

Prevention of Corruption and Related Offenses Policy.

Anti-corruption Policy



Brighten ISO/IEC 27001 certified entity

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1. GOALS

Brighten carries out its activity based on a set of rules, principles and values that define the conduct of all its employees and the behavior to be adopted in relations established with any other entity or individual.

Good corporate conduct is essential for developing high levels of trust between the different stakeholders and contributes to strengthening Brighten's reputation, with a positive impact on its sustainability. In order to safeguard trust in Brighten and its reputation, it is essential that the conduct of its Administrators and Employees is guided by compliance with all applicable legal rules on combating corruption and related offenses, as well as compliance with the other rules, values, principles and correct practices contained in Brighten's policies and regulations, which are equally applicable.

This Policy for the Prevention of Corruption and Related Infractions (hereinafter, "Policy" or "Anti-Corruption Policy) formalizes a set of rules applicable to Brighten across the board, which aims to ensure that its activity is carried out ethically, with integrity and transparency, particularly in the areas of activity that are most sensitive to the risks of corruption and related infractions. The prevention of corruption and related infractions is a fundamental pillar of Brighten's culture of integrity and compliance, and any situations that could constitute the practice of corruption or related infractions are prohibited, namely influence peddling, undue receipt of an advantage, embezzlement, economic participation in business, concussion, abuse of power, money, laundering or fraud in obtaining or diverting a subsidy, grant or credit.

In this regard, Brighten has adopted a regulatory compliance program to prevent, detect and sanction acts of Corruption and Related Offenses, carried out against or through Brighten, which, in compliance with **Decree-Law no. 109-E/2021, of December 9** ("General Regime for the Prevention of Corruption" or "RGPC") consists of the following elements (together, "Regulatory Compliance Program"):

- a plan for the prevention of risks of corruption and related infractions at Brighten ("PPR");
- a policy for the prevention of corruption and related offenses (Anti-Corruption Policy);
- a training program, and
- a Whistleblowing and Ethics Channel and a Whistleblower Policy.

2. SCOPE

This Policy establishes the set of principles, values and rules of action, which cut across all its activities, in terms of professional ethics and the prevention of corruption and related offenses, as provided for in the RGPC, which should be read in conjunction with the **Code of Conduct and Ethics** and the **Whistleblower Policy**, both available on Teams/Sharepoint.

3. DEFINITIONS

For the purposes of this Policy, the following terms and expressions shall have the meaning indicated below:

- **Brighten:** Brighten S.A.
- **Administrators:** member of the management bodies of Brighten companies.
- **Employees:** all Brighten employees, including the governing bodies of all Group companies, as well as service providers and consultants, regardless of the nature or form of their legal relationship with the respective company.
- **Third Party:** natural or legal persons, private or public, national or foreign, who do not have a contractual relationship with Brighten or, if they do, are not integrated into the organisation, such as its suppliers of goods or services.
- **Active Bribery (Corruption):** the promise or delivery, directly or indirectly, of undue advantages to public officials, whether national or foreign, and to private sector workers, for their own benefit or for the benefit of third parties, so that the official or worker performs or refrains from performing an act in the exercise of their duties, even if their action or omission does not involve a breach of the duties of office.
- **Passive Bribery (Corruption):** the request, receipt or acceptance of the promise, directly or indirectly, of any undue advantage, for their own benefit or for the benefit of third parties, for the performance or abstention from the performance of an act in the exercise of their duties as a Director or Employee of Brighten.
- **Related offences:** the request, receipt or acceptance of the promise, directly or indirectly, of any undue advantage, for their own benefit or for the benefit of third parties, for the performance or abstention from the performance of an act in the exercise of their duties as a Director or Employee of Brighten.
- **Active Influence Peddling:** the promise or offer, directly or indirectly, of undue advantages, for their own benefit or that of a third party, so that the beneficiary abuses their influence with a public body and for the purpose of obtaining a lawful or unlawful decision favourable to the interests or any claims of Brighten.
- **Undue receipt of active advantage:** the promise or offer, directly or indirectly, of undue advantages to public officials or to third parties indicated by them or with

their knowledge, in the exercise of their functions or which take place because of those functions.

