

Book of Honour

Introduction

Critical TechWorks isn't just another software company. We are a community of people who dare to think differently; who learn from mistakes; who speak openly; who are tolerant of and humble towards each other yet never satisfied with what we have already achieved.

We challenge the status quo!

Our dream is to change the way the world moves, and like anything ambitious, we know that the challenges ahead will be huge, full of successes, but with some setbacks along the way.

It will not be easy, but it will be great!

Success is not an isolated endeavour; it depends greatly on the interactions and collaboration both inside and outside the company. We cannot achieve it without the many entities that help us to fulfilling our mission, from our colleagues at BMW Group and Critical Group to our partners, suppliers, and governmental authorities.

We do not walk alone!

With the help of our colleagues and partners, we commit to creating the most impactful software products in the most spectacularly and joyfully. Products that delight their users in a way that adds real value and brings joy to those who build them. We believe in Joy In Motion!

We align ourselves with high ethical standards and comply with all security industry and government regulations. We regularly oversee the way we work to continually improve our effectiveness and reliability. Each of us should always feel comfortable with being transparent about our motives, learning from mistakes and asking for help when facing a difficult situation.

We don't take shortcuts to success!

We never forget that we are building the company we want to be part of. A company whose values and strengths come from the power of our ideas, from our imagination, and from the results we deliver.

**We believe our values are
the real measure of our
success!**



Rui Cordeiro
Chief of Purpose

Board of Directors' Foreword

At Critical TechWorks, we are committed to maintaining the highest standards of integrity, professionalism, and ethical conduct. This Book of Honour serves as Code of Conduct, but it is not just a set of rules – it's a reflection of who we are and how we work together.

This Book is a guideline for all our stakeholders, including employees, providers, and business partners, and a commitment between us. It's here to guide our actions, help us make ethical decisions and ensure that together we create an environment built on trust and respect.

We are proud to issue this book of honour, which reflects what guides our daily work and inspires our decisions. It highlights what we honour and what you shall demand from us. We strive every day to live up to these standards and earn your respect. Thank you to all of you who contributed to bringing this vision to life!

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1.

Mission & Values

Our Mission

We're changing the way the world moves.

Our Slogan

Joy in Motion

Our beliefs

In addition to our mission and values, there are behaviours that should be there always, because without them, everything else is meaningless.

Integrity: Trust: Respect

These words are used by many, taken for granted by some and misused by others, but they are felt most when they are lacking or destroyed.



Our Values



We care about how we get to the top

We trust that each one of us will show up every day to deliver our very best.



We value people's autonomy over processes

We trust in our judgement over process. We believe that self-direction is what makes self-organized teams surpass their best.



We go above and beyond

We love meaningful ambition and want to change lives for the better.



We leave no one behind

We love diversity; it's the uniqueness of each one of us that makes us strong.



We believe in Joy in Motion

What we feel after delivering demanding arduous and excellent work together is joy.



We believe in uncompromised engineering excellence

We expect from ourselves nothing less than excellence



2.

Our guiding principles

These guiding principles reflect what we stand and fight for. They guide our decisions and shape the way we work. By staying true to these commitments, we build trust, drive innovation and create a positive impact on our people, the environment and society.



Integrity & Transparency

Integrity goes beyond honesty; it's about living our values through our actions and words. We conduct business with integrity, prioritising open communication and fairness in everything we do.

Respect & Inclusion

We foster an environment where everyone feels valued and heard. We stand against discrimination, celebrate diversity and promote equal opportunities for all.

Innovation & Excellence

We push boundaries to drive technological and business excellence. Progress is built on curiosity, creativity, and a commitment to continuous improvement.

Sustainability & Community

We act with responsibility, ensuring that the resources we rely on today are used in a way that allows future generations to meet their needs. Beyond sustainability, we believe it's our responsibility to create a better society for all.

