



Patricia Pilar
GRUPO

Prevention Code of Conduct
Corruption and Related Offenses

2025

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A top-down view of a person's hands writing on a notepad. The right hand holds a wooden pen with a silver clip, writing on a white notepad with a gold border. The left hand holds the notepad open. The background is a light-colored surface with some brown paper scraps. A large, stylized, teal-colored watermark is visible in the bottom right corner.

01 | Introduction

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The Patrícia Pilar Group, referred to as the **Patrícia Pilar Group**, reaffirms its commitment to the highest standards of ethics, integrity, and transparency by adopting concrete measures to prevent, detect, and sanction acts of corruption and related offenses that may occur in or through its activities.

This commitment is formalized in accordance with **Decree-Law No. 109-E/2021, of December 9**, through the implementation of the **Compliance Program**, composed of the following elements:

- 1 A **Corruption and Related Offenses Risk Prevention Plan (PPR)**;
- 2 This **Code of Conduct for the Prevention of Corruption and Related Offenses ("Code")**;
- 3 A **Continuous Training Program** for employees and partners;
- 4 A **Whistleblowing Channel and the respective Regulation for Reporting Infractions**.

This Code is intended for all employees, service providers, business partners, and stakeholders, guiding them in adopting ethical behaviors and complying with applicable regulations.



02 | Scope of Application

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This Code applies to practices that, under the law, are applicable to private entities and all employees, as well as, with due adaptations, to all those who represent the Patricia Pilar Group and all its partners.

The Patricia Pilar Group's Code of Conduct for the Prevention of Corruption and Related Offenses applies to all companies in which the Group has ownership ("Patricia Pilar Group"), without prejudice to the legal framework applicable in their respective geographies and any specific adaptations necessary based on the activities carried out by them and the specific risks of corruption, as outlined below:

- a.** In the case of wholly owned subsidiaries of the Patricia Pilar Group, their management bodies should adopt this code of conduct;
- b.** In the case of:
 - (i) Companies in which the Patricia Pilar Group exercises control;
 - (ii) Companies in which the Patricia Pilar Group holds an interest but does not exercise control or significant influence, the members of the management bodies of these companies, whose appointments were proposed by the Patricia Pilar Group, must encourage the adoption of the principles in this Code and promote the necessary measures to, as much as possible, encourage the adoption of the rules and procedures outlined in it, always in compliance with applicable legislation.



03 | General Principles



03 | General Principles

The Group bases its actions on the following principles:

Integrity and Transparency

All activities and decisions must be guided by honesty and clarity, rejecting any conduct that may compromise the Company's reputation.

Compliance with Norms

Strict adherence to applicable laws and regulations, with a particular focus on anti-corruption standards.

Intolerance to Corruption

Any act or attempt at corruption will be strongly rejected and sanctioned.

Responsibility and Commitment

Everyone has the duty to prevent and report any suspected cases of corruption or related offenses.



04 | Objectives of the Code

04 | Objectives of the Code

1

Prevent and mitigate risks of corruption and related offenses;

2

Promote an organizational culture of ethics and compliance;

3

Ensure transparency in decision-making processes;

4

Define the responsibilities and expected conduct of all employees and partners.



05 | Prohibited Conduct

05 | Prohibited Conduct

Corruption and related offenses are understood as crimes including bribery, improper acceptance and offering of advantages, embezzlement, economic participation in business, extortion, abuse of power, misconduct, influence peddling, money laundering, and fraud in obtaining or misappropriating subsidies, grants, or credits, as defined in the Penal Code (attached to Decree-Law No. 48/95, March 15), its current wording, Law No. 34/87, July 16, its current wording, the Military Justice Code, attached to Law No. 100/2003, November 15, Law No. 50/2007, August 31, its current wording, Law No. 20/2008, April 21, its current wording, and Decree-Law No. 28/84, January 20, its current wording.

Thus, the following are expressly prohibited:

Offering, Promising, Granting, or Accepting

Any undue advantage, financial or otherwise, that may influence decisions or actions in the exercise of public or private functions;

Fraud and Collusion/Combination

Participating in fraudulent schemes, document falsification, money laundering, or other illegal practices involving financial transactions, concealment of facts, or manipulation of processes;

Conflict of Interest

Omission or concealment of situations that may generate personal advantages to the detriment of the Company's interests;

Improper Use of Resources

Using company assets, resources, or information for illegal purposes or contrary to its interests.

A photograph showing several hands of different skin tones reaching towards and placing white puzzle pieces on a light-colored surface. The image is overlaid with a semi-transparent teal filter. In the bottom right corner, there is a large, stylized teal logo consisting of three interlocking circular shapes.

06 | Duties of Employees and Partners

06 | Duties of Employees and Partners

All employees and partners of the Grupo Patrícia Pilar have the following duties:

1

Know and Comply:

with this Code, the PPR, and other norms of the Compliance Program;

2

Report Irregularities:

through the Whistleblowing Channel;

3

Cooperate in Internal or External Investigations:

related to the prevention of corruption and related offenses;

4

Participate in Training:

promoted by the Company regarding ethics and compliance;

5

Transparency in Operations:

All payments, contracts, and financial transactions must be carried out transparently, with adequate records and in compliance with the tax and accounting principles in force in Portugal and the European Union.

