

1. INTRODUCTION

CTT – Correios de Portugal, S.A. (“**CTT**” or “**Company**”) and the companies in a control or group relationship with CTT (“**Subsidiaries**”) govern the exercise of their activity in compliance with the principles of legality, good faith, responsibility, transparency, loyalty, integrity and professionalism, either in the relationship with shareholders, regulatory and supervisory authorities, clients, suppliers, service providers, media, public and private entities and the general public, or internally in the relationship between CTT employees.

To ensure that these principles are followed, CTT has developed mechanisms to prevent and control irregularities, having approved a Code of Ethics, a Code of Conduct for Senior Officers and Insiders and a Code of Conduct regarding the Prevention of Corruption and Related Infringements, and established procedures regarding the reception, storing and handling of any reported irregularities covered by this Regulation, pursuant specifically in Law no. 93/2021 of 20 December (“**Law 93/2021**”).

CTT intends these procedures to enable reporting and follow-up on reports in line with the principles of completeness, integrity and preservation of the information, as well as confidentiality and security.

This Regulation applies to CTT and its Subsidiaries, notwithstanding the provisions of the following paragraph.

Where a Subsidiary adopts a specific system and procedure of that Subsidiary for the purposes of receiving, storing and handling reports (specifically Banco CTT, S.A. and respective subsidiaries 321 Crédito – Instituição Financeira de Crédito, S.A. and Payshop (Portugal), S.A.), any irregularities relating to the Subsidiary concerned shall be subject to the procedure adopted by the latter (in which terms references to “**CTT Group**” in this Regulation include CTT and its Subsidiaries that have not adopted a specific system and procedure for that purpose).

2. OBJECT OF THE REGULATION

- 2.1 This Regulation defines the procedures for receiving, storing and handling the disclosure of irregularities received by CTT in such matters as (i) accounting, (ii) auditing, (iii) internal accounting controls, (iv) risk control, (v) insider trading, (vi) fraud or corruption and related infringements, (vii) banking and financial crime and (viii) money laundering and terrorist financing, (ix) public procurement, (x) consumer protection, (xi) protection of privacy and personal data, and (xii) other matters as provided for in article 2(1) of Law 93/2021, that may be reported by any Reporting Person. For this purpose are relevant the acts or omissions, willful or negligent, which can be foreseen as likely to constitute an infringement in the referred matters, including infringements committed, in the process of being committed, or that can be reasonably foreseen to be committed, as well as any attempts at concealing them.
- 2.2 All other reports that are communicated through the channels identified in Section 5, that exceed the scope of the matters listed in the previous paragraph, will be duly forwarded to the Ethics Committee or to the department of the Company with competence for handling them and follow them up.

- 2.3 The reports covered by this Regulation shall be made through the internal reporting channels described and regulated therein, to the detriment of any external reporting channels (i.e., of reporting to the competent authorities provided for in article 12 of Law 93/2021), except when legally permitted, namely (i) if the Reporting Person has reasonable grounds to believe that the breach will not be properly addressed internally or that there is a risk of retaliation, or has initially reported through an internal reporting channel without being informed of the measures provided for or adopted within the due deadlines or (iii) if the breach in question constitutes a crime or administrative offence punishable with a fine in excess of €50,000.
- 2.4 For avoidance of doubt, the provisions of the Code of Ethics of CTT Group shall in no way prejudice the application of this Regulation, nor the conditions for protection of Reporting Persons who use the reporting channels described and regulated by this Regulation, nor the duties and responsibilities also described and regulated by this Regulation.

3. DEFINITION OF REPORTING PERSON

- 3.1 For the purposes of this Regulation, the following are considered “**Reporting Person**”:
- (i) holders of any corporate position in the CTT Group, as well as the directors reporting to the Executive Committee and/or Board of Directors of CTT or one of the Subsidiaries,
 - (ii) employees, in any capacity, of the CTT Group, irrespective of the nature of the existing contract, thus including, namely, employees on temporary assignment and trainees,
 - (iii) holders of qualified shareholdings,
 - (iv) service providers, contractors, subcontractors and suppliers of the CTT Group and any persons acting under their supervision and direction,
 - (v) other Stakeholders as defined in the Code of Ethics of CTT Group, who in good faith report an irregularity based on serious grounds on information obtained in the course of their duties or professional activity.

4. FUNCTIONS AND RESPONSIBILITIES

- 4.1 Pursuant to article 423-F(1)(j) of the Commercial Companies Code and CTT Audit Committee Regulation, the Audit Committee is the body responsible for receiving the reporting made pursuant to this Regulation and for managing the procedures for receiving, storing and handling irregularities as provided for in this Regulation (without prejudice to the legal powers of the other corporate bodies of the CTT Group).
- 4.2 For the exercise of these duties, the Audit Committee is assisted by the Audit and Quality department of the Company, if necessary.

