

## 1. POLICIES AND PRINCIPLES

Eco-Oil based on its people, business and environment vectors of action, defines policies and principles as elements of guidance in different themes. This document brings together these different policies and codes that Eco-Oil has in place:

- A. Quality, Environmental, Safety and Sustainability Policy
- B. Data Protection and Privacy Policy
- C. Anti-Corruption Principles
- D. Human Resource Management Principles

### Involvement

The implementation of the principles and objectives related to these policies, requires the consultation, involvement and motivation of all employees, at all levels and in all circumstances. It also requires, the maintaining a good work environment an preserving the necessary social, psychological and physical factors thar contribute to it. It is also bases on a mutual an common benefit relationship between all relevant stakeholders and from a sustainable development perspective, under the ONU challenges and its 2030 Sustainable Development Goals.

With this document, the Bord of Administration aims to demonstrate the vision and way of acting in the market making know the guidelines in the different topics addressed.

The CEO

01/02/2023

## A. Quality, Environmental, Safety and Sustainability Policy

### Principles

Eco-Oil's Board of Directors assumes compliance, defense and promotion of the principles of responsible action, as a fuel producer, through the commercial brand EcoGreen Power, a 100% recycled and sustainable fuel oil, in line with the principles of economy circular resulting from the transformation and recovery of waste, with environmental benefits and a smaller carbon footprint from a life cycle perspective compared to alternative fossil fuels.

It is therefore committed to adopting a management model based on the principles of continuous improvement and sustainability, aiming to be the best partner of relevant stakeholders, namely customers, suppliers, employees, shareholders and the environment.

In this sense, an Integrated Management System is established - Quality, Environment and Safety and Occupational Health, based on the ISO 9001, ISO 14001 and ISO 45001 standards, and a Sustainability Management System, based on the requirements of the Sustainability Et Carbon Certification international system, both based on the principles of continuous improvement of its processes, products and services.

### Strategic objectives

In accordance with the defined principles, Eco-Oil intends to achieve the following strategic objectives:

- Sustainably and systematically produce fuel oil with the “EcoGreen Power” brand, 100% recycled fuel, always complying with established quality standards;
- Apply to the organization and comply with the requirements of the International Sustainability Et Carbon Certification - ISCC system.
- Improve the organization's environmental performance through the incorporation of measures to mitigate the impacts of the activity in the processes, reduction of direct or indirect emissions of greenhouse gases and in the actions of planning, coordination, execution and control of tasks, including those related to shifts and infrastructure repair and improvement works;
- Disseminate throughout the organization and communicate the organization's mission, vision and sustainability commitments to stakeholders;
- Systematically promote specific initiatives to improve environmental performance, to promote concrete and measurable gains in the main axes of impact of the activity, namely, in the rational use of resources, in the reduction of emissions, in the implementation of accident mitigation measures, in the efficient rationalization the use of raw materials applied in production processes and in the production of a cleaner and less polluting fuel;
- Increase its competitiveness, thus enhancing the investment necessary to strengthen its market position;
- Continuously improve services in order to meet the needs of customers and exceed their expectations, seeking always respond in a timely and preventive manner;

- Improve partnership relationships with suppliers, promoting the identification of key suppliers and supplies and streamlining the management of these relationships;
- Promote a permanent development action of its employees, seeking to increase the updating of their skills, streamlining development and training plans, as well as disseminating information and ensuring adequate integration plans whenever necessary as a result of functional profiles;
- Ensure compliance with applicable legal requirements and others to which the organization subscribes, promoting a periodic assessment of this compliance;
- Ensure that relevant aspects of environmental protection and occupational safety and health are systematically reviewed and taken into account;
- Maintain and develop the quality, environment, safety and health management systems at work, setting goals for continuous improvement, monitoring the results obtained and introducing the necessary corrective actions or setting more ambitious goals;
- Minimize the environmental impacts arising from its activity, promoting the efficient use of resources, the reduction of pollution, the prevention of accidents or incidents and the carrying out of emergency drills, all in order to guarantee the maintenance of the company's image and good reputation;
- Provide its employees with safe working conditions and a healthy work environment, in order to prevent injuries, injuries and any other damage to health, as well as the occurrence of accidents involving hazardous substances, work accidents and occupational diseases, in order to ensure high performance standards in terms of the environment and occupational safety and health;
- Promote communication, training and professional development of its employees, ensuring the adequacy of their skills to the functions they perform;
- Involve all company employees, as well as suppliers and service providers that cooperate with it, in respect for the aforementioned principles and commitments, including those relating to the "Responsible Care" Program;
- Assume an integrated management vision having social responsibility as a guiding element, a structuring factor for sustainable development.

