

CODE OF ETHICS AND CONDUCT



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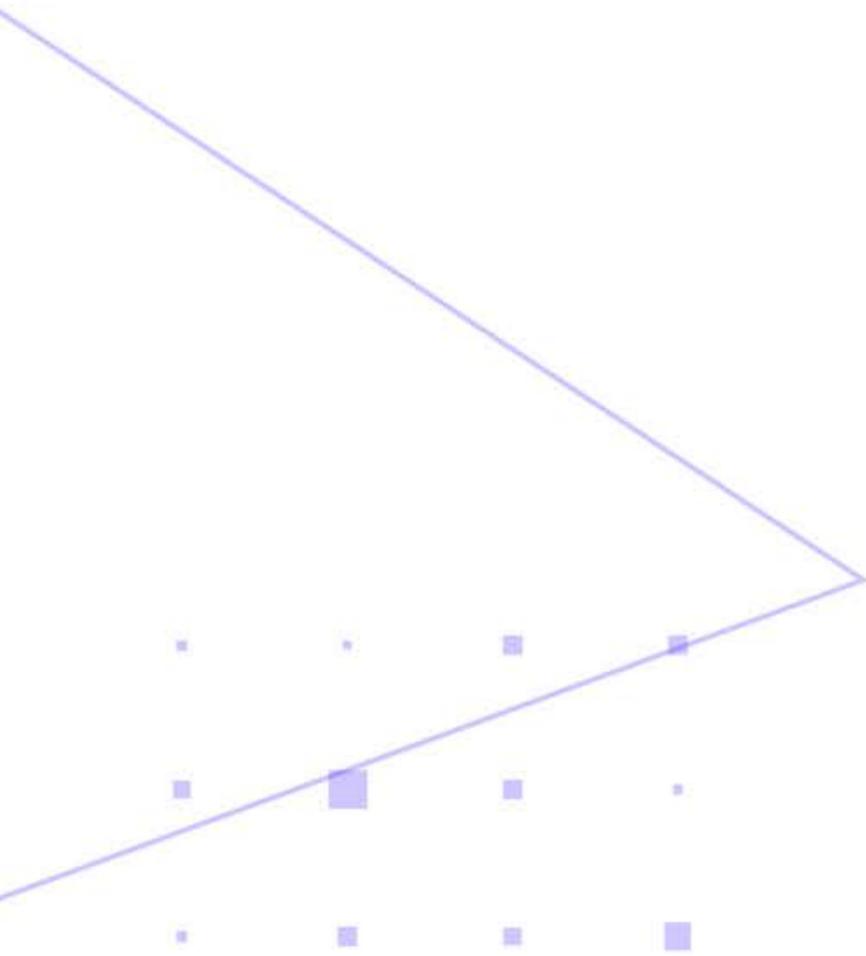
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PORTO BUSINESS SCHOOL

This Code of Ethics and Conduct declares the values and principles that conduct Porto Business School's actions and which all those who collaborate with the School promote and embrace as their own.

This document also highlights Porto Business School's public commitment to the PRME – Principles for Responsible Management Education – alongside the advocacy of the Principles of the UN Global Compact within the community. These values and principles apply to all students, members of governing bodies, coordinators, faculty, consultants, and other collaborators, regardless the type of their affiliation.



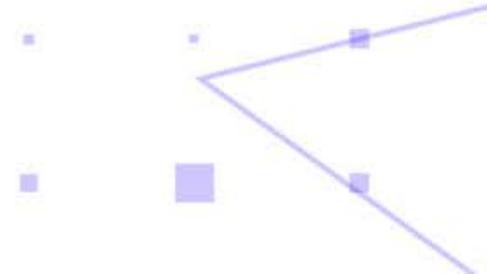
Mission

Through educational experiences that foster excellence, ambition, and connectivity, we empower individuals and organisations to create a positive and innovative impact. We cultivate a vibrant ecosystem where change becomes a catalyst for growth and where leaders are inspired to serve their teams and shape a better future.



