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# Corticeira Amorim

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## Procedure for reporting irregularities

(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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It is the responsibility of the CORTICEIRA AMORIM Audit Committee - in accordance with its rules of procedure – to receive the information on irregularities reported by the Organisation's Shareholders, Employees, Stakeholders or other individuals or bodies and to treat such whistle-blowing reports appropriately.

Such reports shall be addressed to:

Audit Committee of CORTICEIRA AMORIM, SGPS, S.A.

Address - Registered office of the Company: Rua Comendador Américo Ferreira Amorim, n.º 380 – PO Box 20 - 4536-902 MOZELOS

Telephone: 22 747 54 00

The email specifically set up for this purpose is as follows: [supervision@amorim.com](mailto:supervision@amorim.com).

The Organisation ensures that the Audit Committee will be the first to be made aware of the contents of such whistle-blowing reports (no employee of the Organisation is authorised to open mail specifically addressed to this corporate body or any of its individual members).

It is the Audit Committee's responsibility to review any such reports and ask the Organisation's other governing bodies and officers for any explanations on the disclosed events and the circumstances surrounding the situation. In dealing with concrete situations, the Supervisory Board is entitled to:

- Suggest measures to prevent such irregularities occurring;
- Report any identified and confirmed irregularities to the Board of Directors and relevant authorities, both internal and external, in accordance with each specific situation.

CORTICEIRA AMORIM believes that there are a number of measures, i.e. (i) the assignment of such responsibilities to the Audit Committee – a body composed entirely of independent members, thus ensuring the impartial handling and consideration of irregularities reported; (ii) the non-imposition of the use of a specific format for such reports and the fact that the whistle-blower may use the channels it deems most suitable to make the report; (iii) the obligation to ensure protection of personal data (scrupulously following the instructions given by whistle-blowers regarding confidentiality) that safeguard the rights of both whistle-blowers and other Organisation employees involved, while ensuring that the reporting process remains simple, and contribute effectively to promoting the impartial investigation and clarification of the situations reported.

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**AMORIM**

Corticeira Amorim, SGPS, S.A.

Edifício Amorim I

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Sociedade Aberta

Capital Social: € 133 000 000,00

Pessoa Coletiva e Matrícula: PT500077797

C.R.C. de Santa Maria da Feira – Portugal

[instagram: amorimcork](https://www.instagram.com/amorimcork)

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Those seeking advice or wishing to report an incident will be treated with respect and dignity, in accordance with the following principles:

- **Confidentiality:** The details and statements made will be treated in the strictest confidentiality during all phases of the investigation. The maximum confidentiality of the information transmitted and the identity of the information transferor is guaranteed, whenever the transferor requests it. Anonymous reporting will also be considered, and it is important to note that this option may limit the ability to carry out an investigation.
- **Thoroughness:** Information received about potential violations of the Code of Business Ethics and Professional Conduct, or associated Regulations, Policies or Principles, should be investigated fully and thoroughly to determine the truthfulness of the reported situation.
- **Respect and dignity:** Those seeking advice or wishing to report an incident will be treated with the utmost respect and dignity, always respecting the fundamental rights of those involved in possible violations. Before evaluating the information reported about situations, the third parties and/or Employees affected will be entitled to provide the reasons and explanations they deem necessary.
- **Fundamentals:** Any decision must be adopted in a reasonable, proportional and appropriate manner, considering the circumstances and the nature of the events.

The Organisation undertakes to refrain from retaliation or reprisals against those who make complaints/speak out, as well as to treat the targets of the accusations fairly. In particular, employees who report illicit activities conducted by others, acting in good faith and according to criteria of reasonableness and care, may not be the subject of any disciplinary procedure.

Such commitment shall not, however, prejudice the right to any legal action, civil or criminal, that may correspond to the party or parties affected, and the Organisation therefore recommends that: (i) the Procedure for Reporting Irregularities be used prudently, professionally and in accordance with the highest standards of integrity and (ii) the Reporting be reasoned and made in good faith and not abusive or formulated on the basis of conjecture or supposition.

The reporter may also, at his or her discretion, request in advance an opinion from the Organisation's Legal Department on the risks of reporting and/or on the reasonableness of the grounds. Where requested, the Legal Department will ensure that the identity of whistle-blowers and the information provided by them are not disclosed and the decision as to whether or not to proceed with the report will remain with them. The email specifically set up for this purpose is as follows: [legal@amorim.com](mailto:legal@amorim.com).

Mozelos, 06 December 2021