



**PROFESSIONAL
ETHICS AND CODE
OF CONDUCT**



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WHY CLEVERTI'S PROFESSIONAL ETHICS AND CODE OF CONDUCT?

The whole equals the sum of its parts. Cleverti's Professional Ethics and Code of Conduct (PECO) presents the core values and acting principles of Cleverti, outlining our relationship with our co-workers, clients, associates, suppliers and any other stakeholders.

Cleverti's PECO is not a strict codex setting a rule for each possible case. It is rather a mantra of the values we embed in our everyday life.

As expected, we drive our business within the framework of applicable national and international laws, rules, and regulations. But we want to take our commitment beyond expectations.

We strive for a working environment that we can all be proud of in a company well-regarded and respected by our entire community.

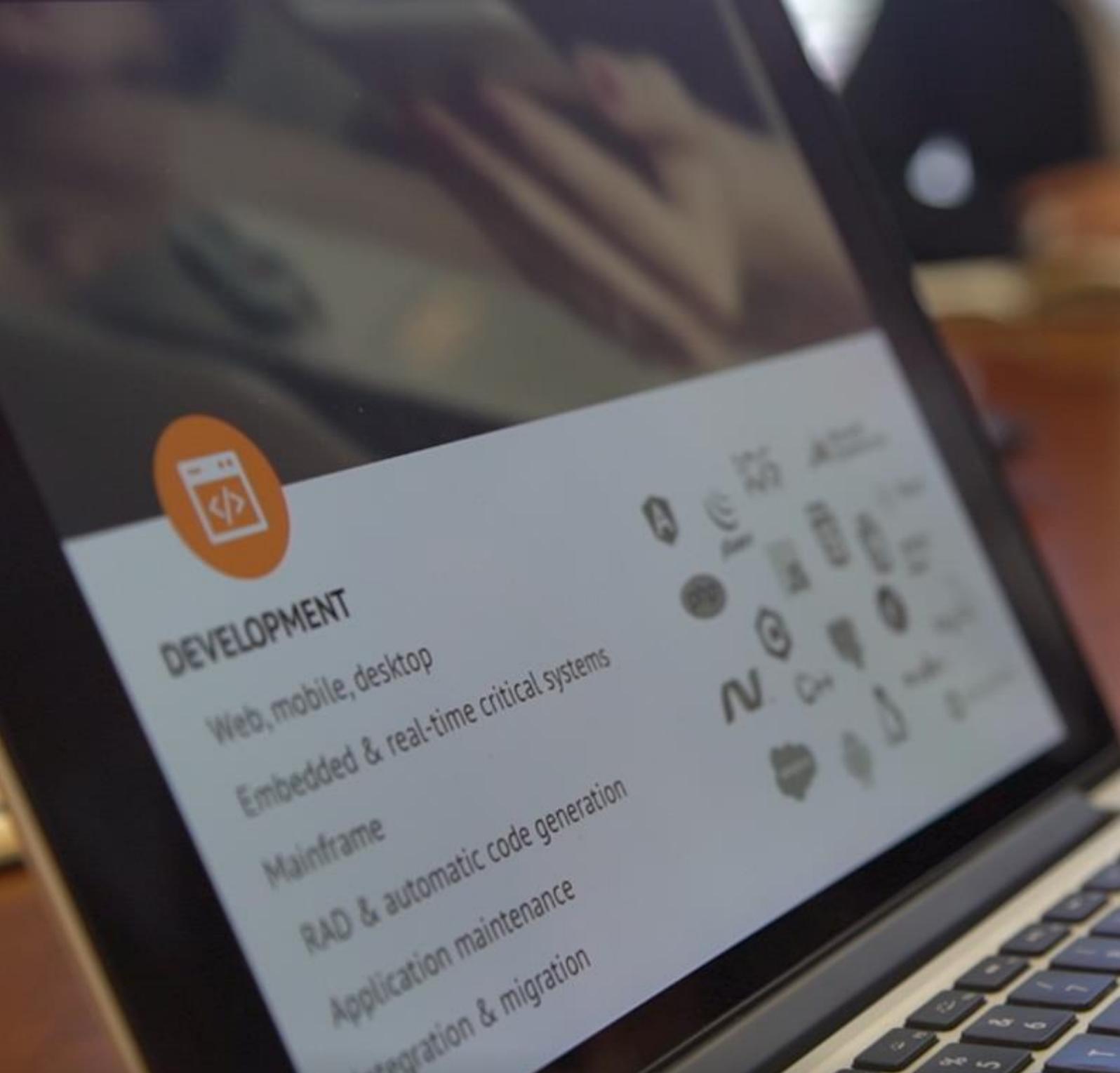
We are all individually responsible for protecting Cleverti's name, ethics and reputation. By incorporating these principles into our daily activities we are contributing positively to our collective future.