Vision

We envision a future where Porto Business School becomes a global ecosystem of lifelong agents of change.



Values

Innovation

We have embraced innovation as the fuel for progress, propelling individuals and organisations to new heights of success.

Ambition

Nourished by ambition, we empower our community to dream big and reach for the extraordinary, unlocking their full potential.

Excellence

Our unwavering commitment to excellence nourishes our quest for greatness, setting the standard in business education.

Service

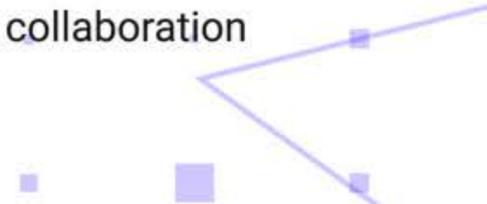
We place the people of our ecosystem at the core of our actions: we exist to serve them, providing a transformative learning experience.

Impact

We stand by our commitment to making a positive impact on society, fostering responsible leadership that leaves a sustainable legacy.

Connectivity

Through our interconnected network, we create meaningful relations, enabling collaboration and sparking the exchange of ideas that drive innovation forward.



EXCELLENCE & INTELLECTUAL THOROUGHNESS



EXCELLENCE & INTELLECTUAL THOROUGHNESS

1 / To guide one's conduct by valuing the human person, respecting citizenship, honesty, and intellectual rigor, refraining from all forms of intellectual fraud, copying, and plagiarism.

2 / All processes of coordination, teaching, and learning, including assessment, must be defined by quality, integrity, and scientific and pedagogical rigour, while fully respecting the intellectual creations of others and the right to intellectual property.



CONDUCT



CONDUCT

- 1 /** To address clients, suppliers and all the stakeholders with kindness, respect, fairness, professionalism, and efficiency.
- 2 /** Ensure compliance with all national and international legal, regulatory, and normative provisions.
- 3 /** Provide all the require cooperation and requested information to supervisory, inspection, and accreditation authorities.
- 4 /** Manage the School zealously, with transparency and open dialogue as regards the compliance of the highest standards of governance.



LOYALTY, INTEGRITY & CONFLICT OF INTERESTS

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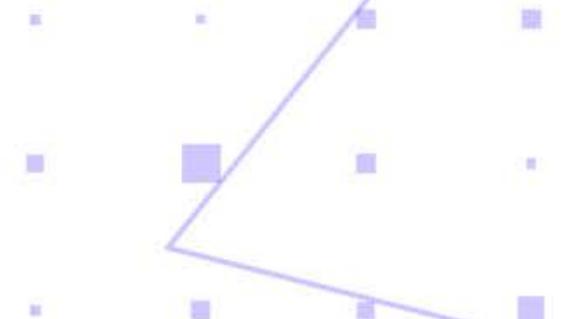
1 / Express commitment of loyalty towards Porto Business School, strive to safeguard its credibility and good image, as well as promote and guarantee its prestige.

2 / Avoid all situations where affinity, kinship or any type of personal relationship that may arouse doubts as to the impartiality of decisions in a given situation.

3 / Not to accept or offer to third parties any payments or other benefits, which may create expectations of preferential treatment to interlocutors in their relations with the School.

4 / Not to carry out activities external to the School, which by their very nature, content or intervening parties, may result in conflict of interest (1) with activities out by Porto Business School.

(1) May constitute conflicts of interest, among others: i) the acceptance of proposals from entities with which employees, programme directors, teachers, or consultants have had contact through the School; ii) the provision, in external entities, of programmes, projects, or other activities identical or similar to those developed at the School or on its behalf.



