



LOGISTICS  
SOLUTIONS

# CODE OF CONDUCT AND PERSONAL DATA

OUR PASSION DRIVES US TO NEW  
CHALLENGES

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## I. PREAMBLE

This code of conduct has the primary objectives of defining the general rules and ethical and deontological principles that should guide the behaviour of all KLOG stakeholders. At the same time, it aims to safeguard the legal imperatives provided for in paragraph k) of Article 127 (1) of the Labour Code.

As a corollary, the policies set out in this Code of Conduct seek to uphold KLOG's commitment to the provisions of the Universal Declaration of Human Rights and the UNWTO conventions.

In addition, this Code respects the discipline in force at KLOG for the processing of personal data, within the scope of its legal powers.

The Code of Conduct should serve as a benchmark for the standard of conduct, assuming the commitment to consolidate the organisational image as an example of innovation, authenticity, and excellence.

In addition to the matters set out above, for the purposes of this code, we take into account the requirements provided for in the IWAY<sup>1</sup> policy.

This code of conduct applies to all stakeholders and plays a decisive role in long-term success. Failure to comply with the values set out in this code may lead to disciplinary action.

## II. APPLICATION

This code of conduct is applicable to all KLOG stakeholders and enters into force immediately after approval by the Board of Directors.

In case of doubt about any of the principles listed, please consult your line manager or the Ethics Committee.

The code of conduct will be disseminated in a manner that promotes the consolidation of principles and the adoption of prescribed behaviours.

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<sup>1</sup> The IWAY policy is available for consultation by all employees and will be made available to stakeholders upon request.

### III. ETHICAL BEHAVIOUR

KLOG believes in the quality of its services and the performance of its employees. Relations with stakeholders are based on respect, transparency, honesty, loyalty and integrity, and no form of unethical behaviour or corruption is tolerated.

We preserve our independence so that we can speak and act freely, in defence of the company's interests.

### IV. SOCIAL AWARENESS

We know that our business activity has an impact on the social environment and that we have a responsibility to support the local community. Our aim is to collaborate with social solidarity or charitable institutions and to support cultural, sporting, or other activities, encouraging the active participation of all our employees.

### V. ENVIRONMENTAL AWARENESS

We believe that responsible management of environmental issues is crucial to our business success. We are committed to the concept of eco-efficiency and prioritise the development of sustainable transport and logistics services and solutions, and actively respect these principles in all our business practices.

We aim to enhance brand recognition amongst our clientele by increasing the visibility of the environmental performance of road haulage within the supply chain.

### VI. HEALTH AND SAFETY

The physical and psychological well-being of our employees is crucial to us, and we strive to ensure a safe and healthy work environment for everyone.

We expect all employees to comply with the applicable occupational health, hygiene and well-being guidelines and practices that have been implemented internally.

## VII. OPENNESS AND TRANSPARENCY

We take responsibility and expect others to do the same. We encourage a culture of openness, transparency, and accountability, and we welcome feedback from employees, as well as from all our stakeholders, as a means of obtaining an independent assessment of our performance, our degree of compliance with the best practices and our own values and principles. We endeavour to respond to the concerns of our stakeholders.

## VIII. READINESS FOR CHANGE

We strive to find the best solutions and services for our customers. Our employees and company managers must be flexible enough to accept new ideas and new ways of doing business. They must also be prepared to accept change, improve services and processes, and respond to new organisational challenges.

## IX. ASSOCIATIVISM

KLOG employees can exercise their right to join collective bargaining mechanisms, such as trade unions and workers' organisations.

All workers who belong to the mechanisms identified above should not be subject to discrimination, violence, and harassment, whether physical or psychological.

## X. CONFIDENTIALITY AND PROFESSIONAL SECRECY

KLOG employees and all stakeholders are subject to professional secrecy, particularly with regard to matters that, due to their importance to the organisation or by virtue of the law, should not be public knowledge.

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<sup>2</sup>The anti-discrimination policy is outlined in Chapter XIII.

<sup>3</sup>The anti-abuse and harassment policy is described in Chapter XIV.

The use of privileged information inside or outside of KLOG for personal gain may result in disciplinary action.

All personal data collected must be processed in a fair, lawful and careful manner in order to protect the privacy of each employee and in strict compliance with the applicable legal standards.

## XI. PERSONAL DATA

### 1. Object and Scope

This document applies:

- a) To all KLOG employees, regardless of the nature of their employment relationship, in the context of the collection, processing and use of personal data;
- b) To the relations between KLOG and its employees, partners, or suppliers, as well as subcontractors.

