

Anti-Corruption Policy – MEO Group

The MEO Group's operating principles comprise a set of fundamental ethical values and commitments that mark its identity, distinguish it in the business world and guide its entire activity.

The MEO Group believes that corruption is one of the main obstacles to the development of society and the economy, prevents the sustained growth of companies, increases costs and poses serious legal and reputational risks. The Group therefore endeavours to continuously strengthen its anti-corruption practices in order to maintain and strengthen its ethics and integrity, protect its reputation and safeguard the interests of its stakeholders.

The Group expects and encourages its employees to conduct themselves with integrity, based on honesty, ethics, transparency and responsibility in their actions and decisions, conferring trust and respect on all stakeholders. To this end, it continuously invests in training its employees in matters of ethics and anti-corruption behaviour.

The MEO Group's Code of Ethics and Conduct includes a set of principles, values and commitments applicable to all employees without exception:

Resource utilisation

The MEO Group's resources are not used by employees for personal purposes, with any exceptions being expressly authorised from above and restricted to economically irrelevant and legally and ethically non-reproachable situations.

Compliance with legislation

MEO Group ensures scrupulous compliance with the legal and regulatory standards applicable to its activity, refraining from any acts that violate them.

Conflicts of interest

MEO Group employees do not participate in decision-making processes that directly or indirectly involve organisations with which they collaborate, or people to whom they are or have been linked by ties of kinship or affinity, actively declaring the existence of real, potential or apparent conflicts of interest.

Offers and hospitality

Gifts and hospitality received or granted in the performance of duties may be accepted, provided that they cannot reasonably be understood or interpreted as an attempt to influence or obtain illegitimate advantages, and are subject to registration and approval.

Preventing corruption

The MEO Group condemns, repudiates and encourages the fight against acts committed or omitted for the purpose of obtaining an undue advantage or compensation, namely acts of passive corruption (including soliciting or accepting a bribe), active corruption (including offering or paying a bribe) and other related offences (including bribery, embezzlement and prevarication, exchange of influence and receiving an economic advantage in business).

Relations with third parties

The MEO Group's relationship with third parties is carried out in accordance with market conditions, taking into account not only financial, commercial or quality issues, but also their ethical behaviour, through a prior and mandatory assessment of their compliance with anti-corruption compliance regulations.

Whistleblowing Channel

MEO Group has a whistleblowing channel which ensures the safe submission and follow-up of reports, their integrity and preservation, the confidentiality of the identity or anonymity of the whistleblower and third parties mentioned in the report. Whistleblowing can be submitted by employees or external organisations.

Non-compliance with the Anti-Corruption Policy

Failure to comply with the provisions of the Anti-Corruption Policy or any of the procedures to which it refers will result in the imposition of disciplinary sanctions or the execution of the corresponding actions depending on the type of relationship that the offender maintains with the MEO Group, and may imply, if applicable, the termination of said relationship, whatever its nature.

Criminal proceedings may also be initiated under the terms of the legal regulations in force.

The Compliance and Data Privacy Department will answer any questions about the application of the Anti-Corruption Policy in each specific case.