The goals associated with these objectives will be defined annually by the Eco-Oil Board of Directors.

### **Involvement**

The implementation of the aforementioned principles and objectives requires the consultation, involvement and motivation of all company employees, at all levels and in all circumstances. It also requires the maintenance of a good working environment and the preservation of the necessary social, psychological and physical factors that contribute to it. It is also based on a mutual and common benefit relationship with all relevant stakeholders, from a sustainable development perspective, under the UN challenges and its 2030 Sustainable Development Goals.

## B. Data Protection and Privacy Policy

### 1. General considerations

ECO-OIL respects the privacy of all personal data holders and values the relationship he has with himself. This Data Protection and Privacy Policy aims to make known how ECO-OIL treats your personal data and guarantees your privacy in the development and performance of its activities, namely:

- Principles applicable to the protection of your personal data
- Personal data, treatment of personal data and data subject
- Category of personal data that ECO-OIL handles
- Purposes for the processing of your personal data
- Lawfulness fundamentals
- Period of retention of your personal data
- Sharing of your personal data
- International flows of personal data
- Your rights and how you can exercise them
- The Data Protection Officer
- Security of your personal data
- Confidentiality

### 2. Principles applicable to the protection of your personal data

The treatment of your personal data is carried out in accordance with the general principles described in Regulation (UE) No. 679/2016 - General Regulation on Data Protection, namely:

In the context of the relationship established, ECO-OIL ensures that your personal data will be treated in a lawful, loyal and transparent (Principle of lawfulness, loyalty and transparency);

ECO-OIL collects your personal data for specific, explicit and legitimate purposes and does not subsequently process the same data in a manner incompatible with those purposes (Principle of limitation of purposes);

ECO-OIL ensures that only appropriate personal data will be processed, relevant and limited to what is strictly necessary for the purposes for which they are processed (Principle of data minimization);

ECO-OIL takes appropriate measures so that inaccurate personal data, taking into account the purposes for which they are processed, are erased or rectified without delay (Principle of accuracy);

ECO-OIL keeps personal data in a way that allows their identification only for the period necessary for the purposes for which they are processed (Principle of conservation);

ECO-OIL ensures that your personal data are treated in a way that guarantees your security, including protection against its unauthorized or unlawful treatment and against its loss, destruction or accidental damage, adopting technical or organizational measures (Principle of integrity and confidentiality).

### **3. Personal data, processing of personal data and data subject**

Personal data are all information and / or elements that, regardless of their support, can identify or make you identifiable, directly or indirectly.

The treatment of personal data means the operation or set of operations carried out on personal data, automated or non-automated means, from the collection of information to its destruction. Within this cycle, among others, registration, organization, structuring, conservation, adaptation or alteration, recovery, consultation, use, dissemination by transmission, dissemination or any other form of availability, comparison or interconnection, limitation, erasure.

In the context of the activities developed by ECO-OIL, the data subject is, without limitation, the customer, potential customers, investors, partners, jobseekers, employees and ex-employees, employees of partners, suppliers and service providers and their employees, claimants and claimants, visitors and individuals captured in CCTV images and all those individuals maintain a relationship with ECO-OIL and to whom personal data relate

### **4. Category of Personal Data that ECO-OIL handles**

In development of its activities, ECO-OIL processes the personal data of a significant number of categories of data subjects. The personal data collected always depends on the nature of the interaction, its legality underlying it and may include the following:

- a) Identification and contact details;
- b) Demographic data
- c) Commercial data for the provision of services and / or supply of products;
- d) Payment details;
- e) Account data;
- f) Preference data;
- g) Identification and contact data for access control and / or image capture and recording by CCTV devices;
- h) Data on the use of information technologies.

It should be noted that the sharing of personal data with ECO-OIL is not mandatory, however and if that information is not shared, it may result in ECO-OIL being unable to supply the desired products and / or services, as well as ensuring the compliance with requirements that are necessary for the purposes of contractual relations

### **5. Purposes for the processing of personal data**

The development and performance of the various activities pursued by ECO-OIL mean the existence of a relevant set of specific, explicit and legitimate purposes for the treatment of personal data, such as:

- a) Accounting, tax and administrative management;
- b) Management of the integrated quality, environment and safety and health at work system;
- c) Commercial and marketing activity;
- d) Capture and recording of images by CCTV devices;
- e) Access control management;
- f) Human resource management;
- g) Management of electronic communications;
- h) Analysis of statistical information;
- i) Litigation management;
- j) Compliance with legal and / or contractual obligations.

