

CASCAIS DINÂMICA'S - ANTI-CORRUPTION POLICY

Cascais Dinâmica, aware of the exposure of organisations to the risks of conflicts of interest, corruption and bribery, reaffirms its commitment to involving all stakeholders in a collective effort towards transparent, ethical and equitable management. It also recognises the fundamental role of each individual in promoting a culture of integrity and in preventing, detecting and combating illegal practices.

Considering corruption and bribery as phenomena that undermine the essence of the company, as well as democracy itself and its fundamental principles such as equality, transparency, free competition, impartiality, legality, integrity and fair redistribution of wealth, Cascais Dinâmica expressly prohibits any form of corruption and bribery, whether active or passive, direct or indirect. The organisation is therefore committed to ensuring, in an exemplary manner, its Anti-Corruption Management System (SGAC), in line with the NP ISO 37001 standard and in accordance with applicable legislation and regulations, with a view to continuous improvement.

The Anti-Corruption Policy constitutes the reference framework for defining, monitoring and reviewing Cascais Dinâmica's anti-corruption objectives, ensuring the implementation of measures proportionate to the risks identified. Awareness is promoted among all stakeholders, with an ethical commitment to guide the actions of employees and other collaborators, applying the necessary resources for this purpose.

Cascais Dinâmica encourages the reporting of concerns expressed in good faith or based on reasonable beliefs, ensuring confidentiality and protection against potential reprisals, in line with the internal and external reporting mechanisms defined in the SGAC. This system fosters a culture of ethics, integrity and compliance, ensuring that everyone understands their duties and the consequences associated with behaviour contrary to this policy.

To ensure the proper implementation, monitoring and improvement of the SGAC, an Anti-Corruption Officer (Compliance Officer) has been appointed, with decision-making autonomy, functional independence and adequate resources to ensure compliance with this Policy and with the NP ISO 37001 standard.

The Anti-Corruption Policy is formalised as documented information and disclosed to all internal and external stakeholders through the most appropriate channels for each context, including digital media and awareness-raising actions.

Failure to comply with this Anti-Corruption Policy may result in disciplinary and, where applicable, civil, administrative and criminal liability for offenders, in accordance with the law and the organisation's internal instruments. Such non-compliance may also affect the continuity of relations with external entities, including

SGAC.MA.02.02	Elaborado	Aprovado	18-02-2026
	Gabinete Mais Transparência	Conselho de Administração	Página 1 de 2

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the suspension or termination of contracts, partnerships or other forms of collaboration with Cascais Dinâmica.

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(Cascais Dinâmica Administration)

SGAC.MA.02.02	Elaborado	Aprovado	18-02-2026
	Gabinete Mais Transparência	Conselho de Administração	Página 2 de 2