

## Cascais Municipality Anti-Bribery Policy

The Municipality of Cascais is committed to the engagement of all stakeholders, in a common pledge that every part has an active role in promoting a safe culture for preventing and fighting bribery acts.

This pledge includes the implementation of an Anti-Bribery Management System, allowing the definition of anti-bribery objectives, the establishment of methods that ensure the prevention and action against bribery acts, the assessment of the bribery risk level of the different areas of municipal activity, and the implementation and monitoring of anti-bribery control mechanisms.

The aim is to systematise strategies, methodologies and controls that are reasonable and proportional to the risks of bribery in the Municipality's activities. This ensures good administration and public service provision, capable of guaranteeing transparency and the quality of service provided with coherence, efficiency, and effectiveness, aiming to defend the interests, and meeting the needs of the local population and the sustainable development of the Municipality, from a perspective of territorial cohesion.

To ensure the above intentions are achieved, the Municipality establishes the following commitments:

- Forbid any kind of active or passive bribery.
- Provide the necessary resources to implement reasonable and proportionate measures, conceived to prevent, detect, and fight bribery.
- Raise awareness among all stakeholders to consolidate the ethical commitment underlying everyone's actions.
- Encourage the assessment of concerns raised in good faith or based on reasonable belief, in full confidence and without fear of retaliation.
- Ensure compliance with the applicable anti-bribery laws and voluntary commitments relevant to its activities.
- Promote compliance and improvement of the Anti-Bribery Management System, as well as involve all employees, to ensure its effectiveness.

The Responsible for the Anti-bribery Compliance Function has the necessary authority and independence to ensure the Anti-bribery Management System compliance, as well as to provide the necessary resources to guarantee it.

This Anti-bribery Policy must be acknowledged by all stakeholders, to ensure the maintenance of the existing relationship with the Municipality of Cascais.

Cascais, January 2026

  
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(The Mayor)

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	Responsible for the Anti-bribery Compliance Function	Governing Body	Page 1 of 1