



WHISTLEBLOWING POLICY

1. PURPOSE

This Whistleblowing Policy establishes the principles, rules and procedures governing the reporting, receipt, handling and follow-up of reports of infringements falling within the material scope defined in Law no. 93/2021 of 20 December, which transposes Directive (EU) 2019/1937 into Portuguese law, and aims to ensure the protection of whistleblowers against retaliation.

This Policy also ensures compliance with the General Data Protection Regulation (GDPR) and Law no. 58/2019, with respect to the processing of personal data carried out in the context of the whistleblowing channel.

2. SCOPE OF APPLICATION

2.1 Group-wide applicability

This Policy applies to all companies of the Quadrante Group established in Portugal, irrespective of their legal form, business activity or organisational structure, including any entities that may be incorporated in the future.

2.2 Personal scope

This Policy applies to reports submitted by both internal and external persons, including, without limitation:

- a) employees and former employees;
- b) candidates, trainees and volunteers;
- c) members of corporate bodies;
- d) service providers, contractors, subcontractors and suppliers;
- e) partners, shareholders and consultants;
- f) any other persons who obtain information on infringements in a professional context, as defined in Article 5 of Law no. 93/202.

3. INFRINGEMENTS COVERED

Reports may concern acts or omissions that constitute infringements strictly within the material scope defined in Article 2 of Law no. 93/2021 of 20 December, namely:

- breaches of European Union law in the following areas, as applicable:
 - public procurement;
 - financial services, products and markets, and prevention of money laundering and terrorist financing;

- product safety and compliance;
- transport safety;
- environmental protection;
- radiation protection and nuclear safety;
- food and feed safety, animal health and animal welfare;
- public health;
- consumer protection;
- protection of privacy and personal data, and security of network and information systems;
- criminal offences, as defined under Portuguese law;
- administrative offences, including serious or very serious administrative offences, as defined by law;
- acts or omissions that undermine the financial interests of the European Union, within the meaning of Article 325 of the Treaty on the Functioning of the European Union;
- acts or omissions relating to the internal market, including breaches of EU competition rules and State aid rules.

Violations of internal policies, ethical standards or codes of conduct are covered only insofar as they correspond to or evidence one of the infringements listed above.

Reports concerning matters that fall outside the scope described above may be addressed through other internal channels or procedures but shall not benefit from the whistleblower protection regime provided for in Law no. 93/2021.

4. WHISTLEBLOWING CHANNEL

The Quadrante Group maintains an internal whistleblowing channel that allows the secure submission and follow-up of reports, ensuring the completeness, integrity and preservation of the information reported.

Reports may be submitted through a dedicated and secure whistleblowing channel, including by sending an email to whistleblow@quadranteglobal.com.

The whistleblowing channel guarantees:

- the confidentiality of the identity of the whistleblower;
- the anonymity of reports, where chosen by the whistleblower;
- the confidentiality of the identity of any third parties mentioned in the report;
- the prevention of access by unauthorised persons,

in accordance with Law no. 93/2021.

The channel is operated internally by persons specifically designated for the purpose of receiving and following up reports, who perform their duties with independence, impartiality, confidentiality, data protection, professional secrecy and absence of conflicts of interest.

Reports may be submitted anonymously or with identification of the whistleblower, in writing and, where applicable, orally, including by telephone, and, at the whistleblower's request, through a face-to-face meeting, in accordance with legally applicable requirements.



QUADRANTE

5. HANDLING OF REPORTS

5.1 Acknowledgement of receipt

Receipt of a report shall be acknowledged within seven (7) days, unless the whistleblower has expressly requested otherwise or unless there are reasonable grounds to believe that such acknowledgement would compromise the protection of the whistleblower's identity.

5.2 Follow-up and feedback

The Quadrante Group shall diligently follow up on reports and shall inform the whistleblower of the measures envisaged or taken within a maximum period of three (3) months from the acknowledgement of receipt, in accordance with Article 21 of Law no. 93/2021.

Follow-up measures may include, without limitation, internal inquiries, audits, disciplinary proceedings, referral to competent authorities, or the justified closure of the report where no infringement is identified.

6. CONFIDENTIALITY AND PROTECTION OF THE WHISTLEBLOWER

The identity of the whistleblower, as well as any information from which their identity may be directly or indirectly inferred, shall be kept strictly confidential and shall not be disclosed to unauthorised persons.

Any form of retaliation against whistleblowers is strictly prohibited, in accordance with Articles 19 to 23 of Law no. 93/2021.

Acts of retaliation may include, without limitation, suspension, dismissal, demotion, negative performance assessments, harassment, discrimination or any other adverse treatment linked to the report.

7. EXTERNAL REPORTING

Whistleblowers may, under the terms provided by law, submit reports to competent external authorities, including the Portuguese National Anti-Corruption Mechanism (MENAC), the Public Prosecutor's Office or other competent authorities, in accordance with Law no. 93/2021.

Whenever appropriate and effective, whistleblowers are encouraged to use the internal whistleblowing channel before resorting to external reporting, without prejudice to the rights granted under Articles 7 and 8 of Law no. 93/2021.



QUADRANTE

8. PROCESSING OF PERSONAL DATA

8.1 Responsibility for processing

Personal data processed within the scope of the whistleblowing channel are processed under the responsibility of the Quadrante Group entities established in Portugal, within a centralised, group-wide whistleblowing framework.

8.2 Data protection rules

Personal data shall be processed exclusively for the purposes of receiving, handling, investigating and resolving reports, in accordance with Articles 24 to 28 of Law no. 93/2021, the GDPR and Law no. 58/2019.

Access to personal data is strictly limited to authorised persons, and appropriate technical and organisational measures are implemented to ensure confidentiality, integrity and security.

8.3 Retention periods

Personal data shall be retained only for the period necessary for the handling of the report and any related proceedings, and in any case for no longer than five (5) years, unless a longer retention period is required by law or for judicial or administrative proceedings.

8.4 Relationship with the Privacy Policy

The processing of personal data within the scope of the whistleblowing channel is subject to the specific rules set out in Law no. 93/2021, which shall prevail over the general Privacy Policy of the Quadrante Group where applicable. The general principles on data protection set out in the Privacy Policy apply insofar as they are compatible with the whistleblowing regime.

9. AMENDMENTS TO THIS POLICY

The Quadrante Group reserves the right to amend this Policy at any time, particularly to ensure compliance with applicable legal or regulatory requirements. Any material changes shall be duly communicated through appropriate means.

10. ENTRY INTO FORCE

This Policy enters into force on the date of its approval and applies to all companies of the Quadrante Group established in Portugal.

Version 00 — Approved 23/03/2026.