#### **6. Lawfulness foundation**

The lawfulness principle is underlying in all data processing operations carried out by ECO-OIL, which only proceeds to this processing as long as there is lawfulness grounds, namely:

- a) Consent;
- b) Pre-contractual diligence or the performance of a contract;
- c) Compliance with a legal obligation;
- d) Defense of vital interests of the data subject;
- e) Legitimate interests (provided that it does not prevail over the fundamental interests or rights and freedoms of the person and his data).

#### **7. Retention period of personal data**

ECO-OIL keeps personal data only for the period of time necessary to carry out the specific purposes for which they were collected. However, it may be necessary to keep personal data for a longer period of time, taking into account factors such as:

- a) Legal obligations, under current laws, to keep personal data for a certain period;
- b) Contractual obligations and / or legitimate interest of ECO-OIL;
- c) Limitation periods, under the laws in force;
- d) Disputes (eventual);
- e) Guidelines issued by the competent data protection authorities.

#### **8. Sharing of personal data**

Personal data may be shared with:

- a) Companies and subcontractors responsible for providing services to ECO-OIL (these companies and subcontractors are bound in writing with the company ECO-OIL, only being able to process personal data for the purposes specifically established);
- b) Other responsible persons and / or third parties (other companies of the group to which the company ECO-OIL belongs, by means of a sharing agreement, the companies being responsible for complying with the data protection rules);
- c) Judicial, administrative, supervisory or regulatory authorities (based on due legality).

ECO-OIL ensures that personal data is not shared outside the European economic area.

## 9. Rights and their exercise

The holder of personal data has the right of access, rectification, limitation, portability, erasure and right to object to the processing of data, in certain circumstances, namely:

- a) Right to provide information - you have the right to obtain clear, transparent and easily understandable information about how ECO-OIL uses your personal data and what your rights are;
- b) Right of access - you have the right to obtain information about your personal data and the way they are treated;
- c) Right of rectification - has the right to request the correction of incomplete or incorrect personal data, and ECO-OIL should ensure its correction without undue delay;
- d) Right to erase data - you have the right to request the erasure or elimination of the personal data transmitted, as long as there are no valid grounds for ECO-OIL to continue using them or their use is illegal (example of exception: defense of a right in a judicial process);
- e) Right to limitation of processing - has the right to block or prevent the future use of the personal data transmitted, while ECO-OIL evaluates a request for rectification or as an alternative to deletion;
- f) Right to data portability - you have the right to obtain and reuse certain personal data for your own purposes in various organizations;
- g) Right to opposition - you have the right to oppose certain types of treatment, for reasons related to your particular situation, at any time during which this treatment is taking place, for the purposes of the legitimate interest of ECO-OIL or third parties. However, ECO-OIL will be able to continue processing these data if it can prove the overriding legitimate reasons for the treatment, which override the right to opposition (example: establishment, exercise or defense of a right in a judicial process);
- h) Right to file a complaint - you have the right to file a complaint with the competent supervisory authority, the National Data Protection Commission (CNPD), if you believe that the processing carried out violates your rights and / or data protection laws applicable.

You may at any time, in writing, exercise the rights enshrined in the Personal Data Protection Law and other applicable legislation through the email [goncalo.camejo@eco-oil.pt](mailto:goncalo.camejo@eco-oil.pt).

## 10. The data protection officer

ECO-OIL appointed Gonçalo Refoios Camejo as the person responsible for the protection of personal data, who assumes a fundamental role within ECO-OIL, in monitoring the data processing activities carried out and in ensuring the respective legal compliance.

The data protection officer has the following functions:

- a) Control the compliance of the treatments carried out by ECO-OIL with the provisions contained in the data protection laws in force and related to the matter of personal data protection in the European Union;
- b) Provide advice to ECO-OIL;
- c) Cooperate with national and European supervisory authorities in the field of personal data protection (in Portugal, the National Data Protection Commission);
- d) Constitute a point of contact with the authorities and with the respective holders of personal data, in matters related to data protection.

The data protection officer can be contacted, at any time, about any data protection issues, via email [goncalo.camejo@eco-oil.pt](mailto:goncalo.camejo@eco-oil.pt).

