

CODE OF CONDUCT AND ETHICS

2024



This Code of Conduct and Ethics establishes the ethical principles and guidelines governing the behavior of LTP's employees.

The document is based on the General Regime for the Prevention of Corruption (RGPC -Regime Geral de Prevenção da Corrupção) and the Regulatory Compliance Programme (PCN - Programa de Cumprimento Normativo), ensuring compliance with current legislation and promoting an ethical and transparent environment.

This Code applies to all LTP employees, regardless of their hierarchical position, including senior managers and suppliers and business partners.

LTP is committed to ensuring the effectiveness of this Code, promoting an environment of integrity and good corporate practices. All employees are encouraged to act responsibly and to report any irregularities through the appropriate channels.

This Code will be periodically reviewed and updated as necessary to ensure that it is in line with legal requirements and the evolution of best governance and business ethics practices.

Introductory Note

LTP's principles for conduct and ethics

Versatility and
disruption

Rigor and
impartiality

Respect and
trust in others

Consciousness and
professionalism

Promotion of
excellence

Confidentiality and
discretion

Promotion of excellence

Every LTPeer shall live the value of an **excellence-based approach**. This principle can be poured into various behaviors such as:

- **Providing timely and constructive feedback** looking to assist in bringing out the best in each one;
- Ensuring that everything we deliver to our (external and internal) clients **complies with the highest credibility and quality standards**;
- Preserving intellectual honesty, objectivity, respect for intellectual property, and methodological rigor.

Confidentiality and discretion

As part of our solutions, we have privileged access to sensitive data. Each of us is responsible for ensuring confidentiality, integrity, and proper availability of information. It is expected that LTPeers embrace a reserved attitude, both in the physical and online worlds, restraining comments/opinions/beliefs regarding fragmenting themes to forums that cannot be traced back to LTP. Client-specific disclosures in social media are strictly forbidden.

Versatility and disruption

Becoming an LTPeer means one demonstrated to be and is challenged to **continue on being versatile and disruptive**. We are expected to instill a problem-solving attitude from day one and in every context, being able to work with the most diverse problems and stakeholders successfully.

Disruption is also one of the key ingredients for innovation, which is crucial to guaranteeing that LTP continues to be on the crest of the wave regarding applications of Advanced Analytics and AI in businesses.

Rigor and impartiality

LTP's approaches must align with each client's business reality, guarantee accurate and factual results, and deliver rigorous outcomes catering to each client's needs.

Each one is responsible for ensuring that every relationship, recommendation, or suggestion is **unbiased and free of personal interests**. LTPeers won't participate in any form of actual or perceived corruption or bribery.

Also, LTP may work with more than one player in an industry and must be a neutral partner, guaranteeing that there exists no leakage of information that can affect each of the client's businesses. LTP guarantees that LTPeers do not work simultaneously with direct competitors.

Respect and trust in others

Caring for LTPeers is a crucial factor in the success of LTP and the key to creating a collaborative and supportive environment lies in acknowledging and embracing the unique qualities, beliefs, and values of each LTPeer. As LTPeers, it's our **shared responsibility to cultivate a polite and considerate attitude towards one another.** Acts of any type of discrimination and harassment are strictly forbidden.

Consciousness and professionalism

LTP thrives in an informal culture based on great proximity. Yet, some principles cannot be pinched – an **always professional stance is one of them**. There are guidelines regarding the relationships with our clients, work wear, mandatory days to be present (e.g., outlabs and monthly inlabs), expenses, and others that are non-negotiable and cannot be crossed over. LTPeers **shall make the most of what is available**, avoiding spoilage, and taking care of their belongings (computers and others). One of the most important assets that we should preserve is our office - it is our duty to keep it clean and organized (just as we would do in our homes).

LTP's commitment towards LTPeers

Guarantee an ever-challenging environment

by creating adequate foundations, providing the development tools and support necessary to bloom a versatile mindset, while ensuring a fair performance assessment, reward, and fostering work-life balance.

Strive to preserve an informal, close-knit, and flat organization

proximity, openness, and transparency are some of LTP's characteristics that shall be well-preserved by continuing to involve all LTPeers in strategic decisions and internal management.

Continuously work on improving conditions, perks, and benefits

always keeping LTPeers' interests in the highest regard and caring for everyone's personal and professional goals while maintaining a sustainable financial model.

