

## **Annual report on the execution of the Plan for the Prevention of Corruption and Related Offences of COLEP Packaging**

### **1. Scope**

For the compliance of the obligation set forward in the article 6(4) (b) of the General Regime of Prevention of Corruption, as approved by and in Annex to Decree Law no. 109-E/2021 of 9<sup>th</sup> December (hereinafter "RGPC"), regarding the monitoring of implementation of the Plan for the Prevention of Corruption and Related Offences, COLEP Packaging Portugal, S.A.'s (hereinafter "COLEP Packaging") presents the following report, considering its commitment in addressing any eventual corruption and related offences risks which it may be exposed.

For such purpose, this annual assessment report refers to the year of 2024, detailing hereunder, namely, the quantification of the degree of implementation of the preventive and corrective measures identified in the PPR, as well as the expected full implementation.

### **2. Methodology**

This report focuses on the period between April 1, 2024, the date of the last annual report, and April 1, 2025 and provides a summary overview of the stage of implementation of the programmed activities laid out in the PPR, as well as the completion of some of the planned activities set out therein.

This assessment was carried out by the responsible for the normative compliance of the RGPC (hereinafter "RCN"), assisted by and with the intervention of the key internal areas with assigned responsibilities in the context of the anti-corruption program, namely the People & Sustainability functional internal area and the Legal area.

To this effect, the Company analyzed the programmed activities as previewed in the PPR and measured the degree of implementation of such preventive and corrective measures. Also analyzed the undeveloped steps to be accomplished for its full implementation, in order to be able to predict its completion.

### **3. Implementation of specific measures to address COLEP Packaging High Risk activity**

Before proceeding to the analysis of the activities described in the PPR and the respective degree of implementation, it is important to note that there were no risk activities events considered as high or maximum risks, as better reported within the PPR, namely in subparagraph 3.3.5., and therefore the Company did not adopt specific and urgent measures, nor was deemed or necessary the drafting of the underlying semi-annual assessment report.

### **4. Implementation of the Anti-corruption compliance program and PPR**

During the period covered by this report, as better defined above in the methodology, COLEP Packaging has carried out the following activities in accordance with the plan laid out in the PPR:

- With regard to the whistleblower internal reporting channels:
  - Despite the fact that the company already possessed an Internal Reporting Channel, dated even before the date of entry into force of the RGPC and complementary legislation, we have been analysing and evaluating different solutions on the market. In fact, since our solution was implemented, the market has evolved and various alternatives have been

launched. We thought it made sense to revisit the subject and analyse solutions that might be more intuitive for users. We will continue this evaluation in the following months and analyse whether it makes sense to update our reporting platform;

- Nevertheless, it is important to mention that, during the period concerning the present report, there were no occurrences reported through the Internal Reporting Channel relative to corruption breaches.
- Continuous implementation of the preventive and mitigating measures adopted to address the main activities exposed to corruption and related offences risks of the organisation. For example:
  - Powers of Attorneys were issued for all new situations that require corporate representation and the ones in force were subject to the annual revision to ensure that they are in line with the company's present business demands;
  - All of the information and documentation is properly archived and organized under the internal network system, in accordance with the requirements set out in the applicable policies and procedures in place.
- Regarding the contractual enforcement of the anti-corruption measures applicable to COLEP Packaging, in order to ensure contracts are properly aligned with the company's compliance with the Regime:
  - Legal and Social Responsibility areas have reinforced the monitorization and inclusion of anti-corruption clauses in contracts with customers and suppliers;
  - The Legal Area revised and amended all the internal available contract's templates with service providers, suppliers and customers, as well as the GTCP (General Terms and Conditions of Purchase) published in the COLEP Packaging website, in order to include anti-corruption clauses in such templates.
- As for the Plan for the prevention of risks of corruption and related infractions (PPR):
  - Due to slight changes to the internal organizational structure of the company, the person appointed as responsible for implementing, monitoring and reviewing the whole regime within the company (the "RCN") was replaced. Following this reappointment, and since this person is appointed in the PPR, a new version of this document was approved. The new PPR was published on the company's official website, as well as on the intranet.
- With regard to prior risk assessment procedures for third parties acting on its behalf, suppliers and customers:
  - the company has been evaluating the best way to efficiently distribute the third-party assessment questionnaires prepared with regard to corruption. The Legal, Commercial and Procurement internal teams have been working on a solution and assessing the most efficient way to proceed in regard with this topic.
- As for specific training sessions:
  - A training session is scheduled to occur this month (April, 2025), specifically addressed to the responsible for the normative compliance of the RGPC (the "RCN"), regarding relevant risk behaviours for the prevention of corruption and related offences inherent to the control functions the person in charge is assigned to perform. In this session, the person in question will be duly informed about the regulatory framework that had evolved since he began performing his function, so that he may be fully prepared to carry it out.
  - Three training sessions were scheduled to be carried out during this month (April, 2025), targeting employees, directors and other persons with relevant responsibilities on the anti-corruption compliance program and focusing on the key components such as the PPR, the Code of Conduct, the Anti-corruption Policy, the Prior Assessment Procedures and the Internal Whistleblowing Channel (the internally called "Direct Line").



- All Induction and Onboarding Training – given by the company to all the new employees hired to work in any of the Colep Packaging’s Affiliates and to employees who have been involved in internal mobility processes – focus on the Ethical and Conduct topics based on our Code of Conduct, duly updated in line with the General Regime for the Prevention of Corruption, expressly stating the company’s commitment to the prevention of corruption. Therefore, within training programme it is emphasised the Anti-corruption compliance program of the company, being highlighted topics such as the Code of Conduct, the internal whistleblowing channel and the Plan for the Prevention of Corruption and Related Offences. By doing so, we ensure that all the company’s employees are aware of the existence of these instruments and know how to use and consult them, whenever needed.

Taking into consideration the programmed activities perpetrated during the period to which the present report refers, we quantify the degree of implementation of the preventive and corrective measures identified, as being high<sup>1</sup>.

## 5. Expectation for full implementation

Following all that has been set out in this report, it is the Company’s duty to note that, as the degree of implementation of these measures has been quantified as high, there is no need, at this time, to finalize or develop preventive and corrective measures within the scope of the PPR. This, considering that this is an on-going process and that the company will continue to monitor developments within this process and ensure full compliance with the principles of the regime.

In any case, we believe that the still on-going topics, as referred in the PPR, are:

- The completion of the internal audits at the group level; as well as,
- The full implementation of the third-party risk assessment procedures.

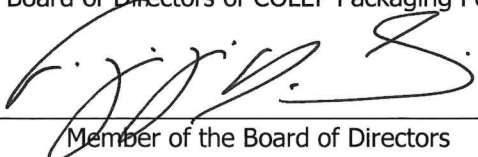
COLEP Packaging undertakes and maintains its commitment to maintain the good development and continuous compliance with the preventive measures adopted in order to be considered fully compliant with anti-corruption and related infractions.

## 6. Conclusions and final considerations


Concluding, the monitoring activities carried out evidence COLEP Packaging’s effort to address the corruption and related offences risks which the organization is exposed to and without prejudice of further opportunities for improvement and further development.

April 1, 2025

The Board of Directors of COLEP Packaging Portugal, S.A.,



Member of the Board of Directors



Member of the Board of Directors

<sup>1</sup> For the purpose of quantifying the degree of implementation adopted in this report, the criteria considered adopted was Low (L), Medium (M) and High (H).