Human Rights & Wellbeing

We respect and promote human rights, ensuring that technology plays a positive role across the globe. We care for people and prioritize people's wellbeing, fostering a safe and supportive environment.

Business Ethics & Compliance

Doing the right thing isn't optional - it's fundamental. We uphold the highest ethical standards, even in the face of challenges, ensuring that compliance is part of how we do business.



3.

Our commitment

A strong and ethical workplace is built on trust, respect, and shared responsibility. This section defines our mutual commitment—what you can expect from us as and what we expect from you. By upholding these standards together, we create a culture where integrity, fairness, and accountability thrive.



We stand up for what we do

When making decisions, ask yourself: does this build or harm trust and value for our customers and other stakeholders?

We continually look for ways to deliver better products, engage our customers, advocate for them and empower them to achieve more. Our stakeholders can expect a dedicated team that works with integrity and commitment.

Honour Privacy

We implement procedures to protect our stakeholders' privacy and use their data only in the ways they allow us. We understand and follow legal frameworks and international standards related to data privacy.

Don't make improper payments

We are truthful and transparent in our interactions with stakeholders, and do not influence their decisions through improper payments.

Compete fairly

We love fair competition because it pushes us to provide the best choice of products and services at a fair price. We know there is only one way to win: it's through fair competition.

Ensure quality and customer satisfaction

We don't just release products. We take care of the products for our customers until they stop using them. We deliver products with quality and comfort, always complying with all safety protocols. We believe that customer satisfaction is not enough: we work to delight, to produce superb experiences and moments of joy.

Maintaining a Focused and Positive Environment

We foster a workplace that is free from distractions and negativity, where everyone can work with clarity and focus. We avoid behaviours that can harm the professional atmosphere, such as unprofessional conduct, inappropriate actions, or anything that conflicts the company's values. A positive environment helps us stay focused, productive, and engaged in our work.



We stand up for those who help us to deliver value

When making decisions, ask yourself: will this strengthen our long-term working relationship with our suppliers and representatives?

We hold ourselves to high ethical standards, and we expect our representatives, who are the partners, vendors, consultants and other companies who work on our behalf, to meet the standards we set for ourselves. They can expect the same loyal and fair treatment from us. We earn the trust of our representatives when we return value to them and don't ask them to do anything we would not do ourselves

Use trustworthy representatives

We partner with honest and ethical representatives, who commit to doing business with integrity. Anyone acting on our behalf must uphold our ethical standards and legal obligations.

Treat gifts, hospitality and travel responsibly

We demonstrate sound judgment and moderation when exchanging business courtesies. Giving and receiving gifts, hospitality and travel can build strong working relationships and goodwill between us and those with whom we do business. However, extravagant or undisclosed gifts, meals or travel can undermine trust and may be perceived as bribery or corruption. That's why we implement strict procedures to prevent unethical practices and maintain transparency.

Choose suppliers with integrity

We rely on our supplier relationships for our success. We select the best suppliers for the job, by carefully considering their proven track record, reliability, reputation, and ethical business practices— never on favouritism or personal relationships.

Listen to our suppliers

We value feedback from our suppliers and regularly conduct satisfaction surveys to ensure we meet their expectations. Their insights help us improve and strengthen our partnerships.

Promote Health and Safety

We are devoted to protecting the health and safety of our people, customers, suppliers and the community within we operate. It is part of us, our business, our mindset and inseparable from our mission as a company.



We stand up for those who believe in us

When making decisions, ask yourself: does this strengthen or harm our reputation with investors and the public?

Our investors must have confidence that we will create value for them in a responsible and thoughtful way. We earn their trust by protecting our assets and information, accurately stating where we are headed as a company and honestly communicating with them and with the public

Model professionalism at all times

We are all ambassadors of the company's values, and our conduct should reflect that. We understand that professionalism encompasses not only our job performance but also our communication, appearance, and attitudes toward others. We strive to maintain high standards of behaviour in everything we do.

