
CODE OF ETHICS AND BUSINESS CONDUCT



NORONESC

ORACLE

Partner



NORONESC

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NORONESC is an IT consultancy firm, founded in 1997, with the aim to support in the definition, implementation and integration of technological and enterprise business solutions, cloud and platform services from Oracle.

ORACLE

Partner



NORONESC

Oracle Certified Partner 2004, Oracle E-Business Suite Certified Partner 2005, Oracle Best Partner 2009 Portugal NRE, Oracle Platinum Partner 2010, Runner up Portugal for Midsize Partner and Best Accelerate Partner, Oracle Gold Partner 2016, ODA Summit 2017 Nomination Regional Partner Award South Europe, ODA Summit 2018 Runner Up for Oracle Best Business Development Partner EMEA Award, Oracle NetSuite Solution Provider 2018, Oracle Cloud Infrastructure (OCI) Certified 2019 (IaaS), Oracle Cloud PaaS Certified – Analytics & Mobile 2019, Oracle NetSuite SuiteSuccess 2019, Oracle Autonomous Database Expertise 2020, Oracle Database Appliance Expertise 2020, Oracle Cloud Platform Expertise in EMEA-Iberia 2021, Oracle Cloud Data Management Expertise 2022, Service Expertise in Oracle Cloud Platform Data Management in Western Europe 2023.

SERVICES

Support

Standard Support Services, Advanced Support Services, Outsourcing: Expert Onsite, Partial Outsourcing (DBA), Installation, Migration, Upgrade, Backup & Restore, High Availability, Load Balancing, Disaster Recovery, Assisted Services, Technical Assessments, Business Critical Assistance, Solution Support Center Services.

DevOps Low Code Agile Software Development

Oracle Application Express Framework (APEX), Mobile, J2EE Application Development Framework (ADF), JDeveloper, Forms, Reports

Consulting

Best Business Solutions, Technology Consulting Services, Industry Services, Optimization Services, E-Consulting Approach, Applications Implementation Services, Business Intelligence Services, Technology Implementation Services, Implementation Accelerators & Tools, Architecture Services

Education

Instructor Led Courses, Technology Implementation Training, Private Customer Onsite Training Events

Outsourcing

Business Process Outsourcing

Licensing

Oracle Licenses

Financing

Oracle Financing

Cloud Computing

Universal Credits Subscription

Funded Allocation (Public Sector)

IaaS, PaaS, SaaS, DaaS, Private Cloud, Managed Cloud (Hybrid, Public)



INFRASTRUCTURE

CLOUD INFRASTRUCTURE

Infrastructure (IaaS): Oracle Cloud Infrastructure
Oracle Cloud Free Tier
Compute
Storage
Network
Cloud@Customer



Platform (PaaS):

Analytics
Application Development
Integration
Mobile, Digital Assistant
Content and Process, Management

SOFTWARE

Database

Database Servers, High Availability, Data Guard & Real Application Clusters, Secure Backup & Recovery Manager, Enterprise Manager Cloud Control, Advanced Security, Database Vault, Partitioning, Advanced Compression, Golden Gate, Data Integrator, Data Warehousing e Data Mining, Big Data

Middleware

WebLogic Application Servers, Content Management, Webcenter Portal, Sites, Business Process Management, Service-Oriented Architecture, Service Bus, Data Integration, Enterprise Data Quality, Identity Management, Collaboration, Java & Developer Tools

Business Intelligence & Analytics, Big Data, IoT, Blockchain

Enterprise Performance Management, Enterprise Reporting, Interactive Dashboards, Ad hoc Analysis and Interactive Reporting, Mobile Analytics, In-Memory, Information Discovery, Scorecards and Strategy Management, Real Time Decision Management, Planning & Budgeting, Big Data, IoT, Blockchain

Headquarters

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APPLICATIONS

CLOUD APPLICATIONS

Artificial Intelligence (AI)
Enterprise Resource Planning (ERP)
Customer Relationship Management (CRM)
Supply Chain Management (SCM)
E-Commerce
Planning and Budgeting, Forecasting
Analytics
Customer Experience (CX)
Social

