



CODE OF CONDUCT FOR SUPPLIERS

Background

Prismore Capital (Prismore) intends to carry out its activities beyond strict compliance with the legislation in force. Therefore, it has adopted in its practices a set of principles of Sustainability, Ethics, Justice and Honesty.

Recognising the challenges and risks associated with its supply chain, it has established this Code of Conduct to inform its suppliers and the respective subcontracting chain of the minimum requirements to be ensured during the entire period of collaboration with Prismore, both local and global.

Prismore aims to create value based on relationships of ethics and trust in a medium- to long-range horizon, and avoid circumstances or situations that may be perceived as improper or creating a conflict of interest for the market or the other interested parties.

Prismore expects that its suppliers and service providers will comply with these requirements, always on the assumption, when acceptable, that they shall be given enough time to make the necessary adjustments.

In addition, and since transparency is the basis for any type of relationship of trust, Prismore expects that its suppliers will notify it of all circumstances that may place at risk compliance with this Code of Conduct, in an attempt to, jointly, resolve the problem.

This Code of Conduct is modelled on the standards of the Universal Declaration of Human Rights and other standards issued by organisations such as the International Labour Organisation, International Social Responsibility and Ethical Trading Initiative.

Prismore expects, from all of its suppliers, a commitment to comply with and cause to be complied with this Code of Conduct.

Scope

This Code of Conduct applies to the suppliers of Prismore Capital, SGPS, S.A. and of all the companies of the Prismore Group, and should be read together with the Prismore Code of Ethics and Conduct, the Policy for the Prevention of Corruption and Related Offenses and the Whistleblowing Policy, available at <https://www.prismore.com>.

It is also applicable to Prismore subsidiaries, without prejudice to their adopting their own Code of Conduct for suppliers, adapted to the nature of their businesses, to the geographies where they operate and to the particular risks thereof. In such case, this Code of Conduct constitutes the minimum standard to be ensured: the code adopted by the subsidiaries may not provide for requirements less demanding than those set out herein and, in case of divergence, the stricter requirement shall prevail.

Relationship with Suppliers

General Principles

Prismore is aware that it is important for the sustainability of its business to maintain relationships of trust and respect with all suppliers, recognising them as key partners in the development of their activity.

Prismore believes that strengthening partnership relationships with suppliers consists of maximising trust, respect and the creation of mutual value.

Prismore publicly makes the commitment to develop its activity with suppliers based on:

- Ethics;
- Transparency;
- Good faith;
- Accuracy;

- Respect;
- Professionalism;
- Comply with terms of confidentiality;
- Full compliance with commitments assumed;
- Safe and healthy working conditions;
- Cooperation, striving to improve the processes and services associated with the products and/or services supplied.

Prismore expects from its suppliers, as agents of the value chain capable of influencing its development:

- The reciprocal assumption of commitments assumed by Prismore with suppliers;
- Conducting business with total respect for applicable legislation and regulation;
- The continual improvement of all processes associated with the products or services provided;
- The adoption of business and sustainability practices that are progressively more responsible;
- The promotion, along with suppliers, of business and sustainability practices that are also progressively more responsible;
- Adherence to the other principles and duties provided in this Code of Conduct.

Integrity and Fair Trading

Unfair trading practices and/or fraudulent trading procedures, in any form, are prohibited.

Prismore shall not relate with entities suspect of or known by practices of money laundering, thus making its contribution to the fight against illicit capital derived from unlawful activities and financing terrorism.

Suppliers:

- May not violate any applicable anti-corruption law or regulation in the countries where they operate, nor any international anti-corruption convention, including the OECD Anti-Bribery Convention and, where applicable, the UK Bribery Act and the US Foreign Corrupt Practices Act;
- May not develop or accept any type of actions associated with corruption, and shall adopt internal management procedures that prevent the occurrence of situations associated with practices of corruption;
- Commit to maintain on file detailed information on business activities, structure, financial situation and performance according to applicable laws;
- Shall be available for visits or audits by Prismore, in cases considered essential;
- Shall accept and comply with the Prismore Policy for the Prevention of Corruption and Related Offenses;
- Shall disclose to Prismore any situation of actual or potential conflict of interest, namely any relationship with Employees or Members of the Governing Bodies.

