



POLICY FOR REPORTING IRREGULARITIES

within the scope of the prevention of corruption and related offences

Where applicable laws or regulations provide for stricter standards than those set out in this Code of Conduct, such provisions shall prevail. At the same time, a breach of these provisions shall also constitute a breach of this Code of Conduct.

1. Presentation

Telhabel identifies integrity as one of its core values, establishing very high standards of conduct for itself and its partners. The existence of a true ethical culture within an organisation will always depend on everyone's commitment to preventing phenomena such as corruption.

2. Subject Matter and Scope

This Code of Conduct for the Prevention of Corruption and Related Offences seeks to establish a set of principles, values and rules of conduct - **transversal to all of Telhabel's activities and applicable to all its Employees and Partners** - in terms of professional ethics and the prevention of Corruption and Related Offences, as provided for in the Corruption Prevention Framework.

3. Concepts

For the purposes of this Code, the following terms and expressions shall have the meaning indicated below, when beginning with a capital letter, in the singular or in the plural:

Code: this Code of Conduct for the Prevention of Corruption and Related Offences;

Employee: any individual who performs duties at Telhabel, whether under an employment contract, service contract, internship or any other capacity, even on a temporary or provisional basis, for remuneration or free of charge, including management positions or positions of office, on a permanent or temporary basis;

Corruption and Related Offences: offences 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 misappropriating a subsidy, grant or credit, provided for in the Penal Code, approved in annex to Decree-Law no. 48/95, 15 March, in its current wording, in the Code of Military Justice, approved in annex to Decree-Law no. 100/2003, in its current wording. 48/95, of 15 March, in its current wording, in Law no. 34/87, of 16 July, in its current wording, in the Code of Military Justice, approved in annex to Law no. 100/2003, of 15 November, in Law no. 50/2007, of 31 August, in its current wording, in Law no. 20/2008, of 21 April, in its current wording, and in Decree-Law no. 28/84, of 20 January, in its current wording. Also included are the provisions of the aforementioned laws in force at any given time, as well as other legislation which in the future may regulate matters which, by their nature, should be considered to be covered; in the future that, due to their nature, should be considered covered;



Courtesies: donations, gratuities, gifts, benefits, offers, payment of expenses, entertainment, acts of hospitality or participation in events;

Partners: third parties acting on behalf of Telhabel, its suppliers and its customers;

Sponsorships and Donations: allocation of financial, human or asset resources to an organisation, individual or event, promoted by an external entity, with the aim of developing some social, cultural or promotional action, among others;

Contribution: the act or effect of contributing, of collaborating in the development of something.

CPF: Corruption Prevention Framework, approved by Decree-Law no. 109-E/2021 of 9 December;

Telhabel: Telhabel - Construções, S.A., a commercial company registered under company number 500 282 013.

4. Responsible for Regulatory Compliance

Under the terms of the CPF, Telhabel appoints a senior manager or equivalent to be responsible for regulatory compliance, who guarantees and controls the application of the regulatory compliance programme, of which this Code of Conduct is a part.

5. Guiding Principles

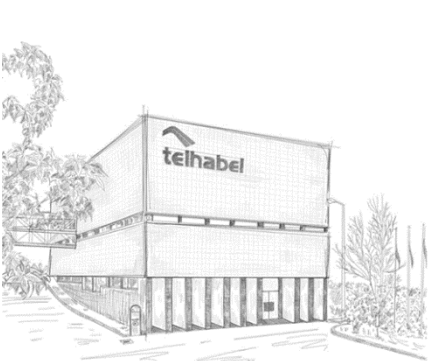
Telhabel employees and partners must carry out their duties ethically and responsibly, basing their performance on values such as transparency, integrity, responsibility and always in strict compliance with applicable laws and regulations.

6. Unauthorised Conduct

Telhabel repudiates any practice of corruption, whether active or passive, and other forms of undue influence or illicit behaviour, imposing strict compliance with these principles in all its internal and external relations, whether with private or public entities.

Employees and partners, being subject to the regulations on tackling corruption and related offences, may not adopt behaviour that constitutes the commission of such crimes. However, it is important to emphasise that this is absolutely unauthorised:

- a. making payments intended to encourage or expedite the performance of an act, to obtain an omission or refusal, or to obtain favourable treatment, even if attempted, whether or not contrary to the duties of their office or function;
- b. accepting any advantages or offers in return for preferential treatment from any third party in order to influence an action or decision;
- c. offer or accept, under any circumstances and regardless of value, cash, cheques and other goods subject to legal restrictions;
- d. influencing Partners' decisions in any way that is illegal or appears to contravene applicable regulations.