- **Undue receipt of passive advantage:** the request or acceptance, directly or indirectly, of any undue advantages, for their own benefit or for the benefit of third parties, in the exercise of the functions of Director or Brighten Collaborator or which take place as a result of these functions.
- **Advantages:** include gifts, travel, accommodation, meals, entertainment, gratuities or any delivery of goods or services with an economic value, but also any acts that cannot be valued or quantified in monetary terms (such as personal favours, preferential treatment for hiring, internships, etc.)
- **Undue Advantage:** any advantage that is not permitted under the terms of this Policy.
- **Embezzlement:** the appropriation by a Brighten Director or Collaborator, for their own benefit or that of another person, of money or other movable or immovable property, public or private, which has been given to them, is in their possession or is accessible to them by reason of their duties.
- **Economic Participation in Business:** the damage, in a legal transaction, of the property interests of Brighten whose administration, supervision, defence or realisation is the responsibility of the Director or Collaborator, with the intention of obtaining, for themselves or for a third party, an illicit economic participation.
- **Concusion:** the receipt, by a Brighten Director or Employee, through inducement into error or taking advantage of the victim's error, of a pecuniary advantage that is not owed to him or is greater than that owed, namely a contribution, fee or emolument.
- **Abuse of Power:** the abuse of powers or violation of the duties inherent to their functions, by a Brighten Director or Collaborator, with the intention of obtaining, for themselves or for a third party, an illegitimate benefit or of causing damage to another person.
- **Whitening (Bleaching):** the conversion, transfer, aid or facilitation of any conversion or transfer operation of advantages obtained, by themselves or by a third party, directly or indirectly, with the aim of concealing their illicit origin or avoiding criminal prosecution for the offence(s) committed.
- **Fraud in obtaining subsidy or grant:** obtaining a subsidy or grant for Brighten by providing inaccurate or incomplete information, omitting important facts, or using a document justifying entitlement to a subsidy or grant obtained through inaccurate or incomplete information.
- **Credit Fraud:** the provision of inaccurate or incomplete written information relevant to the decision on the credit application, the use of inaccurate or incomplete documents relating to Brighten's economic situation (balance sheets, profit and loss

accounts, general descriptions of assets, etc.), the concealment of deteriorations in the economic situation that have occurred in the meantime.

- **Embezzlement of subsidy, grant or subsidised credit:** Use of benefits obtained by Brighten as a subsidy, grant or subsidised credit for purposes other than those for which they are legally intended.
- **Courtesies:** Donations, gratuities, gifts, benefits, gifts, payment of expenses, entertainment, acts of hospitality or participation in events.
- **Sponsorships and donations:** Allocation of financial, human or asset resources to an organisation, person or event, promoted by an external entity, with the aim of developing some social, cultural or promotional action, among others.

4. RESPONSIBLE FOR REGULATORY COMPLIANCE

The Regulatory Compliance Officer ('RCN'), appointed by Brighten's Board of Directors as the CFO, monitors and controls the execution of the Regulatory Compliance Programme, without prejudice to the powers legally conferred on other Brighten bodies or Employees.

The Regulatory Compliance Officer carries out his/her duties with independence and decision-making autonomy, with access to internal information and the technical and human resources necessary to carry out his/her duties.

The Compliance Officer shall provide all necessary clarification on the application of the Anti-Corruption Policy and shall promote regular internal audits with a view to assessing compliance.

5. PERMITTED PRACTICES AND CONDUCT

Brighten strongly repudiates any practice of corruption, bribery or related offences, whether active or passive, and likewise repudiates other forms of undue influence or illicit conduct, imposing strict compliance with the principles set out in this Policy in all its internal and external relations, whether with private or public entities.

All Brighten employees and directors must comply with the applicable national and international rules on combating corruption and related offences, and it is **expressly forbidden for them to accept, request, promise or offer any advantages in the course of their duties or because of them, except for the conditions expressed in this policy.**

Actions **not expressly** provided for in the following paragraph **are considered prohibited practices and conduct.**

Offering, promising, requesting or receiving any courtesy permitted under the terms of this Policy is a requirement:

- Be permitted by law (including, without limitation, anti-corruption laws);
- Be permitted by internal guidelines (Policies and Regulations);
- Have a legitimate and verifiable purpose;
- If it is appropriate to the circumstances, considering the reason for the gift, the moment and the value. For example, in Portugal it's usual to give/receive small gifts at Christmas;
- Not be intended to influence or constitute a counterpart to any action or omission.