Confidentiality

Suppliers shall not disclose to third parties confidential information that may have been provided to them in processes in which they are involved, and they shall also take every precaution to guarantee confidentiality and the security of all Prismore information.

The use of information from the internal documentation of Prismore and its provision to third parties may only occur in cases clearly and duly authorised by the Management of Prismore or by its representatives.

Suppliers with access to information on investments, transactions or companies of Prismore shall treat it as privileged and non-public information, may not use it for their own benefit or for the benefit of third parties, and shall comply with the applicable market abuse rules.

Any personal data to which suppliers have access shall be processed exclusively for the purposes agreed with Prismore, in accordance with the applicable data protection legislation and with adequate security measures.

Working Conditions

Child Labour

Child labour and any form of child exploitation is prohibited.

The hiring of workers under 18 years of age shall occur only in cases of risk-free work, and only when these workers have reached legal working age in their country or the age established for the completion of mandatory schooling.

The supplier agrees to comply with all applicable child labour laws and to maintain records proving the date of birth of each employee.

Prevention of involuntary work and human trafficking

Prismore suppliers may not use any type of slave or forced labour, nor be related to any activities that involve the trafficking of human beings, namely the transport, recruitment, transfer or receipt of persons through threats or fraud.

Prismore will not tolerate the demand of any financial guarantees from workers; it will not condone that their original identification documents are confiscated or accept any retention from their salaries, benefits or any other form of cohesion to force or oblige them to provide labour.

Suppliers shall ensure that contracts for workers clearly convey the working conditions, and are drafted in a language understood by the worker.

Work Hours and Remuneration

Prismore suppliers shall pay their workers as provided in the respective labour laws of each country and must agree to comply with the maximum limit of working hours per week defined by legislation in effect.

They shall also guarantee that their workers enjoy days off, holidays and legally instituted bank holidays.

Workers shall receive, at least, the minimum wage in effect in their country and benefit from all of the Social Benefits provided by law.

Discrimination and Punitive Practices

Prismore recognises and respects cultural differences and promotes equal opportunity, therefore it also requires that its suppliers do not use any form of discrimination in recruitment, remuneration, access to training, promotion, termination or retirement based on race, caste, religion, social class, nationality, ethnicity, illness, pregnancy, disability, gender, age, civil status, family responsibilities, sexual orientation, union membership or political affiliation.

The suppliers of Prismore shall agree to maintain a working environment free of harassment, threats and aggression.

Prismore will not tolerate any practices that involve physical or mental pressure, bodily punishments, harassment or sexual abuse, threat, verbal insults or gestures, as well as any other form of inhumane treatment.

Hygiene, Health and Safety

Suppliers shall offer their employees working conditions that are safe and healthy, including any company housing in compliance, at a minimum, with the parameters established in applicable legislation.

At a minimum, workers shall be guaranteed:

- Drinking water;
- Sanitation facilities that are adequate and in good working order;
- Emergency exits;
- Essential safety equipment;
- Access to health care;
- Adequately lighted and equipped working area.

In addition, the facilities of the suppliers shall be constructed and have up-to-date maintenance according to the standards defined in the codes and regulations in effect.

Environmental Protection and Sustainability

Environment

The suppliers shall:

- Assume environmentally responsible behaviour and practices and comply with applicable environmental legislation;
- Seek, in a sustained manner, the continual improvement of its environmental performance;
- Use their best efforts to provide Prismore, whenever requested, with the environmental and social information required for the sustainability reporting and for the assessment of its supply chain.

Compliance and Reporting

Any breach of this Code of Conduct may be reported through the Prismore Internal Whistleblowing Channel, in accordance with the Whistleblowing Regulation, and no form of retaliation shall be tolerated against those who report in good faith.

Failure to comply with this Code of Conduct may, in a manner adequate and proportionate to the infraction, give rise to the application of penalties or to the termination of the business relationship, without prejudice to any other liability under the applicable law.

Validity and Review

This Code of Conduct comes into effect on the date of its approval by the Board of Directors and must be reviewed every 3 (three) years or whenever there is any change that justifies its revision.

Any amendment to this Code of Conduct must be approved by the Board of Directors, with the power to delegate to the Executive Committee with regard to the necessary changes to conform the Policy with the legal framework in force at any given time.

This Code of Conduct, at its most recent version, is made available to all employees and is available for consultation at the company's website (<https://www.prismore.com>).

Prismore Board of Directors, 2026

