

Regulation on the Procedures Regarding the Report of Infringements



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, 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 infringements, 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, Policies, including on the Prevention of Money Laundering and Terrorist Financing, and established procedures regarding the reception, storing and handling of any reported infringements, covered by the Whistleblowing Policy and by this Regulation, pursuant specifically in accordance with the provisions of the legislation in force, namely Law no 93/2021 of 20 December (“Law 93/2021”), General Regime for Protection of Whistleblowers.

CTT intends that these procedures allow the submission and follow-up of complaints in line with the principles detailed in the CTT Group Whistleblowing Policy and those of completeness, integrity and conservation of complaints, 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 its subsidiary 321 Crédito – Instituição Financeira de Crédito, S.A., as well as Payshop (Portugal), S.A.), any infringements 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 infringements 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 Whistleblower. For this purpose, are relevant the acts or omissions, wilful or negligent, which can be foreseen as likely to constitute an infringement in the

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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 Channel – CTT Complaints Platform - created, 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 Whistleblower has reasonable grounds to believe that the infringement 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 infringement 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 Whistleblowers 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 WHISTLEBLOWER

- 3.1 For the purposes of this Regulation, the following are considered “**whistleblowers**”:
- (i) holders of any corporate position in the CTT Group, including in administrative and supervisory bodies, 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, voluntaries 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,

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- (v) other Stakeholders as defined in the Code of Ethics of CTT Group, who in good faith report an infringement based on serious grounds on information obtained in the course of their duties or professional activity.

3.2. The fact that the complaint of an infringement is based on information obtained during a professional relationship which has since ceased, as well as during the recruitment process or during another phase of pre-negotiation of a professional relationship constituted or not constituted, does not compromise the consideration of the “**Whistleblower**”.

4. FUNCTIONS AND RESPONSIBILITIES

- 4.1 Pursuant to article 423-F(1)(j) of the Commercial Companies Code and CTT Audit Committee Internal 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 infringements 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, Compliance and Risk Department and by the Secretary of Company and the Legal Department of CTT, 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 the following reporting channels:
 - CTT Complaints Platform, available on the CTT website (www.ctt.pt), in accordance with the instructions contained therein;
 - Address: Remessa Livre 8335, Loja de Cabo Ruivo, 1804-001 LISBOA
- 5.2 The reports shall:

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CTT Complaints Platform

- Indicate the subject of the Report
- Brief and objective description of the facts of the report
- Omit any personal data in the report
- Indication of the e-mail (**optional**)

Address

- Identify the communication as confidential and adopt a format that allows to guarantee its confidentiality until its receipt by the respective recipient
- Contain a brief and objective description of the facts of the report

5.3 Regardless of the means by which the complaint is lodged, it shall be included in the database for complaints and a register of complaints covered by this Regulation shall be kept, containing::

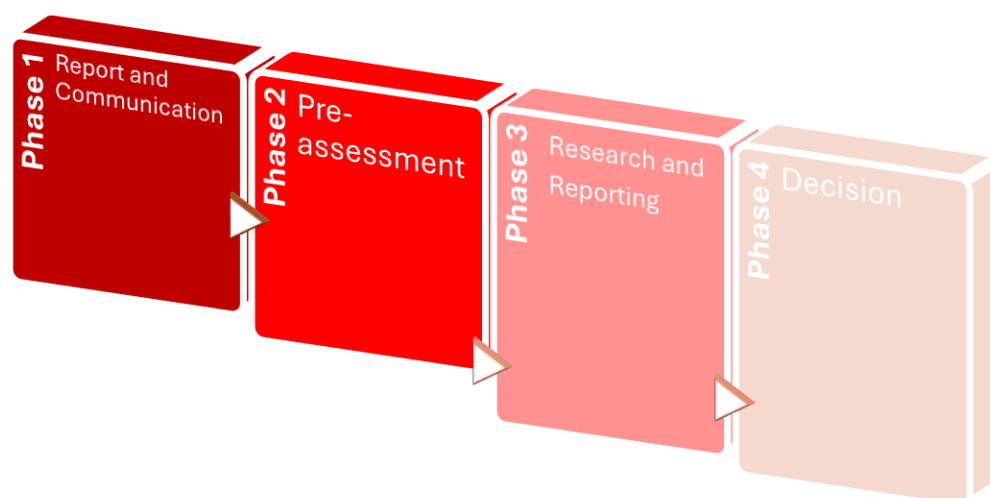
- a) Identification number of the report;
- b) The date of receipt;
- c) The method of reception;
- d) A brief description of the nature of the report;
- e) Measures taken due to the report;
- f) Updated status of the process (pending or closed).

