

TAP Group's Code of Ethics



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Objectives and Fundamental Rights

The TAP Group has as the focus of its activity air transportation and activities related thereto. It is present in nearly all Continents and is part of an economic activity that occupies a very significant portion of the working population and of the developed and globalized economy, contributing towards the creation of wealth and also towards bringing peoples and cultures together.

Committed to the realization of its calling, TAP established as its core objectives to assert itself as one of the most wanted companies to:

- Fly, satisfying its clients with high quality standards;
- Work, valorising its collaborators in their personal and professional valencies;
- Invest, looking for better investment returns and remunerating its investors adequately;

TAP acts according to criteria of excellency and commitment to the community, joining in initiatives that promote ethic values as the foundation of entrepreneurial management and culture, hence why it also undertakes as its objectives:

- To practice the highest ethical and personal integrity values;
- To respect the quality of life of the communities of which it is part of.

I – SCOPE

The Code of Ethics applies to all who work in the TAP Group companies, irrespective of the type of labour bond or mandate in executive or non executive social bodies of the companies that constitute the group, hereinafter “collaborators of the TAP Group”.

II – GENERAL VALUES

1. **Accountability**

The collaborators of the TAP Group are accountable before their respective management or appropriate social bodies and the latter before the respective shareholders, for the abidance and compliance of the principles consigned in the Code of Ethics.

2. **Independence**

The interests of the group shall be the only ones to be taken into account in all relations with third parties, respecting and assuming the values of honesty and impartiality.

3. **Conflicts of Interests**

a) Collaborators and members of the social bodies of the TAP Group cannot become involved in any activity which is against the entrepreneurial interest of the Group, is prejudicial to the companies’ reputation or to its relation with third parties or interferes with his responsibilities as a collaborator or member of a social body.

b) Collaborators and members of the social bodies are inhibited from competing against the companies or use their position, influence, knowledge, assets or resources for their own benefit or for that of third parties.

c) Collaborators and members of the social bodies cannot use for their own benefit opportunities found through the assets, information or position in the companies of the TAP Group.

- d) Whenever, in the exercise of his activity, any collaborator has to intervene in decision processes or learns of processes that in one way or another involve real or personal interests regarding himself or any member of his family, he shall take the appropriate steps to avoid it, or, said not being feasible, he shall advise the respective management or the social body that elected him.

4. Professional Development

Throughout their professional life in the company, the collaborators of the TAP Group will endeavour to give their best in the fulfilment of the tasks entrusted to them and always try to improve and update their knowledge.

5. Confidentiality

- a) Collaborators of the TAP Group are to maintain confidentiality in relation to all facts regarding the life of the company of which they may be aware in the scope of their functions or as a result thereof.
- b) The collaborators' personal data is subject to the confidentiality principle, its use being restricted to the collaborator himself and to the staff responsible for the keeping, maintenance and treatment of said data.

III – SPECIAL OBLIGATIONS

1. Relations with the Market

The companies of the TAP Group will act in a transparent manner and in loyal competition, with the objective to achieve the greatest efficiency of the transactions and the clients' satisfaction.

2. Relations with the Customer

The companies of the TAP Group will maintain a transparent relationship with their customers based on the principles of:

- a) Correct and full information on the services rendered;
- b) Use of commercial practices that respect the customer's freedom of choice;

- c) Adoption of publicity messages that respect the principle of correction, of identification and of truth, in strict observation of the rights of third parties;
- d) Maintenance of complaints' services that are effective in their answer to the customers' solicitations;
- e) Timely answer to the questions raised by their customers, offering clear and appropriate information.

3. Relations with Competitors

- a) TAP in its relation with all companies in general and in the aviation field in particular, will adopt loyal competition practices, accepting and respecting the operating rules of a market economy.
- b) Its functioning shall be ruled by principles of transparency and correction, based on a competitive valorisation focused on performance, merit and on the quality of its offer, without resorting to disloyal means to divert customers, nor propagating false and misleading publicity messages.

4. Relations with suppliers

The companies of the TAP Group will maintain a loyal and friendly relation with its suppliers, based on procedures that, in observance with the market rules, ensure a fair share of the benefits and of the responsibilities of the value chain in which they operate;

- a) The companies will chose their suppliers according to similar ethical requirement criteria;
- b) The relations with the suppliers will be in accordance with transparency procedures, in strict observance of the contractual conditions negotiated.

