



ETHICS CHARTER

2022

INDEX

1. GUIDING PRINCIPLES	2
2. SCOPE OF APPLICATION.....	3
3. CONFLICT OF INTEREST.....	4
4. ANTI-BRIBERY AND CORRUPTION	4
5. FAIR PLAY: MATCH-FIXING IN COMPETITIONS AND/OR ILLEGAL BETTING... 	5
6. AGAINST HARASSMENT AND DISCRIMINATION	6
7. SAFETY AT WORK	7
8. DATA PROTECTION AND USE OF INFORMATION TECHNOLOGY	7
9. COMMUNICATION AND REPORTING CHANNEL.....	7

1. GUIDING PRINCIPLES

This Code of Ethics and Conduct approved by Fundação Filhos de São Tomé on 13 September 2019, sets out the set of rules of action and general principles of governance, and conduct of our Foundation, which are applicable to all Persons Linked to the Foundation.

All Persons Linked to the Foundation must read, know, respect and subscribe to this Code of Ethics and Conduct, declaring their express renunciation of carrying out any type of activity that could be contrary to these principles, as well as avoiding methods and practices that are illegal, immoral or contrary to ethical principles or that could tarnish or damage the image or reputation of our Foundation.

The principles established in this Code of Ethics and Conduct will be developed through the Protocols and control mechanisms included in the Foundation's Compliance Programme Manual at the time of its approval and any others that may be included in the future.

Our commitment and sporting culture is based on the following guiding principles.

A. Integrity and Ethics

We conduct all our activities in accordance with the strictest ethical standards and with the utmost integrity. All those who have a relationship with the Foundation, whether in employment or not, are obliged to carry out their activities following the highest ethical standards, and to ensure the good reputation of the Foundation at all times.

B. Fair Play

This translates into loyal, sincere, correct, and respectful behaviour in the development of sporting activities, with full respect for the Sporting Spirit that we have promoted from the beginning and with special respect for sporting regulations and for all the people who carry out their functions in this area (sportsmen and women, coaches, managers, fans, etc.).

C. Zero tolerance for any form of corruption

In the same vein, we express our absolute rejection of any form of corruption, including conduct aimed at manipulating the outcome of the competition, illegal betting, bribery, bribery or engaging in conflicts of interest. These acts are incompatible with the spirit of sport and alter the essence of sport, provoking rejection in society. We will establish all the necessary mechanisms to prevent this type of conduct.

D. Zero tolerance for violence, discrimination, harassment, racism, xenophobia or intolerance in sport

Sport is an activity carried out by free people, based on respect, diversity and equality between people. It is also a factor of intercultural integration. We radically reject any act of physical or verbal violence, or violence based on race, ethnicity, religion, gender, sexual orientation, language, physical appearance or political opinions. Nor will we tolerate harassment, moral or sexual, physical or verbal, or manifestations

of intolerance of any kind. The Foundation will take all necessary measures to prevent and, if necessary, eradicate this type of manifestation and conduct.

E. Support and commitment to all of out beneficiaries

With the aim of training and transmitting to children the feeling and passion for sport and the values that are implicit in it (effort, self-improvement, companionship, humility and teamwork). In addition to carrying out training activities with the children, they are complemented with activities in the fields of health, the environment and education, with a view to comprehensive accompaniment.

F. Social engagement and integration

From the Foundation, we promote the integration of people with some kind of disability, both physical and mental, through our various adapted sports projects, through which we promote their inclusion and integration. We try to promote the predominant values of our foundation, such as the spirit of self-improvement, humility, struggle and effort, through educational talks, aimed at children and young people, by top-level Olympians and Paralympians from São Tomé.

G. Environmental commitment

Taking into account the uniqueness and singularity of Sao Tome and Principe's biodiversity, the Foundation is committed to assessing each of its actions in order to minimize the environmental impact and thus contribute to its conservation.

H. Transparency

The foundation is accountable to donors, sponsors, and stakeholders, as well as to the general public. It ensures transparency with regard to the origins of its funds and the ways in which those funds are used.