TRANSPARENCY & CONFIDENTIALITY



TRANSPARENCY & CONFIDENTIALITY

- 1 /** Compliance with the principle of equal treatment, and thereby ensuring the availability of all necessary information in a manner that is appropriate, true, transparent, and thorough.
- 2 /** Process all personal data in an impartial and careful manner to protect the privacy of each individual.
- 3 /** Maintain the confidentiality, both inside and outside the School, of all facts and other information considered private or confidential in nature that they may come to have knowledge of through the exercise of duties.



SOCIAL RESPONSIBILITY & SUSTAINABLE DEVELOPMENT

SOCIAL RESPONSIBILITY & SUSTAINABLE DEVELOPMENT

1 / Contribute to the progress and well-being of the surrounding community and act with due regard to sustainable development in the economic, social, and environmental dimensions, in accordance with the best available practices and norms.

2 / Promote respect for the dignity, diversity, and rights of the individuals: abstain from any kind of discrimination, whether it is related to ethnic origin, gender, nationality, political affiliation or religious complexion, race, sexual orientation, or physical disability.

3 / Provide a good working environment where health and safety are safeguarded, promoting team spirit, equal opportunities, personal development, and the balance between professional and personal life, assuring certain behaviours, such as mobbing, abuse of power, or sexual harassment are not accepted.



PREVENTION AND CONTROL AGAINST WORKPLACE HARASSMENT

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1 / General Principles of Conduct

Everyone who plays a professional role in Porto Business School, either in core organisation as in external relations, should act in compliance with Porto Business School principles and ethical values, adopting a behaviour based on responsibility, rigour, and respect by the dignity and rights of every person.

Porto Business School encourages the respect and cooperation among all the School's workers, in a respectful and dignified environment, reason why Porto Business School does not condone any harassment practices, either sexual or moral harassment as well as abuse of power.

According to the Article 29 of the Labor Code:

Harassment is defined as unwelcome behaviour, including discrimination based on access to employment or at the job place, work, or professional training, with the aim of disrupting or embarrassing the person, affecting his or her dignity, or to create an intimidating, hostile, degrading, humiliating, or destabilising environment.

Sexual harassment means an undesirable sexual behaviour, in a verbal, non-verbal or physical form, with the purpose mentioned in the preceding paragraph.

Moral harassment means any behaviour that includes verbal attacks providing offensive or humiliating content, physical attacks, and other acts, more subtle, which can encompass physical and psychological violence with the aim of diminishing the victim's self-esteem, and ultimately, the untying of the job position.

PREVENTION AND CONTROL AGAINST WORKPLACE HARASSMENT

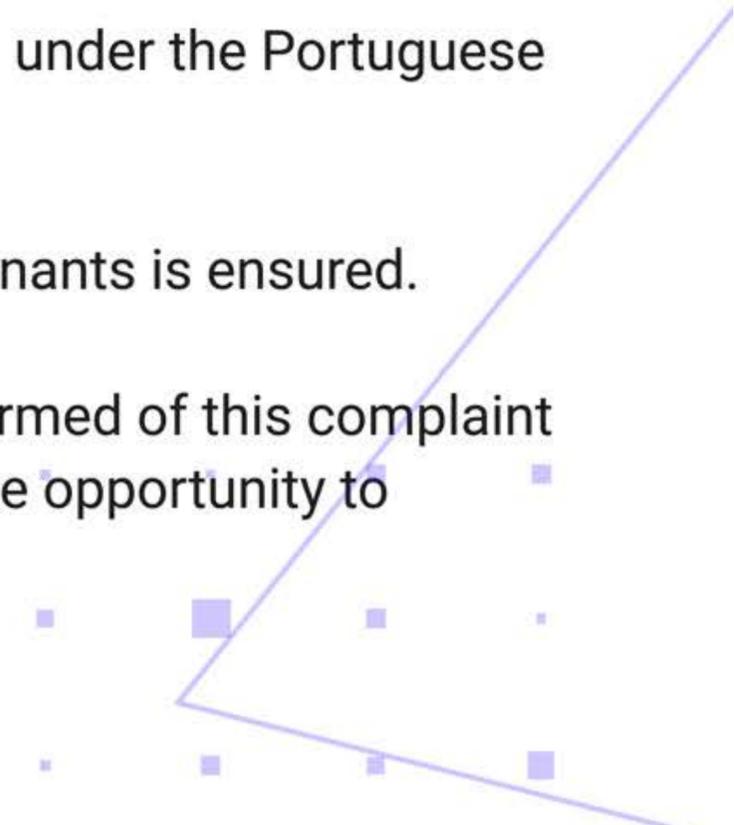
2 / Consequences of Workplace Harassment