7. Rules of Conduct

Courtesies

A courtesy is considered socially acceptable if it is offered and/or received as a sign of good manners, if it is related to professional activity and if it is not intended to persuade or obtain preferential treatment or an illegitimate advantage from the recipient or to unduly influence their behaviour. Among the courtesies that are in line with Telhabel's commercial practices, although of a value of less than €300.00 (three hundred euros) and in accordance with custom and practice, are: the occasional offer of meals as part of the company's business; the sporadic offer of tickets to artistic or sporting events, as a demonstration of good business relations; occasional charges for business partners' travelling expenses; offers of merely symbolic value, such as Christmas and other festive gifts, which do not constitute the acceptance of economic advantages; and gifts of reduced value, such as merchandising or small promotional items. Whenever the defined values are exceeded, this situation should be duly reported to compliance@telhabel.net.

Donations to Political Parties or Organisations

Employees may not make donations or contributions, in cash or in kind, on behalf of and/or in the name of Telhabel or in a manner that appears to be made on behalf of and/or in the name of Telhabel, to political parties or political organisations, or to any of their representatives or candidates.

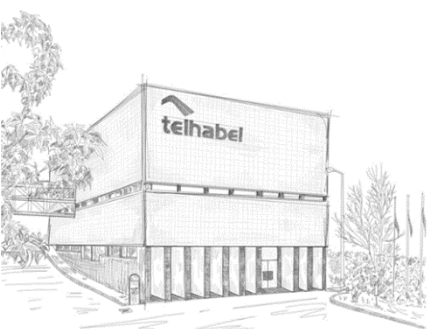
Sponsorship and donations

The awarding of Sponsorships and Donations must not constitute an undue or unjustified advantage or be used as a means of exerting influence or pressure on any decision by the recipient organisation. The awarding of Sponsorships and Donations must always be transparent.

Hiring of Partners

In its relations with its Partners, Subcontractors, Suppliers, Service Providers and Consortia, Telhabel must duly ensure that they share the same ethical principles it follows and which are set out in the present Code of Conduct. Thus, the respective contracting should only take place when there is an actual need for the services or goods to be acquired and the agreed price corresponds to the market value, except in duly justified situations.

Whenever possible, contracts signed with Partners should include a clause on the prevention of corruption and related offences.



Conflict of Interest

Employees may not negotiate on their own account or in competition with Telhabel, and are also prohibited from obtaining personal benefits, advantages or favours by virtue of the position held or duties performed.

All Employees who are in an apparent or real position of conflict of interest with Telhabel and/or with Telhabel's interests must immediately report the fact to the channels indicated in point 10, labelled "Human Resources", which will be directed to the Human Resources department, and refrain from performing any act or making any decision in relation to which the conflict of interest arises.

8. Non-compliance

Failure to comply with the regulations set out in this Code of Conduct will be considered a serious offence, giving rise to the application of disciplinary measures to the offenders, and may even result in the termination of any contractual ties with Telhabel. Thus, depending on the offender's degree of guilt and the seriousness of the offence, acting in breach of the Code of Conduct may give rise to the opening of disciplinary proceedings, as well as the application of one of the following disciplinary sanctions: unrecorded reprimand; recorded reprimand; financial penalty; loss of holiday days; suspension from work with loss of pay and seniority; dismissal with just cause.

Failure to comply with the present Code of Conduct may also lead to administrative, civil or criminal liability for the offenders and result in the imposition of fines, penalties, compensation or penalties, as well as the imposition of ancillary sanctions, including a ban on holding office or carrying out activities, restrictions on receiving government loans, subsidies or incentives, loss of assets and, in the case of legal persons, even the dissolution of the company. The offences of Corruption and Related Offences referred to in this Code of Conduct are punishable, depending on the legal framework, by fines and imprisonment for a maximum of 12 years.



9. Training

Telhabel ensures that an internal training programme is carried out for all employees, with the aim of providing them with knowledge, debate and understanding of all the regulations and procedures within the scope of the prevention of Corruption and Related Offences.

10. Reporting Irregularities

If, within the scope of their professional activity, any Employee or Partner becomes aware of facts, evidence or information about offences that have already been perpetrated or are highly likely to be perpetrated, or that are being perpetrated, as a result of a breach of the provisions of the Code of Conduct, they may report them to Telhabel through the following channels:

Via e-mail to: compliance@telhabel.net; or

Via post to: Telhabel Construções S.A - Compliance - Rua Nova da Nespereira, n.º 14, Edifício "Telhabel", 4770-287, Lagoa, Vila Nova de Famalicão (marked "CONFIDENTIAL").

Irregularities can be reported either nominally or anonymously. When the report is made nominally and the whistleblower expressly requests it, all those involved in its management and processing will be assured that the report will be transmitted anonymously.

Telhabel prohibits any kind of retaliation against anyone who reports an irregularity in good faith (Law no.93/2021 of 20 December). The rights of the defendant will also be protected under the terms of the applicable law.

11. Validity, Revision and Publishing

The present Code of Conduct comes into force on the date of its approval by the Board of Directors; it will be duly reviewed every three years or whenever there is a change in Telhabel's duties or organisational or corporate structure that justifies its review; and it will be published, in its most up-to-date version, on the Telhabel website.

Vila Nova de Famalicão, 27 May 2024

