INTERIM ASSESSMENT REPORT

Risk Prevention Plan for Corruption and Related Offences

Reference period: May 1, 2026 – October 31, 2026.

1. Purpose and legal basis

This Interim Assessment Report has been prepared pursuant to the General Regime for the Prevention of Corruption approved by Decree-Law No. 109-E/2021 of 9 December (the "RGPC"), and within the framework of **BLOQSTRX, S.A.'**s (hereinafter "**Bloq.it**") compliance programme, covering this entity and its Portugal-based subsidiaries, BLOQSTRX R&D, UNIPESSOAL LDA. and BLOQSTRX D&M, UNIPESSOAL LDA..

Bloq.it adopted its Risk Prevention Plan for Corruption and Related Offences (the "Plan") and its Anti-Corruption Code of Conduct on 13 February 2025, as part of its regulatory compliance programme and broader commitment to integrity, transparency, accountability and the prevention of corruption and related offences.

Under the Plan and the RGPC, **Bloq.it** is responsible for preparing:

(i) an interim assessment report, to be completed in October, addressing identified high or maximum risk situations; and

(ii) an annual assessment report, to be prepared in April of the following year, including a quantification of the degree of implementation of the identified preventive and corrective measures, together with a forecast for their full implementation.

The purpose of this report is therefore to comply with the interim assessment requirement applicable to the Plan and to assess whether, during the relevant reference period, any situations classified as high or maximum risk were identified under **Bloq.it'**s risk prevention framework.

2. Bloq.it compliance framework

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Bloq.it's Plan states that the company has implemented a regulatory compliance framework that includes, among other elements:

- the Plan itself;
- an Anti-Corruption Code of Conduct;
- rules regarding the internal reporting channel; and
- the designation of the Compliance Officer.

The Anti-Corruption Code of Conduct applies broadly across the organisation, including managers, employees, consultants, directors, interns and anyone performing functions for or on behalf of the company, regardless of contractual basis or hierarchical level.

Together, the Plan and the Code establish **Bloq.it**'s anti-corruption control environment, including rules on conflicts of interest, gifts and benefits, abuse of influence, transparency, whistleblowing and compliance oversight.

3. Scope and methodology of the interim assessment

This interim assessment was carried out by reference to:

- the risk classifications set out in **Bloq.it**'s Plan;
- the preventive and corrective measures identified therein;
- the Anti-Corruption Code of Conduct and related compliance documentation;
- the status of implementation of relevant mitigation measures; and
- any known developments during the reference period capable of affecting the risk assessment reflected in the Plan.

The Plan provides that **Bloq.it**'s methodology for risk analysis combines two core indicators:

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(i) likelihood of occurrence; and

(ii) predictable impact,

whose combination determines the overall risk level across five categories: minimum, low, moderate, high and maximum.

This interim report has been prepared specifically for the purposes of the October assessment of **high** and **maximum** risk situations (if any). It does not seek to replace the broader annual assessment of the implementation and effectiveness of all preventive and corrective measures, which falls within the scope of the annual report expressly foreseen in the Plan.

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4. Summary of the Plan risk assessment

Bloq.it's Plan identifies corruption and related offences risks across several relevant processes and areas, including:

- interactions with public authorities;
- client business relationships;
- supplier selection, contracting and management;
- third-party external assessment and reporting;
- payment processing;
- expense approval;
- management of access to internal systems;
- recruitment;
- governance relationships with shareholders; and
- investment development.

The risk matrix included in the Plan classifies the identified risks using the methodology described above. Following review of that matrix, **no risks were classified as high or maximum**. The highest level attributed in the Plan is moderate, with other risks classified as reduced or minimum.

Accordingly, for the purposes of the interim assessment specifically required for high and maximum risk situations, **Bloq.it**'s Plan does not contain any such situations.

5. Interim assessment findings

Based on the assessment carried out, **Bloq.it** concludes as follows:

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(a) The corruption and related offences risk matrix included in the Plan does not identify any situations classified as high or maximum risk.

(b) **Bloq.it** continues to maintain the preventive and corrective framework described in its compliance documentation, including the measures identified in the Plan and the conduct rules set out in the Anti-Corruption Code of Conduct, notably in relation to conflicts of interest, gifts and benefits, transparency, abuse of power and whistleblowing.

(c) For purposes of this interim assessment, **Bloq.it** has not identified any substantiated circumstances requiring immediate revision of the risk classifications reflected in the Plan. This conclusion is without prejudice to any findings that may result from **Bloq.it**'s ongoing review of the Plan.

Lisbon, October 28, 2026.

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