

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 9th December (hereinafter "RGPC"), regarding the monitoring of implementation of the Plan for the Prevention of Corruption and Related Offences, COLEP Packaging Portugal, S.A. (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 2025, 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, 2025, the date of the last annual report, and April 1, 2026 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.

The assessment carried out annually takes into consideration, mainly, the following criteria:

- Legal frameworks updates;
- Corporate governance updates;
- Geopolitical and economic updates;
- The compliance program's activity through the year under analysis.

To this effect, COLEP Packaging analyzed the programmed activities as previewed in the PPR and measured the degree of implementation of such preventive and corrective measures. Also analyzed the ongoing 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 COLEP Packaging did not adopt specific and urgent measures, nor was deemed or necessary the drafting of the underlying semi-annual assessment report.

The reported results follow and second analysis carried out over the company's 2025 activity.

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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 maintained the continuous implementation and monitoring of the preventive and mitigating measures set out in the PPR and covered by the previous report, ensuring their adequacy in light of the Company's operational reality, namely:

- With regard to the whistleblower internal reporting channels:
 - After studying different market solutions for an optimized user experience, we were happy to choose to work with Formalize, which offers a simple and intuitive whistleblowing software experience, allowing us to maintain and improve the channel's accessibility;
 - Much like last year, 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 and monitoring of preventive and mitigating measures: COLEP Packaging has ensured the ongoing application of the preventive and mitigating measures identified in the PPR across its main areas of activity. In particular:
 - Powers of Attorney have been issued and periodically reviewed to ensure alignment with COLEP Packaging operational needs and to safeguard appropriate levels of representation and control;
 - Documentation and information remain duly organised and archived within the internal systems, in accordance with applicable internal procedures, ensuring traceability and accessibility.
- 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, economic and geopolitical landscape:
 - Legal and Social Responsibility areas have continued to ensure the inclusion and monitoring of anti-corruption clauses in contractual relationships with customers, suppliers and other business partners.
 - The Legal Area makes sure standard contractual templates, including the General Terms and Conditions of Purchase, remain aligned with the COLEP's compliance framework and incorporate the relevant anti-corruption provisions.
- With regard to prior risk assessment procedures for third parties acting on its behalf, suppliers and customers:
 - COLEP Packaging has continued to internally assess and refine its approach to third-party risk assessment procedures, namely with regard to suppliers and customers, taking into account operational constraints and the need for proportional and efficient implementation mechanisms.
 - COLEP Packaging improved the awareness and degree of the third party assessment, considering the economic and geopolitical instability, reflected into commercial relations through sanctions lists, tariffs and traditional commercial routes to be potentially affected by these factors.
- Training and awareness:
 - COLEP Packaging has maintained its focus on awareness and dissemination of the principles underlying its anti-corruption framework, notably through onboarding and internal communication practices, ensuring that employees are aware of the Code of Conduct, the Anti-corruption Policy, the internal reporting channel and the PPR.
- Supervision

- The legal and human resources team offer full support to the department leaders to ensure full compliance with the policies implemented, maintaining a constant control over the risk prevention plan execution during the whole activity year.

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 high¹, considering vectors of analysis, for 2025, such as:

- Awareness;
- Enforcement of controls;
- Number of the compliance program controls/rules violations reported

5. Expectation for full implementation

Following all that has been set out in this report, it is COLEP Packaging'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 event, 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, which is being object of improvement internally, considering the importance this control is assuming within every company with international business exposure and will be further and deeply better analyzed in the next report to be filed by April 2027.

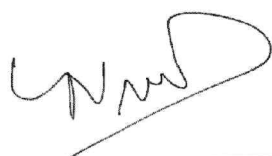
COLEP Packaging undertakes and maintains its commitment to maintain good development and continuous compliance with the preventive measures adopted in order to be considered fully compliant with anti-corruption and related infractions.

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, some of those already being carried out.

April 1, 2026

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



Member of the Board of Directors
Vítor Neves



Member of the Board of Directors
Francisco Rodrigues

¹ 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).