Harassing conducts, such as sexual harassment and/or moral harassment, constitutes a prohibited behaviour which will be subject to a disciplinary action in accordance with the Portuguese labor law, without prejudice to any civil and/or criminal liability.

The employee, who considers that he/she is being harassed in the workplace, or by people with whom he/she has a business connection, must report the situation.

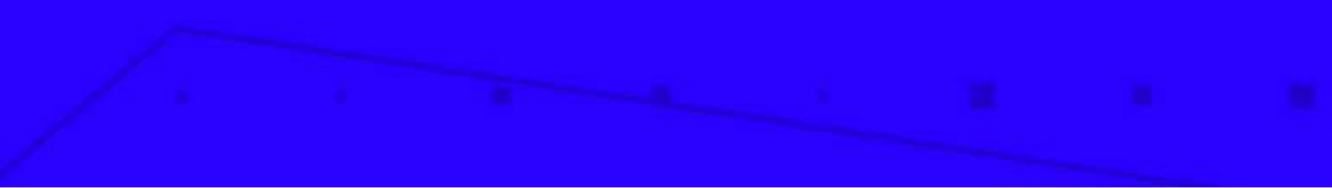
The following principles are assured:

- Any complaint should have an immediate response.
- The confidentiality is guaranteed under the Portuguese law.
- Non-victimization of the complainants is ensured.
- The accused employees are informed of this complaint and its content, allowing them the opportunity to respond in a timely manner.