If you offer or provide courtesies or gifts and you suspect that this has been interpreted as improper solicitation by the recipient, immediately report the situation to the Compliance Officer (RCN), and all necessary and appropriate measures must be taken promptly in order to clarify unequivocally to the recipient of the courtesy the reason behind it, so that there is no doubt in the recipient's mind.

5.1. Gifts, Hospitality and Expenses

Business and leisure courtesies are intended to demonstrate goodwill and build solid, working relationships between business partners. The concept of gifts, entertainment and hospitality includes, but is not limited to, the granting of gifts, goods, meals, hotel or similar accommodation, leisure-related transport, travel, invitations to social or sporting events (together referred to as 'Courtesies') when related to Brighten's business.

This Policy is not intended to prohibit practices of cordiality or loyalty towards Customers or Business Partners, however the criteria of use, normality and reasonableness must always be taken into account within the market in which they operate and, cumulatively, they must be within the limits of the rules established by law, this Policy and other internal rules.

It should also be noted that courtesies may, in certain circumstances, be considered an attempt at favourable treatment, and may raise doubts about the ability of the recipient of the courtesy to make an erroneous value judgement, thus calling into question Brighten's commitment to strict compliance with the rules governing this matter, as well as the fair and impartial treatment of all persons, whether natural or legal. In certain situations, these courtesies may be considered illegal, so in all situations, the fundamental criterion of the 'Theory of the recipient's impression', enshrined in Article 236 of the Portuguese Civil Code, should always be borne in mind, which tells us that the *declaration is valid in the sense that*

a normal, moderately educated, sagacious and intelligent declarant, placed in the position of the specific declarant, would understand it.

Members of the Board of Directors, Employees and Partners must understand that accepting or granting illicit advantages, improper gifts, payments or favours could irreparably damage Brighten's reputation and relations with its Clients and Regulators and could also result in heavy sanctions and lead to civil and criminal liability for Brighten and its Employees.

Offering courtesies to third parties requires a commercial justification, as well as compliance with this anti-corruption policy.

Particular care should be taken when you are offered hospitality by people with whom you have no previous business relationship. Hospitality, gifts or payment of expenses that have "strings attached", i.e. require you to fulfil obligations of any kind, should be **rejected outright**. If the courtesy has the intention or purpose of trying to secure a commercial advantage or influence a decision (for example, by creating a feeling of obligation), it should also be **rejected outright**.

5.2. Principles for Offer and Acceptance

In this context, Brighten **determines a set of rules of conduct and procedures that must be complied with** under this Policy, in order to mitigate any risks related to corrupt, unlawful or unethical behaviour:

1. The Acceptance and Offering of courtesies are acceptable if they meet the following requirements:
 - o They have been made as an act of gratitude, with no obligation of consideration or other expectations;
 - o They have been made in a public and transparent manner, and are not seen as an illegal act by the interested parties;
 - o They are of reasonable value, proportional, in accordance with customs and socially appropriate and accepted in the market sector in which Brighten operates;
 - o **The economic value may not individually exceed €50.00 (fifty euros);**
 - o They comply with the recipient's rules, particularly in relation to the rules or codes of conduct of the receiving organisation;
 - o They are sporadic (they are not a regular occurrence between the donor and the recipient);
 - o They are small in value, for marketing purposes such as merchandising or small promotional items (low value branded products);

- They do not consist of money (cash) or other equivalent means of payment;
- Do not consist of cheques or gift cards (except when offered as part of marketing campaigns duly approved internally and in accordance with the specific rules and procedures on this matter) and even when they are acceptable, it is recommended to send a formal thank you letter on letterhead or email, testifying to the intended business context and referring to your internal approval.

Some employees may receive unsolicited commemorative gifts from marketing departments, such as symbolic Christmas presents that do not exceed the established amount. It is necessary to take into account the impact of displaying or using these objects in front of third parties who may interpret it as a preference on your part for one and/or a particular supplier over another.