For the purposes of this code, the concept of personal data and its processing are expressly defined in the General Data Protection Regulation (GDPR), approved by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, and are reproduced below:

- a) «Personal data», information relating to an identified or identifiable natural person («data subject»); An identifiable natural person is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, identification number, location data, online identifiers or to one or more elements specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- b) «Processing», any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.

## 2. Data Collection

The collection of personal data for processing is based on the fulfilment of a legal obligation or on the consent of the data subject and must be processed:

- a) In accordance with the applicable legislation;
- b) In strict compliance with citizens' rights, freedoms and guarantees.

The collection of personal data, whether by KLOG or its subcontractors, from the respective data subjects, must be preceded by information to them about the purpose for which it was collected and must be processed as strictly appropriate and relevant for that purpose.

KLOG employees, as well as its subcontractors, must ensure:

- a) that the data is only processed for the purposes for which it was collected;
- b) that the data collected, used, and stored is limited to the minimum personal data necessary and sufficient for the respective purpose;
- c) that personal data is only stored for the period of time necessary to fulfil the purpose for which it was processed;
- d) that there is no transmission of personal data for commercial or advertising purposes;
- e) that the processing of personal data is carried out for legally prescribed purposes or for the provision of online services at your request.

## 3. Right to Information and Access

As the data controller, KLOG undertakes to inform the data subjects about the data it collects and the purpose for which it is collected.

## 4. Rectification, Updating, Portability and Erasure of Data

Whenever requested, KLOG undertakes to rectify, update, make available, and delete the data contained in its files, databases or data banks relating to it, when legally permitted, in the shortest possible time period.

## 5. Security equipment

In the pursuit of its activities, KLOG uses a set of technologies and security procedures appropriate for the protection of personal data, protecting unauthorised access or disclosure, namely through:

- a) Physical security measures, such as physical access control for employees, collaborators and visitors to the head office premises, highly restricted mechanisms for accessing data centres and combating intrusion, fire safety measures and access control in accordance with the Access Control Policy;
- b) Logical security measures for access to systems and workstations through identity management, authentication, and privilege mechanisms; in the network component, the use of firewalls and intrusion detection systems, segregation of networks (internal, external, demilitarised zone) and application environments, as well as encryption of information through secure communication channels.

## 6. Use of computer resources and information technologies

Employees must use the computer equipment and resources provided to them by KLOG exclusively for professional purposes and diligently maintain them, being forbidden to change peripherals or open computer equipment without the express authorisation of Management.

KLOG has a central directory system for managing user accounts and workstations. Each employee is assigned a user account and a password to access the computer resources made available to them, in accordance with their access profile.

Each user is responsible for keeping his/her passwords secure in accordance with the Access Control Policy defined globally for KLOG.

The electronic platforms that KLOG manages or administers have secure authentication mechanisms, and employees can authenticate themselves using the authentication certificate available on the Citizen Card or the Digital Mobile Key as an alternative mechanism with the same level of security. TO BE CONFIRMED

Regarding software use, the following is established:

- a) The basic image of the workstations provided by KLOG includes a standard suite of productivity applications common to all users;
- b) Updates and changes to the software base are carried out centrally and distributed automatically through group policies;
- c) The need for additional software to perform specific functions must be communicated to the Management, and its installation is subject to authorisation;
- d) The detection of malfunctions in the operation of the software or suspicion of malware must be immediately reported to the Management.

Regarding Internet use:

- a) Access to websites containing sexually explicit messages, profanity, obscenities, or others is prohibited;
- b) KLOG reserves the right to block access to websites that prevent all users from using them with quality and in a fair condition. Such rules are published on the KLOG intranet.

Regarding e-mail use, the following is established:

- a) Each employee is provided with an e-mail address;
- b) The e-mail address provided by KLOG must be used exclusively for professional purposes;
- c) It is expressly forbidden to use that e-mail to send:
  - i. Material that is considered illegal, namely content that violates copyright or contains material that is obscene or offensive to good morals;
  - ii. Chain e-mails or the equivalent.

## 7. Institutional relations with the supervisory authority

KLOG, through its Data Protection Officer, cooperates with the Supervisory Authority by providing it with information whenever requested.

