

Purchasing Policy – MEO SGPS SA

1. Scope and objectives of the Purchasing Policy

We recognise the importance of the supply chain as a key component in achieving our business strategy. The supply chain contributes to meeting current and future challenges, creating value for all stakeholders and, together, being active agents of transformation towards a fairer, more humane and environmentally sustainable society.

The Purchasing Policy applies internally to all employees who are directly or indirectly involved in supplier contracting activities at the Group's companies. They are responsible for closely complying with the guidelines contained in this document, in a zealous, confidential manner, providing clear information to promote a transparent exchange of information, establishing a relationship of partnership, respect and diligence with the suppliers with whom they interact in the performance of their duties.

Externally, this Policy applies to all suppliers and their employees, as well as to the companies they subcontract.

Through a relationship of mutual trust, this is our goal:

- Developing long-term, fair and equitable commercial relations, understood as partnership relations that enable both parties to be more competitive and sustainable;
- To publicise and involve all those involved in the supply chain in the Group's commitment to reducing its adverse impacts on society, the economy and the environment, endeavouring, wherever possible, to prevent, and mitigate them.

In this way, we aim to maximise synergies in the market, develop more sustainable, renewable and innovative solutions, mitigate conflicts of interest, promote the development of the economy, particularly the local one, and strengthen relationships that create mutual value with our suppliers through open and trusting communication.

This Policy also reinforces our commitment to complying with international standards, such as the United Nations Universal Declaration of Human Rights, the conventions of the International Labour Organisation, the United Nations Convention on the Rights of the Child and the Organisation for European Economic Cooperation (OECD), and with the 10 Principles of the United Nations Global Compact, in the areas of Human Rights, Labour Practices, Environmental Protection and Anti-Corruption, as well as with the Sustainable Development Goals and the defence of Human Rights.

2. Supply chain management

Responsible supply chain management is a concern for any organisation that wants to ensure its long-term sustainability and the elimination or minimisation of operational and reputational risks. In this sense, the establishment of contractual relationships with suppliers by the different companies in the Group must respect the following assumptions, which allow us to guarantee the natural course of supplies necessary for the continuity of our operations:

- a. Supplier diversification in terms of location, references, portfolio, etc;
- b. Diversification of the means of transport used in the logistics process;
- c. Preference for suppliers with local activity;
- d. Longer contractualised time horizon, with long-term forecasts;

- e. Mandatory minimum compliance with safety stock levels;
- f. Permanent monitoring of deliveries;
- g. Fulfillment of legal compliance criteria in relation to anti-corruption, money laundering and terrorist financing regulations

3. Legal compliance and ethical conduct

Our companies promote ethics as a basic principle of business relations with their customers and suppliers, as well as with employees who have a direct relationship with the purchasing function, in order to avoid acts of bribery, mitigate conflicts of interest, regulate gifts and hospitality and avoid any other inappropriate practice that jeopardises the legal transparency of purchasing processes.

To this end, MEO Group's Compliance and Data Privacy Department, in conjunction with the requesting area, carries out a prior assessment of the third party, with a view to gauging the supplier's ethical and legal suitability in the areas of corruption and money laundering and terrorist financing.

In accordance with our Code of Ethics and Conduct, failure to comply with the general rules in force entails the disciplinary and criminal liability of the offenders and is considered a material breach of the contract with the MEO Group and, consequently, the Group reserves all its rights and legal remedies in relation to such a breach.

4. Supplier commitments

In order to reinforce the effectiveness of compliance with established ethical standards and to minimise potential negative impacts on people and/or the environment, we have a set of formalised policies, practices and mechanisms that guide all our operations:

- [Code of Conduct for Third Parties](#)
- [Code of Good Conduct for Preventing and Combating Harassment at Work](#)
- [Code of Ethics and Conduct](#)
- [Plan for the Prevention of Risks of Corruption and Related Offences](#)
- [Anti-Corruption Policy](#)
- [Third Party Valuation Policy](#)
- [Personal Data Protection Policy](#)
- [MEO SGPS Supplier Club Regulations](#)
- [Sustainability Policy](#)
- [Human Rights Policy](#)
- [Information Security Policy](#)

Suppliers must confirm their acceptance of the aforementioned policies, practices and mechanisms as part of the Supplier Club Membership Process and, by doing so, consider themselves committed to their compliance.

It is the supplier's responsibility to publicise and enforce the principles contained therein among its employees, throughout its activity and value chain, namely among the entities it subcontracts, within the scope of goods and services to be supplied to MEO Group companies.

The subcontracting of any entity shall not relieve the supplier of any responsibility or obligation for itself arising from the award contract, and it shall be fully responsible for the fulfilment of the obligations of any subcontractor, its agents, employees, workers, technicians or collaborators.

5. Supplier monitoring and follow-up

We reserve the right to assess compliance with these principles through verification activities, such as requests to answer questionnaires or visits to the sites where the activity is carried out. Our suppliers undertake to co-operate in providing the information requested.

We are committed to the satisfaction of our customers, our employees and the development of society and the communities in which we operate. Under this commitment, the certifications to which we are bound (e.g. Quality, Environment, Occupational Health and Safety, Information Security, among others) and with a view to continuously improving our processes and the quality of our products and services, we assess the performance of previously selected suppliers.

The evaluation criteria considered may cover topics such as proactivity and innovation, meeting agreed deadlines, the quality of the service provided, response times and quality to requests, compliance with information security requirements, environmental, social and governance (ESG) criteria, compliance with ethical and conduct standards, among others that may be considered relevant.

It is the responsibility of the requesting area to define and communicate to the supplier the criteria and respective weightings to be applied when evaluating the supply of the good/service, when awarding the contract and communicating the result of the evaluation. If it is rated below the defined level, the supplier is asked to implement corrective actions to improve future supplies.

6. Whistleblowing Channel

We have a reporting channel for corruption offences, in accordance with the provisions of Law 93/2021 of 20 December.

Complaints can be made by any employee or by any entity outside the company and may relate to offences committed or still in progress, or the commission of which can reasonably be foreseen, as well as attempts to conceal such offences. Improper practices that contravene the good practices set out in the MEO Group's [Code of Ethics and Conduct](#), particularly in relation to human rights, social and environmental responsibility, may also be reported, and the anonymity of those reporting the situation will be guaranteed.

Reports can be made using the following link: [Submit complaints | MEO Institutional](#)

7. Approval and Validity

Our Executive Committee is the body responsible for approving this Policy and any subsequent updates, on the recommendation of the Purchasing Department, after receiving the prior opinion of the Sustainability Department and the Compliance and Data Privacy Department.

This document will be reviewed periodically, whenever changes occur that have an impact on updating it, and will be publicised to all parties involved.