2. Situations in which the Offering and/or Receiving of Gifts or Courtesies of a value greater than the established limit (above 50€) must be considered absolutely exceptional and comply with the following:

- The Situation of Exceptionality only applies to members of the Executive Committee;
- Regardless of the value, hospitality must fulfil all the other conditions set out above;
- They must be duly registered on the *Brighten Courtesy Register form*, which is made available by email to members of the Executive Committee. Although it is restricted to a very limited number of members (the Executive Committee), it is necessary to inform management of the amounts registered, by filling in the "Acknowledgement by" field. The form automatically synchronises with the *Smartsheet - Brighten Courtesy Register* developed to support this process and to facilitate the annual reporting process to Management and/or the Regulator (MENAC). Compliance will have access to this Smartsheet;
- The internal rules defined in "*PP_Perdiems Policy and daily commuting*" and "*PP_PM309_Brighten_Aspiring_User Guide_Expenses*" must be followed.

5.3. Entertainment invitations

Entertainment invitations should serve commercial purposes and therefore also be subject to the usual approval and control procedures. The decision must take into account commercial reasons, including the appropriate benefits and costs. Special attention should be paid to aspects that may influence Brighten's reputation, namely:

- A very close connection between the entertainment and expected, current or past business can create the impression of improper solicitation, inducement or even bribery and should therefore be avoided;
- When considering the acceptance of a business entertainment invitation, the same rules should be applied, considering in particular the effect that such acceptance may have on Brighten's reputation when associated through the invitation to the event with its sponsor;
- Moderation should be observed at meals and in the consumption of alcoholic beverages as well as that described in the document "*PP_Code of Conduct and Ethics*".

Invitations that include spouses or people living in a situation similar to that of spouses, or children, may be seen as having no connection to Brighten's activity, so their acceptance must be carefully considered, duly justified and approved.

6. SPONSORSHIPS AND DONATIONS

Brighten carries out sponsorship activities aimed at combining brand promotion with the development and enrichment of various social, sporting and cultural events. In this context, funds are transferred, or other types of support are granted to event organisers as sponsorships, who in return undertake to promote the Brighten brand among the event's participants.

The granting of sponsorship and donations cannot be used as a means of exerting undue influence on the organisation benefiting from them, nor does it constitute an advantage aimed at, or intended for, the performance of an act or omission on the part of the benefiting organisation or a third party.

The allocation of sponsorships and donations must always be carried out transparently, with integrity, rigour, coherence and developed within the framework of Brighten's commitment to Social Responsibility.

Brighten must ensure that donations and sponsorships consisting of money, the provision of services or any other advantage granted, are not used to carry out acts prohibited by law and by this Policy.

In the case of donations and sponsorships, Brighten must carry out prior identification and due diligence procedures on the respective beneficiary(ies) and the proposed operation, in order to prevent the donation or sponsorship from constituting a simulated act aimed at avoiding the detection of illicit conduct, carried out in violation of this Policy and any applicable anti-corruption rules.

Any donation or sponsorship must be kept on file, under the responsibility of the Finance Department.

7. RELATIONS WITH CIVIL SERVANTS

During Brighten's activity, interactions may occur with civil servants, administrative officials, government agents and other public bodies, and such interactions must be guided by the utmost rectitude and transparency, as well as strict compliance with all legal rules, the provisions of this Policy and the ethical duties applicable to each subject.

8. POLITICAL CONTRIBUTIONS

Brighten employees shall not make any contributions, monetary or in kind, on behalf of Brighten to political parties or candidates for political office, organisations or individuals associated with them whose mission is essentially political.

The use of Brighten resources for actions related to political processes is not permitted, unless otherwise required by law.

However, Brighten provides the necessary conditions for the personal participation of employees in political processes, under the terms of the law.

9. CONFLICT OF INTEREST

Brighten Administrators and Employees may not negotiate on their own behalf or in competition with Brighten, and are also prohibited from accepting, soliciting, offering or promising personal benefits, advantages or favours by virtue of the position held or duties performed.

“Conflict of interest” means any situation **in which the personal interests of Directors and Employees are potentially contrary to the interests of Brighten.**

Brighten Directors and Employees must do everything possible to prevent and avoid situations of conflict of interest with Brighten's activity, and must also refrain from using influence over someone they know to be in a situation of conflict of interest, with a view to obtaining some advantage for themselves or for third parties.

