

ANTI-CORRUPTION MANAGEMENT POLICY

VER.02



STCP considers the implementation of the Anti-Corruption Management System essential, following the **ISO 37001** standard, with the objective of ensuring the organisation's transparency.

To achieve the established objectives, we propose to follow these guidelines:

- Prohibit the practice of active or passive corruption activities;
- Ensure compliance with anti-corruption laws and regulations, applicable in Portugal or countries related to STCP's activities, both national and international;
- Request the participation of all internal or external stakeholders in identifying less transparent practices or those that may raise suspicions of corruption or bribery, ensuring that such actions will not be subject to any retaliation.
- Commit to meeting the requirements of the anti-corruption management system and to continuous improvement of the anti-corruption management system;
- Appoint a Compliance Function with authority and Independence, to analyse cases suspected of practises that do not align with the Anti-Corruption Management System.
- Failure to comply with the policies and documents defined in the Anti-Corruption Management System may result in disciplinary or criminal proceedings, depending on the severity and specifics of the case.
- Identify and assess corruption risks according to established criteria, implementing mitigation measures for risks considered unacceptable.
- Promote awareness among all employees regarding anti-corruption efforts.

We commit to fulfilling the requirements of our shareholders, regulatory, statutory, and other obligations applicable to the organisation, providing the necessary resources for the development of effective and efficient processes essential for continuous improvement.

STCP expects all employees and partners to commit fully to continually satisfying our clients, always maintaining an ethical and transparent stance to ensure an environment of growth and trust.

APPROVAL

Board of Administration

DATE

13 | 10 | 2022