INDUSTRY SOLUTIONS

Advertising and Digital Marketing Agencies
Apparel, Footwear and Accessories
Campus Stores
Consulting
Education
Energy
Financial Services
Food and Beverage
Health and Beauty
Healthcare and Life Sciences
IT Services
Manufacturing
Media and Publishing
Nonprofit
Professional Services
Hospitality
Retail
Software / Internet Companies
Transportation and Logistics
Wholesale Distribution
Public Sector



SYSTEMS

Engineered Systems

Database Appliance (ODA)
EXADATA Database Machine
Private Cloud Appliance (PCA)
Zero Data Loss Recovery Appliance
Big Data Appliance
ZFS Storage Appliance



Server Systems

SPARC, x86

Storage & Backup Systems

SAN Storage, NAS Storage,
Tape Storage



Operating Systems

Unix (Solaris, AIX, HP-UX), Linux (Oracle, Red Hat, SuSE),
Windows Server

Virtualization Systems

Oracle VM for x86, Oracle VM for SPARC, Solaris
Containers/Domains, KVM

Management Systems

Database Management, Application Management,
Middleware Management, Systems Management,
Application Quality Management

Networking Systems

Virtual Networking, Ethernet Networking, InfiniBand
Networking, Storage Networking

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Partner



NORONESC

Antitrust and Competition Laws

Noronesc is committed to observing the applicable antitrust or competition laws of all countries. Although these laws may vary from country to country, they generally prohibit agreements or actions that reduce competition without benefiting consumers. They seek to protect the competitive process so that consumers receive the benefits of competition. Violations of antitrust or competition laws may result in severe penalties, including large fines and jail terms.

Compliance with antitrust or competition laws is required at all times. Therefore, we don't agree with any competitors to **(i)** fix or control prices, either by agreeing directly with a competitor or any other method, such as through third parties; **(ii)** structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging), including abstaining from bids or submitting noncompetitive or "courtesy" bids; **(iii)** boycott suppliers or customers; **(iv)** divide or allocate markets or customers; or **(v)** limit the production or sale of products or product lines. These prohibited agreements are against correct policies and are avoided in our discussions with Oracle and other Oracle partners, as well as representatives of other companies. In addition, we refrain from prohibited discussions with competitors (whether OracleDirect, other Oracle partners, or other companies) about prices, costs, profits or profit margins, production volumes or bids, or quotes for a specific customer's business.

Our competitors are Oracle direct sales, other Oracle partners, or any other entity that may compete with us for a business opportunity. If we are ever solicited by an Oracle employee to engage in any of this prohibited conduct, we will report this behavior to the Oracle Legal Department.

Certain sales tactics or other arrangements with customers or suppliers may also raise antitrust and competition law risks, if they unfairly restrain or prevent competition by our competitors or among our customers. Examples of sales arrangements that have been found to violate the antitrust laws include predatory pricing below cost, exclusive dealing contracts, bundled or tie-in sales, agreements with customers or suppliers about minimum resale prices, and discriminating between competing customers.

Regardless of our location, the antitrust laws of the United States are likely applicable as they apply to business operations and transactions related both to imports to or exports from the United States.



NORONESC

Improper Payments, Money Laundering, and Economic Boycotts

Noronesc cannot offer or pay bribes. We are prohibited from offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks, or payments of money or anything of value (directly or indirectly) to improperly obtain business or any other advantage for Oracle or ourselves. The Foreign Corrupt Practices Act (FCPA) and other similar international anti-corruption laws outlaw bribery. Penalties for violating these laws are severe and can include prison time and large fines for individuals. Noronesc also prohibits all forms of money laundering, which involves disguising, channeling unlawfully obtained money, or transforming such money into legitimate funds.