2. SCOPE OF APPLICATION

This Code of Ethics and Conduct must be complied with by all persons related to the Foundation, whether it is of an employment or other nature (trustees, directors, players, technical staff, medical staff, other employees, volunteers, suppliers, sponsors, etc.) (hereinafter, "Related Persons"). All Persons Related to the Foundation must sign a declaration of commitment in which they certify having read and understood the Code and their commitment to adhere to its provisions, thereby obliging themselves to comply with each and every one of the guidelines and rules specified in this Code of Ethics and in all the Protocols and Controls that derive from it. Disciplinary sanctions are foreseen for any breach of the provisions of this Code and the Protocols and Controls, in accordance with the provisions of the Foundation's Disciplinary Code and the Internal Regulations.

3. CONFLICT OF INTEREST

On a daily basis, we deal with people or companies that have business relationships with the Foundation (suppliers, third parties). It is important that any decisions we make are motivated by the interests of the Foundation and not by personal interests or relationships.

A conflict of interest may arise if Persons Connected to the Foundation have, or give the impression of having, private or personal interests that impair the performance of their duties independently and with

integrity. Private or personal interests are understood to be any possible agreement that is in the interests of oneself, relatives, friends or acquaintances.

Most conflicts of interest can be completely avoided or resolved if they are properly disclosed to the Foundation. If you are in doubt about any activity that could give rise to a conflict of interest, please contact the Compliance Officer.

4. AGAINST BRIBERY AND CORRUPTION

From the Filhos de São Tomé e Príncipe Foundation, we express our firm and profound rejection and repulsion toward any form of bribery.

For this reason, we will only accept gifts or other benefits from persons of the Foundation or third parties, who:

- a) have a symbolic or irrelevant value;
- b) have no influence whatsoever on our official activities or their scope;
- c) do not contravene our obligations;
- d) do not derive undue financial or other benefits;
- e) do not cause a conflict of interest.

Acceptance of any gift or benefit that does not meet the above criteria is prohibited. On rare occasions, exceptions may be made, for which it will be necessary to follow the procedure established in the Foundation's Anti-Corruption Protocol.

In case of doubt, no gifts will be offered or accepted.

Under no circumstances will we offer or accept from any person within or outside the Foundation any amount of money in cash or cash equivalent.

Expenses of family members or associates accompanying us to official events cannot be reimbursed by the Foundation, unless expressly permitted by the Foundation. Such permission must be in writing.

We will refrain from behaviour or activities that could be construed as, or may arouse suspicion of, inappropriate conduct as described in the preceding paragraphs.

Bribery can take many forms in addition to cash and gifts. These include:

- a) Payment of unjustified commissions
- b) Illegal or excessive commissions
- c) Unjustified discounts
- d) Unjustified donations (political parties, entities other than NGOs)
- e) Offers or promises of jobs

These prohibitions apply to all Persons Linked to the Foundation and to all those persons or entities with whom the Foundation is related, whether they are suppliers, collaborators, etc.

5. FAIR PLAY: MATCH-FIXING AND/OR ILLEGAL BETTING

We will not participate in or be associated, directly or indirectly, with betting, lotteries, gambling and similar activities, or businesses related to football competitions. Nor shall we have any involvement, active or passive, in companies, firms, organizations, etc., that promote, arrange, organize or direct such activities or transactions.

In this sense:

1. We will not place, ourselves or through an intermediary, bets on a match involving, directly or indirectly, any team related to the Foundation.
2. We will not place bets on a match in a competition involving any team related to the Foundation.
3. We will not solicit or instruct a third party to place a bet if we possess inside information in relation to:
 - The result of a sporting match or competition.
 - Any circumstance within the course of a competition.
 - Any other fact or circumstance of which prior notice has been given that affects any activity related to the Foundation.

The Foundation is deeply committed to integrity, and fair play in all its meanings, including financial integrity.

We will refrain from behavior or activities that could be construed as or arouse suspicion of improper conduct, not only because we are required to do so by law, but because we are committed to Integrity, Ethics and Fair Play in all of our activities.

