
CODE OF CONDUCT TO PREVENT AND COMBAT HARASSMENT AT WORK

TRIANGLE'S COMPLIANCE 2025

I. FRAMEWORK

Law No. 73/2017 of August 16 amended Article 127 of the Portuguese Labor Code, thereby establishing the employer's duty to adopt codes of good conduct for the prevention and combat of workplace harassment, whenever the company has seven or more employees.

Triangle's – Cycling Equipments, S.A. (hereinafter "Triangle's") has had procedures in place since March 2024 regarding the prevention and combat of workplace harassment, which all employees are bound by and which must guide their professional conduct.

Triangle's aims to reinforce its commitment to the prevention and combat of workplace harassment by approving and implementing this Code of Conduct, which sets out specific rules designed to promote the prevention and combat of all forms of harassment in the workplace, without prejudice to other applicable codes of conduct.

II. SCOPE OF THE APPLICATION

This Code applies to all employees of Triangle's.

III. PROHIBITION OF HARASSMENT IN THE WORKPLACE

1. Harassment in the workplace is strictly prohibited, regardless of the specific form it may take.
2. Harassment is understood to mean any and all unwelcome behavior – particularly that which is based on a discriminatory factor – carried out during access to employment or within the scope of employment, work, or professional training, with the purpose or effect of disturbing or constraining the person, undermining their dignity, or creating an intimidating, hostile, degrading, humiliating, or destabilizing environment.

3. Sexual harassment is defined as any unwelcome behavior of a sexual nature whether verbal, non-verbal or physical, with the purpose or effect referred to in the previous paragraph.

IV. OBLIGATIONS OF THE EMPLOYEE REGARDING HARASSMENT

Every Triangle's employee must:

- a. Comply with the rules of conduct in force at Triangle's, ensuring that their behavior does not include or imply harassment of any kind;
- b. Promptly report in writing any circumstance constituting harassment in the workplace of which they are a victim or have become aware.

V. OBLIGATIONS OF THE EMPLOYEE

Triangle's must:

- a. In cooperation with their team members, promote compliance with the provisions of this Code of Conduct, with a view to ensuring the prevention and combating of workplace harassment;
- b. Promote the proper dissemination of this Code of Conduct, in order to ensure the implementation and adoption of the principles set forth herein;
- c. Disseminate information regarding the workplace harassment policy, when applicable and in accordance with the legislation in force;
- d. Implement the necessary measures to prevent and combat harassment, in accordance with and under the terms of this Code of Conduct.

VI. PROCEDURE

1. Reports made by employees regarding harassment practices must be submitted in writing to Triangle's Ethics Officer, with acknowledgment of receipt provided to the reporting employee;
2. When the reported employee is a member of the management team, the responsible for the guidance and supervision of the process is the executive committee, with the necessary adaptations;
3. If the report received is deemed credible and substantiated, following a preliminary assessment of its content, the appropriate disciplinary proceedings shall be initiated against the employee who is allegedly involved in the harassment practice;
4. Triangle's ensures the confidentiality of any proceedings related to cases of workplace harassment;
5. The employee who reports a harassment incident, as well as any witnesses indicated by them, may not be subject to disciplinary action (except in cases of intentional misconduct), based on statements or facts contained in the records of judicial or administrative proceedings initiated due to harassment, until a final and binding decision is rendered, without prejudice to the right of defense.

Or

Reports of harassment by employees must be submitted through the Company's Whistleblowing Channel, in accordance with the applicable procedures, which ensure the

availability of appropriate mechanisms for the communication and handling of reports, while safeguarding the confidentiality of the information provided and the identity of the whistleblower, pursuant to the applicable regulation.

VII. CONSEQUENCES OF NON-COMPLIANCE

1. Violation of this Code of Conduct, by any employee, may be subjected to disciplinary review, through the initiation of the appropriate disciplinary proceedings and the application of a sanction deemed appropriate, in accordance with the applicable legal provisions;
2. The consequence referred to in the previous paragraph may also be applied in cases of reports or testimonies concerning facts that are knowingly false;
3. Employees are likewise warned that certain behaviors constituting workplace harassment may also entail civil or criminal liability.

VIII. CONSEQUENCES OF NON-COMPLIANCE

This Code shall take full effect as of the present date, March 1, 2024.

1. The application of the provisions of this Code shall not prejudice the applicability of other codes or relevant legislation in force.
2. Triangle's may, at any time and unilaterally, amend this Code of Conduct, in compliance with the applicable legislation.

Document Control

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Prepared by: People & Sustainability

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