Carlos Coutinho Silva
CEO

CLEVERTI'S PECO IS AIMED AT:

- Our **management**: so that their decisions and attitudes towards peers and employees take into account both their responsibilities and our values.
- Our **co-workers**: so that everyone knows what is expected of them and how to incorporate our values, for the benefit of each other, within their duties and responsibilities.
- Our **new and prospective employees**: as a guide into the company in which they have just entered or consider joining.
- Any **third parties**: contracted by or acting on behalf of Cleverti, whenever Cleverti may be held liable for their conduct.
- Our wider **community**: when they seek to understand our corporate DNA and realize what to expect in our relationship to them.



CORPORATE IDENTITY

NOTHING SHOULD LESSEN OUR COMMITMENT TO INTEGRITY. NEITHER THE STRESS OF GETTING RESULTS, PERSONAL AMBITION, OR EVEN AN ORDER FROM ABOVE.



OUR MANIFESTO

1

We have **A FIRM AMBITION TO GROW**

Growing is essential to create employment and wealth, enable investment and reach a higher number of clients in more geographies.

But our growth is not at all cost. It needs to be sustained and firmly guided by legal and ethical standards.

2

We struggle to **BE THE BEST**

Being on top allows us to become unique, differentiate our offer, and attract more and better clients.

But the top is not an end in itself. We assume a shared commitment to excellence, honesty and fair competition.

3

We want to **BE FAMOUS**

Standing out from the crowd opens doors, gives us access to wider opportunities and makes people want to be around us.

But we do not seek hollow or bad fame. We want to be known for having a positive impact on the businesses we do, and for acting responsibly within our entire community.

OUR MISSION

Enable our clients to improve business processes and create competitive advantages by providing them with high value-added services that cover the entire lifecycle of their software applications.

OUR VALUES

Our values define who we are collectively and guide our performance in everything we do.

Integrity

We truly believe in doing the right thing even if nobody is watching.

People

We seek to engage, treasure and develop the best people.

Innovation

We embrace and drive different forms of innovation.

Affiliation

We build open, reliable and lasting relationships with our people, our clients and our partners.

Proximity

We keep close to our clients, providing the best options to fulfil their needs and help them succeed.

Community

We endorse solidarity causes, green policies and ideas that help to build a better world.



WORKING ENVIRONMENT

WE BELIEVE IN WORKING RESPONSIBLY AND BEING ACCOUNTABLE FOR WHAT WE DO. BUT WE ALSO CARE DEEPLY ABOUT HOW WE DO IT.



We respect and value our people. Our employees should be able to commit spontaneously. We seek to provide them with the right conditions and instruments to make this happen. Through our common values and goals, we expect to promote true collaboration and teamwork.

DIVERSITY WIDENS OUR HORIZONS

We accept and value people with different thoughts, experiences and backgrounds. By sharing our ideas and working together, we can deliver better results than each of us could ever achieve alone.

WORK SUCCESS IS PRESSURE ENOUGH

We give our best in a positive and reliable workplace. Our employees are required to treat others politely, with respect and dignity, without any verbal or physical abuse, regardless of their status, promoting an harassment-free working environment.

WE ARE INDIVIDUALS TREATED EQUALLY

We are not all alike but we deserve equal respect. Our people have equal opportunities and treatment, regardless of sex, race, colour, nationality, ethnicity, religion, age, marital status, sexual orientation, disability, status, or any reason other than qualification or merit.

WHEN ONE GROWS WE ALL GROW

Professional and personal development are key within Cleverti's culture. We are all encouraged to continuously update our knowledge and expertise to enhance performance and motivation. Our selection, remuneration, and professional advancement policies are guided by merit and reference market practices.

A TEAM IS MORE THAN A SET OF PEOPLE

Teamwork goes beyond working in the same company. We are much more than mere colleagues, we are a true team. We share knowledge, ideals, goals and difficulties. We collaborate with each other to overcome obstacles and succeed.

SPEAKING OPENLY AVOIDS MISTAKES

We have an open-door culture where we can communicate openly and effectively, assuring that sufficient information is accessible to all.

AN ENVIRONMENT FOR THE BENEFIT OF ALL

We provide a healthy, safe and pleasant work environment that promotes the well-being and productivity of all the people working with us.

EMPLOYEE CONDUCT

Cleverti's PECO is embraced by all our employees, regardless of hierarchical position, role and responsibilities. Wherever we perform our duties, as long as we represent Cleverti, our conduct is guided by it. **We are proudly:**

HONEST

We hold to high standards of honesty, integrity and ethics, and strive to fulfil our commitments.

We are guided by mutual respect, deference, cooperation and assertiveness.

RESERVED

We protect the confidentiality of information regarding Cleverti and our clients to which we have access while performing our duties.

RESPONSIBLE

We adopt a suitable and decent behavior to defend Cleverti's good name and reputation. We take care of Cleverti's physical, financial and intellectual assets and use our resources efficiently.