The above prohibition applies to

- ➔ Government and public sector, which includes public utilities, higher education, public healthcare entities, and public international organizations and their employees or officials
- ➔ Political parties or candidates for political office
- ➔ Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or officials

- ➔ Privately held commercial companies and their employees
- ➔ Oracle employees
- ➔ Any other third party

Noronesc prohibits giving money or anything of value directly or indirectly to a government official or employee of a state-owned enterprise, or to the spouse, significant other, child, or other relative of any such person, for the purpose of influencing or rewarding an action or decision of the government or public sector employee or official or to gain any improper advantage. “Anything of value” is intended to be broad and covers not only money, but also gifts, lavish or excessive entertainment, funding of personal travel such as sightseeing, contributions to charity, and employment opportunities. Noronesc also prohibits facilitation or facilitating payments, which are payments to an official to speed up or expedite routine government actions, including processing and approving applications and permits.

We do not participate in any economic boycott not sanctioned by the United States Government. We don't provide information that could be construed to support any such unsanctioned boycotts.



NORONESC

Dealing with Government

Noronesc's standards and the applicable laws for dealing with government and public sector employees or officials are more stringent than standards for commercial company employees.

We strictly observe the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Activities that may be appropriate when dealing with nongovernment customers may be improper and even illegal when dealing with government. If we deal with any governmental entity, including public international organizations, we are responsible for knowing and complying with all rules that apply to government contracting and interactions with government or public sector employees and officials, including but not limited to the following:

- ➔ We must not attempt to obtain, directly or indirectly, from any source, procurement-sensitive information that is not publicly available or otherwise authorized for disclosure by the government; confidential internal government information, such as pre-award, source selection information; or any proprietary information of a competitor, including, for example, bid or proposal information, during the course of a procurement or in any other circumstances where there is reason to believe that the release of such information is unauthorized.

- ➔ We ensure the submission of accurate invoices to the government and comply with all laws regarding invoicing and payments.
- ➔ We do not give or offer, either directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of monetary value to any government or public sector employee or official except as may be permitted by applicable law. We established and maintain appropriate internal controls to ensure compliance with all applicable local country and US laws concerning prohibitions on offering anything of value to government and public sector employees or officials.
- ➔ We do not provide, attempt to provide, offer, or solicit a kickback, directly or indirectly, to obtain or reward favorable treatment in connection with any transaction.



NORONESC

- ➔ We do not pay or enter any agreement to pay, directly or indirectly, a contingent fee to any party for the purposes of obtaining a government contract or influencing government action. We do not receive any contingent fees or participate in any influence/referral fee program on any transaction involving a government or public sector end user (this includes, but is not limited to, public higher education, public healthcare, and utility entities).
- ➔ If we are selling or offering to sell commercial products to the United States Government, we are familiar with and ensure compliance with the laws and regulations concerning the sale of commercial products and sales to government and, if applicable to us, the Multiple Award Schedule (MAS) contracting regulations of the General Services Administration (GSA).

Lobbying of Government Officials

Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, however, the legal definition of “lobbying” can also cover procurement and business development activity. We are responsible for understanding when our activities may legally be considered lobbying in a particular jurisdiction and for complying with all applicable laws.

We will not lobby government. Government relations consultants/lobbyists will not be used for any such purpose.



Trade Compliance Laws and Regulations

United States global trade laws and regulations govern all imports, exports, re-exports, and use of US origin commodities and technical data, wherever located. Noronesc complies fully with all applicable US and global trade laws and regulations. Failure to comply could result in the loss or restriction of our trade privileges. Violation of these laws and regulations may also result in fines and imprisonment. We are responsible for understanding how the global trade laws and regulations apply and for conforming to these laws to ensure no technology, data, information, program, and/or materials resulting from services (or direct product thereof) will be imported or exported, directly or indirectly, in violation of these laws, or will be used for any purpose prohibited by these laws and regulations.

Conflicts of Interest

The term “conflict of interest” describes any circumstance that could cast doubt on our ability to act with total objectivity with regard to the distribution of products and services. Noronesc is free from any conflicts of interests. Conflict of interest situations may arise in many ways. If we feel that we have an actual or potential conflict we will report all pertinent details to interested parts.

Contracting

Noronesc and our employees compete fairly and ethically for all business opportunities. Our employees who are involved in the sale or licensing of products/services, the negotiation of agreements, or the delivery of services to customers are expected to understand and honor the terms of contractual agreements. We ensure that all statements, communications, and representations to customers are accurate and truthful.