Act responsibly with inside information

We maintain trust with our investors and the public by following financial laws and all standards regarding confidentiality and fair business conduct. We never trade or help others trade based on material, non-public information. Integrity guides our decisions.

Keep accurate records and contracts

Our records are clear, accurate, and complete. We truthfully record and report financial transactions and business information, following applicable laws, regulations, and accounting practices.

Communicate clearly to the public

Our public statements and communications are honest and not misleading. We care about how we communicate and about the content we pass to the public—transparency and honesty are our drivers. We communicate with professionalism and integrity, ensuring that social media and public statements align with our values and protect our company's reputation.

Encourage open dialogue

Every week, we host an open forum for all our community, "Breakfast Talks", to promote internal communication. In this forum, our community can address directly and openly other people from the company, including the BoD. We are proud of being an open-minded company that strives for complete integrity and moral rectitude in all our actions and attitudes.

Care for people

We stand by those facing tough times, offering meaningful support during difficult moments, including illness and personal struggles. We believe in being there for each other when it matters most.

Protect confidential information and intellectual property

We protect and respect the business value of information and ideas, whether they belong to us or another company. Trust is at risk when confidential information is mishandled, which is why we take every measure to protect it. Respecting intellectual property and business-sensitive data is fundamental to our success and reputation.



We stand up for each other

When making decisions, ask yourself: does this improve how we work together?

The strongest contributions come from teams who trust each other—those that can be open, honest, and constructive with one another. It takes all of us working together to cultivate an atmosphere of mutual respect, inclusion, and collaboration.

Ensure no one is left behind

We know we do not walk alone. We fall and rise together, and no one is left behind. Even when someone leaves, our connections remain. We connect, learn, share and grow as humans and as a community.

Contribute to a safe and productive workplace

We promote a work environment that empowers everyone to do their best, grounded in fairness, safety, and respect. CTW complies with the Equality Act 2010 and the Portuguese Labour Code, ensuring equal treatment in recruitment, development, and daily interactions. Discrimination, harassment and unsafe working conditions have no place here. We maintain clear, confidential channels for reporting concerns and take swift, fair action when needed. By valuing freedom of expression and open dialogue, we create a space where trust, inclusion, and collaboration thrive.

Avoid Conflicts of Interest

Our decisions put integrity first – they are always in the best interest of our customers, our teams, our work and for our company. We avoid conflicts of interest by separating our personal relationships and financial interests from our professional responsibilities. If we don't navigate potential conflicts of interest carefully, these situations can impact the decisions we make, erode trust within teams and harm our company's reputation.

Speak Up Without Fear

We foster a culture of openness where concerns can be raised safely. If something feels wrong, we report it. We do not tolerate retaliation against those who speak up in good faith—transparency and accountability make us stronger.

Communicate Responsibly, Online and Beyond

Our words and actions reflect who we are, whether in person or online. Disparaging comments, offensive language, or unprofessional communication undermine our work environment and the trust we build with one another. Every conversation and message should reflect our commitment to respect and understanding.

Support Well-Being and Work-Life Balance

Success is not just about work; it's about people. We respect each other's well-being, promote a healthy work-life balance, and support mental health. We know that when we take care of ourselves and one another, we all thrive.

Flexible working hours and place

We aim to foster an environment where the 40 hours work week is not a strict 9 to 6. We do believe in autonomy and accountability of our teams, and their responsibility to manage their worktime while complying with the labour regulation. We devised the Work in Motion Policy to create a flexible approach to work conditions, assuming that both working at home and at the office offer advantages and contribute to work-life balance.



4.

How we safeguard your trust

Trust is earned through consistent action, transparency, and unwavering ethical behaviour. This chapter outlines how we ensure that our conduct, decisions, and actions uphold the trust you place in us, every day. Our goal is not just to maintain trust but to actively build it through clear, transparent, and fair practices that reflect our commitment to people and to the company.



An accountable and ethical conduct

We are accountable for our actions, both individually and collectively.