TRUSTING

We act in good faith, making no promises we don't intend to keep in order to have the trust of those working with us.

FAIR COMPETITORS

We follow competition rules and abstain from giving or taking compensations to favour ourselves or Cleverti.

NON-CONCORRENT

We do not engage in activities which may directly or indirectly compete with Cleverti's business.

EXCELLENCE-DRIVEN

We focus on understanding our clients' needs and challenges to deliver top quality solutions that help them succeed. We act with a sense of urgency, adding the highest possible value to the solutions we provide.

LOYAL

We avoid situations that may create a conflict between our own interests and the interests of Cleverti.

COMMITTED

We adopt a constructive and proactive attitude, focusing on achievement and taking pride in the service we provide.

EAGER TO BE BETTER

We endeavour to keep improving and exceed our clients' expectations. We foster a positive perception of Cleverti in order to enhance our clients' satisfaction and loyalty.



RELATING TO OTHERS

THE PEOPLE AND ENTITIES WITH WHOM WE DO BUSINESS OR OTHERWISE RELATE MUST BE ABLE TO TRUST OUR WORD AND BELIEVE THAT WE WILL DELIVER AS AGREED.



WE CREATE VALUABLE RELATIONSHIPS ALL AROUND

Our conduct is one, no matter who we interact with. Integrity and ethical behavior are part of our DNA and guide the way we relate with our co-workers, clients, partners, associates, suppliers and any other stakeholders.

CLIENTS COME FIRST

- We face client's challenges as our own, striving for excellence in everything we do. We are diligent to provide our clients with the best solutions for their needs within reasonable timing.
- We relate to our clients with professionalism, respect, and loyalty. We protect confidential information, respect privacy and secure client's intellectual property.
- We earn the trust of our clients. We are true and communicate clearly, providing our clients with the information they need to make an informed decision. We fulfil the terms of our agreements.

- Our offering is global and therefore we work with clients in many different geographies. We accept and respect cultural diversity. We comply with international trade laws and regulation.

PARTNERS IN BUSINESS

- We handle the affairs with our business partners with good faith and loyalty, creating trusting relationships. We establish clear goals and communication to enforce the pursuit of business objectives.
- Our service providers and suppliers are selected based on impartial quality criteria. We assure their compliance with our policies and standards of conduct.
- We are transparent and equitable in business and do not tolerate illegal practices, bribery, corruption or money laundering. We honour our obligations and were one of the first Portuguese companies to join the [Punctual Payment Commitment](#) initiative.

FAIR COMPETITION

- We are in favour of fair competition and free enterprise. Our attitude in business is guided by market laws and rules.
- We respect our competitors and promote relationships based on cordiality and mutual respect. We avoid practices and arrangements that inhibit competition.

SOCIALLY RESPONSIBLE

- We believe that in order to receive, we also have a firm duty to give. We prize sustainability, cooperation and positive contributions to our communities and to the society.
- We defend the human rights of our employees and all the people within our communities, in accordance with international standards, including UN's Universal Declaration of Human Rights.
- We strive to make positive contributions to our communities and we encourage our employees to do the same. Our contributions are mostly addressed to humanitarian, educational and innovation projects.

- We adopt and stimulate a responsible use of natural resources. We strive to preserve the environment, specially by minimizing the ecological footprint resulting from corporate activities.



COMPLIANCE AND REPORTING

Cleverti will not accept violations to the Professional Ethics and Code of Conduct. If you become aware of a situation that violates Cleverti's PECO, you should report it to your line manager or to Cleverti's Management.

Reporting should be responsible and plausible, not based on personal opinions or minor issues.

Violations will be addressed promptly by Cleverti and may lead to disciplinary action in accordance with applicable regulations and laws.

RIGHT TO NON-RETALIATION

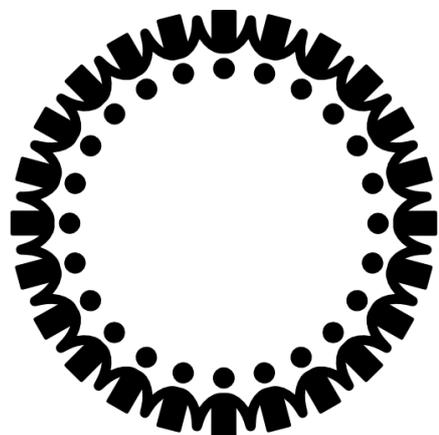
Cleverti will not take action against anyone who reports an ethical issue in good faith.

Retaliation from anyone against an employee that reports an ethical issue in good faith will not be tolerated.

ADDITIONAL POLICIES AND PROCEDURES

Cleverti has currently other policies and procedures in place which include:

- Privacy Policy
- Code of Good Conduct for Preventing and Combating Harassment at Work





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