5. Relations with Collaborators

The management of the companies of the TAP Group will develop policies that ensure:

- a) The ennoblement of the person, not allowing discriminating practices or practices that attempt, in any way, against the personal and professional integrity of the collaborators;
- b) Platforms of understanding based on the compatibility between the flexibility derived from the competitiveness demands and the employability of its collaborators;
- c) The respect for the quality of life of its collaborators, recognizing the merit as a factor of productivity gains;
- d) The investment on the human capital, promoting the continuous professional training of all collaborators and valuing free initiative;
- e) The recruitment, selection and betterment of the collaborators on the basis of transparent, objective and technically well-funded criteria, ensuring their supervision by professionals of the respective areas;
- f) The incitement of its collaborators to take part in a quality and productivity culture, propitiator of an endless search of opportunities to improve the performance.

6. Interpersonal Relations

- a) To promote and sustain urbane interpersonal relations and conducts;
- b) No behaviours that, unfoundedly, harm the reputation of colleagues, namely through prejudiced judgments, rumours or unfounded information, will be accepted, and no intimidations, discriminations, threats and moral or sexual harassments of the collaborators, in all life spheres of the company will be tolerated.

7. Protection of Personal Rights

- a) Special efforts will be promoted to ensure the full parity of opportunities to all who collaborate professionally with the Group companies, fighting persistently against any type of discrimination;
- b) The principle of non discrimination, namely as regards the ascendance, deficiency, gender, ethnic, language, country of origin, religion, political beliefs and trade union affiliation, will be observed;
- c) The right to the reserve of the privacy of the personal life will be respected in all situations;
- d) The collaborators carriers of non contagious disease will remain in the work place, as far as the evolution of disease and the demands of job allow.

8. Safety and Well being in the Work Place

The TAP Group will try to promote a healthy and safe work environment, aimed at betterment and well-being, promoting trust, respect, justice and the incentive to innovations.

Thus:

- a) It will create conditions to afford the collaborator an environment that facilitates the active participation in the prevention of professional hazards;
- b) It will ensure conditions to enable the company services to assess and advise on the demands of the work positions and of the professional hazards, thus making it possible to optimise and adjust the collaborators to the work situation and guarantee the supervision of health according to the hazards faced by them in their work place;
- c) It will ensure conditions for the appropriate and responsible functioning of the Company's Safety, Hygiene and Health services, aimed at the elimination/reduction of the professional hazards, quality improvement and productivity increase.

9. Utilization of the Company's Property

- a) The resources of the TAP Group Companies exist to pursue their entrepreneurial objectives and therefore can only be used for the purposes established by them;
- b) The collaborators must make sensible use of the property and services made available to them and prevent waste and misuse.

10. Environment

The TAP Group considers that its sustained growth presupposes the harmonization of the economic performance with its responsibility towards society and the environment. It further recognizes that everybody is responsible for the environment protection, hence why it tries to instate the environmental questions in all of its activities.

Thus, it undertakes the following guidelines:

- a) To promote the continuous improvement of its environmental performance, through the development and implementation of an Environment Management Plan;
- b) To use eco-efficient practices and technologies that conciliate growth with environment protection;
- c) To adopt a prevention approach regarding the environment issues;
- d) To prevent the pollution at source, reducing the amount of waste produced, promoting its valorisation/recycling;
- e) To promote initiatives of divulgation and environmental awareness of collaborators and suppliers;
- f) To promote environmental quality in all company activities.

11. Social Responsibility

The management and the collaborators of the TAP Group will pay attention to the social responsibility, sustainability and entrepreneurial citizenship thematic;

- a) Promoting the company policies that develop the social responsibility, both internally and externally;
- b) Participating, direct or indirectly in social intervention projects, civic, social and cultural activities within the communities of which they are part of;
- c) Trying to stimulate the availability of its competencies in community projects, namely through voluntary work.

Approved in the meeting of the Executive Board of TAP – Transportes Aéreos Portugueses, SGPS, S.A., of October 25, 2007 (minutes nº. 74, decision nº. 74.02).

The Executive Board:

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