6. PROCEDURES TO HANDLE REPORTS

The processing of reports will proceed according to the following:

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- 6.1 **Phase 1:** Once a report has been submitted and within 7 (seven) days of receipt of it, and provided that it is not an anonymous report sent by post, the Whistleblower will be notified of the receipt of the report, and informed on the requirements, competent authorities and form and admissibility of the external report.
- 6.2 **Phase 2:** After receiving and registering the report of an infringement, the Audit Committee will make a pre-assessment and promote the actions necessary to confirm the existence of sufficient grounds to proceed with the investigation and may conclude:
- a) For a Preliminary Close due to lack of grounds or relevance or unfeasibility of investigation, preparing a competent report to substantiate the decision; or
 - b) That an investigation procedure should be opened, depending on the nature of the infringement, preparing a report that includes: the nature of the infringement, namely whether or not it falls within the scope of the matters identified in Point 2.1; the feasibility of the investigation; and the people involved and those who may have knowledge of facts relevant to the investigations. In this case, the report will be forwarded to the area responsible for the matter.
- 6.3 **Phase 3:** The investigation process is conducted by the Audit Committee, using the services

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of the Audit, Compliance and Risk Department and/or, if necessary, other employees or responsible areas of the CTT Group or by hiring external means (auditors or experts) to support the investigation. The investigation shall be conducted in compliance with the applicable law and internal rules of CTT Group.

Persons involved in any investigation process must be informed of their right to legal advice before making any statements within the scope of the investigation.

In situations of manifest urgency or gravity, the Audit Committee shall take or promote measures deemed appropriate for the protection of CTT Group's interests in the face of the irregularities detected.

6.4 Phase 4: As a result of the investigation carried out, the Audit Committee shall decide on:

- a) The filing;
- b) The adoption or submission of recommendations for the adoption of an appropriate measure or measures by the competent body of the CTT Group, including:
 - i. Changes to the processes or control methods or policies of the CTT Group;
 - ii. Reporting to competent authorities;
 - iii. Filing legal or criminal proceedings, or a similar measure;
 - iv. Termination of contractual relations;
 - v. Proposal of disciplinary proceedings or the loss of membership of a corporate body in the CTT Group.

6.5 The Whistleblower must be informed, within a maximum period of 3 (three) months from the date of receipt of the report, and provided that it is not an anonymous by post one, about the measures planned or adopted to follow up on the complaint, with its reasons.

6.6 The Whistleblower may request, at any time, to be informed of the result of the analysis made to the report, within 15 (fifteen) days of its conclusion.

7. CONFIDENTIALITY

7.1 The confidential handling of the reports is guaranteed (including the Whistleblower's identity, as well as any other information from which the identity of the whistleblower 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, Compliance and Risk Department and to the employees and third parties responsible for the operational management of the mechanisms and procedures

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for receiving, keeping records of and handling reports in accordance with Section 6. above.

- 7.2 The identity of the Whistleblower shall only be known to the Audit Committee and to the employees and third parties providing support to the process, as provided for in Section 7.1. above.
- 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 Confidentiality of identity does not prevent the Whistleblower from being contacted by the Audit Committee to make statements with a view to ascertaining the facts.
- 7.5 The identity of the Whistleblower may be disclosed as a result of a legal obligation or judicial decision and, when this occurs, CTT shall notify the Whistleblower 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 Whistleblower 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 report.
- 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

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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 infringement. 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, or public disclosure (where legally permissible), and which causes or may cause unjustified pecuniary or non-pecuniary damage to the Whistleblower (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;

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- d) Backup copies of the information shall be made and kept in a place accessible only to authorised persons;

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 their 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 by the Audit Committee at its meeting of 19 December 2022, and by the Board of Directors at its meeting of 20 December 2022.

The amendment to this Regulation was approved by the Audit Committee on 19 February 2025 and by the Board of Directors on 20 March 2025.

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