We ensure that our decisions are made with integrity, and we are transparent about the processes and reasons behind them. This transparency helps foster a culture of trust, ensuring everyone feels informed, valued and involved. We strive to ensure that information is shared effectively and openly to build an environment where no one is left in the dark.

A safe space for ethical concerns

Part of building a culture of trust is learning to speak up when something's not right, so that we can address the problem.

Everyone should speak freely. We encourage everyone to speak up if something is raising any integrity concerns, feels wrong, unethical or against our core values. Keep in mind a failure to report potential violations is a separate violation. Even if you're not totally sure that something is effectively wrong, or if you don't have all the details about what has been going on, we encourage you to speak.

With our whistleblowing Speak Freely channel, you can reach us in confidence and, if necessary, anonymously. We guarantee that anyone who reports in good faith will be heard. The reports will be treated seriously, fairly and promptly, and if something needs to be addressed, we'll take action immediately.

We understand that you might be uncomfortable, as it takes courage to speak up when something's not right: that is why we do not tolerate retaliation, which will be treated with disciplinary measures.

A fair and impartial environment

We believe that healthy connections and relationships between people within the organisation are essential to our success as a company and, most importantly, as human beings.

Also, we trust our people. Our people are professional and operate under our values in an ethical, fair, honest and inclusive way.

We don't see that a blood relationship, a marital relationship, or a friendship relation between colleagues is more prone to conflicts than others. All of them are relations between people that we believe will not pervert the professionalism we all have and what we want to us as a community.

We expect people with any type of relationship to act in a professional manner at every moment, when they are at the company, during working hours, and also when representing the organisation. That means behaving in a discrete way, acting according to the company's principles and reflecting our values. If someone acts otherwise, disciplinary sanctions may arise since such behaviours won't be tolerated.

We encourage everyone to disclose any potential conflicts of interest and take necessary steps to address them. By actively managing conflicts of interest, we maintain an unbiased and fair workplace where decisions are based solely on what is best for the company and its employees.

The organisation implements several procedures and mechanisms with four-eyes approaches (even more in some situations) when a relevant decision is made to ensure fairness and inclusiveness are always guaranteed.

If a person or entity feels not being treated fairly and inclusively, one should use the speak freely channel to express the situation in a confidential manner.



A community of informed people

We have open channels to share news, results, and any other subjects that are relevant to our people.

We value an information sharing culture, in the most transparent way, with our customers, between our people inside the organization, our partners, public institutions and governments. Knowledge is power, and by ensuring everyone has the right information, we build a stronger, more unified organization.

By keeping people informed on our policies, procedures, and core values, we empower them to make the best decisions in their roles.

We encourage people to speak for themselves and participate by any other means so that they can share their experience with us.

The information we put on our communication channels is constantly being updated and monitored not only by our internal mechanisms that always follow up and keep our policies and procedures up to date, but also by external entities that continually audit us in order to grant the certifications we need to provide the best service we can.

Ongoing internal awareness and education

Our Book of Honour, its ethics and compliance program are endorsed by and have the full support of our Shareholders and Board of Directors

Maintaining trust requires more than just one-time training; it's about continuous awareness. We promote open discussions to ensure that our ethical standards are not just a set of guidelines but a living part of our culture. Whether through training sessions, workshops, or team discussions, we keep ethical behaviour top of mind and ensure everyone is regularly reminded of our values.

Every action, every decision, and every interaction matter. Upholding these standards is essential not only for the success of our organization but also for maintaining the trust and respect that we have earned from our employees, customers, and partners.



This book applies to all of us, with no exception, including those partners that work with us, helping to deliver products and services.

It is crucial that we all adhere to these principles and hold each other accountable. Violation of these standards is not taken lightly and may result in disciplinary action, up to and including termination of employment. By following this Book, we ensure that we continue to create a positive, ethical, and trustworthy workplace for everyone.



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