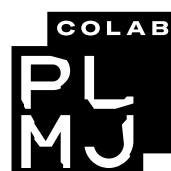


Code of Conduct and Ethics



Angola
RVA ADVOGADOS

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1. Scope and purpose

1.1. Scope

- 1.1.1 All RVA's lawyers and staff should view this Code of Conduct and Ethics ("Code") as an ethical model for the firm's conduct that should inspire them. All lawyers and staff must respect its rules.
- 1.1.2 All lawyers, counsel, administrative staff and suppliers of RVA Advogados, whether permanent or occasional, are bound to respect these values, principles, and rules of conduct.
- 1.1.3 For the purposes of applying this Code, employees are all individuals who have an employment relationship with RVA Advogados or an equivalent relationship.
- 1.1.4 This Code does not exclude or limit the application of other codes, internal regulations and manuals relating to specific conduct, all of which are in force and with which all employees are required to be familiar.

1.2. Interpretation and application

- 1.2.1 The principles and rules of conduct contained in this Code are not exhaustive. They are structural principles and guidelines for the highest standards of conduct and the best practices, and they should be seen as a benchmark.
- 1.2.2 Any questions about how to interpret this Code should be put to the management at RVA Advogados, who will clarify them.
- 1.2.3 The management team at RVA Advogados is responsible for ensuring compliance with and enforcement of this Code.

2. Professional ethics

2.1. Respect for RVA's history, values and culture

- 2.1.1 The practice of law at RVA Advogados is founded on the highest principles and standards of conduct. Employees are required to respect the firm's history, and to embrace its values and culture. Integrity, loyalty, honesty and responsibility are particularly important ethical principles. These principles ensure the reputation, credibility and trustworthiness of RVA Advogados and its employees in the eyes of clients.

2.2. General duties

- 2.2.1 Employees of RVA Advogados are subject to, and must strictly comply with, the Regulations of the Angolan Bar Association and all other applicable professional regulations. They must also observe all the rules on incompatibilities and impediments applicable to their work at all times.
- 2.2.2 All RVA Advogados lawyers are committed to strict compliance with the principles and rules of professional ethics, both in their individual conduct and in their relations with clients, courts, authorities and other lawyers.
- 2.2.3 Any situation of incompatibility, impediment or non-compliance with the ethical principles and rules to which RVA Advogados employees are subject must be reported to the competent bodies immediately.

2.3. Principle of non-discrimination, equality, and prohibition of harassment

- 2.3.1 All RVA Advogados employees and lawyers must avoid any behaviour that may undermine the dignity of other RVA Advogados employees or stakeholders. This includes harassment or behaviour based on discrimination, which may create an intimidating, degrading or humiliating environment.
- 2.3.2 Discrimination on the basis of ancestry, age, sex, sexual orientation, gender identity, marital status, family situation, race, ethnicity, disability, illness, place of birth, religion, political, ideological or philosophical beliefs, level of education, economic, social or professional status is prohibited.
- 2.3.3 In any situation where there is a lack of legal or contractual provision that might otherwise allow differential treatment, all employees and clients must be treated equally.
- 2.3.4 RVA Advogados' lawyers and employees must conduct themselves with tolerance and neutrality, refraining from any behaviour that could be considered offensive.

2.4. Respect for professional confidentiality and secrecy

- 2.4.1 Professional secrecy is one of the main ethical obligations and a fundamental pillar of the functioning of the firm. All RVA Advogados employees must maintain full confidentiality regarding any information to which they have access, either directly from clients or indirectly as a result of their work, unless expressly permitted by law.

- 2.4.2 Secrecy and confidentiality apply both inside and outside RVA Advogados. Therefore, lawyers and staff must not discuss their work with any colleague who is not also working on the matter in question.

2.5. Independence

- 2.5.1 All lawyers and employees of RVA Advogados must act in accordance with the principle that clients' interests are kept independent from those of RVA Advogados, personal interests are kept independent from those of clients and RVA Advogados, and clients' interests are kept independent from each other.
- 2.5.2 Without prejudice to the absolute respect for the political orientations or affiliations of each RVA Advogados lawyer, RVA Advogados lawyers cannot hold political office or positions of political trust in a way that implies, influences or conditions the independence and impartiality of RVA Advogados' private legal practice on behalf of its clients.
- 2.5.3 Lawyers may not combine the practice of law with holding any political office or position of political trust, unless the management has decided that all necessary measures have been taken to defend the independence and impartiality of RVA Advogados.