6. AGAINST HARASSMENT AND DISCRIMINATION

The Filhos de São Tomé e Príncipe Foundation values the broad and enriching diversity of all people. We believe that diversity contributes in a very positive way to the success of our Foundation, but we also believe in and encourage our profound Santomense identity. By "diversity" we mean differences in gender, race, age, religion, political opinion, ethnicity, language, sexual orientation, physical appearance, purchasing power or educational level. Therefore, any discrimination on these or any other grounds is expressly prohibited.

Likewise, it is the Foundation's intention and duty to provide a working environment free of any kind or form of harassment, whether it be workplace, sexual, psychological, physical or moral. Whether committed in person or by any other means.

The protection of children and people with disabilities are also key priorities for the Foundation.

These measures are set out in more detail in the Foundation's Protocol against Harassment and Discrimination.

In this way:

1. We shall not offend the dignity or integrity of a country, a person or a group of persons by derogatory words or denigrating actions, for the above or any other reason.
2. We will respect the integrity of every individual, i.e. the respect, protection and safeguarding of the personal rights of every person with whom we deal, directly or indirectly.
3. Bullying is prohibited and is defined as a series of systematic and repeated assaults directed over a considerable period of time against a person, aimed at isolating or excluding that person, thereby affecting his or her dignity, especially with regard to minors and persons with disabilities.
4. Sexual harassment, which we define as inappropriate sexual behaviour that is unwelcome or unwelcome, is prohibited. In particular, threats, promises of benefits and coercion for sexual purposes are prohibited.

7. SAFETY AT WORK

The Foundation is firmly convinced that it has to provide all its Related Persons with a safe workplace in accordance with occupational risk prevention legislation. Therefore, we provide a safe, healthy and adapted workplace for all of our Connected Persons, depending on their position within the Foundation.

In the same vein, it is expressly forbidden to come to the workplace under the influence of any type of drug or toxic, psychotropic or narcotic substance, as well as alcohol while performing the duties entrusted to us.

We shall not carry weapons or potentially dangerous devices, unless required for the performance of our professional activity. We shall indicate to our colleagues that they are carrying out an unsafe activity if this is the case.

8. DATA PROTECTION AND USE OF INFORMATION TECHNOLOGY

Fundação Filhos de São Tomé e Príncipe firmly respects the private sphere of all Persons bound by this Code of Ethics.

The personal data of all its members will be absolutely protected. With regard to the use of computer media, the Foundation will respect the content of the same as long as there are no irregularities committed through the use of the same, a limit that will be regulated in the corresponding Privacy Protocol.

9. COMMUNICATION AND COMPLAINTS CHANNEL

At Fundação Filhos de São Tomé e Príncipe, we are concerned about those acts or activities that may damage our image, reputation or are contrary to this Compliance Programme or to the laws, rules and regulations that apply to us. Therefore, in order to avoid such situations, we impose a series of rules and guidelines



regarding the procedure for reporting and resolving reports of non-compliance or possible non-compliance with this Code of Ethics and the Protocols that accompany it, in order to put an immediate end to them.

If we observe or suspect misconduct or conduct contrary to this Code or the Programme as a whole, we have an obligation to notify the Compliance Officer. Failure to report could have negative consequences for the Foundation or the individuals concerned, including financial, reputational, physical injury or dismissal, or legal action.

The Foundation will not tolerate retaliation of any kind against individuals who express a concern or report in good faith an ethical or regulatory irregularity. We will take all possible steps to ensure the confidentiality of all views expressed and reports received. We understand retaliation to include: dismissal from employment, reduction in pay, demotion, assignment to unpleasant tasks and the threat of physical or psychological harm.

Reports submitted will be treated with the utmost seriousness and dealt with promptly, every allegation of retaliation will be fully investigated and disciplinary action will be taken against those responsible if proven, in accordance with the applicable Collective Bargaining Agreement, the Disciplinary Code and the Internal Regulations. All information provided will be treated confidentially.

In order to ensure confidentiality and to help in the discovery of possible infringements, the following e-mail address is available to all Persons Linked to the Foundation, where they can make their complaints or communications:

info@filhosstp.org

They may also contact the Compliance Officer designated for this purpose, who is obliged to act with the highest level of confidentiality in relation to the information received.