

POLICY FOR PREVENTING CORRUPTION,
BRIBERY AND MONEY LAUNDERING

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Document Approved



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INTRODUCTION

In line with the Code of Ethics and Conduct, approved by Senior Management, GRUPO CARRINHO has defined as one of its essential policies the Prevention of Corruption, Bribery and Money Laundering, fully aligned with the laws in force in the country.

GRUPO CARRINHO does not directly or indirectly support acts of corruption, bribery, money laundering, forgery or tax evasion.

1. SCOPE

This Policy applies to all Shareholders and Associates of GRUPO CARRINHO and also aims to guide their conduct towards third parties.

2. RESPONSIBILITIES

From Managers: Communicate this policy to all members of GRUPO CARRINHO.

Of the Associates: Comply with all the precepts established in this Policy.

3. SCOPE

This Policy aims to adopt appropriate measures to identify, assess, understand and mitigate risks of corruption, bribery and money laundering, in addition to supporting legal compliance and related internal regulations.

4. CONDUCT OF MEMBERS

Members of GRUPO CARRINHO must respect the general principles arising from the Constitution of the Republic of Angola, the administrative procedure regime and administrative activity in particular: the principle of legality, good faith, competition and transparency.

From this perspective, no associate should offer, give or promise any financial or non-financial advantage to third parties who may be obliged to provide services to GRUPO CARRINHO, to perform certain acts or omissions inherent to the duties of their respective position or function.

To this end, in the process of contracting any services or sales, the following must be assessed:

- The nature, size and complexity of the activity carried out by the third party (supplier or customer);
- The countries or geographic areas in which the third party operates, directly or through other entities, whether or not they belong to the same group;
- The business areas developed by the third party, as well as the products, services and operations made available;
- The history of the third party (supplier or customer);
- The way in which the business relationship is established.

Furthermore, whenever they come across suspicions of possible activities related to corruption, bribery or money laundering, it is the duty of members to:

- Communicate promptly to the superior;
- *Compliance* Department or the Ethics Committee; and,
- Avoid discussions with the Counterparty (or in some way “alert”) regarding your suspicions ¹.

Third Party *Due Diligence* Procedures , and:

- Comply with internal control procedures to mitigate the risks of corruption and money laundering.
- Understand and comply with all basic training requirements to mitigate the risks of corruption, bribery or money laundering.
- Areas that outsource services must ensure that the risks of corruption, bribery and money laundering associated with such services are mitigated by adopting measures that must include: appropriate contractual clauses, requirement of policies and procedures applicable to third parties, training on corruption, bribery and money laundering.
- Senior Management and Managers of GRUPO CARRINHO must demonstrate an unequivocal commitment to this Policy.

¹ All associates must exercise caution regarding the accuracy of any internal written communication regarding such suspicion. If in doubt, consult the GRUPO CARRINHO Compliance Department.

4.1. Anti-corruption and Anti-bribery Positioning

No member shall adopt corrupt practices, such as offering financial advantages to public officials to unduly influence deliberations or decisions to be taken in the exercise of their functions.

The adoption of fraudulent practices, such as the intentional declaration of false or erroneous facts, with the aim of obtaining favorable deliberations or decisions in public procurement procedures or in the

execution of a contract is prohibited; as well as criminal practices, such as threats to people or entities, with a view to coercing them to participate or not in bidding processes.

Restrictive competition practices, translated into acts of collusion or simulation between interested parties, at any stage of the procedure, with a view to artificially establishing bid prices, preventing the participation of other interested parties or distorting and/or restricting competition, represent a serious deviation from the corporate culture of GRUPO CARRINHO.

The *Compliance Department* must promote training sessions on corruption and bribery with business units, allowing associates to gain in-depth knowledge of the phenomenon, making them more involved in preventing and detecting corruption and bribery, leading them to report any facts they become aware of.

4.2. Position against Money Laundering

No member of GRUPO CARRINHO shall engage in transactions that he knows, or should reasonably suspect, that:

- Involves money or other property derived from, or intended to promote, criminal activity or terrorism;
- Intended to conceal or disguise the nature, location, source, disposition, movement, or ownership of money or other property; or,
- Is, in any way, an attempt by a third party to participate in money laundering;

Compliance Department should promote training sessions on money laundering among the Business Units, thus allowing associates to obtain in-depth knowledge of the phenomenon,

making them more involved in the prevention and detection of fraud, leading them to report any facts of which they become aware.

4.3. Complaints

In order to encourage a culture of reporting, GRUPO CARRINHO developed and adopted an exclusive channel for reporting irregularities for internal and external purposes, guaranteeing the whistleblower absolute confidentiality and complete anonymity.