## 8. Appointment of the Data Protection Officer

The Data Protection Officer, after his/her appointment, has the following main duties:

- a) To inform and advise the data controller or processor, as well as the employees who process the data, of their obligations;
- b) To monitor the compliance of the processing carried out under the GDPR, with other European Union or national data protection provisions and with the data protection policies of the data controller or processor, including the allocation of responsibilities, the awareness and training of personnel involved in the data processing operations, and the corresponding audits;
- c) To provide advice, when requested, on the data protection impact assessment and to monitor its implementation;
- d) To cooperate with the supervisory authority.

## 9. Professional secrecy

All KLOG employees, regardless of the type of employment relationship, as well as service providers and suppliers who process personal data, are obliged to keep such data confidential, in particular not to disclose or use it, except in the event of a legal obligation or court order.

## 10. Existing responsibilities

KLOG employees are subject to disciplinary sanctions for the breach or illegal transmission of personal data to which they have access, whether due or undue, as well as for any breach of this code of conduct.

The remaining collaborators, suppliers or service providers are liable under contractual and legally established terms.

## 11. Breach of Personal Data

If the party responsible for the processing becomes aware of a personal data breach that is likely to jeopardise the rights and freedoms of natural persons, he/she must notify the supervisory authority of this without undue delay and, if possible, within 72 hours of becoming aware of the incident.

If it is not possible to comply with the deadline mentioned in the previous paragraph, the notification must be accompanied by the reasons for the delay, and the information may be provided in phases without undue delay.

When a situation such as that referred to in this article arises, KLOG must open an internal investigation procedure to determine the causes of the breach.

It is the duty of all employees who become aware of any situation that may involve a breach of personal data to report it urgently to KLOG's Data Protection Officer at [comite.seguranca@klog.pt](mailto:comite.seguranca@klog.pt), or by any other more expedient means.

## 12. Clarifications and application of the code

Requests for clarification of any doubts regarding the interpretation or application of this Code of Conduct should be addressed to the Data Protection Officer, who will respond or forward them to the relevant department for a response.

The Data Protection Officer shall promote the dissemination of the Code of Conduct, the awareness and training of all employees, as well as the monitoring of its application and evaluation, in collaboration with any team it deems necessary.

## 13. Filling in loopholes

Any omissions from the provisions of this Code of Conduct will be subject to the provisions of the GDPR, as well as to the national legislation in force on this matter.

## XII. ANTI-CORRUPTION AND BRIBERY POLICY

### 14. Legal Definition

For the purposes of this policy, corruption is considered to be the *practice of a lawful or unlawful act or an omission contrary to the law or the duties of a particular position, by someone who, in the fulfilment of their duties, accepts an undue advantage in exchange for providing a service.*

Additionally, bribery is considered to be the *act of convincing or attempting to convince another person, through the gift or promise of a financial or non-financial advantage.*

## 15. Prohibition

KLOG promotes a zero-tolerance policy on corruption and bribery, prohibiting this practice in any form, whether directly or through third parties. Offering or accepting bribes of any kind is not tolerated.

Gifts received from third parties that exceed mere courtesy or a symbolic and commercially insignificant amount must be reported to the line manager and refused if they indicate expectations of obtaining special favours from the givers.

Integrity is a characteristic of our organisational culture, and bribery and corruption represent a threat to our values.

## 16. Prevention

In the following three points, we reiterate the behaviour expected from KLOG employees in this regard:

### ✓ Act in accordance with national and international trade principles

All KLOG employees must act in accordance with all national and international trade laws and must respect the applicable import and export rules, legal restrictions, and customer standards. Any customer requests that contradict these principles must be refused.

Services where there are suspicions of illegal operations on the part of our partners or that could lead to illegal operations on our part should not be accepted.

### ✓ Managing Conflicts of Interest

KLOG expects employees not to engage in activities that could harm organisational interests. The development of functions for competitor companies, partners and suppliers is only permitted with the written consent from the management.

All employees are prohibited from giving preferential treatment to business partners for reasons of personal or family interest.

### ✓ Competition

KLOG promotes fair competition, avoiding the adoption of restrictive practices. This code prohibits agreements between competitors aimed at dividing up the market and customers, as well as agreements aimed at influencing prices and market conditions.