- 4.3 In implementing the terms of this Regulation, it will be ensured that all applicable legal requirements regarding independence, impartiality and absence of conflicts of interest are met by the persons in charge of or involved in the receipt, registration and handling procedures defined in this Regulation.

5. PROCEDURES REGARDING THE RECEIPT OF REPORTS

- 5.1 The reports shall be addressed in writing to the Audit Committee of CTT through one of the following reporting channels available on the intranet and internet websites of the company:

CTT and Subsidiaries (except Banco CTT, S.A. and respective subsidiaries 321 Crédito – Instituição Financeira de Crédito, S.A. and Payshop (Portugal), S.A.)

- Email: irregularidades@ctt.pt;
- Address: Remessa Livre 8335, Loja de Cabo Ruivo, 1804-001 LISBOA

- 5.2 The reports shall:

- a) Be identified as confidential and if communicated by letter, shall adopt a format allowing its confidentiality until being received by the recipient;
- b) Whenever they are not anonymous, they shall identify the author, expressly mentioning if he/she wishes to maintain his/her identity confidential, without prejudice to Section 7 below;
- c) Contain a description of the facts backing up the report.

- 5.3 CTT will keep a record of the reports made under this Regulation, with the following details:

- a) An identifying number per report;
- b) The date of receipt;
- c) The method of transmission;
- d) A brief description of the nature of the report;
- e) Measures taken due to the report;
- f) Updated status of the process (pending or closed).

- 5.4 The staff authorised by the Audit Committee shall give a number to every report received and shall include it in the reporting database.

- 5.5 Within 7 (seven) days from the receipt of the report, and if it is not anonymous, the Reporting Person shall be notified of the receipt of the report and informed of the requirements, competent authorities and form and admissibility of the external report.

6. PROCEDURES TO HANDLE REPORTS

- 6.1 After receiving and recording a report, the Audit Committee promotes the necessary actions to confirm the existence of sufficient grounds to carry out an investigation, and drafts a note that shall

consider the following:

- a) The nature of the report, particularly whether it falls under the matters identified in Section 2.1 above;
- b) The need to carry out an investigation;
- c) The persons involved and those who may have information relevant to the inquiries,

based on which the Audit Committee decides:

- a) To forward to the Ethics Committee or to the department of the Company competent to handle it and follow it up under the terms of Section 2.2 above when it does not fall within the scope of the matters covered by this Regulation;
- b) Immediate closing of the case due to lack of grounds or relevance or impossibility of carrying out an investigation; or
- c) Carry out an investigation.

6.2 The investigation is led by the Audit Committee, assisted by the Audit & Quality department of the Company or, if necessary, by any other members of CTT staff or even, if necessary, by external resources (auditors or other experts) hired to help in the investigation.

6.3 The investigation shall be conducted in compliance with the law in force and CTT Group's internal rules.

6.4 Those involved in an investigation shall be informed in advance of their right to seek legal counselling before making any statement within such investigation.

6.5 In situations of obvious urgency and seriousness, the Audit Committee shall take or promote all the appropriate measures to protect CTT Group's interests in view of the irregularities detected.

6.6 Following the investigation, the Audit Committee shall decide on:

- a) Closing the case;
- b) Adopting, or presenting a report and opinion advising on the adoption by the competent body of the CTT Group of, adequate measures, such as:
 - i. Changing the procedures, the control methodologies or the policies of the CTT Group;
 - ii. Reporting the facts to the competent authorities;
 - iii. Filing a lawsuit, a criminal complaint or the adoption of a similar measure;
 - iv. Termination of contractual relations in place;
 - v. Disciplinary action against employees or dismissal of a member from a corporate body within the CTT Group.

6.7 The Reporting person shall be informed, within a maximum period of 3 (three) months from the date

of receipt of the report, and provided that the report is not anonymous, of the measures envisaged or adopted to follow up on the report, with the respective grounds.

- 6.8 The Reporting person may request, at any time, that the result of the analysis carried out on the complaint be communicated to him/her, within 15 (fifteen) days of the conclusion thereof.

7. CONFIDENTIALITY

- 7.1 The confidential handling of the reports is guaranteed (including the Reporting Person's identity, as well as any other information from which the identity of the reporting person may be directly or indirectly deduced, and the identity of third persons referred to in the report). Access to the reports is restricted to the Audit Committee, the Audit & Quality Department and to the employees and third parties responsible for the operational management of the mechanisms and procedures for receiving, keeping records of and handling reports in accordance with Section 6.2 above.

