

POLICY FOR THE PREVENTION OF CORRUPTION AND RELATED OFFENSES IBERSOL GROUP

THE IBERSOL GROUP (the “Group” or the “Company”) bases its activity on the highest standards of responsibility and professional ethics, governed by the principles of integrity, transparency, honesty, loyalty, rigor and good faith.

The GROUP has adopted a regulatory compliance program with a view to preventing, detecting and sanctioning acts of Corruption and Related Offenses, carried out against or through the Company, which, in compliance with Decree-Law No. 109-E/2021, of December 9 (“General Corruption Prevention Regime” or “RGPC”), is composed of the following elements (together, “Normative Compliance Program”):

- (i) a plan to prevent risks of corruption and related infractions of the GROUP (“PPR”);
- (ii) a Policy for the Prevention of Corruption and Related Offenses (“Anti-Corruption Policy” or “Policy”),
- (iii) a training program, and
- (iv) a reporting channel and respective Infraction Reporting Regulations.

1. Object

1.1. This Policy establishes the set of principles, values and rules of action, transversal to all its activities, in matters of professional ethics and prevention of Corruption and Related Offenses, as provided for in the RGPC, which must be read in conjunction with the Code of Conduct of the Ibersol SGPS, S.A. Group and the Infraction Reporting Regulations, both available at www.ibersol.pt

1.2. For the purposes of this Policy, the following terms and expressions will have the meaning indicated below, when started with a capital letter, in the singular or plural:

a. Code of Conduct: set of principles that govern the activities of GRUPO IBERSOL, SGPS S.A. companies and a set of rules of an ethical and deontological nature to be observed by members of the governing bodies and by all Employees and Service Providers in their relationship with Customers, Suppliers and other Stakeholders. It is also

intended for third party entities, hired by or acting on behalf of the GROUP, in cases where the GROUP may be held responsible for its actions.

b. Employees and Members of Corporate Bodies (together, “Employees”): all employees of the GROUP, including corporate bodies.

c. Corruption and Related Offenses: crimes of corruption, improper receiving and offering of advantages, embezzlement, economic participation in business, concussion, abuse of power, malfeasance, influence peddling, money laundering or fraud in obtaining or diverting subsidy, subsidy or credit, provided for in the Penal Code, approved as an annex to Decree-Law No. 48/95, of March 15, in its current wording, in Law No. 34/87, of July 16, in its current wording, in the Code of Military Justice, approved as an annex to Law no. 100/2003, of 15 November, in Law no. 50/2007, of 31 August, in its current wording, in Law no. April 21, in its current wording, and in Decree - Law no. 28/84, of January 20, in its current wording. Its version currently in force is also covered, as well as other diplomas that in the future may govern matters that, due to their nature, should be considered covered here.

d. Partners: agents, external auditors, customers, suppliers and other people who provide services to the GROUP, in any capacity, permanently or occasionally.

2. Scope of Application

This Policy regulates the practices that, under the terms of the law, respect private entities and all Employees, as well as, with the respective adaptations, all those who represent the Company and all the Partners.

3. Responsible for Regulatory Compliance

3.1. The Person Responsible for Regulatory Compliance (“RCN”), appointed by the Board of Directors of IBERSOL, S.G.P.S. S.A., monitors and controls the execution of the Regulatory Compliance Program, without prejudice to powers legally conferred on other bodies or Employees of the Company.

3.2. The Person Responsible for Regulatory Compliance carries out his functions with independence and decision-making autonomy, having access to internal information and the technical and human resources necessary to carry out his functions.

3.3. The Person Responsible for Regulatory Compliance must provide all necessary clarifications regarding the application of the Anti-Corruption Policy and will promote regular internal audits to assess compliance with it.

4. Prevention of Corruption and Related Offenses – Rules of conduct and action

4.1 The IBERSOL GROUP repudiates any practice of corruption, bribery or related infraction, actively or passively, and other forms of undue influence or illicit conduct, imposing strict compliance with these principles in all its internal and external relationships, whether with private entities or public entities.

4.2. All Employees must comply with applicable national and international standards for combating Corruption and Related Offenses, with any and all behaviors that may constitute the practice of the crime of corruption or any offense being expressly prohibited. related provisions provided for by law. In particular, it is expressly prohibited for all Collaborators:

- a.** accept any advantages or offers in return for preferential treatment from any third party, to influence an action or decision;
- b.** offer or accept, under any circumstances and regardless of value, money, checks and other goods subject to legal restrictions;
- c.** influence the decisions of business partners in any illegal way or that appears to contravene applicable regulations;
- d.** obtain any benefit or advantage for the company, for the Employee or for third parties, through practices that are unethical or contrary to the duties of the position, namely through corrupt practices, undue receipt of advantages or influence peddling.

