive responses.
- c. Acknowledge and address concerns: Timely acknowledgement of negative feedback and stakeholder concerns is essential. Show empathy and commit to addressing the issue, if only to acknowledge it's received and to ensure further investigation.
- d. Encourage offline communication: Provide contact details or direct people to a specific email address/customer service representative to address their concerns privately.
- e. Engage legal and compliance teams: Involve legal and compliance teams to ensure that responses comply with regulations, adhere to company policies and mitigate potential legal risks.

8. Employee Social Media/LinkedIn pages

While recognising that employees' profiles are their own personal pages and a space for a personal overview of how they wish to describe themselves, their career history, education and other achievements, it must be noted that employees' digital footprints reflect upon a firm's reputation. This extends to their presence and conduct on LinkedIn and/or Instagram, where it is their responsibility to behave appropriately.

To ensure consistency across individual profiles and reinforce that Start Campus is a professional and high standards firm, it is important that all current and future employees be aware of best practices when it comes to their social media presence and conduct.

To start with, we recommend that you:

- a. Encourage each employee to display their headline in a consistent manner (i.e., 'Job Title' at Start Campus rather than a generic phrase), as this (i) enhances professional credibility and clarity, (ii) immediately communicates the employee's expertise and professional identity, (iii) contributes to a stronger professional brand overall
- b. Offer support to employees to write a short LinkedIn 'About' section, which emphasises an employee's role at Start Campus, their personal skills / experience, and the strength of the Start Campus brand.
- c. We strongly recommend that this 'About' section uses standardised language when describing Start Campus, aligned with language used on the website and/or boilerplate.
- d. Supply Start Campus employees with a banner image of the firm and suggest they use this on their profiles.
- e. Remind employees that with regards to what they post or comment on, LinkedIn is a public forum and information on the business and details of its operations, activity, clients and contracts, or those of its peers, should not be posted.

- f. Encourage employees to utilise a professional headshot, to present a consistent style across LinkedIn or Instagram and the website

3. CONTENT

3.1. GOALS PHASE I

- a. Establish Start Campus/the SINES Project as a relevant player in the market by increasing brand awareness and visibility - clearly communicating its identity, purpose and progress.
- b. Increase engagement and interaction on the Start Campus/the SINES Project LinkedIn or Instagram page to foster meaningful connections and relationships within the industry.
- c. Align LinkedIn and/or Instagram content with Start Campus' strategic goals and values to demonstrate leadership and expertise in sustainable data centre solutions.
- d. Measure and track LinkedIn and/or Instagram performance metrics to continually optimise strategy and achieve desired results.

3.2. STRATEGY

- a. Target audience demographics: Industry professionals, potential customers, partners and stakeholders
- b. Content themes and formats: industry insights, case studies, thought-leadership comments and articles, conference attendance, and company updates.
- c. Posting frequency: Minimum every 14 days, maximum every 5 days.
- d. Engagement metrics KPIs to measure the success of the LinkedIn and Instagram strategy will be likes, comments, shares, click-through rates and follower growth.
- e. Profile optimization: Relevant keywords, compelling descriptions and up-to-date information to attract and engage visitors.

3.3. THE BRAND VOICE

The brand voice professional and Knowledgeable:

- a. Start Campus should maintain a professional tone on LinkedIn and/or Instagram. The expertise in sustainable data centres positions the company as industry leaders.
- b. Use language thoughtfully reflecting true knowledge, experience, and commitment to innovation. Empathetic and Solution-Oriented:
- c. Understand the challenges faced by businesses and individuals in the data center industry
- d. Offer practical solutions and tips to address these challenges

3.4. ENGAGEMENT AND INTERACTION

1. Comment and Engage

Participate selectively in relevant discussions, comment on industry-related posts, and engage with other professionals. Respect community guidelines and seek permission from counterparties, when necessary, before engaging or sharing content.

Employees are not permitted to post links directly from web pages using copied URLs. Both the page and the post generated by the social sharing buttons must meet the requirements for safe to share content.

- a. Employees must not use their personal social media accounts for business purposes (e.g., communicating with customers, soliciting business, marketing products and services, distributing sales messages, etc.).
- b. Currently, we recommend that employees refrain from interacting in any visible way with Start Campus social media content using their private social media accounts (e.g., liking, sharing, reposting, hyperlinking, commenting, etc.). We appreciate your cooperation in this matter. We recognise that employees' private social media accounts are their own, but we ask them to consider carefully how any posts from private accounts that mention or link to Start Campus in any way might reflect on the company before posting.

Hashtags and Keywords include: #DataCenters, #Sustainability; #Portugal and #Innovation. Incorporate keywords related to the service/content being showcased.

2. Visual Content

When incorporating images and third-party information, it is essential to comply with the relevant association's policies and guidelines. If necessary and in the case that IP rights are not secured, content should be revised or summarised and images omitted to avoid infringement of IP rights.

4. BEST PRACTICES

CLARITY: Clear communication is the foundation of effective writing. Today's readers have limited time and shorter attention spans, so it's important to be concise and well structured. Here are some tips:

- Start with your main point and get straight to the point.
- Simplify your language.
- Use everyday language that's easy to understand.
- Avoid long sentences or paragraphs.
- Use subheadings and bullets to improve readability.
- Use active verbs to make your writing more dynamic".

ASSURANCE: Persuasion is the cornerstone of effective communication. Make sure your audience not only understands your message, but believes in it. Write with relevance, trust and credibility.

- Provide only necessary information.
- Prioritize benefits over processes.
- Be specific, not abstract.
- Back up claims with evidence, not just adjectives.
- Claim only what you can substantiate.

CONSISTENCY: Maintaining coherence and continuity in communication is crucial for building trust and credibility with your audience. Here's how to ensure consistency in your messaging:

- Use a consistent tone and voice across all platforms and channels.
- Ensure alignment between your written and visual content.
- Adhere to brand guidelines for logos, colours, and typography.
- Regularly review and update messaging to reflect any changes or developments.
- Define a content Start Campus schedule calendar - publish and monitor results regularly.

ORIGINATION & APPROVAL PROCESS: All content, whether created in-house or externally outsourced, undergoes a thorough approval process involving internal and external teams. This

ensures that all materials meet quality standards, adhere to brand guidelines and comply with regulatory requirements.

Post origination can come from anyone in the company and is sent jointly to Community Owner and Marketing.

The CO and Marketing ensure that the relevant people are identified and contacted to validate the topic, assures messaging, refines or rewrites copy and determines timing for post and approvals, as required.

Marketing or Community Owner shares final approved post with vendor for posting. Communication agencies can support in copy, as required.

APPLICABILITY: Writing compelling headlines is crucial to grabbing readers' attention. To ensure effectiveness, follow these principles.

- A two-step approach
 - i. The headline should grab the reader's attention immediately.
 - ii. The Infoline/subheading should provide additional context to focus attention.
- Key line
 - i. Prioritise professionalism and expertise, while being forward-thinking, authentic, empathetic and solution focused.
- Clarity tips
 - i. Ensure clarity and precision by using active verbs to effectively communicate complex technical concepts.
 - ii. Choose commonly used words and phrases over formal language to improve comprehension and accessibility.
- Persuasion tips
 - i. Focus on demonstrating benefits rather than detailing processes.
 - ii. Provide evidence to support claims rather than relying on adjectives alone.