2.6. Anti-corruption policy

- 2.6.1 RVA Advogados expressly prohibits any cases of corruption, influence peddling, receipt of undue advantages, obtaining an economic benefit from a transaction or proposed transaction, or payment of undue advantages, and has zero tolerance for such behaviour.
- 2.6.2 As a general rule, RVA Advogados prohibits its employees from accepting, soliciting, promising or offering professional courtesies in the course of their work.
- 2.6.3 RVA Advogados will exceptionally accept, promise or offer professional courtesies, provided that all of the following criteria are met: (i) they are not prohibited by law; (ii) they are occasional and have an economic value of AOA 150,000 or less; and (iii) they must also not generate any direct or indirect conflicts of interest, particularly in situations involving negotiations, contract reviews or tender procedures in which RVA Advogados is involved, either as a service provider or competitor.
- 2.6.4 Even if individual courtesies fall within the above limit, the annual cumulative limit per entity of AOA 300,000 must be observed. For this purpose, the period considered is 12 consecutive months from the first courtesy received from or offered to the same party.
- 2.6.5 Exceptional cases that justify courtesies of a higher value must be submitted to the management of RVA in advance for approval, along with a formal and substantiated request.

- 2.6.6 It is strictly forbidden to accept, solicit, give, offer or promise courtesies professionals in the following situations:
- a) When they involve any person (family and relatives or related parties), company, organisation or public or private entity: (i) in the context of negotiation with RVA of contracts, contract reviews, tenders or bidding procedures, or (ii) in any situation that may generate some advantage that causes, or is likely to cause, a conflict of interest, which implies any obligation or constraint on the person receiving the courtesy or that implies the breach of any professional duties.
 - b) When they involve any person (family members, relatives or related parties), company, organisation or public or private entity, whose decision or failure to act may result in an undue advantage for RVA or an advantage obtained by breaching professional duties.
 - c) When they involve any form of professional courtesy involving offering or accepting anything that could compromise the good name, reputation or prestige of RVA, including sexual services, drugs or any other illegal activities or products.
 - d) When the professional courtesy is not received/given in cash or a cash equivalent (i.e. vouchers, securities, bank deposits or transfers of funds).
- 2.6.7 This Code requires that relationships with suppliers of goods and services, clients, and other partners be based on honesty and integrity. Privileges and discrimination are not permitted.
- 2.6.8 Professional courtesies must never be offered or promised to Angolan or foreign civil servants, entities, international organisations, political office holders or holders of high public office, nor to family members or friends of RVA employees.
- 2.6.9 No RVA employee may be harmed or subjected to retaliation or penalties due to delays or failures to conclude business resulting from a refusal to allow, condone or participate in conduct prohibited by this Code.
- 2.6.10 RVA Advogados will publicise and encourage the good practices covered in this Code, and will answer any questions employees may have about situations, operations, activities or practices that may constitute corruption or other illegal practices.

2.7. Prevention of market abuse

- 2.7.1 RVA regularly provides legal services to companies that issue securities admitted to trading on regulated markets. It also advises on transactions involving those companies. Against this background, it has defined a set of rules and implemented strict procedures to identify insiders and to draw up, update and maintain lists of insiders. PLMJ is also committed to performing its duties to provide information to issuers, insiders and, if applicable, to the supervisory authorities.

- 2.7.2 RVA's lawyers and staff must familiarise themselves with the Angolan rules on market abuse. In particular, they must be aware, regardless of any potential criminal liability, that any person or entity that has inside information may not, in any way, communicate it outside the normal scope of their work duties or use it before it is made public.
- 2.7.3 Every lawyer or member of staff is individually responsible for complying with the legal prohibition on the disclosure or use of inside information and individually liable for any crimes of insider trading and market manipulation. Nevertheless, all RVA lawyers and members of staff recognise that any involvement in an administrative or criminal offence of this type necessarily impacts the firm's image.
- 2.7.4 Accordingly, RVA Advogados encourages and supports the best preventive practices in this area. To this end, it recommends that lawyers and staff should not trade or advise others to trade, directly or indirectly, in securities or financial instruments issued by entities that have underlying securities issued by those same entities, nor should they order the subscription, purchase, sale or exchange of such securities or financial instruments for themselves or others. The only exception to this is in cases where it is justified by the defence of the best interests of RVA and its clients.