No transaction should be conducted in a manner that conceals its nature or purpose.

6

Management of Conflicts of Interest:

All employees must avoid situations where their personal interests could interfere with the company's interests.

Any conflict of interest must be communicated immediately to the Ethics and Sustainability Department, which will take the necessary measures.

A top-down view of a person's hands writing on a notepad. The right hand holds a wooden pen with a silver clip, writing on a white notepad. The left hand holds the notepad open. The background is a light-colored surface with some brown paper scraps. The text '07 | Prevention of Related Offenses' is overlaid in white on the left side of the image.

07 | Prevention of Related Offenses

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Money Laundering

- The company adopts rigorous research and prior analysis (due diligence) policies and procedures to prevent involvement in any money laundering activity.
- All employees must be alert to suspicious activities and report any signs of money laundering according to the established channels.

A top-down view of a person's hands writing on a notepad. The right hand holds a wooden pen with a silver clip, writing on a white notepad with a gold border. The left hand holds the notepad open. The background is a light-colored surface with some brown paper scraps. The text '08 | Whistleblowing Channel' is overlaid in white on the left side.

08 | Whistleblowing Channel

08 | Whistleblowing Channel

Patrícia Pilar Group provides a secure and confidential Whistleblowing Channel for employees, partners, and third parties to report irregularities or violations of this Code.v

Guarantees:

- Absolute confidentiality of the whistleblower;
- Protection against retaliation;
- Independent and impartial investigation of the reports.

Channels:

Email: denuncias@patriciapilar.pt;

Mail: Canal de Denúncias, Rua Poço de Arroz, N°2, Casal da Lapa, 2560-030 A-dos-Cunhados;

In person: Departamento de Ética e Sustentabilidade;

Suggestions/Complaints Box: Disponibilizada no interior da Empresa.

A close-up photograph of a hand tipping a domino over a row of standing dominoes. The dominoes are light-colored wood. The hand is positioned at the top right, with the index finger pressing down on the top of the domino that is about to fall. The dominoes are arranged in a line, with the first few already tipped over and the others still standing. The background is a solid, muted teal color.

09 | Sanctions and Consequences

09 | Sanctions and Consequences

Failure to comply with this Code may result in:

- Initiation of disciplinary processes, potentially leading to sanctions, including termination of the employment contract for just cause;
- Adoption of applicable legal measures, including communication to the competent authorities;
- Exclusion of business partners involved in illegal practices.



10 | Training and Awareness



10 | Training and Awareness

The Group promotes internal training programs for all its executives, employees, and partners to ensure they understand and comply with the corruption prevention policies and procedures in place.

The training activities aim to:

- Equip employees, executives, and partners with knowledge of the risks associated with corruption;
- Strengthen understanding of the preventive measures adopted;
- Spread best practices of ethical conduct in the fight against corruption.

11 | Disclosure



11 | Disclosure

The Group ensures that the Compliance Program is widely communicated through various channels to guarantee accessibility and promote understanding. The methods of disclosure include:

Company Website

The Code is published on the official company website at ***www.patriciapilar.pt***, easily accessible to all employees and stakeholders;

Internal Channels

The Code is also communicated through internal channels to reach all employees and ensure access to the information;

Printed Format

A printed version of the Code is available so that everyone, including employees without online access, can consult it with ease;

Actions

Through training actions aimed at disseminating and ensuring knowledge acquisition and individual commitment by employees.

A man with short brown hair, wearing a light blue button-down shirt, is seen from the back. He is standing against a dark, textured background. The lighting is soft, highlighting the texture of his shirt and the back of his head. The overall mood is contemplative or professional.

12 | Responsible for Compliance

12 | Responsible for Compliance

The Board of Directors delegates the responsibility for Compliance to the Director of the Ethics and Sustainability Department, who ensures and controls the application of this Code.

This department ensures compliance with the Code, exercising its duties independently, continuously, and with decision-making autonomy, ensuring access to the necessary internal information and human and technical resources to perform its function effectively.

The Responsible Officer for Compliance shall provide any necessary clarifications regarding the application of this Code of Conduct and will promote regular internal audits to assess compliance with it.

13 | Review of the Code



13 | Review of the Code

This Code is reviewed every three years or whenever there is a change in the responsibilities or organizational or corporate structure of the entity that justifies a revision.

A photograph of a person's hands holding a single white puzzle piece. The hands are positioned over a spiral-bound notebook with a grid pattern. A magnifying glass is visible in the background, resting on the notebook. The scene is softly lit, and the overall tone is contemplative. The text '14 | Final Considerations' is overlaid on the left side of the image.

14 | Final Considerations

14 | Final Considerations

The **PATRÍCIA PILAR GROUP** expects all those involved in its activities to act responsibly, respectfully, and in alignment with the values and principles outlined here.

Approved on: 31 / 12 / 2024



Patrícia Pilar

G R U P O