

PRINCIPLES OF RELATIONSHIP WITH THE SUPPLIERS
OF NOVO BANCO



**NOVO
BANCO**

GRUPO NOVO BANCO

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ANTI-CORRUPTION

The business environment should fight against all forms of corruption, including extortion and bribery. Based on these «Principles of the United Nations' Global Compact», and because it believes that a transparent and socially responsible relationship between a company and its suppliers should be based on a relationship of principles, which are always more important than the contractually established rules, the NOVO BANCO developed these principles, which are essential for a healthy and transparent relationship between the Group and its various stakeholders.

THE NOVO BANCO PRINCIPLES OF CONDUCT

In approving these «Principles», the NOVO BANCO (NB) is stating to all of its suppliers, current and future, what its values are as an entity that receives the supply of goods and services in the market.

And it also wants to implement a number of principles that it hopes will be fulfilled by all of its suppliers.

Regarding this last point, one must bear in mind that the NOVO BANCO has a variety of suppliers and that not all of them are Portuguese companies. The NOVO BANCO's suppliers are subject to laws, customs and traditions that are very different from each other.

This cultural and legal diversity among the suppliers of the NB is healthy and a sign of the quest for efficiency and quality of the bank itself. It shows that the NB cannot impose rigid rules on all of its suppliers, which could counter the very essence of the diversity that it defends.

There are, however, certain principles that are fundamental, in the understanding of the NOVO BANCO. For this reason, the NB hopes and believes that its suppliers respect these principles and promote them, as well as applying them to their companies and all those with whom they establish business relations.

Whether a supplier respecting these principles or not is essential in assessing how the NB acts with regard to its suppliers and whether it maintains the commercial relationship in the future.

PRINCIPLES OF CONDUCT OF THE NOVO BANCO

Principle of Impartiality

The NOVO BANCO undertakes to act with impartiality in relation to all of its suppliers, current or potential.

The NOVO BANCO:

- Will not grant privileges nor act with favoritism in relation to any supplier;
- Will be loyal to its suppliers, demanding reciprocity in this relationship. Loyalty will imply, mutually, fair treatment, through respect for the confidentiality of the information to which each party has access and through the guarantee of intellectual property rights;
- Will respect the principle of equal treatment among the various suppliers;
- Will avoid conflicts of interest in its internal organization;

- Will require, when necessary, declarations that there are no personal or ownership interests from employees allocated to the area of the relationship with the suppliers.

Principle of Transparency

The NOVO BANCO undertakes to provide appropriate information to its suppliers. The NB:

- Will provide all information regarding possible tenders or the future likelihood of supplies;
- Will indicate, whenever appropriate, the criteria that determine the choice of each supplier;
- Will provide, during the supply relationship, all information reasonably requested, providing each supplier with an interlocutor in its internal structure.

Principle of Quality and Efficiency

The NB undertakes to orient the choice of its suppliers by a principle of quality and seek to obtain maximum efficiency in the relations established. The NB:

- Will seek to choose the best suppliers, and not simply only those that submit the cheapest proposals;
- Will simplify procedures and strive to reduce bureaucratic on-costs in order to reduce unnecessary costs;
- Will pay its suppliers in good time, in accordance with the contractual agreement;
- Will comply with all commitments assumed so as to avoid delays and shortcomings in its compliance;

- Will declare a relationship of proximity with the suppliers, seeking to prevent any litigation, and aiming to resolve situations in a friendly manner in order to avoid seeking judicial redress.

PRINCIPLES OF CONDUCT OF SUPPLIERS

The suppliers of the NOVO BANCO undertake:

- To adopt in their companies measures that aim to protect the environment, to respect all legislation and regulations in force with regard to the environment;
- To implement internal controls that will help to gauge and confirm its respect for the said legislation and regulations;
- Appoint a person to be internally responsible for defence of the environment.

Labour conditions

- The suppliers of the NB undertake to comply with the following fundamental duties:
- Not to have any form of forced or child labour or any other kind of human exploitation. All labour should be the voluntary and result from the free choice of the workers;
- There will be no kind of treatment or threat of inhuman treatment, including sexual harassment or abuse, corporal punishment, physical or moral coercion or verbal abuse of workers;
- There will be no discrimination based on race, colour, religion, political convictions, ancestry, sexual orientation, gender, pregnancy, civil status or nationality;
- Appropriate working conditions for all workers will be guaranteed;

- Respect for legislation in force regarding working hours will be guaranteed;
- Freedom of association and the right to collective bargaining will be respected;
- Local legislation regarding health and safety at work will be respected.

Ethics

The suppliers of the NOVO BANCO undertake to comply with the following fundamental duties:

- Ensure respect for business integrity, avoiding all kinds of bribery, corruption, extortion and suchlike. All business should be transparent and precisely and fully reflected in the respective records and accounts;
- Guarantee confidentiality, respecting the principles and rules of confidentiality legally in force, as well as those that derive from business customs and uses;
- Respect for intellectual property rights will be guaranteed;
- Respect for market rules and the rules of competition will be guaranteed.