Through this, GRUPO CARRINHO ensures the operating conditions of a means that facilitates the clarification of doubts and the presentation of complaints, regarding violations of the guidelines of the Code of Ethics and Conduct, corrupt practices, in strict observance of fundamental rights, as well as confidentiality, secrecy and the protection of whistleblowers and related persons.


It is prohibited to carry out acts of retaliation against the whistleblower.

If the whistleblower and the person reported coincide in the same workplace, an assessment must be made as to whether or not it is necessary to adopt some measure aimed at separating these people.

The whistleblower is guaranteed the right to protection against any hostile measures following a complaint, and the Ethics Committee is responsible for ensuring compliance with this safeguard principle.

The duty of protection may not, however, cover situations in which, during the course of investigations, it is discovered that the whistleblower:

- He was involved in the irregularities that were the subject of the complaint;
- Acted in bad faith;
- He himself committed any type of irregularity not related to the irregularity that is the subject of the complaint and that has not been previously identified;
- Committed a violation of professional duties, within the scope of the complaint, which implies or may imply the application of disciplinary measures.

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5. RISK ASSESSMENT AND MITIGATION

The *Compliance Director*, overseen by the Senior Management of GRUPO CARRINHO, based on the risks and in a proportionate manner, will assess and take measures to mitigate the risks of exposure to corruption, bribery and money laundering arising from *Joint Ventures*², mergers, acquisitions, disposals and acts of social responsibility (which include charitable donations).

6. MONITORING AND REVIEW

Compliance Department of GRUPO CARRINHO must regularly monitor activities to reasonably ensure compliance with this and other specific policies, procedures and controls aligned with the National Strategy for the Prevention and Suppression of Corruption and other related legislation.

6.1. Communication and alert tools

GRUPO CARRINHO guarantees the sharing of information and news through existing communication channels. Other means of communication must be created so that all members and third parties are constantly well informed and trained.

7. EXCEPTIONS AND ADDITIONS

Any exceptions or additions to this Policy will require written approval from the *Compliance Officer* or his/her designee.

8. PERIODIC REVIEWS

This Policy is subject to review and changes in order to ensure that it is always in accordance with all the essential assumptions of the corporate culture of GRUPO CARRINHO.

² (...) "Joint adventure or risk union". A business partnership in which two or more companies collaborate to carry out a specific project, sharing risks and resources.

9. DISCLOSURE

This instrument will be published on the GRUPO CARRINHO *website* and will be accessible to all Associates and third parties.

10. REGULATORY SOURCES

Constitution of the Republic of Angola, Revised Version 2022

Law No. 38/20, of November 11 (Penal Code);

Law No. 41/20, of December 21 (Public Contracts Law);

Law No. 12/23, of December 27 (General Labor Law);

Law No. 5/20, of January 27 (Law on the Prevention and Combating of Money Laundering, the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction);


Law No. 22/11, of June 17 (Data Protection Law);

Law No. 1/07 of May 14, as amended by Law No. 26/21 of October 18 (Commercial Activities Law);

Presidential Decree No. 169/24, of July 19 (National Strategy for the Prevention and Suppression of Corruption 2024-2027);

ISO 37001;

Code of Ethics and Conduct – version 2024.

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GLOSSARY

Public Agent: someone who provides any type of service to the State or who performs public functions. Also referred to as an employee.

Senior Management: refers to the highest level of executive management at GRUPO CARRINHO.

Associates: workers with signed employment contracts with GRUPO CARRINHO.

Money Laundering: is a criminal process that conceals the origin of assets and income obtained illegally, transforming them into legal assets, by disguising the origin or the true owner of the resources.

Conduct: manifestation of behavior, way of acting (action or omission).

Corruption (Active): crime committed by a person who, by themselves or through an intermediary, with their consent or ratification, offers, gives or promises a financial or non-financial advantage to an employee or person specifically obliged to provide a public service, or to a third person with their consent, to perform an act or omission inherent to the duties of the respective position or function.

Corruption (Passive): crime committed by an employee who, by himself or through an intermediary with his consent, requests or accepts, for himself or for a third party, a patrimonial or non-patrimonial advantage, or the promise thereof, to carry out an inherent act or omission.

Duty of protection: embodied in the obligation to maintain the confidentiality and anonymity of the identity and information provided by any person who presents an exposure of irregularity.

Ethics: behavior that alters or guides the way human beings act, especially those that are linked to any rule, precept, social and moral norms.

Gifts: any objects or services that have commercial value.

Protection: set of means and measures designed to guarantee security and integrity, as well as protect the rights of members and third parties.

Retaliation: offense, aggression, reprisal, revenge or hostile act due to an internal or external complaint made in a professional context.