## XIII. ANTI-CHILD LABOUR POLICY

### 1. Legal Definition

According to the International Labour Organization, child labour is defined *as work that deprives children of their childhood, their potential, and their dignity, and that is detrimental to their physical and mental development. It refers to work that:*

- *Is mentally, physically, socially, or morally dangerous and harmful to children;*
- *Interferes with their schooling;*
- *Deprives children of the opportunity to attend school;*
- *Forces children to leave school prematurely; or*
- *Requires combining school attendance with excessively long and heavy work.*

According to ILO Convention No. 138, *child labour is considered to be work performed by children and adolescents below the minimum age for admission to employment/work established in the country.*

### 2. Prohibition

KLOG undertakes not to promote or engage in child labour, complying fully with the provisions of Subsection V of Title II of the Labour Code on the work of minors.

### 3. Prevention

The prevention of child labour is an organisational concern present in the various relationships that KLOG establishes, through careful selection of its partners.

## XIV. ANTI-FORCED LABOUR POLICY

### 1. Legal Definition

According to the International Labour Organization and under the terms of the Convention on Forced or Compulsory Labour, forced labour refers to *all work or service which is exacted from any person under the menace of any penalty, and for which said person has not offer him/herself voluntarily*. All member states of the International Labour Organization have, by virtue of the ILO Declaration on Fundamental Principles and Rights at Work and its follow-up, the obligation to respect the principle of the elimination of forced labour, regardless of whether or not they have ratified these Conventions.

### 2. Prohibition

KLOG undertakes not to promote or engage in forced labour.

### 3. Prevention

The implementation of anti-forced labour practices is an organisational concern present in the various relationships that KLOG establishes, through careful selection of its partners.

## XV. ANTI-DISCRIMINATION POLICY

### 1. Legal Definition

For the purposes of this policy and in accordance with the Portuguese Association for Victim Support (Associação Portuguesa de Apoio à Vítima), discrimination *consists of an action or omission that provides differentiated (inferior) treatment to a person or groups of people on the grounds of their particular race, colour, sex, nationality, ethnic origin, sexual orientation, gender identity or other factor*.

### 2. Prohibition

KLOG guarantees all its employees a safe organisational environment, free from discrimination of any kind. We expect all employees to respect different points of view and cultural differences by adopting an attitude of respect, impartiality, and courtesy.

### 3. Prevention

We are an equal opportunities employer. KLOG is committed to creating an organisational culture where all employees feel respected.

Our recruitment processes, as well as our compensation and career development systems, are based on meritocracy.

## XVI. ANTI-ABUSE AND HARASSMENT POLICY

### 1. Legal Definition

Under the terms of Article 29 (2) of the Labour Code, Harassment is understood as *unwanted conduct, including conduct based on discrimination, committed at the time of access to employment or during employment, work or vocational training itself, with the purpose or effect of upsetting or embarrassing a person, affecting his/her dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment for them.*

Article 29 (3) of the Labour Code further adds that *unwanted verbal, non-verbal or physical behaviour of a sexual nature with the aim or effect referred to in the previous paragraph constitutes sexual harassment.*

### 2. Prohibition

The practice of any form of Harassment is expressly prohibited by law.

### 3. Prevention: identifying situations of harassment

Harassment is an unacceptable behaviour that can constrain and limit the rights, freedoms and guarantees of the Human Person. It can take many forms and occur in various situations.

In the workplace, Harassment occurs whenever:

- Any KLOG Worker or Manager is repeatedly intimidated, threatened, humiliated, or embarrassed in work-related circumstances.
- A KLOG Worker or Manager acts toward a co-worker with the purpose or

effect of violating their dignity, affecting their health, and creating a hostile work environment.

### 3.1 Case Studies

Harassment in the workplace includes, among others, the following behaviours:

- Degrading, offensive, insulting, intimidating, embarrassing, or humiliating behaviour towards other Workers or Managers.
- Physical Punishment.
- Segmentation of an individual through differentiated behaviour.
- Preventing the performance of an activity.
- Sabotage of the developed activity/work.
- Emptying the Worker of his/her duties or assigning him/her tasks for which he/she is not competent, with the aim of humiliating him/her.
- Unjustified criticism.
- Spreading discriminatory rumours.
- Publicly disparaging the work developed by the Worker.
- Displaying offensive images, in physical or digital format, with the aim of embarrassing the Worker or Manager.
- Cyberbullying.
- Creating a hostile, humiliating, or destabilising environment for the Worker or Manager.

Unwanted behaviour of a sexual nature, in verbal, non-verbal, or physical form, with the aim of upsetting or embarrassing the Worker or Manager.

### 3.2 Exceptions

Harassment in the workplace does not represent, nor is it intended in any way to prevent, KLOG from disciplining Workers or managing their work in the way that best suits the pursuit of its activity.

