



ANTI-CORRUPTION POLICY

FORteams Lab is fully committed to integrity, ethics, transparency and legal compliance across all its activities. This Anti-Corruption Policy sets out the principles, rules and mechanisms to prevent, detect and respond to corruption, bribery, fraud, influence peddling and any related unlawful practices.

This policy ensures that all business decisions and relationships are conducted with professionalism, impartiality and respect for applicable law, including:

- ✓ Portuguese General Anti-Corruption Framework (RGPC);
- ✓ Portuguese Criminal Code;
- ✓ General Whistleblower Protection Framework;
- ✓ Applicable compliance and business ethics standards.

1. Scope

This policy applies to:

- ✓ All FORteams Lab employees;
- ✓ Management and leadership;
- ✓ Service providers;
- ✓ External consultants;
- ✓ Business partners;
- ✓ Suppliers and subcontractors;
- ✓ Any entity acting on behalf of the organisation.

Compliance with this policy is mandatory regardless of role, seniority or type of contract.

2. General Principles

FORteams Lab is committed to:

- ✓ Acting with honesty, ethics and transparency;
- ✓ Rejecting all forms of active or passive corruption;
- ✓ Ensuring fair and open competition;
- ✓ Avoiding conflicts of interest;
- ✓ Promoting a culture of integrity;
- ✓ Ensuring traceability and control of internal processes;
- ✓ Encouraging responsible reporting of irregularities.

No employee may be penalised for refusing to take part in unlawful practices, even if this results in the loss of a contract or business opportunity.

3. Terminology

4.1 Corruption

Corruption is any act in which a person offers, promises, requests or receives an improper benefit with the aim of influencing a decision or gaining an illegitimate advantage.

4.2 Bribery

The offer, promise, payment or acceptance of money, gifts, favours or any benefit intended to influence professional decisions.

4.3 Conflict of Interest

A situation in which personal, family or financial interests may compromise professional impartiality.

4.4 Fraud

Any intentional act aimed at gaining an improper advantage through manipulation, falsification, omission or deception.

4. Prohibited Conduct

The following are strictly prohibited:

- ✓ Offering or accepting bribes;
- ✓ Making improper payments;
- ✓ Facilitating informal payments ("facilitation payments");
- ✓ Manipulating tenders, proposals or contract awards;
- ✓ Falsifying documents or records;
- ✓ Concealing relevant information;
- ✓ Granting improper advantages to public or private entities;
- ✓ Using company resources for personal unlawful gain;
- ✓ Favours suppliers, partners or clients based on personal interests.

5. Gifts, Hospitality and Benefits

Offering or receiving gifts, meals, travel or hospitality is only acceptable when:

- ✓ It is lawful and occasional;
- ✓ It is of limited and proportionate value;
- ✓ It does not influence business decisions;
- ✓ It does not compromise professional independence;
- ✓ It is properly recorded where required.

Cash or cash-equivalent gifts are strictly prohibited.

When in doubt about the acceptability of a gift or benefit, management should be consulted.

6. Relations with Public Entities

Relations with public bodies must comply with the highest standards of integrity and transparency.

No employee may:

- ✓ Offer advantages to public officials;
- ✓ Attempt to improperly influence administrative decisions;
- ✓ Conceal relevant information from authorities;
- ✓ Use intermediaries for unlawful purposes.

All relevant institutional contacts must be properly documented.

7. Supplier Selection and Management

FORteams Lab is committed to selecting suppliers and partners based on objective, transparent and impartial criteria, including:

- ✓ Technical competence;
- ✓ Quality;
- ✓ Sustainability;
- ✓ Operational capacity;
- ✓ Legal and ethical compliance.

Where applicable, risk assessments and integrity checks may be carried out on business partners.

8. Financial Records and Internal Control

All accounting and financial records must:

- ✓ Be complete, accurate and transparent;
- ✓ Correctly reflect all transactions carried out;
- ✓ Be supported by valid documentation;
- ✓ Comply with legal and tax obligations.

Creating parallel accounts, hidden funds or false documents is strictly prohibited.

The organisation will maintain adequate internal control mechanisms to prevent irregularities.

9. Whistleblowing Channel

FORteams Lab provides secure and confidential channels for reporting suspicions of:

- ✓ Corruption;
- ✓ Fraud;
- ✓ Conflicts of interest;
- ✓ Ethical violations;
- ✓ Legal irregularities.

Reports made in good faith will be handled with confidentiality, impartiality and protection for the whistleblower.

Any form of retaliation against whistleblowers acting in good faith is strictly prohibited.

10. Training and Awareness

The company will promote awareness activities on business ethics, corruption prevention and professional conduct. All employees are expected to know and comply with this policy.

11. Non-Compliance

Failure to comply with this policy may result in: disciplinary action; contract termination; referral to competent authorities; civil and criminal liability. All breaches will be investigated rigorously, proportionately and impartially.

12. Responsibilities

Role	Responsibilities
Management	<ul style="list-style-type: none"> ✓ Approve and promote the policy; ✓ Garantir recursos adequados ao cumprimento; ✓ Promover cultura ética.
Managers and Department Heads	<ul style="list-style-type: none"> ✓ Ensure policy implementation; ✓ Monitorizar riscos; ✓ Apoiar esclarecimentos e prevenção.
Employees	<ul style="list-style-type: none"> ✓ Fully comply with this policy; ✓ Reportar irregularidades; ✓ Atuar com integridade e transparência.

13. Monitoring and Review

This policy will be reviewed periodically or whenever necessary.

14. Approval

Approved



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CEO

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