10. THIRD PARTIES

All Third Parties who have business relationships (agreements or contracts) with Brighten, or on its behalf, must act with the highest level of commercial, professional and legal integrity.

Any Brighten Collaborator seeking to formalise a business relationship between Brighten and a Third Party **must check the following criteria before contracting with that Third Party;**

- The existence of a legitimate need for the services or goods to be purchased;
- The conditions accepted by Brighten (including price and payment terms) are in line with market practices (unless there is a legitimate reason for this);
- The third party must be considered adequate from the perspective of the degree of exposure to the risk of corruption (**due diligence**);
- The choice of potential suppliers is based on objective, clear and impartial criteria, disclosed in a transparent manner;
- Contracted third parties accept Brighten's Anti-Corruption Policy.

(Red Flags): In determining the degree of exposure to corruption risk of the Third Party, Brighten shall consider the following risk indicators (“Red Flags”):

- Unnecessary or inappropriate purchases;
- Existence of conflict of interest;
- Difficulty in identifying the real beneficiaries;
- Becoming aware that a third party (including its employees) has engaged, or has been accused of engaging, in improper business practices;
- Becoming aware that a third party has been subject to criminal or civil proceedings for committing illegal, improper or unethical conduct or is subject to investigation by the competent authorities;
- Um Third Party insistir na utilização de “side letters” ou recusar colocar por escrito os termos acordados;

- Refusal by the third party to cooperate with the due diligence process and/or information about the third party and its services cannot be verified and validated by documents or other sources deemed reliable;
- The corporate purpose/field of activity is not related to the service to be provided;
- Company located or with business operations in countries considered high risk¹ and/or request that payment be made to a country or a geographical location other than where the third party resides/has its headquarters or does business;
- The legal representative, administrator, shareholder or other employee of the “third” company is included in sanctions list, such as, but not limited to, those listed below:
 - UN sanctions list (Consolidated List of the United Nations Security Council); or
 - European Union sanctions list (Consolidated list of sanctioned persons and entities).

11. RECORD KEEPING

Brighten is required to keep complete and accurate books, accounts and records. In compliance with applicable laws, it is Brighten’s policy to maintain accurate financial documentation that reflects its operations. Accordingly, records of all payments made or received must accurately and adequately reflect such transaction. Brighten prohibits confidential, unrecorded and uninformed transactions.

Brighten has detailed records, which adequately and fairly reflect all financial transactions and the disposal of assets, not only in relation to expenditure, but also in relation to their nature or purpose.

It is necessary to declare and keep a written record of any courtesy received or offered in the form determined in the Smartsheet developed for this purpose. This record will be subject to acknowledgement by the Administration. All requests for reimbursement relating to courtesies, gifts or payments to third parties must be submitted to the finance department and the reason for the expense must be recorded, as described in the “*PP_Expense Recording Manual Brighten format*”.

The financial department of Brighten is responsible for reporting any unusual transactions to top management. This includes proper verification of invoices against the respective purchase orders or other relevant commercial documents, as well as checking the

Pursuant to Commission [Delegated Regulation \(UE\) 2016/1675](#) of July 14, 2016, updated on 16.03.2023

signatures on reimbursement requests. Any unusual situation that deviates from the normal patterns will be reported to the administration.

12. DISCLOSURE AND TRAINING

This Policy will be made available to the Administration and other Employees through **Teams/SharePoint Brighten**. It will also be made available to Third Parties who represent Brighten or who establish contractual relationships with any of the companies included, whenever justified or deemed relevant within the normal parameters.

As part of its training plan and program, Brighten will include anti-corruption training, which will be mandatory for all Administrators and Employees, taking into account the various degrees of exposure to identified risks.

13. IMPLEMENTATION AND MONITORING OF THE ANTI-CORRUPTION POLICY

Brighten maintains an internal control and monitoring system for its operations. The Brighten Administration is responsible for promoting the implementation of appropriate procedures and control systems to monitor compliance with this Policy and any other complementary standards approved and implemented by Brighten for corruption prevention.

