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# Corticeira Amorim

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## Anti-Corruption Policy

(Approved by the Board of Directors of Corticeira Amorim, S.G.P.S., S.A. at a meeting held on 06 December 2021)

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### 1. VISION

Corticeira Amorim and its Companies (all the companies in which Corticeira Amorim has a controlling interest, regardless of whether their head offices are in Portugal or in another country), hereinafter jointly referred to as the "Organisation", consider institutional integrity to be a fundamental value of the Organisation's corporate culture.

The Organisation undertakes to conduct itself with honesty and to maintain appropriate internal control systems for the prevention and detection of fraud or irregularities, in particular with regard to corruption and bribery.

The Organisation does not tolerate corruption or bribery, whether active or passive, in the private or public sector, including payments for the facilitation, creation, continuation or promise of illicit or favourable situations.

### 2. SCOPE

All the Organisation's employees are responsible for contributing to the implementation of this policy, by both defending and observing the principles of good governance, as also set out in the company's Code of Ethics and Professional Conduct.

This policy is aimed at both an internal and external group:

- The internal group includes all employees (including members of the governing bodies, directors and workers) of any company that is part of the Organisation. The Organisation and its employees will base their decisions and actions on the principles established in this Code, fulfilling their obligations in a professional, responsible and dutiful manner, at all times pursuing excellence in performance and promoting an appropriate working environment, while upholding the reputation of the Organisation and contributing to its sustainability;
- The external group comprises all entities that have an economic, institutional or corporate relationship with the Organisation. External stakeholders (the Organisation's shareholders and investors, customers, business partners and suppliers) are expressly required to respect and adhere to the principles established in this policy, to the extent that the values, principles and standards established herein may be applicable to them.

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### 3. REFERENCES

This policy includes the Organisation's stance on this issue and establishes principles in line with the main applicable international frameworks:

- Principles of the 1948 Universal Declaration of Human Rights;
- Basic conventions of the International Labour Organization;
- Organisation for Economic Cooperation and Development's (OECD) guiding principles for multinational companies;
- The 10 principles of the United Nations Global Compact;
- BCSD Portugal Charter of Principles;
- Act4Nature Portugal.

### 4. COMMITMENTS

The Organisation expects its representatives and Employees to:

- Refuse to receive, refrain from making, and abstain from requesting from third parties any offers, gifts, invitations, benefits, gratuities, compensation, commissions, advantages, favours, privileges or any other type of incentive that could be considered an attempt to influence, in order to unduly obtain a corporate or administrative decision or an illegitimate advantage; unless such offers do not exceed the limits considered reasonable by corporate practice (i.e. the respective amount does not exceed 150 euros and there is no indication of less than transparent intentions or an attempt by the offeror to prejudice their impartiality) and are given on festive occasions; all such offers must be reported in writing to the respective hierarchies;
- Respect, in their relationship with public officials and heads of public entities, the impartiality obligations to which they are subject, refraining from giving or promising any kind of undue benefit;
- Not make monetary or other contributions to political parties on behalf of the Organisation.

The Organisation also expects its suppliers not to participate in any form of corruption, extortion or bribery that could undermine fair trade principles or result in public scandals that might impact on the Organisation.

### 5. RELATED DOCUMENTS

- Code of Business Ethics and Professional Conduct;
- Corticeira Amorim Sustainability Report;
- Purchasing Policy.

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## **6. VALIDITY**

This Policy takes effect on 06 December, the date on which it was approved by the Corticeira Amorim Board of Directors. Given the Organisation operates in different countries, if the content of this policy differs from local rules and regulations, Employees shall give preference to the most restrictive rule.

## **7. REVIEW AND UPDATE**

This Policy will be periodically reviewed, taking into account annual reports. Whenever possible and desirable, the Organisation will notify Employees of updates to this Policy, and will promote training courses to ensure that they are aware of the rules it contains.

## **8. COMMUNICATION**

The Organisation will take appropriate measures to ensure that all employees are aware of the contents of this Policy and understand its scope. To this end, the Anti-Corruption Policy will be available on the Intranet and on Corticeira Amorim's corporate website (in Portuguese and English), so that all those to whom it is addressed may have access to it, the Human Resources Department also being responsible for other internal disclosure measures.

Mozelos, 06 December 2021