
Corticeira Amorim

Irregularities' internal reporting procedure

(in accordance with Portuguese Law No. 93/2021 of 20 December)

1. In compliance with the applicable legislation and in accordance with its high ethical standards, CORTICEIRA AMORIM SGPS, S.A. ("CORTICEIRA AMORIM") establishes the present internal reporting procedure, aimed at preventing and detecting improper and/or illicit behaviour in the context of professional activity, and at protecting those who, in good faith and with genuine grounds, report such behaviour, as well as the people and entities related to them.

2. The rights and guarantees of those submitting a report, namely those of confidentiality or anonymity, of processing personal data, as well as the conditions and measures for their protection, are legally established in this specific scheme and in other applicable legislation, all of which are complied with. These include the prohibition of retaliation against those submitting the report. The practice or the omission of any acts that, in a professional context and motivated by the report, directly or indirectly, cause or may cause damage to the person submitting the report are forbidden.

Also benefitting from the legally established rights and protection, with the necessary adaptations, are (i) the persons assisting those submitting a report through this procedure and whose assistance must be confidential, or who have family or professional relations with those submitting a report and who, for that reason, may be subject to retaliation in a professional context (ii) entities which are owned or controlled by those submitting a report, for which they work or which are otherwise related to them, as well as (iii) persons who had a professional relationship with the Company which has terminated or has not entered into a professional relationship with the Company but have obtained information at a pre-contractual negotiation stage which they consider may comprise an irregularity.

3. Irregularities are defined in this reporting procedure as improper or unlawful conduct, by action or omission, in a professional context, including attempts to conceal it, which are reasonably foreseeable, are taking place or have already taken place, in breach of the Code of Business Ethics and Professional Conduct or Regulations, or are contrary to related Policies or Principles, and/or the relevant legal rules in this context.

By way of example, any of the following is considered to be an irregularity (i) discrimination or unequal treatment based on ethnic criteria, gender, sexual orientation, religion, belief, culture, nationality, disability, political or ideological orientation, education or marital status; (ii) harassment in any form, which has the purpose or effect of creating an intimidating, hostile, degrading or humiliating environment; (iii) failure to comply with rules concerning health, safety and working conditions; (iv) improper sharing of confidential information or use of privileged information; (v) facilitation, creation, maintenance or promise of irregular situations or favours; (vi) undue receipt of advantage; (vii) failure to comply with the duty of diligence in respect of procedures for the prevention and detection of illegal practices in financial and accounting matters, including money laundering or financing of terrorism; as well as any form of participation in (viii) violent crime, especially violent and highly organised crime; (ix) human trafficking; (x) child pornography and procurement of minors; (xi) arms trafficking; (xii) influence peddling; (xiii) drug trafficking; (xiv) illegitimate access to computer systems, computer sabotage and any practice causing damage to computer programmes or data.

4. The reporting procedure may be used, in particular, by (i) CORTICEIRA AMORIM employees, (ii) persons or entities who are counterparties of the Company (and subcontractors), namely customers, service providers and suppliers, (iii) owners of shareholdings, (iv) members of administrative or management bodies and of supervisory or oversight bodies.

5. Reports from CORTICEIRA AMORIM employees are addressed first and foremost to the senior manager of the area/unit in which the person making the report works, either verbally, at a meeting scheduled in advance, or in writing, in the latter case the person submitting the report can choose to file the report anonymously or to identify themselves, using the form available at <https://www.amorim.com/en/investors/corporate-governance/corporate-regulation-and-policies/>.

In exceptional circumstances, if the person submitting the report believes, with reasonable grounds, that the report will not be duly analysed and decided upon objectively and impartially by his or her hierarchical superior, or if the hierarchical superior is implicated in the report or even if there is a risk of retaliation, the report may be directly sent to the Audit Committee referred to in point 6, anonymously or with the identification of the person submitting the report, at his or her discretion, using the form available at <https://www.amorim.com/en/investors/corporate-governance/corporate-regulation-and-policies/>, to be sent to the computer address especially set up for this procedure, supervision@amorim.com which only the Audit Committee will have access to.

CORTICEIRA AMORIM employees may also resubmit their report to the Audit Committee if they believe, with reasonable grounds, that the decision taken by their superior officer was not appropriate to the case reported.