2.8. Abusive tax planning and representation

- 2.8.1 The current Angolan legislation on abusive tax planning establishes a set of obligations that all RVA lawyers and staff must be aware of before agreeing to act for any client in any matter.
- 2.8.2 RVA has adopted internal procedures to help its lawyers and staff with the practical application of the rules mentioned above. These procedures are based on the BEPS Action Plan to combat tax base erosion and the diversion of profits to low-tax jurisdictions.

2.9. Competition

- 2.9.1 RVA observes the appropriate rules and best market practices to encourage fair and healthy competition, and to prevent any practices that restrict or limit competition.
- 2.9.2 In its relationships with third parties, RVA's lawyers and staff must act with loyalty and protect the interests of RVA, and they must not be involved in any activities that compete directly or indirectly with the work done by RVA.

2.10. Abuse of information

- 2.10.1 RVA lawyers and staff must comply with the applicable legal and regulatory rules, and with the internal rules and procedures on abuse of information, specifically disclosure or use of inside information and market abuse.
- 2.10.2 RVA lawyers and staff may not use any type of inside information to which they have had access in the course of their work, either to make investments or to obtain any type of benefit or advantage.

2.11. Data protection

- 2.11.1 RVA is committed to complying strictly with all national and international legal and regulatory provisions relating to the protection of personal data, particularly with regard to its storage, processing, transmission and deletion.
- 2.11.2 Personal data will be deleted within the time limits established by the applicable legislation. Where appropriate, personal data will be deleted in accordance with specific contractual requirements to ensure compliance with the rights of data subjects.

2.12. Conflicts of interest

- 2.12.1 Before establishing any service agreement, RVA Advogados must check for conflicts of interest and/or strategic conflicts in a given operation, activity, business or partnership. RVA must also verify the legitimacy of the potential supplier or partner.
- 2.12.2 To promote the smooth running of RVA Advogados and maintain client trust, the firm favours the adoption of rules of good conduct in situations of potential or actual conflict of interest in its culture and practices.
- 2.12.3 In compliance with the principles of loyalty, integrity and transparency, lawyers must avoid any situation or activity that could lead to a conflict of interest.
- 2.12.4 RVA Advogados undertakes to report any situation that constitutes or may constitute a conflict of interest to RVA's management immediately in writing. RVA's management can then take the necessary measures in accordance with applicable legislation.
- 2.12.5 In line with the above principle, RVA Advogados implements procedures to prevent and control conflicts of interest.

3. External relations

3.1. Relationship with the Angolan Bar Association

- 3.1.1 RVA Advogado's lawyers and staff are subject to and must comply strictly with the Regulations of the Angolan Bar Association and all other applicable legal and professional regulations. At all times, they must also observe all the rules on the incompatibilities and impediments applicable to their work.
- 3.1.2 RVA Advogados has adopted strict compliance with all principles and rules of professional ethics as the benchmark for irreproachable conduct by everyone in the firm. This standard applies to each individual and in their relationships with colleagues, clients, courts of law, administrative authorities, and other third parties.
- 3.1.3 RVA Advogados must immediately report any suspected money laundering offences to the Supervisory Committee for Lawyers on the Prevention and Combating of Money Laundering, Terrorist Financing and the Proliferation of Weapons of Mass Destruction at the Angolan Bar Association.

3.2. Relationship with the media

- 3.2.1 At RVA Advogados, we reinforce the importance and responsibility of each lawyer in defending the fundamental values of professional secrecy, impartiality, decorum and discretion when practising law, particularly in relation to the media and cases with media impact.
- 3.2.2 RVA Advogados lawyers may publicly express their opinion on non-professional matters or legal issues of general interest, provided that the matter under discussion does not involve facts or contested points of law relating to the affairs of RVA Advogados' clients.
- 3.2.3 With regard to the use of social networks, blogs and other media, RVA Advogados employees must act in accordance with the abovementioned values.
- 3.2.4 Relations with the media or third parties on matters relating to RVA Advogados are the responsibility of RVA Advogados' management.
- 3.2.5 Defamatory statements that could damage the reputation of RVA Advogados, its clients, employees or administrators will not be tolerated.

3.3. Relationship with suppliers

- 3.3.1 RVA Advogados builds relationships with suppliers based on quality, transparency and fairness.

3.3.2 When dealing with suppliers, RVA Advogados' lawyers and staff must:

- a) Take ethical behaviour into account, as well as commercial, financial and economic factors.
- b) They must also avoid relationships with suppliers who act in a manner that diverges from the principles set out in the Code.
- c) They must also raise awareness among suppliers of the ethical principles upheld and defined by RVA Advogados.

