

## Sovena Group Donations, Offers, Gifts and Sponsorship Policy

### I. Objective

The purpose of this policy is to establish clear guidelines and procedures for the management of donations, offers, gifts and sponsorships, ensuring compliance with Sovena Group's ethical principles, applicable Portuguese and international legislation, as well as best corporate ethics practices.

Sovena Group is committed to acting with total transparency and integrity, avoiding situations that could constitute conflicts of interest or jeopardise its reputation and integrity.

This policy applies to all employees, management positions and directors of Sovena Group, including all its subsidiaries and affiliates.

### II. Definitions

For the purposes of this policy, the following definitions apply:

- **Donations:** These are financial or property contributions made by Sovena Group to organisations, institutions or individuals, without any expectation of return or direct benefit to the company.
- **Gifts and presents:** These correspond to goods or valuables of a personal nature offered or received with the aim of establishing or strengthening commercial or institutional relations, or as a gesture of courtesy, provided that they do not unduly influence any business decision.
- **Sponsorships:** financial or material support granted by the company to events, cultural, sporting or social activities, with the aim of promoting Sovena Group's image and brands, in line with its strategy and ethical principles.

### III. General Principles

Sovena Group is governed by the following principles:

- **Transparency**

All transactions relating to donations, gifts, presents and sponsorships must be properly documented, justified and approved, guaranteeing clear and open management.

- **Ethics and Integrity**

It is expressly forbidden to carry out any act, direct or indirect, for the purpose of obtaining undue advantage or unlawfully influencing commercial, administrative or institutional decisions. This prohibition covers all forms of conduct that could jeopardise impartiality, transparency, integrity and ethical conduct.

- **Prohibition of Bribery**

Sovena Group does not accept or offer gifts or sponsorships that could be interpreted as a bribe or an attempt to obtain illegitimate favours, or that could in any way unduly influence any business decision.

- **Legal Compliance**

Sovena Group is committed to fully respecting Portuguese legislation, including anti-corruption rules and business ethics, as well as the best practices in the sector.

#### **IV. Donations**

- **Purpose of Donations**

Donations made by Sovena Group are intended to support social, cultural, educational or environmental causes, and under no circumstances should they be aimed at obtaining commercial benefits for the company or personal benefits for its employees.

- **Approval process**

All donations must be evaluated and approved in accordance with the general procedures set out in point VI.

- **Documentation and Transparency**

Each donation must be accompanied by documentation justifying its purpose, application and those responsible for its management. Donations must be recorded in internal reports and, where applicable, included in public corporate social responsibility reports.

- **Ban on political donations**

Sovena Group does not donate to political parties, candidates or electoral campaigns, guaranteeing its political impartiality.

#### **V. Gift and Offer Management**

##### **Principles for Acceptance and Offer**

- **Value Limit:**

Gifts and hospitality offered by Sovena Group must be of symbolic value and not exceed **150,00€** (one hundred and fifty euros). It should be noted, however, that even if a specific proposal does not exceed the approval limit, you should make sure that it is appropriate and prudent, and you should consider the proportionality and intention behind the gift or invitation, as well as its frequency and appropriateness.

Sovena Group employees, directors and managers may accept gifts up to a maximum value of **150.00€** (one hundred and fifty euros). This amount may be adjusted according to the organisational culture and local practices, and its approval is subject to the General Procedures (point VI).

- **Gifts in Kind**

Goods or services received or offered must be assessed as to their suitability and proportionality, ensuring that they do not influence decisions or create conflicts of interest.

- **Prohibition in Critical Decisions**

It is expressly forbidden to offer or accept gifts during strategic decision-making processes or business negotiations.

All gifts and invitations must be duly documented using a form available for this purpose on Sovena Group intranet (Younify).

Employees must refrain from promising, offering, delivering, asking for or receiving, directly or indirectly, any gifts, invitations to institutional or cultural events, or similar benefits, gratuities, remuneration, commissions, travel, accommodation, favours, or any other type of incentive or financial or non-financial advantage, which may or could affect the impartiality and/or integrity of the performance of their duties.

Without prejudice to the above, the gift or invitation in question should only be accepted or offered if, cumulatively, the following requirements are met:

- i. It's done publicly and transparently;
- ii. It is neither imposed nor suggested by the recipient;
- iii. It has a legitimate and verifiable purpose;
- iv. It is according to the circumstances and the occasion in which it is offered;
- v. It is not offered in cash;
- vi. It is not repeatedly offered to the same recipient, i.e. more than once in a period of 3 (three) months;
- vii. It is not contrary to applicable law or regulations, nor could it jeopardise Sovena's integrity or reputation.

Special considerations also apply in cases where a gift or invitation is to be offered to a civil servant, where prior approval should always be sought under the General Procedures (Point VI).

## **V. Sponsorship**

### **Purpose of Sponsorship**

The sponsorships granted are aimed at promoting Sovena Group's brands and image, supporting corporate social responsibility and supporting events aligned with Sovena Group's strategic values.

### **Criteria for Granting:**

- **Strategic alignment:** Sponsorship must be in line with the company's strategy and corporate values.
- **Evaluation and Approval:** All sponsorships must be evaluated and approved in accordance with the general procedures set out in point VI.
- **Documentation and Transparency:** Sponsorships must be clearly documented, with transparent internal records, guaranteeing the traceability of decisions.

## VI. General Procedures

### Communication and Approval

All actions related to donations, offers, gifts, presents and sponsorships must be communicated to the Legal & Compliance Department and subsequently approved by the heads of each of the respective areas (i.e. reporting directly to the CEO), and when these heads are involved they must be approved by the Board of Directors.

## VII. Sanctions

Failure to comply with this policy may result in disciplinary measures, including reprimand, suspension or termination of employment, depending on the seriousness of the offence. Violations involving illegal practices will be reported to the competent authorities in accordance with applicable legislation.

## VIII. Review and Update

This policy will be reviewed periodically, ensuring that it remains up-to-date in the face of legal or corporate changes. All significant changes will be communicated to employees.

**SOVENA** Group has specific people responsible for dealing with allegations of corruption:

- **Ethics Officer:** Vera Ramos  
E-mail: [vera.amos@sovena.pt](mailto:vera.amos@sovena.pt)
- **Legal & Compliance Department:** Margarida Matos (Head of Regulatory Compliance)  
E-mail: [margarida.matos@sovena.pt](mailto:margarida.matos@sovena.pt)

## IX. Entry into Force

This policy is effective as of **March 31, 2025** and is mandatory for all Sovena Group employees, managers, directors and stakeholders.

For the Board of Directors