RGPD

General Data Protection Regulation

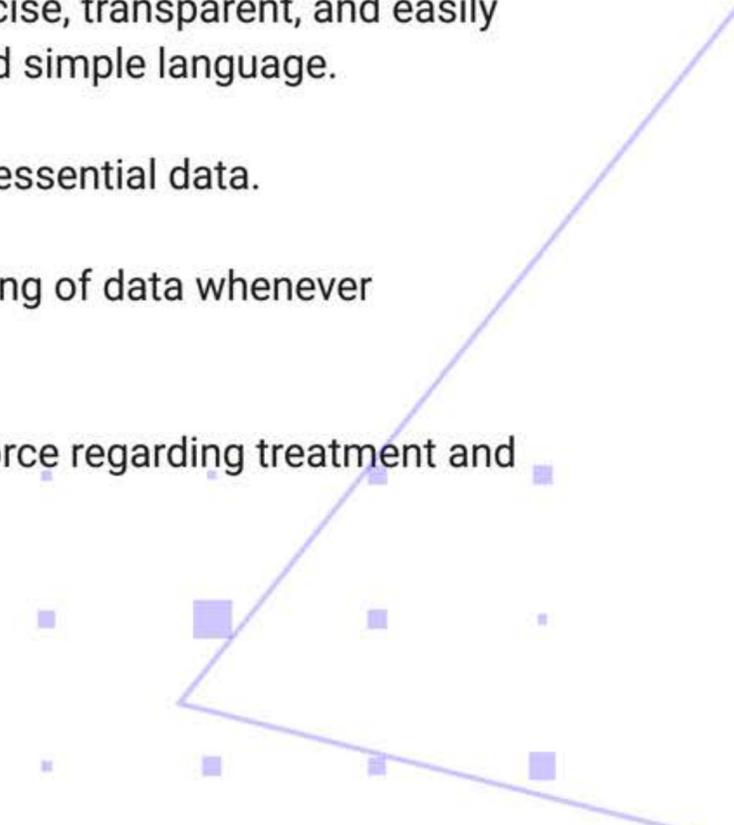


GENERAL DATA PROTECTION REGULATION

Porto Business School is committed to protecting the personal data of its students/users, pledging to comply with the rules of personal data protection, which will be processed in strict compliance with the provisions of the General Data Protection Regulation (GDPR) and other applicable legislation. Porto Business School abides by the Best Practices in the field of security and personal data protection, and to this end, has taken the necessary technical and organisational measures to comply with the GDPR and ensure the processing of personal data is lawful, fair, transparent, and limited to authorised purposes.

In this way, and to safeguard the protection and proper use of the personal data, Porto Business School abides by five basic principles:

- 1. Security:** ensuring data processing is done safely.
- 2. Transparency:** providing information in a concise, transparent, and easily accessible manner, and always using a clear and simple language.
- 3. Minimising data:** collecting and treating only essential data.
- 4. Quality of data:** ensuring accuracy and updating of data whenever necessary.
- 5. Responsibility:** fulfilling of the legislation in force regarding treatment and protection of personal data.



GENERAL REGIME FOR PREVENTION OF CORRUPTION

GENERAL REGIME FOR PREVENTION OF CORRUPTION

Porto Business School has adopted a regulatory compliance programme aimed at preventing, detecting, and sanctioning acts of Corruption and Related Offenses carried out against or through Porto Business School. This programme in compliance with the Decree-Law n° 109-E/2021 of December 9, (“General Regime for Prevention of Corruption” or “GRCP”), consists of the following elements (collectively, the “Regulatory Compliance Programme”):

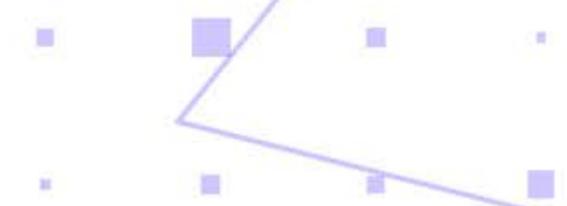
- (i) a plan for the prevention of risks of corruption and related infractions (PPR);
- (ii) a Code of Conduction on Corruption Prevention and Related Offenses (“Code”);
- (iii) a training programme;
- (iv) an internal reporting channel and its respective Offense Reporting Regulation.

The Person Responsible for Regulatory Compliance (“PRRC”), appointed by Porto Business School, monitors and controls the execution of the Regulatory Compliance Programme and performs the duties independently and with decision-making autonomy, having access to internal information and the technical and human resources necessary to carry out the functions.

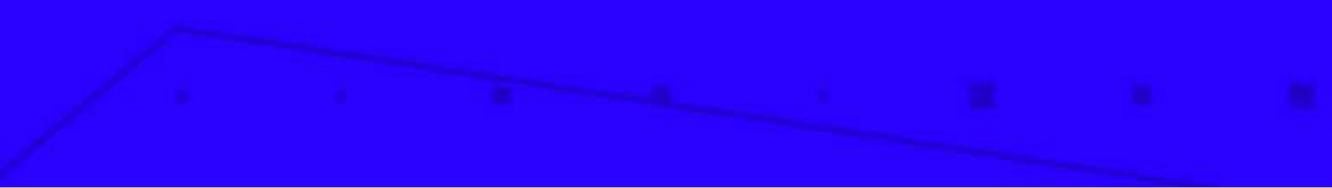
Porto Business School actively condemns any practice of corruption, bribery, or related offenses, whether active or passive, as well as other forms of undue influence or unlawful conduct. It enforces strict adherence to these principles in all its internal and external relationships, whether with private entities or public entities.

