

The background of the page features several abstract, thin, grey lines. A large, sweeping arc starts from the bottom left and curves towards the center. Several straight lines intersect at various points, creating a dynamic, geometric pattern. The text is centered within this abstract composition.

# **ANTI-CORRUPTION, BRIBERY AND MONEY LAUNDERING POLICY**

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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 related to Anti-Corruption, Bribery and Money Laundering, fully aligned with the laws in force in the country.

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

### **1. SCOPE**

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

### **2. RESPONSIBILITIES**

**Managers:** To communicate this policy to all GRUPO CARRINHO associates.

**Members:** Comply with all the precepts established in this Policy.

### **3. SCOPE**

This Policy aims to adopt appropriate measures to identify, assess, understand and mitigate the risks of corruption, bribery and money laundering, as well as underpin legal compliance and related internal regulations.

### **4. CONDUCT OF MEMBERS**

GRUPO CARRINHO associates 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.

With this in mind, no associate should offer, give or promise a pecuniary or non-pecuniary advantage to third parties who may be obliged to provide services to the CARRINHO GROUP, in order to carry out certain acts or omissions inherent to the duties of the respective position or function.

To this end, in the process of contracting any services or sales, an assessment must be made:

- The nature, size and complexity of the activity carried out by the third party (supplier or client);
- The countries or geographical areas in which the third party operates, directly or through other entities, whether or not belonging to the same group;
- The business areas developed by the third party, as well as the products, services and operations provided;
- 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 the members:

- Promptly inform the superior;
- Notify the *Compliance* Department or the Ethics Committee; e,
- Avoid discussions with the Counterparty (or in some way "alert" them) regarding your suspicions.<sup>1</sup>

GRUPO CARRINHO associates must comply with the Gifts and Offers Policy and the *Due Diligence* Procedures of third parties, 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 through the adoption of measures that should include appropriate contractual clauses, requirements for policies and procedures applicable to third parties, training in corruption, bribery and money laundering.
- The Senior Management and Managers of the CARRINHO GROUP must demonstrate an unequivocal commitment to this Policy.

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<sup>1</sup> All associates must be careful as to the accuracy of any internal written communication regarding this suspicion. If in doubt, consult the GRUPO CARRINHO Compliance Department.

#### **4. 1 Anti-corruption and anti-bribery stance**

No member should engage in corrupt practices, such as offering financial advantages to public officials in order to, unduly influence deliberations or decisions to be taken in the course of their duties.

Fraudulent practices, such as intentionally stating false or erroneous facts in order to obtain favorable deliberations or decisions in public procurement procedures or in the execution of a contract, are prohibited, as are criminal practices, such as threats to people or entities in order to coerce them into participating or not participating in procurement procedures.

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

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

#### **4.2 Position against Money Laundering**

No associate of the CARRINHO GROUP should engage in operations that he/she 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,
- It is, in some way, an attempt by a third party to participate in money laundering;

The *Compliance* Department should promote training sessions on money laundering in the Business Units, thus enabling associates to gain in-depth knowledge of the phenomenon, making them more active in preventing and detecting fraud and leading them to report any facts they become aware of.

### **4.3. Allegations**

In order to encourage a culture of whistleblowing, GRUPO CARRINHO has developed and adopted an exclusive channel for internal and external whistleblowing, guaranteeing the whistleblower absolute confidentiality and total anonymity.

Through it, GRUPO CARRINHO ensures the conditions for the operation of a means that facilitates the clarification of doubts and the submission of complaints about violations of the guidelines of the Code of Ethics and Conduct, practices of corruption, in close observance of fundamental rights, as well as confidentiality, secrecy and the protection of complainants and related persons.

It is forbidden to retaliate against the whistleblower.

If the whistleblower and the person being whistle blown coincide in the same workplace, an assessment should be made as to whether or not any measures need to be taken to separate 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 cannot, however, cover situations in which, in the course of investigations, it is discovered that the whistleblower:

- He was involved in the irregularities complained of;
- He acted in bad faith;
- He himself has committed any type of irregularity that is not related to the irregularity that is the subject of the complaint and that has not been previously identified;
- You have committed a breach of professional duty, within the scope of the complaint, which implies or may imply the application of a disciplinary measure.

## **5. RISK ASSESSMENT AND MITIGATION**

The *Compliance* Manager, overseen by GRUPO CARRINHO's Senior Management, 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*<sup>2</sup> , mergers, acquisitions, disposals and acts of social responsibility (which include charitable donations).

## **6. MONITORING AND REVIEW**

GRUPO CARRINHO's *Compliance* Department shall 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 Repression of Corruption and other related legislation.

### **6.1 Communication and warning tools**

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

## **7. EXCEPTIONS AND ADDITIONS**

Any exceptions or additions to this Policy will require the written approval of the *Compliance* Manager or his/her representative.

## **8. PERIODIC REVIEWS**

This Policy is subject to review and amendment in order to ensure that it is always in line with all the essential assumptions of the CARRINHO GROUP's corporate culture.

## **9. DISCLOSURE**

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

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<sup>2</sup> (...) "Joint venture or risk pooling". Commercial partnership in which two or more companies collaborate to carry out a specific project, sharing risks and resources.

## **10. NORMATIVE SOURCES**

Constitution of the Republic of Angola, Revised Version 2022

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

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

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

Law No. 5/20, of January 27 (Law on Preventing and Combating Money Laundering, Terrorist Financing 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 169/24, of July 19 (National Strategy for the Prevention and Repression of Corruption 2024-2027);

ISO 37001;

Code of Ethics and Conduct - version 2024.



## GLOSSARY

**Public Agent:** anyone who provides any kind of service to the State or performs public functions. Also known as an official.

**Senior Management:** refers to the highest level of executive management in the CARRINHO GROUP.

**Associates:** workers with employment contracts signed with GRUPO CARRINHO.

**Money Laundering:** is a criminal process that conceals the origin of illicitly obtained goods and income, transforming them into legal ones by disguising the origin or the true owner of the funds.

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

**Corruption (Active):** a crime committed by a person who, by him/herself or through an intermediary, with his/her consent or ratification, offers, gives or promises a pecuniary or non-pecuniary advantage to an official or to a person specially obliged to perform a public service, or to a third party with their consent, in order to carry out an act or omission inherent in the duties of the respective office or function.

**Corruption (Passive):** a crime committed by an official who, by him/herself or through an intermediary with his/her consent, requests or accepts, for him/herself or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, to carry out an act or omission inherent to it.

**Duty of protection:** this consists of the obligation to preserve the confidentiality and anonymity of the identity and information provided by anyone who raises an 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:** a set of means and measures aimed at guaranteeing security and integrity, as well as safeguarding the rights of members and third parties.

**Retaliation:** offense, aggression, reprisal, revenge or hostile act on account of an internal or external complaint that occurred in a professional context.