The Financial Department, in coordination with the "Compliance / IS Team," is responsible for assessing the quality and effectiveness of the control and monitoring systems and procedures implemented to ensure compliance with this Policy.

The quality and effectiveness of the control and monitoring systems and procedures implemented to comply with this Policy are evaluated and audited annually.

Brighten prepares an annual report identifying occurrences or risk of occurrences related to active or passive corruption, economic and financial crime, money laundering, influence peddling, mismanagement, embezzlement, participation in business deals, abuse of power or breach of confidentiality, as well as acquisitions of real estate or securities resulting from the illegal acquisition or use of insider information.

Additionally, Brighten, in the execution of its PPR, prepares a summarized anti-corruption report annually to be reviewed by the Administration, covering the following;

- confirmation of the policy and procedural compliance with this policy (including the preparation of the annual courtesy report);
- any serious instances of non-compliance by individuals and the measures taken;
- a list of activities where the risk of bribery is assessed as medium or higher;
- measures taken to mitigate the risk in each case.

The PPR will be reviewed every two years, or whenever a review of risks is justified, particularly due to changes in the responsibilities or organizational or corporate structure of Brighten. The PPR will be made available to its Employees through Teams/SharePoint and on its official website within 10 days from its implementation and respective revisions or preparation.

14. NON-COMPLIANCE

The violation of any rules established in this Policy may constitute a disciplinary infraction and/or a criminal offense, subject to legal sanctions including disciplinary, civil, and/or criminal proceedings against the offender. If the violation results in damages to Brighten, the offender will also be civilly liable for the damages caused.

In the case of a Partner, Service Provider, or other Third Parties, their conduct, in addition to being subject to civil and/or criminal liability, may also lead to the termination for cause of the contractual relationship they or their affiliated company have with Brighten.

The crimes of Corruption and Related Offenses mentioned in this Policy are punishable, according to the legal framework, with fines and imprisonment of up to 12 years.

15. INTERNAL REPORTING

It is the responsibility of all Brighten Employees to ensure compliance with this Policy. Violations of this Policy, whether inadvertent or not, must be reported immediately through the Whistleblowing and Ethics Channel, as outlined in the *Irregularities Participation Policy (Whistleblower Policy)*.

Brighten provides a Whistleblowing Channel and addresses reports of acts of corruption and related offenses in accordance with the legislation transposing Directive (EU) 2019/1937

of the European Parliament and Council, dated October 23, 2019, on the protection of persons who report breaches of Union law.

The receipt and forwarding of reports follow the applicable procedure established in the Whistleblowing and Ethics Policy, available at <https://brightenconsulting.com/>.

16. REPORTING TO THE COMPETENT AUTHORITIES

Preventing corruption and related offenses involves the internalization by each Administrator and Employee of a culture that respects the constitutional and legal principles governing this matter, as well as an awareness of the negative consequences for society at large of failing to observe these principles.

Corruption crimes and related offenses are public offenses, and as such, authorities are required to investigate as soon as they become aware of them, whether through reports or other means. Brighten will report to the competent judicial authority any suspicions of corruption crimes or related offenses that come to its attention.

17. EXECUTIVE MANAGEMENT RESPONSIBILITY

At Brighten, through its executive management body, will ensure the compliance and implementation of this Policy, providing the necessary material and human resources and mechanisms for:

- Monitoring the adequacy, sufficiency, and currency of the Policy and its related procedures and controls;
- Defining, monitoring, and evaluating Brighten's internal training policy;
- Handling and monitoring reports of irregularities and violations of this Policy.

18. APPROVAL, PUBLICATION, AND EFFECTIVENESS

This document is valid until its next revision.

When the employment contract is formalised, during the Onboarding process, the Anti-Corruption Policy is shared with each new employee/ service provider, ensuring that they are aware of the document and commit to complying with its rules.

Each current employee/ service provider can access this document via *Teams / Sharepoint / Brighten ISO27001/ 001.Brighten RGPC*, and it has been communicated through a training session and an internal communication sent by Compliance. In this way, all employees/

service providers are aware of the rules set out therein and undertake to respect and enforce them.

This policy shall come into force and apply with full effect from the date of its approval.

Approved by:

Approved by:	Approved on July 2025, by the Managing Directors André Coutinho and Jorge Carvalho
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