Porto Business School has an Internal Reporting Channel (whistleblower@pbs.up.pt) and follows up on reports of acts of Corruption and Related Offenses, in accordance with the provisions of Law 93/2021, December 20, which transposed the Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, regarding the protection of persons who report breaches of Union law.

The receipt and forwarding of reports follow the applicable procedure established in the Offense Reporting Regulation, available at www.pbs.up.pt.



CODE COMPLIANCE



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Any reports can be communicated anonymously.

If the Complainant had provided a contact, he/she will be notified within a period of seven days of receipt of the complaint, and informed of the requirements, competent authorities, mode, and admissibility of the complaint. After being registered, communications are subject to preliminary analysis to certify its degree of credibility, the irregular nature and/or illicit behaviour reported, the feasibility of the investigation and the identification of the people involved or who have knowledge of facts relevant, and therefore should be inquired into.

If the communication is considered to be unfounded, abusive, containing clearly erroneous or misleading information, or was made with the sole intention of harming others: i) it will be archived; ii) the summary of the fundamentals communicated to the Complainant (unless this has not identified himself/herself), iii) the immediate destruction of personal data involved, iv) the statistical treatment and information of this archiving.

If the communication is considered to be consistent, plausible and credible and the facts reported are likely to substantiate the practice of an infringement under the terms set out in this Code, a process of investigation will be initiated..

Once the investigation phase provided in the previous paragraph has been completed, a report will be carried out with: the analysis on the complaint, a description of the internal acts, the facts discovered during the investigation, the conclusions, and the respective duly reasoned decision.

This report will identify any measures adopted (or to be adopted) to mitigate the identified risk and prevent the recurrence of reported infractions.

If deemed necessary and appropriate, particularly depending on the type and nature of the Infringement, the Infringement will be communicated to the competent authorities. Unless the Complainant has chosen to remain anonymous, he/she will be notified with the measures envisaged or adopted to follow up on the complaint and its reasons, within a maximum period of three months from the date of receipt of the complaint.

The Ethics Committee is an independent collegial body aimed at ensuring compliance with and promoting standards of integrity, honesty, and ethical quality in the activities of Porto Business School and the conduct of its members.

The Ethics Committee is responsible for analysing issues that raise ethical issues related to non-compliance with this Code whenever requested by the Executive Board of Porto Business School.

CODE COMPLIANCE

The Ethics Committee does not make legal or disciplinary assessments, without preventing the possibility of being asked for opinions with a view to instruct legal or disciplinary proceedings.

Porto Business School Ethics Committee is composed of 6 elements: a member of the Board of Directors, a member of the Academic Council, a faculty representative, two student representatives and one representative of the School's staff.

Confidentiality

Any communication of Infractions covered by this Code will be treated as confidential. Access to information relating to any communication of the Infringement, including the identity of the Complainant, in cases in which it is known, and the information that may allow the respective identification, are restricted to access by people/body of Porto Business School responsible for receiving and handling complaints made the under this Code. The obligation of confidentiality extends to all people who have received information about the allegations, even if they are not the people responsible for receiving it and/or treatment. The identity of the Complainant may only be disclosed in compliance with a legal obligation or court decision, preceded by a written

communication to the Complainant, indicating the reasons for the disclosure, unless the provision of this information compromises the related investigations or legal proceedings.

Complainants' Guarantees

Porto Business School cannot carry out acts of retaliation against the Complainant. Any act or omission (even that in the form of a threat or attempt) that, directly or indirectly, occurring in a professional context and motivated by internal and external complaints or public disclosure, causes or may cause property damage or not assets to the Complainant who, in good faith, and having serious grounds for believe that the information is, at the time of reporting or disclosure publicly, truthfully report or publicly disclose an Infraction.

Contacts

Comissão de Ética da Porto Business School
Avenida Fabril do Norte, 425, 4460-316 Senhora da Hora
E. etica@pbs.up.pt