

# ANTI-CORRUPTION MANAGEMENT POLICY

VER.02



**STCP** considers it essential to implement an Anti-Corruption Management System, in accordance with the **ISO 37001** standard, with the aim of ensuring transparency within the organisation.

To achieve the goals set out above, we propose to follow the following guidelines:

- Prohibit the practice of active or passive corruption;
- Ensure compliance with anti-corruption laws and regulations applicable in Portugal or countries related to STCP's activity, whether national or international;
- Request the participation of all internal and external stakeholders in identifying practices that are less transparent or that may raise suspicions of corruption or bribery, ensuring that such practices will not be subject to any reprisals.
- We are committed to meeting the requirements of the anti-corruption management system and to continuously improving the anti-corruption management system;
- We have appointed an independent Compliance Officer with authority to investigate suspected cases of practices that are less than appropriate under the Anti-Corruption Management System.
- Failure to comply with the provisions of the Anti-Corruption Management System policies and documents may result in disciplinary or criminal proceedings, depending on the severity and specific nature of the case.
- Identify and assess corruption risks according to established criteria, implementing mitigating measures for risks deemed unacceptable.
- Promote awareness among all employees in the fight against corruption.

We are committed to meeting shareholder, regulatory, statutory and other requirements applicable to the organisation, providing the necessary resources for the development of the effectiveness and efficiency of processes fundamental to continuous improvement.

**STCP** expects all employees and partners to be fully committed to the continuous satisfaction of our customers, always acting ethically and transparently in order to ensure an environment of growth and trust.

APPROVAL	DATE
Board of Directors	13   10   2022