Supply Chain Sustainability Policy

Sustainability is at the heart of EST, S.A.'s business operations. EST, S.A. wants to promote the sustainable development of its entire supply chain and expects its suppliers to operate in the same way.

EST, S.A. requires all its suppliers to comply with the following sustainable principles. This is the starting point for initiating and maintaining all business relationships with EST, S.A..

The supplier must ensure that all its employees (fixed and temporary), as well as its suppliers and sub-suppliers, recognize and comply with the requirements set out in this policy.

It is expected of the supplier at least:

1. Business Ethics and Legal Compliance

- comply with all accepted and generally applicable national and international laws, regulations and practices;
- comply with all applicable trade sanctions and export control laws and regulations, including but not limited to those issued by UN, EU, or U.S. authorities
- not to participate in or support any form of corruption, bribery and money laundering, among others, not to pay bribes or make other illegal payments to obtain or maintain business or to facilitate favorable decisions or services;
- not to offer generous or excessive gifts, entertainment or invitations to EST, S.A. employees. Any gifts, entertainment or hospitality must be reasonable and appropriate and reflect national laws and business custom;
- not to provide or accept, directly or indirectly, gifts in the form of money or cash equivalents;
- when requested, provide information about this policy related to your business with EST, S.A., as well as actively report any deficiencies that may appear in the information provided;

Act with integrity in all business relationships. For EST, S.A., integrity means honesty and strong moral principles.

2. Human and labour rights

- comply with all applicable national laws and regulations related to human rights and labour rights, as well as recognise changes to them;
- respect the protection of human rights and respect the principles of UN Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work. These declarations include freedom of association, effective recognition of the right to collective bargaining, the abolition of forced labour, and equal opportunities and treatment;
- pay at least the minimum wage required by national laws for regular working hours, overtime, and differentiated overtime;
- not to employ or negotiate with subcontractors or suppliers who employ people under the minimum age of 15 or at the mandatory school age defined by national legislation, whichever is greater. The employment of people above the minimum age, but under 18 years of age, may not interfere with the individual's school life or harm his or her health, safety or morals;
- not to use forced labor of any kind or to do business with subcontractors or suppliers who do so;
- not withhold government-issued IDs, passports, work permits, or ask for any other unreasonable deposits or fees (e.g., recruitment or hiring fees) as a condition of employment;
- not discriminate in hiring, remuneration, training opportunities, promotion, termination of employment or retirement on the basis of race, age, sex, social class, nationality, religion, disability, sexual orientation, marital or maternal status, union membership, political affiliation or other comparable reasons;
- not to perform or support physical punishment, harassment or physical, sexual, moral or verbal abuse;

ensure that contractors working on site have adequate and dignified accommodation.

3. Occupational health and safety

- comply with all applicable national laws and regulations in relation to occupational health and safety, as well as recognize the changes they undergo;
- provide a safe, healthy and well-managed work environment;
- Prevent occupational incidents, injuries and diseases;
- allocate sufficient resources and the necessary competence to provide a healthy and safe workplace;
- have a process for identifying and assessing work-related hazards, having relevant controls in place, and, based on this assessment, implementing safe work systems. These systems should be monitored by management, being kept up to date and continuously improved;

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- instruct the team to minimize hazards, in addition to risk controls and safe working methods;
- provide staff with adequate occupational health services, including statutory insurance coverage, and all necessary training required by applicable laws;
- report and investigate all health and safety incidents;

4. Climate and environmental management

- comply with all applicable national laws and regulations in relation to environmental management, as well as recognize the changes they undergo;
- provide efficient, clean, and well-managed operations;
- avoid pollution and environmental incidents;
- allocate sufficient resources and the necessary competence for environmental management;
- have all valid environmental permits required by operations and follow the operational and reporting requirements included in permits;
- have a process to identify and assess relevant environmental aspects and operational controls and, based on that assessment, implement procedures to prevent pollution and minimise environmental impacts. These procedures should be monitored by management and kept up to date;
- instruct staff on the environmental aspects, controls and procedures associated with their work tasks;
- properly classify and forward waste, in accordance with applicable laws, for reuse or recycling, in order to minimize environmental impacts and to correctly process and dispose of hazardous waste;
- identify substances that are harmful to the environment or health and use, store and dispose of these substances in a safe and controlled manner;
- keep safety data sheets and accident instructions up to date and implement a plan to replace harmful substances with less hazardous alternatives;
- maintain emergency action plans to ensure that all environmental accidents are managed in order to minimize the consequences;
- strive to continuously reduce the use of energy, raw materials and water, as well as minimize waste and emissions into the air, water and soil.
- monitor, report and attempt to reduce greenhouse gas emissions in its operations and value chain and provide data if requested.

5. Products and services

- maintain a proactive approach to product safety, ensuring, among others, that the products supplied to EST, S.A.
- meet mandatory product safety requirements and identify, assess, and manage all risks related to the use of these products;
- tentar reduzir de forma continuada o uso de substâncias perigosas nos seus produtos;
- to try to continuously reduce the use of hazardous substances in its products;
- ensure responsible and conflict-free sourcing of tin, tantalum, tungsten and gold (3TG) in its supply chain, as required by the EU Conflict Minerals Regulation and the Dodd-Frank Conflict Minerals Act;
- provide information on the above-mentioned substances and minerals, if requested.

6. General Requirements

- designate a person within the company to be responsible for following and developing the principles set forth in this policy;
- have a redress process in place in the event of a violation of human rights, health and safety, or the environment;
- report any violations or non-compliance with this policy to EST, S.A.. The supplier and any staff and stakeholders can report their concerns anonymously 24/7 in Portuguese using this channel:

https://form.jotform.com/233163095199058

- allow EST, S.A., or any third party authorized by EST, S.A. and accepted by the supplier, to conduct, in the presence of the supplier, an audit of the operations carried out by the supplier in relation to this policy.

Application

EST, S.A. actively monitors and evaluates its suppliers' compliance with this policy and may ask its suppliers to complete a sustainability self-assessment.

If the supplier does not comply with this policy, EST, S.A. reserves the right to terminate the contract with the supplier, without prejudice to any other rights, whether under contract or under general law, including orders already placed and future.

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