Interim Assessment report of the

Plan for the Prevention of Risks of Corruption and Related Infractions

MEO Group - October 2025

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1. Introduction

Under the terms of the General Regime for the Prevention of Corruption ("RGPC"), approved in annex to Decree-Law No. 109-E/2021, of 9 December, public or private entities with more than 50 employees must adopt a set of measures to prevent corruption, namely a Plan for the Prevention of Risks of Corruption and Related Infractions ("PPR"). The adoption of these measures seeks to prevent, detect and sanction any acts of corruption and related offences.

Pursuant to article 6 of the RGPC, the implementation of the PPR is subject to periodic control and monitoring, through the preparation of interim and annual evaluation reports.

Thus, as the MEO Group is committed to transparency, this report aims to comply with the provisions of paragraph a) of no. 4 of article 6 of the RGPC, specifically, the interim assessment of the situations identified in the PPR that involve a high or maximum risk of corruption and related infractions.

This report is applicable to the following companies of the MEO Group:

- MEO - Serviços de Comunicações e Multimédia, S.A.;
- Altice Labs, S.A.;
- MEO – Serviços Técnicos de Redes de Comunicações Electrónicas, S.A. (formerly known as STRC Geodesia, S.A.);
- MEO - Associação de Cuidados de Saúde;
- Portugal Telecom Data Center, S.A.;
- PT Contact - Telemarketing e Serviços de Informação S.A.;
- PT Sales - Serviços de Telecomunicações e Sistemas de Informação, S.A.

2. Assessment of high or maximum risk situations

The main objectives of the MEO Group's PPR are to identify corruption risks and related infractions and implement preventive and corrective actions to mitigate them. The MEO Group continuously and permanently analyses the areas that may expose it to potential acts of corruption and related infractions.

In this sense, the PPR is based on the prevention of acts of improper conduct such as bribery, corruption and related infractions, and the MEO Group is firmly committed to be a responsible corporate entity in all aspects of its business, which is conducted in honest, ethical and lawful terms.

The PPR prepared by the MEO Group identified 41 risks covering all the companies that are part of this Group, and the following degrees of risk were assigned: i) "Low", ii) "Medium-Low", iii) "Medium", iv) "Medium-High". Thus, the existence of risks with a high or maximum degree of evaluation was not flagged, which on the scale used would correspond exclusively to "High" risk.

In this way, namely in the context of proceedings that have been reviewed and enhanced within the framework of a continuous improvement of the MEO Group's internal processes, the preventive measures identified in the PPR are adequate to mitigate the risks for each risk area.

3. Conclusion

The positioning and behavior of the MEO Group is fully committed to standards of integrity and transparency, acting in accordance with anti-corruption laws, both national and international, as well as with the 10 principles of the United Nations Global Compact, which includes the principle of Anti-Corruption. The MEO Group continuously and permanently analyses the areas that may expose it to potential acts of corruption and related infractions.

In addition, any practices that may constitute acts of corruption or related infractions are rejected, promoting a culture of responsibility and business ethics.

Considering that, according to the PPR, there were not flagged high nor maximum degree risks, the assessment of the adequacy and efficiency of the measures set in the PPR will be done in April 2026, pursuant to article 6., no. 4, paragraph b), of the RGPC.