



Code of Conduct

COMPANY POLICY · VERSION 1.2 · SEPTEMBER 2026

First written edition (v1.0), September 2026. Version 1.1 added commitments and procedures on sanctions, human rights and labor standards. Version 1.2 adds an external route for raising concerns.

This Code sets out how Eagle Dream Lda. ("Eagle Dream") and everyone working on its behalf behave towards clients, colleagues, partners and the public. It applies to the directors and employees of Eagle Dream and to all subcontractors, associates and agents engaged by Eagle Dream (together, "Representatives"). Acceptance of this Code is a condition of every subcontracting agreement.

1. Integrity and compliance with the law

- We comply with the laws and regulations of every country in which we work, and with the policies and codes of conduct of the clients we serve.
- We do not offer, give or accept bribes or improper advantages. Our Anti-Corruption and Anti-Bribery Policy applies in full to all Representatives.
- We declare conflicts of interest in writing. A Representative who holds an interest in Eagle Dream and also serves a client personally or through another intermediary declares it to the client and takes no part in the client's decisions to select, evaluate, approve or pay Eagle Dream.
- Where a client asks for a specific named individual who contracts through Eagle Dream, we record it as a client-initiated, named-resource engagement. We honor existing agreements with agencies and never use a position at a client to circumvent them.

2. Sanctions and trade controls

- We comply with all economic and trade sanctions and export controls that apply to our work, including those imposed by the United Nations, the European Union, the United Kingdom and the United States.
- We do not deal, directly or indirectly, with any person or entity that is subject to sanctions or is owned or controlled by one, and we never help anyone avoid sanctions.
- Before engaging a client, subcontractor, associate or partner, and again when their ownership or circumstances change, Eagle Dream checks them against the UN, EU, UK and US (OFAC) sanctions lists and keeps a record of the result.
- A possible match puts the engagement on hold until the Managing Director has reviewed it. We do not work with confirmed matches, and we suspend or terminate any existing engagement with them.
- Representatives tell Eagle Dream immediately if they become subject to sanctions or become aware of a sanctions risk in their work.

3. Confidentiality and information security

- Client information, data and intellectual property are used only for the agreed engagement and protected according to the client's security rules and applicable data-protection law, including the GDPR.
- Representatives sign confidentiality undertakings before accessing client systems or information, and return or delete client material at the end of the engagement.

4. Quality and professional conduct

- We deliver what we commit to, report status honestly, escalate risks early and respect the client's governance and ways of working.
- We represent our qualifications and experience accurately and record working time truthfully.



5. Human rights, labor standards and environment

- We respect internationally recognized human rights, as set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, and we are guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
- We treat everyone with dignity and respect and do not tolerate discrimination, harassment or bullying on any ground.
- We reject all forms of forced, compulsory or child labor and human trafficking in our operations and supply chain.
- We respect freedom of association and the right to collective bargaining, pay at least the legal minimum wage, respect legal limits on working hours, and comply with the Portuguese Labor Code and the labor laws of every country in which we work.
- We look for and address risks to human rights in our own operations and among our subcontractors, in proportion to our size and activities, and we take action to put right any harm we cause or contribute to.
- We follow the health and safety rules of every site we work on, minimize the environmental impact of our work and favor remote collaboration over unnecessary travel.

6. Subcontractors and partners

- Eagle Dream selects subcontractors on merit, with due diligence proportionate to the role. This includes sanctions screening and a check that they comply with labor law and this Code. We flow down this Code, the Anti-Corruption Policy and the relevant client requirements in every subcontracting agreement.
- Subcontractors remain responsible for their own staff and may not engage further parties without Eagle Dream's written consent.
- Eagle Dream monitors compliance and may audit, suspend or terminate an engagement in case of breach.

7. Speaking up

Concerns about a possible breach of this Code, including concerns about human rights, working conditions or sanctions, are raised with the Managing Director at info@eagledream.pt or through the client's ethics channel. A concern that involves the Managing Director, or that cannot be raised internally, can be taken to the client's ethics channel or to the competent authority; for corruption matters in Portugal this is the National Anti-Corruption Mechanism (MENAC). Reports are handled confidentially and no one suffers retaliation for a report made in good faith. Breaches lead to corrective action, up to termination of the engagement.

8. Responsibility and review

The Managing Director is responsible for this Code and for the procedures it describes, including keeping records of sanctions screening and subcontractor due diligence. Eagle Dream reviews this Code at least once a year and whenever the law or its business changes significantly. Representatives confirm in writing that they have read and accept it.