Sustain an exceptional culture

proudly created, molded, and lived that is founded on solid collaboration between LTPeers, meaningful and trustworthy relationships, and a shared ambition to keep on empowering every decision with AI & Analytics.

Practical applications of LTP's code of conduct and ethics

LTP is invested in ensuring a living and breathing implementation of this code. This implies greater consequences of both positive and negative applications of the presented guidelines that will always be acknowledged and monitored by LTP's Leadership Committee.

Examples of great commitment to these principles will be positively recognized in appraisal moments.

On the other side, behaviors that are not aligned with LTP's code of conduct and ethics will be properly followed up. Depending on the frequency, gravity, and impact of such acts, different measures can be taken:

- Immediate feedback by a senior LTPeer,
- Negative recognition/impact in appraisal moments,
- Application of disciplinary procedures.

At LTP we believe in leading by example and each one of us can be a leader from day one. As part of LTP's onboarding journey, every new joiner must attend a session, led by one member of the Leadership Committee, dedicated to deep-dive in this code.

How are we living the code

Conflict of interest

Conflict of interest exists when one interaction or relationship can be considered biased or unneutral. That can be connected to different factors such as political, familiar, and affective, and can compromise one LTPeer duty of diligence and impartiality.

The conflicts can happen in different settings:

- LTP and its clients;
- LTPeers and LTP's stakeholders (e.g., clients, candidates, providers);
- Between LTPeers.

Each one of us, in the face of a conflict (existing or potential), has the responsibility of reporting it, as soon as possible, to one of the following figures at LTP- your mentor/appraiser, a member of the People team, or a member of the leadership committee.

The LTPeer who was notified of the situation must follow up on the case. When needed, he/she shall initiate the resolution measures in place:

- LTP and its clients – LTP must ensure a policy of Chinese walls by not allocating LTPeers that may have, or have had in a close past, access to sensitive data of direct competitors;
- LTPeers and LTP's stakeholders – LTP ensures that the LTPeer is not allocated to any project with the client or in any decision-making process involving the candidate/provider.
- Between LTPeers – the allocation process must guarantee that the LTPeers do not collaborate on the same projects. Also, LTP's People team must ensure that the evaluation process remains objective and impartial by not involving one of the LTPeers in any discussion/decision forum related to the other.

If any of the principles and values outlined in this code of conduct, or in any national or European legislation, are not adhered to, every LTPeer has the opportunity to seek clarification from the responsible departments/areas.

Complaints can be addressed to LTP through the following channels:

- By email to hr@ltplabs.com,
- By regular mail sent to "Ethics Committee" with a "Do not open" message in the envelope,
- In a face-to-face meeting, requested by the complainant via email to hr@ltplabs.com.

These channels ensure a secure submission and follow-up of complaints, as access to the data is restricted to authorized LTPeers only (members of the ethics committee or, if one of them is involved, a neutral member of the Leadership Committee). The complainant's identity and any information that could reveal it are confidential and accessible only to LTPeers responsible for receiving and addressing complaints. This confidentiality obligation also applies to other LTPeers who may have received information about complaints. LTP's Ethics Committee is formed by Inês Vasconcelos and Pedro Amorim.

LTP is obligated to not practice any form of retaliation.

Complaints and Communication

Review and update Process

At LTPlabs, we recognize the importance of maintaining an ethical framework that aligns with evolving legal requirements and organizational values. To ensure the relevance and effectiveness of our Code of Conduct and Ethics, we follow a structured review and update process:

- **Regular Review:** The Code will be reviewed at least once every two years to assess its alignment with applicable laws, industry standards, and LTPlabs' evolving business needs.
- **Trigger-Based Updates:** In addition to scheduled reviews, updates may be initiated in response to legal or regulatory changes, organizational restructuring, or emerging ethical considerations.
- **Stakeholder Input:** Feedback from employees, leadership, and external advisors will be considered to identify areas for improvement and ensure the Code remains practical and actionable.
- **Approval and Communication:** Any revisions to the Code will be approved by LTPlabs' leadership team and effectively communicated to all employees. Training or awareness sessions may be conducted as needed to reinforce key changes.
- **Employee Acknowledgment:** All employees will be required to review and acknowledge the updated Code, confirming their commitment to upholding LTPlabs' ethical principles.

By maintaining a dynamic and responsive Code of Conduct, LTPlabs ensures that its ethical commitments reflect **legal compliance and the company's core values**.

CODE OF CONDUCT AND ETHICS

2024

