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textile solutions

**supplier and subcontractor
code of conduct**



Preamble

Adalberto Textile Solutions, S.A. is a Portuguese company with decades of experience in the textile industry, internationally recognised for the quality, environmental responsibility and social commitment embedded in its products and processes.

The supply chain of Adalberto Textile Solutions is an integral part of its business model. The Company's reputation among clients, partners and international markets is directly linked to the way the entire value chain operates. For this reason, Adalberto Textile Solutions requires its suppliers, subcontractors and service providers to observe a set of principles and practices that reflect the values the Company itself upholds and applies.

This Code of Conduct establishes the minimum standards that all business partners must comply with, grounded in the instruments of the International Labour Organization (ILO), the principles of the Universal Declaration of Human Rights and international corporate responsibility frameworks. Non-compliance may result in the suspension or termination of the commercial relationship.

Scope of Application

This Code applies to all suppliers, subcontractors and service providers that establish a commercial relationship with Adalberto Textile Solutions, S.A., regardless of their size, geographic location or the nature of the goods and services provided.

The scope of this Code includes any entity that, directly or indirectly, takes part in the production, processing, transportation, storage or provision of services associated with the products of Adalberto Textile Solutions.

Suppliers are responsible for ensuring that the principles set out herein are equally observed by their own subcontractors and service providers, whenever these form part of the supply chain of Adalberto Textile Solutions.

Labour Rights and Working Conditions

Free and Voluntary Labour

The use of any form of forced, compulsory, slave or bonded labour is expressly prohibited, in accordance with ILO Convention No. 29 on Forced Labour (1930) and ILO Convention No. 105 on the Abolition of Forced Labour (1957). This prohibition includes debt bondage, trafficking of persons for labour purposes and any practices that restrict workers' freedom, including the retention of identification documents or passports.



Workers must be free to terminate the employment relationship, subject to the legally established notice periods.

Prohibition of Child Labour

No form of child labour is permitted. The minimum age for admission to employment is 15 years or the age of completion of compulsory schooling, whichever is higher, in accordance with applicable national legislation, ILO Convention No. 138 on Minimum Age (1973) and ILO Convention No. 182 on the Worst Forms of Child Labour (1999).

The worst forms of child labour are absolutely prohibited, including slavery, trafficking, debt bondage, forced recruitment into armed conflicts, prostitution, the production of pornographic material, and any unlawful or hazardous activities that may harm the health, safety or morals of minors.

Non-Discrimination and Equal Opportunities

All workers are entitled to dignified and equal treatment, in accordance with ILO Convention No. 111 on Discrimination in Employment and Occupation (1958) and ILO Convention No. 100 on Equal Remuneration (1951). Any form of discrimination in recruitment, career progression, remuneration or working conditions is prohibited on the grounds of gender, race, ethnicity, nationality, religion, political beliefs, sexual orientation, disability, age, marital status or any other personal characteristic not relevant to job performance.

Freedom of Association and Collective Bargaining

Workers have the right to freely associate, to form trade unions and to collectively negotiate their working conditions, in accordance with ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organise (1948) and ILO Convention No. 98 on the Right to Organise and Collective Bargaining (1949). Suppliers must respect this right and refrain from any action that may restrict or limit it.

Fair Remuneration

Suppliers must ensure that all workers receive remuneration that meets at least the applicable legal or collective agreement minimums in the country where they operate, in accordance with ILO Convention No. 131 on Minimum Wage Fixing (1970). Overtime must be compensated at a rate higher than the regular hourly rate, as provided for in local legislation.

Payment must be made regularly and transparently, without undue or non-consensual deductions.



Working Hours

Normal working hours must not exceed the limits established by applicable national legislation and ILO Convention No. 1 on Hours of Work (Industry) (1919). Overtime must be exceptional, voluntary and duly compensated. Workers are entitled to at least one rest day per week, in accordance with ILO Convention No. 14 on Weekly Rest (Industry) (1921).

Occupational Health and Safety

Suppliers must provide safe, hygienic and suitable working environments for the preservation of workers' physical and mental health, in compliance with ILO Convention No. 155 on Occupational Safety and Health (1981) and ILO Convention No. 187 on the Promotional Framework for Occupational Safety and Health (2006).