Those submitting reports who are CORTICEIRA AMORIM employees may ask the Company Secretary/Legal Department for clarification of any doubts regarding the use of the communication procedure, via legal@amorim.com or in person, if they request this in advance.

6. The Audit Committee of CORTICEIRA AMORIM is responsible for:

- (I) in the cases under its jurisdiction, receiving the reports addressed to it and to the Company Secretary, to evaluate and decide on them;
- (II) Report any irregularities effectively confirmed to the Board of Directors and to the relevant authorities, both internal and external, as justified or required by each specific situation;
- (III) Suggest measures to prevent such irregularities occurring;
- (IV) Periodically analyse this internal communication procedure in order to ensure its compliance at all times with applicable legislation, and to promote its alteration in terms appropriate to the achievement of its objectives. Due notice will be provided in such cases.

7. The following reports are always directly addressed to the Audit Committee and the Company Secretary (i) reports concerning irregularities committed by members of the management or supervisory bodies, and (ii) reports submitted by persons who are not employees of CORTICEIRA AMORIM.

8. Reports submitted by non-employees of CORTICEIRA AMORIM may be submitted either verbally, in a previously requested face-to-face meeting using the email address supervision@amorim.com, or in writing, in the latter case the person submitting the report can choose to file the report anonymously or to identify themselves, using the form available at <https://www.amorim.com/en/investors/corporate-governance/corporate-regulation-and-policies/>, to be sent to the same e-mail address.

9. Any person wishing to submit a report in writing and where the electronic means are clearly not accessible or manageable by the person making the report, then the report may be sent by post addressed to the Audit Committee and Company Secretary, marked on the outside as "Confidential" - in which case the legally established deadlines to be observed by the Company in this procedure shall only begin from the date on which such letter is demonstrably received:

10. The internal communication procedure begins with the submittal of the report and, within 7 (seven) days of its reception, CORTICEIRA AMORIM, through the employees responsible for the procedure, notifies the person who submitted the report of its reception and informs him/her, in a clear and accessible way, of the requirements, competent authorities, form and admissibility of the external report, as stipulated by law.

The appropriate internal action is taken following the submittal of the report, in order to verify the content of the same and, if necessary, to bring the reported irregularity to an end, including by opening an internal investigation or informing the competent authority for the respective investigation.

Within 7 (three) months of receiving a report, CORTICEIRA AMORIM, through the people responsible for the procedure, will inform the person who submitted the same of the measures planned or already taken to follow up on the submitted report and the reasons for them.

11. If the report is considered to be well-founded, the decision of the hierarchical superior or the Audit Committee, as the case may be, is adopted in a reasonable, proportional and appropriate manner, considering the type of irregularity and the circumstances in which it occurred. Appropriate action shall be taken with the competent authorities, including judicial authorities, for investigation of the breach, where applicable.

12. The prohibition of retaliation against the person who submitted the report is respected at all times, and said person shall not be prejudiced in any way, directly or indirectly, by a report of irregularity which he or she has submitted in good faith and with genuine grounds.

The following, for example, are considered to be retaliation: (i) unjustified change of working conditions; (ii) unfounded negative performance evaluation; (iii) suspension of an employment contract; (iv) non-renewal of an employment contract; (v) application of disciplinary sanctions; (vi) termination of a supply or service contract.

The law establishes that, subject to proof to the contrary, any of these behaviours are presumed to be motivated by the report submitted and are therefore prohibited for a period of 2 (two) years following the submittal of the report.

13. This internal communication procedure offers guarantees of independence, confidentiality and absence of conflicts of interest, ensures the integrity and safekeeping of the reports submitted, the confidentiality of the identity of the person submitting the report, or their anonymity when that person submits the report by these means, as well as the confidentiality of the identity of any third parties mentioned in the same.

Those responsible for handling the report, namely for receiving reports (the hierarchical superior of the person submitting the report or the Audit Committee and the Company Secretary), comply with the corresponding obligations, analyse the reports in an exhaustive, objective and impartial manner, and manage the procedure with dignity and respect for those involved.

14. The rights and protection of the law shall not apply to those submitting a report who, to the detriment of the internal communication procedure available to them, unduly use the route of external communication or public disclosure, because the legal requirements are not met.

Mozelos, 23 February 2022