4.3. In the exercise of the GROUP's activity, interactions with public and administrative officials, government agents and other public bodies may be frequent, and such interactions must be guided by the greatest rectitude, transparency as well as strict

compliance with all applicable legal standards and ethical duties, and of the provisions of this Policy.

4.4. For the purposes of this Policy, and without prejudice to the provisions of the Code of Conduct regarding Gifts and Commercial Offers, only offers may be made that fall within socially appropriate conduct and in accordance with usage and customs. A benefit is considered socially acceptable if it is offered as a sign of education and good manners, in accordance with local uses and customs, to the extent that this benefit is related to professional activity and has no intention or purpose of persuading or obtaining preferential treatment or illegitimate advantage of the recipient or unduly influencing their behavior.

5. Political Contributions

It is absolutely prohibited to make donations or political contributions, in cash or in kind, under any circumstances, on behalf of and/or in the name of GRUPO IBERSOL or in a way that appears to be made on its behalf or in its name, to political parties, candidates for political positions or organizations or individuals associated with those whose mission is essentially political.

6. Hiring Third Parties

6.1. With the aim of ensuring that third parties hired by the GROUP respect this Policy and existing legislation on the prevention of corruption and related infractions, the GROUP has defined a set of principles and rules that, without prejudice to the application of legal standards or any other applicable internal standards must be observed in the hiring processes.

6.2. Therefore, for the purposes of the provisions of the preceding paragraph, the following principles must be observed, in particular:

- a.** The hiring third parties presupposes a legitimate need for the goods or services to be purchased;
- b.** The choice of potential suppliers is based on objective, clear and impartial criteria, and disclosed in a transparent manner;

- c. the choice of potential suppliers is preceded by an analysis of the level of exposure to corruption risk;
- d. The conditions accepted by the GROUP (including price and payment conditions) are in line with market practices (unless justified by any legitimate reason);
- e. Contracted third parties accept the GROUP's Anti-Corruption Policy.

7. Non-compliance

7.1. Failure to comply with the rules contained in this Policy by any Employee will be considered a disciplinary infraction, which, depending on the degree of guilt of the offender and the severity of the infraction, may give rise to the application of the following disciplinary sanctions, which may be applied, with or without disclosure within the company:

- a. Rebuke;
- b. Registered reprimand;
- c. Financial penalty;
- d. Loss of vacation days;
- e. Suspension from work with loss of pay and seniority;
- f. Dismissal with just cause.

7.2. Failure to comply with the rules contained in this Policy by other Employees, namely Partners and other third parties, may constitute grounds for the application of penalties and/or termination of the contract, in an appropriate and proportionate manner to the infraction.

7.3. Failure to comply with the Policy's standards may also lead to administrative or civil liability for offenders, and also, depending on the severity of the infraction and the culpability of the offender, give rise to criminal sanctions.

7.4. The crimes of Corruption and Related Offenses referred to in this Policy are punishable, depending on the legal framework, with fines and prison sentences of up to a maximum of 12 years.

7.5. The Person Responsible for Regulatory Compliance must prepare a report for each infraction committed, which includes the identification of the rules violated, the sanction applied and the measures adopted or to be adopted by the Company within the scope of its internal control system.

8. Internal Reporting Channel

8.1. The Company has an Internal Reporting Channel and follows up on reports of acts of corruption and related infractions, in accordance with the provisions of the legislation that transposes Directive (EU) 2019/1937, of the European Parliament and of the Council, of October 23 2019 on the protection of people who report violations of Union law.

8.2. The reception and forwarding of reports follows the procedure applicable to reports established in the GROUP's Infringement Reporting Regulations.

9. Training

9.1. The Company ensures that a periodic internal training program on the content of this Policy is carried out for all Employees and Members of the Corporate Bodies, aiming at knowledge and understanding of all rules and procedures in the scope of preventing corruption and related offenses.

9.2. The training provided must be adapted to the functions performed by the Employees in question, taking into account the different degrees of exposure to the identified risks.

10. Term and Review

10.1. This Policy comes into force on the date of its approval by the Board of Directors and must be reviewed every 3 (three) years and whenever there is any change, particularly in the GROUP's organic or corporate structure, that justifies its review.

10.2. Any change to the Policy must be approved by the Board of Directors.

10.3. This Policy is disclosed, in its most current version, to its employees and is available for consultation on the official website (www.ibersol.pt).