Workers must receive adequate training on occupational health and safety. Access to personal protective equipment, dignified sanitary facilities, and adequate lighting and ventilation must be ensured. Risk situations must be reported, analysed and corrected promptly.

Prohibition of Harassment and Dignified Treatment

All forms of moral or sexual harassment, physical or psychological violence, intimidation or degrading treatment are prohibited, in accordance with ILO Convention No. 190 on the Elimination of Violence and Harassment in the World of Work (2019). Suppliers must have internal mechanisms in place to receive and address complaints related to these matters, ensuring confidentiality and protection of those who file complaints.

Environment and Sustainability

Environmental Commitment

Suppliers must comply with all applicable environmental legislation in the countries where they operate and adopt continuous improvement practices regarding emissions reduction, waste management and the rational use of natural resources.

Water and Energy Management

Suppliers must implement energy and water efficiency measures, with particular attention to textile production processes involving high consumption. The use of renewable energy sources and technologies with lower environmental impact is encouraged.



Waste and Packaging

Waste arising from production processes must be managed in accordance with applicable legislation, prioritising reduction at source, reuse and recycling. The use of packaging must be optimised to avoid material waste.

Ethics and Legal Compliance

Integrity and Anti-Corruption

Suppliers must conduct their business with integrity, transparency and respect for the law. All forms of active or passive corruption, bribery, influence peddling or offers of value intended to influence commercial decisions are expressly prohibited. This prohibition applies to relations with both public and private entities.

Fair Competition and Legal Compliance

Suppliers must respect competition rules and intellectual property rights. They must comply with all applicable legal and regulatory obligations in the jurisdictions where they operate, including tax, labour, environmental and product safety obligations.

Data Protection and Confidentiality

Suppliers who, within the scope of the commercial relationship with Adalberto Textile Solutions, have access to confidential information, personal data or trade secrets must ensure the appropriate and secure handling of such information, in accordance with applicable personal data protection legislation.

Broader Social Responsibility

Suppliers are encouraged to adopt social responsibility practices that go beyond minimum legal compliance, particularly with regard to the development of local communities, the promotion of diversity and inclusion, and support for the training and qualification of workers.

Verification and Audit

Right of Audit

Adalberto Textile Solutions reserves the right to carry out, directly or through duly accredited third-party entities, audits and inspections of suppliers' facilities and practices, in order to



verify compliance with this Code. Audits may be announced in advance or carried out without prior notice.

Cooperation and Transparency

Suppliers must actively cooperate in all verification and audit processes, making available the necessary documents, records and access. Refusal to cooperate or the provision of false or incomplete information shall be considered a serious breach of this Code.

Consequences of Non-Compliance

Where non-compliance with the principles set out in this Code is established, Adalberto Textile Solutions may adopt such measures as it deems appropriate, including requiring the implementation of a corrective action plan within a defined timeframe, the temporary suspension of orders or the definitive termination of the commercial relationship, depending on the severity and persistence of the irregularities identified.

Reporting and Whistleblowing Mechanisms

Reporting Channel

Adalberto Textile Solutions provides a reporting channel for receiving communications regarding potential violations of this Code or of other applicable codes of conduct. Any person who, within the supply chain, becomes aware of irregular situations may report them through the following email address: portaldadenuncia@adalberto.pt.

Whistleblower Protection

Communications made in good faith will be treated with appropriate confidentiality. Adalberto Textile Solutions does not tolerate any form of retaliation against those who report instances of non-compliance, in accordance with the principles established in Law No. 93/2021 of 20 December (Whistleblower Protection Act).

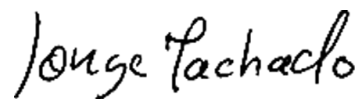


Contact for Clarifications

For any questions regarding the interpretation or application of this Code, suppliers and subcontractors may contact Adalberto Textile Solutions through the Company's official communication channels.

Approval

Approved by the Board of Directors – Rebordões, 2026



Jorge Adalberto Machado

Chairman of the Board of Directors