## 11. Security of personal data

ECO-OIL processes personal data, in the context of the purposes identified in this policy and using appropriate technical and organizational measures to promote their security and integrity, namely in relation to unauthorized or unlawful processing of personal data and respective accidental loss, destruction or damage.

Without limiting, ECO-OIL makes use of logical and physical security requirements and measures to guarantee the protection of personal data, by preventing unauthorized access, ensuring the storage of information on protected media and locations

## 12. Confidentiality

ECO-OIL assumes that it does not sell, rent, distribute, or commercially or otherwise make personal data available to any third party, except in cases where it needs to share information for the purposes set out in this policy. ECO-OIL preserves the confidentiality and integrity of personal data and protects them in accordance with this policy and the laws in force on the subject.

## 13. Other relevant documentation

ECO-OIL can assume internally documented support procedures for operational control activities that are directly related to this policy.

## 14. Changes to this policy

ECO-OIL may change this policy from time to time. When doing so, it will publish it on its official website and / or make it available to all parties interested in protecting personal data.



If the changes result in changes to relevant procedures, with effects on the protection of data already collected, ECO-OIL will take specific actions to ensure that the holders of such data are informed of these changes and the subsequent effects

A ECO-OIL pode assumir internamente procedimentos documentados de suporte, para as atividades de controlo operacional que estejam diretamente relacionadas com a presente política.

### C. Anti-Corruption Principles

The Board of Administration of Eco-Oil, undertakes to adopt principles and measures to prevent the payment of bribes or kickbacks in any transaction.

Eco-Oil business relies on the trust we build with our customers, partners and suppliers. Paying bribes or kickbacks breaks that trust. Bribery influences the decisions process and is inconsistent with Eco-Oil mission.

Eco-Oil is committed to doing business with integrity and transparency.

#### Support actions

In line with the anticorruption statement, Eco-Oil pursues the following support actions:

- All Bribes are Prohibited.  
This means you must not pay or offer a bribe or kickback of any kind. Eco-Oil employees are not allowed to solicit or accept a bribe or kickback.
- Keep Accurate Books and Records  
Eco-Oil do not establish or use any undisclosed or unrecorded company funds, such as 'off-book' accounts, for any purpose.
- Raise Concerns and Ask Questions  
Any question will be welcomed and will be addressed by our top management team.
- No Retaliation  
Anyone will suffer adverse consequences for refusing to pay or take a bribe or kickback, or engage in other activities that violate this policy, even if this results in the loss of business to Eco-Oil.

#### Involvement

This policy applies to all employees.

There are no exceptions to this policy.

Violation may result in disciplinary action, up to and including termination of employment.

#### D. Human Resource Management Principles

The Board of Administration of Eco-Oil, undertakes to adopt a Human Resource Management Model in compliance with best practices and in strong defense of our employees and their family's well-being, to support a competent and willing workforce who are fundamental to achieve organizational goals.

In compliance of the defense and promotion of previous statement, Eco-Oil has also implemented responsible conduct, supported by a management model based on the principles of continuous improvement, aiming to satisfy the stakeholders and the environment.

##### **Support actions**

In line with the principles defined, Eco-Oil pursues the following support actions:

- Company retribution policy includes annual bonus and promotions, based in personal overall performance evaluation.
- All employees have access to health care program. Program can be extended to all family by employee direct contribution.
- All employees with school children have an annual subvention to support child education.
- All salaries are higher than minimum legal wage.
- Eco-Oil has the objective to have no employees with short term contracts.
- All employees have a transport bonus to support commuting expenses.
- Equal opportunities and salary for man and women. Eco-Oil celebrate diversity and are committed to creating an inclusive environment for all employees, we do not discriminate based upon race, religion, color, national origin, gender (including pregnancy, childbirth, or related medical conditions), sexual orientation, gender identity, gender expression, age, status as an individual with a disability, or other applicable legally protected characteristics.
- Harassment is prohibited. Eco-Oil does not tolerate any type of harassment expresses, verbal or physically, coming from any person, representing any function or category, our commitment is to keep a workplace free of harassment, so our employees can feel safe and happy. We will not tolerate anyone intimidating, humiliating or sabotaging others in our workplace.
- Education program and training for all employees to develop skills and competences.
- High standard for individual protective equipment and continues risk assessment.

##### **Involvement**

Eco-Oil's performance is a collective construction, with their effort and dedication are responsible for a continuous worthy performance over the years.