However, the exercise of coordination or management duties must be carried out with absolute respect, encouraging dialogue, team spirit, and respect between co-workers.

When carrying out their duties, Workers must act with Loyalty, Team Spirit, and Respect towards their respective Managers. The same is required of the Managers.

towards the Workers.

Thus, Harassment does not include, for example, the following behaviours:

- Performance Management.
- Pressure arising from the exercise of their respective duties.
- Exercise of authority or disciplinary power.
- Operational Decisions.
- Changes in the workplace.
- Isolated disagreements.

Isolated compliments, as long as they are not likely to offend dignity.

## XVII. ANTI-DRUG AND ALCOHOL POLICY

### 1. Legal Definition

For the purposes of this policy, we will consider the following definitions of alcohol and drugs.

- **Drugs:** any substance, natural or synthetic, which, once introduced into the body, modifies its functions.
- **Alcohol:** any alcoholic beverage.

### 2. Application

Arising from our concern for the physical and psychological well-being of all our employees and partners, we practice a policy of prevention with regard to the consumption of alcohol and drugs.

We believe that our employees are aware and adopt the right attitude towards alcohol and drug use.

The aim of this policy is to ensure an alcohol- and drug-free work environment in order to preserve the health and safety of employees and the community in general, given that their ingestion, even in small quantities, reduces concentration, visual acuity and the ability to respond quickly and promptly to any situation.

## XVIII. PROCEDURE IN SITUATIONS OF NON-COMPLIANCE

### 1. Reporting and subsequent formalities

Any Worker or Manager who is the target of behaviour that may fall under any of the abovementioned policies, as well as any Worker who witnesses this type of behaviour, must immediately, or as soon as possible, file a **Report**.

The Report, in addition to being swift, must be made discretely in order to protect the Parties involved. The dissemination of information to those who are completely unaware of it should also be avoided.

The Report should preferably be submitted in writing and duly substantiated. It must contain the following elements:

- Identification of the workers involved;
- Place and date of the facts;
- Description of the alleged facts as exhaustively and clearly as possible;
- Name of witnesses or elements that can prove the veracity of the reported facts.

The Report must be made, delivered, or addressed to the Human Resources Department, which will endeavour, together with the respective Ethics Committee, to promptly and efficiently investigate the reported facts, in strict compliance with the law in force.

Once the Report has been received, the necessary and appropriate **Investigation Procedure** will be initiated. The Investigations will be conducted by the Human Resources Department, ensuring, from the outset, the privacy, confidentiality, and protection of the Parties involved, and the procedures undertaken, to the extent that can be ensured.

After the end of the Investigation Phase, the Human Resources Manager will prepare a **Report** setting out its conclusions. The Report must contain the established facts and their legal framework, detailing aggravating or mitigating circumstances and proposing a sanction to be applied by the Employer.

In addition to the process described above, an offence can be reported through the Reporting Channel provided on KLOG's website<sup>4</sup>. The purpose of the Whistleblowing Policy is to define the guiding principles for the reporting channel, namely the procedures for receiving, processing, and storing reports of offences, in compliance with Law No. 93/2021, the general regime for the protection of whistleblowers.

## 1.1 Consequences

Whenever alleged offences are reported, disciplinary proceeding may be initiated and, if the offence is proven, the employee may be subject to a disciplinary sanction, without prejudice to any eventual civil and/or criminal liability provided for by law.

The filing of false accusations or information may also give rise to disciplinary proceedings.

## 2. Informal Approach

In addition to the formal procedure stipulated in 4., an informal approach may be considered for situations whose seriousness justifies and allows it.

**If the Worker or Manager deems it sufficient**, by requesting it from their Line Manager, another member of their hierarchical structure or even the Human Resources Department, a direct and straightforward approach may be attempted, condemning the behaviour of those involved and reaching an understanding as to the disapproval of such behaviours at KLOG.

Such an approach should be considered finalised when the participant involved assumes that his/her conduct – not being subject to disciplinary sanction – was not appropriate, and was even rejected by the participant involved, and should, therefore, (with his/her commitment) be stopped.

## 3. Contact Information

- Human Resources Department: [+351] 913 766 283 or [Leonor.machado@klog.pt](mailto:Leonor.machado@klog.pt)
- The Labour Conditions Authority of Porto (Autoridade para as Condições do Trabalho do Porto) 707 228 448

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<sup>4</sup> <https://klog.roboyo.pt/reporting-channel/40c1c>



Date: 13 May 2024

Management

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