3.4. Money laundering

3.4.1 Current national legislation on money laundering, notably Law 11/2024 of 4 July and Regulation 1/25 of 15 April, establishes a number of obligations for lawyers. All RVA Advogados lawyers must familiarise themselves with these obligations before agreeing to provide any legal representation.

3.4.2 To prevent practices that may place its business, people or reputation at risk, RVA refuses any clients who fall into any of the following categories:

- a) Individuals or legal entities referred to in any official sanctions list, including the official lists published for this purpose and established through resolutions of the UN Security Council, the European Union, the African Union or by the OFAC (Office of Foreign Assets Control).
- b) Individuals or legal entities that refuse to provide the legally required information or documentation.
- c) Individuals or legal entities on which information is available that may be related to criminal activities, when outside the scope of representation in criminal litigation.
- d) Individuals or legal entities that have business the nature of which makes it impossible to verify the legitimacy of the activities or the origin of the funds, as well as the structure of ownership and control of the client, particularly with regard to the identification of the beneficial owner.
- e) Casinos, gambling establishments and other similar establishments, provided they are not authorised or located in a third country with equivalent legislation on money laundering and terrorist financing.
- f) For other reasons that the RVA management considers to pose a significant reputational risk, such as money laundering, violations of international sanctions, terrorist financing or related matters.

- 3.4.3 Know Your Client (KYC) is one of the fundamental pillars in assessing the likelihood of money laundering, terrorist financing and reputational risk. Therefore, the adoption of effective KYC measures is at the heart of risk management.
- 3.4.4 RVA has established strict and effective KYC procedures. Under these procedures, RVA will:
- a) Check and confirm the identity of the client and, if applicable, their representatives and/or beneficial owners, and the ownership and control structures of the legal entities.
 - b) Obtain reasonable and reliable information regarding the nature of the economic activities pursued, the purpose and nature of the business, and the provision of services to be performed, the proposed transaction and the origin of the funds involved.
 - c) Assess the information obtained on sources of income and the coherence and consistency of all existing information on the client.
 - d) Classify all clients in its database according to their risk of non-compliance.
 - e) Adjust the levels of due diligence and vigilance according to the risk profile.
 - f) Perform suitable and sufficient due diligence in order to ensure that the information on clients, representatives and beneficial owners is up-to-date, accurate and complete.
- 3.4.5 KYC procedures for accepting RVA clients must comply with applicable legislation.
- 3.4.6 RVA Advogados may veto the establishment or continuation of a business relationship if there are concerns relating to suspected money laundering or terrorist financing.
- 3.4.7 If a client is refused due to suspicions of money laundering, RVA Advogados must provide reasoned grounds for non-acceptance and define subsequent actions within the scope of applicable legislation. This includes the duty to report to the Financial Intelligence Unit and the Bar Association whenever requested, as well as to judicial and police authorities in the context of criminal proceedings.

4. Final provisions

4.1. Regulations and internal procedures

- 4.1.1 When developing the principles and rules of conduct set out in this Code, the relevant RVA Advogados bodies will approve the necessary regulations, guidelines and procedures for its full application, adequacy and effectiveness.

4.2. Supervision and review

- 4.2.1 The management of RVA Advogados supervises the implementation of this Code and ensures that any changes or developments needed to keep it permanently updated and appropriate are made.

4.3. Breach

- 4.3.1 Any failure to respect the principles and standards set out in this Code is a breach of the duty of loyalty and good faith towards RVA and its lawyers and staff.
- 4.3.2 A breach of the duty of loyalty and good faith towards RVA Advogados and its employees may lead to the application of measures that could culminate in the termination of the relationship with RVA.

4.4. Entry into force

- 4.4.1 This Code enters into force immediately after approval by the management.

4.5. Publication

- 4.5.1 The Code will be published and sent to all RVA Advogados lawyers and staff. Their awareness of this Code and their commitment to complying with it is part of the essential and mandatory duties of all lawyers and staff at RVA.

4.6. Updates

- 4.6.1 The Code will be periodically reviewed and updated upon approval by RVA Advogados' management.

VERSION	APPROVED BY	DATE OF APPROVAL	ENTRY INTO FORCE	SUMMARY OF AMENDMENTS
1	Directors	-	-	N/A