

## **Sovena Group's Anti-Corruption Policy**

### **I. Objective**

This Anti-Corruption Policy aims to establish clear guidelines for preventing and combating corruption in all the SOVENA Group's activities, ensuring compliance with Portuguese legislation, including Decree-Law 109-E/2021 of 9 December, which establishes the General Regime for the Prevention of Corruption (RGPC), as well as international standards.

SOVENA Group is committed to conducting all its operations in an ethical and transparent manner, ensuring high standards of integrity and corporate responsibility.

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

### **II. Definition of Corruption**

According to the General Regime for the Prevention of Corruption (RGPC), corruption and related offences are defined as the crimes of corruption, undue receipt and offering of an advantage, embezzlement, economic participation in business, concussion, abuse of power, prevarication, influence peddling, money laundering or fraud in obtaining or diverting a subsidy, grant or credit, provided for, among others, in the Penal Code, the Penal Regime for Corruption in International Trade and the Private Sector, and the Regime for Anti-economic Offences and Offences against Public Health.

Corruption covers any act of offering, promising, giving, requesting or accepting undue advantages to influence a business, government or political decision. It includes, among other practices:

- Bribery and facilitation payments
- Undue acceptance of gifts or favours
- Undeclared conflicts of interest
- Irregular political donations
- Money laundering and other illicit financial practices

### **III. Fundamental Principals**

- **Zero Tolerance of Corruption** - No form of corruption is permitted or tolerated in the SOVENA Group.
- **Transparency** - All decisions must be substantiated and subject to scrutiny.
- **Impartiality and Fairness** - All operations and business relationships must follow fair and objective criteria.

- **Legal Compliance** - The SOVENA Group fully complies with Portuguese legislation and international anti-corruption standards.

#### IV. Responsibilities

The Board of Directors, together with the Legal & Compliance and People & Culture departments, is responsible for implementing and supervising the Anti-Corruption Policy.

All employees and business partners must strictly comply with this policy.

The Compliance Department ensures that this policy is reviewed and monitored, including training and awareness-raising.

#### V. Forbidden Conduct s

SOVENA Group expressly forbids the following:

- **Bribery and Extortion** - Offering or accepting payments or favours to influence business decisions.
- **Illicit Payments** - Facilitating processes through undue payments.
- **Conflicts of Interest** - Relationships that could jeopardise impartiality.
- **Money Laundering** - Any attempt to conceal the origin of illicit funds.
- **Prevention and follow-up procedures**
- **Due Diligence** - Carrying out prior assessments (Know Your Customer) on customers, suppliers and business partners.
- **Audit and Control** - Periodic monitoring to ensure compliance.
- **Continuous training** - All employees will take part in corruption awareness programmes.

Accepting or offering gifts and symbolic invitations can promote good business relations. However, in terms of value and frequency, these must be strictly limited, in accordance with the Gifts and Donations Policy in force at Sovena Group.

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.

Regardless of the circumstances, all Sovena employees and representatives whose professional duties allow them to participate in the contracting or contract renewal process are prohibited from accepting any offers, invitations or promises of advantages during negotiations or in the period preceding the renewal of the contract with any third parties.

Special considerations also apply in cases where you intend to offer a gift or invitation to a public official, in which case you should always register and seek prior approval from the Legal & Compliance Department.

Sovena prohibits the offering of money, gifts or entertainment for the purpose of influencing them to obtain or maintain a business or commercial advantage or decisions that could be seen as beneficial to Sovena's business interests.

## **VI. Sanctions**

Failure to comply with this policy may result in:

- Disciplinary measures, including dismissal for just cause;
- Termination of commercial relations with suppliers or partners;
- Reporting to the competent authorities for criminal or civil liability.

## **VII. 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.ramos@sovena.pt](mailto:vera.ramos@sovena.pt)
- **Legal & Compliance Department:** Margarida Matos (Head of Regulatory Compliance)  
E-mail: [margarida.matos@sovena.pt](mailto:margarida.matos@sovena.pt)

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### VIII. 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