- 7.2 The identity of the Reporting Person shall only be known to the Audit Committee and to the employees and third parties providing support to the process.

- 7.3 The duty of confidentiality shall extend to anyone who has received information about any report, even if they are not responsible or competent for receiving and handling it pursuant to this Regulation.

- 7.4 The confidentiality of the Reporting Person's identity does not prevent him/her from being contacted by the Audit Committee to make statements with a view to ascertaining the facts.

- 7.5 The identity of the Reporting Person may be disclosed as a result of a legal obligation or judicial decision and, when this occurs, CTT shall notify the Reporting Person in writing in advance, indicating the reasons for the disclosure of the confidential data in question, unless the provision of such information compromises the related investigations or legal proceedings and without prejudice to the provisions of the law.

8. RIGHTS AND GUARANTEES

- 8.1 The information provided pursuant to the reporting rules will be used solely for the purposes set forth in this Regulation.

- 8.2 The Reporting Person is assured the right of access, rectification of inaccurate, incomplete or equivocal data and elimination of data reported, as well as the rights to object, limit the processing or portability of their personal data, under the terms of the data protection and information security regulations, and strictly to the extent feasible, by means of a written statement addressed to the Data Protection Officer ("DPO") and to the Audit Committee.

- 8.3 The person reported is guaranteed the right to information, access and rectification of personal data concerning him/her, as well as the rights to object, limit the processing or portability of their personal data, under the terms of the data protection and information security regulations, and strictly to the extent feasible, and may not, in any case, be given access to information about the author of the

communication.

- 8.4 The rights are exercised by the person reported by means of a written statement addressed to the Data Protection Officer ("DPO") and to the Audit Committee, except in the case where the data processing has the purpose of preventing money laundering and terrorist financing, under the terms of Law No. 83/2017, of 18 August, in which case the rights of access and rectification will go through the Portuguese Data Protection Authority.
- 8.5 CTT undertakes not to dismiss, threaten, suspend, repress, harass, withhold or suspend the salary and/or benefit payments, or to take any other kind of retaliatory action against who legally reports an irregularity or provides information or assistance within the investigation of the reported irregularity. For the purposes of this Regulation, retaliation is deemed to be any direct or indirect act or omission occurring in a context related to the professional activity and/or relationship maintained with the CTT Group, motivated by internal or external reporting, and which causes or may cause unjustified pecuniary or non-pecuniary damage to the Reporting Person (including the threat or attempt of such acts or omissions).
- 8.6 The persons and entities referred to in article 6 (3) and (4) of Law 93/2021 benefit from the protections provided for in this Regulation pursuant to said provisions.

9. IMPROPER USE

Any person who uses the reporting mechanism in an abusive or malicious manner by making a report that he or she knew to be unfounded shall be subject to possible disciplinary action and legal proceedings if justified by his or her conduct.

10. RECORD KEEPING OF THE REPORTS

- 10.1 The Audit Committee, in strict compliance with the provisions of the General Data Protection Regulation (GDPR), Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, as well as Law 93/2021 and in accordance with the internal regulations in force in CTT for this purpose, ensures the confidential processing and safeguarding of records and related information, in accordance with the following principles:
- a) Personal data included in the report shall be immediately destroyed should they prove to be inaccurate or useless;
 - b) Records of every report received shall be kept for at least 5 (five) years or, if longer and when applicable, pending the resolution of legal or administrative proceedings related to the report.
- 10.2 Security measures regarding the storage of the data shall be adopted to restrict their access only to authorised personnel, in particular:
- a) The computerized system shall only allow access to the data processing by an individual user using a password, which must be changed periodically, or through another suitable authentication means;

- b) Accesses shall be recorded and monitored;
- c) Restricted access, from the physical and logistical point of view, will be guaranteed to the system's servers;
- d) Backup copies of the information shall be made and kept in a place accessible only to authorised persons;
- e) The data controller shall guarantee that the information is stored and provided in a completely safe manner.

11. REPORTING

- 11.1 Once the investigation phase regarding the report is concluded, the Audit Committee shall prepare a duly substantiated report on the respective results and the measures it considers appropriate to be presented to the Board of Directors or the Executive Committee, to the extent of its powers.
- 11.2 In its annual activity report, the Audit Committee shall inform on the reports it has received and the proposed recommendations.

12. FINAL PROVISIONS

This Regulation was approved at the Audit Committee meeting of December 19, 2022, and the Board of Directors meeting of December 20, 2022, entering into force on December 20, 2022.