

INTERNAL REGULATION¹ OF THE ETHICS COMMITTEE OF THE CTT GROUP

Chapter I GENERAL PROVISIONS

Article One Object

1. This Regulation establishes the rules applicable to the composition, functioning and competences of the Ethics Committee ("COET") of CTT - Correios de Portugal, S.A. ("Company"), as the internal structure responsible for monitoring, applying and interpreting the Code of Ethics in force at CTT Group, as well as the Code of Good Conduct to Prevent and Fight Harassment at the Workplace.
2. Definitions used in this Regulation that are not specifically established herein shall have the meaning attributed to them in the Code of Ethics.

Article Two Mission

1. COET's mission is to ensure the monitoring of and compliance with the standards contained in the Codes referred to in the previous article, as well as to mitigate the risks of non-compliance, acting independently and impartially and exercising its competences in accordance with the highest standards of ethics and professionalism.
2. Whenever it deems it necessary for the fulfilment of its duties, COET shall act together with the corporate bodies, committees and structures of the CTT Group, namely with the Board of Directors ("Board "), the Executive Committee ("EC"), the Audit Committee ("CAUD") and the Corporate Governance, Evaluation and Nominating Committee ("CGENC") of the Company, as well as with other departments of the organizational structure to the extent of their assigned competences.

Chapter II STRUCTURE AND COMPETENCES

Article Three Composition

1. COET is composed of three to seven members designated by the Board of Directors, which shall appoint a Chairperson.

¹ Approved by resolution of the Board of Directors of the Company on 19 September 2023
Unofficial translation. In case of any discrepancy between this translation and the Portuguese version, the latter will prevail

2. The members of COET are elected for a term of office of the same duration as that of the Board that elects them, on a proposal from the CGENC.
3. COET is assisted by the Departments responsible for labour relations (Human Resources Management ("HRM") and Talent Management ("TM")) and the Audit, Compliance and Risk Department ("ACR").
4. COET prepares and proposes the respective Internal Regulation to the CGENC, as well as any amendments thereto that it considers necessary, namely for the purposes of updating or improving it.

Article Four

Powers and Duties

1. In addition to other duties expressly entrusted to it by the CGENC at any given time, COET is responsible for, within the framework of the Code of Ethics:
 - a) Promoting the dissemination, application and fulfilment of the Code of Ethics, and approving the respective communication plan;
 - b) Promoting the programming, with appropriate frequency, of training activities and dissemination of the Code of Ethics, ensuring that workshops and debates are held and that initiatives are carried out that are suitable for promoting adequate knowledge, on the part of all Employees, of the principles of action and commitments assumed in the Code, as set out in paragraph 8 of Chapter V of the Code of Ethics;
 - c) Following up and monitoring the rates of implementation and the impact of the initiatives referred to in the previous paragraph;
 - d) Acting as a channel for clarifying doubts raised by Employees or other stakeholders, in accordance with the provisions of paragraphs 1 and 5 of Chapter V of the Code of Ethics;
 - e) Promoting constructive dialogue within the CTT Group on any topic of ethical relevance;
 - f) Defining preventive actions, to be proposed and reported to all or certain corporate bodies, committees and operational structures within the CTT Group;
 - g) Analysing the reports made to it about situations involving Employees who have a hierarchical or functional relationship with each other under the terms of paragraph 7.1 of Chapter IV of the Code of Ethics and, in coordination with HRM, and making recommendations on how to address each situation appropriately;
 - h) Analysing gifts of more than €150 reported to it by Employees under the terms of paragraph 1 of Chapter IV of the Code of Ethics, and issuing recommendations on these as well as indicating the non-profit organisation to which each gift should be forwarded;
 - i) Analysing suggestions submitted to it by Employees, under the terms of paragraph 8. of Chapter V of the Code of Ethics.
 - j) Issuing opinions on matters covered by the Code of Ethics, whenever requested to do so by the corporate bodies, committees or structures of the CTT Group.
 - k) Receiving and processing any complaints about supposed incorrect or irregular acts and behaviour or breaches of the provisions of the Code of Ethics, ensuring that they are followed up, in coordination with the HRM and the ACR;

2. COET is also responsible for, within the scope of the Code of Good Conduct to Prevent and Fight Harassment at the Workplace:
 - a) Promoting its dissemination, application and fulfilment, in particular by raising awareness among those in management and supervisory positions of its importance in their relations with colleagues and subordinates;
 - b) Promoting the inclusion of relevant matters relating to compliance with the Code of Good Conduct to Prevent and Fight Harassment at the Workplace in the initiatives referred to in subparagraph b) of the previous paragraph;
 - c) Receiving and dealing with any complaints from victims or third parties of conduct considered to be harassment at work, including those to which the complainant is a direct or indirect witness, ensuring that they are followed up, in coordination with HRM;
 - d) Forwarding the complaints referred to in the previous paragraph to the competent departments, namely those with disciplinary powers for each case.
3. In carrying out its duties, COET shall prepare, within 60 (sixty) days of the end of each calendar year, a report on the activities carried out in the previous year in terms of applying both the Code of Ethics and the Code of Good Conduct to Prevent and Fight Harassment at the Workplace, which shall include all the cases involving complaints made under the terms of the previous paragraphs, whether they are in progress or have been finalised.
4. The report referred to in the previous paragraph should be submitted to the CGENC.

Chapter III FUNCTIONING

Article Five Meetings

1. COET shall meet ordinarily at least four (4) times a year, at a time and place indicated by the Chairperson after consulting the other members, and extraordinarily whenever convened at the request of any of its members.
2. Except in cases of manifest urgency, the meeting must be convened at least five days in advance, by post or e-mail, and accompanied by the agenda and the information necessary for the decisions to be taken.
3. Whenever it deems it relevant, COET may, on its own initiative, convene or invite any Employees, as well as internal or external consultants, to participate in its meetings.
4. Minutes must be drawn up of each COET meeting, approved at the following meeting and signed by all members present.

Article Six Quorum and Deliberations

1. COET may not deliberate unless the majority of its members are present or represented.
2. Any COET member may be represented at COET meetings by another member by means of a written communication addressed to the Chairperson, although no COET member may represent more than one other member.

3. COET meetings may be held by telematic means if the authenticity and confidentiality of statements, the security of communications and the recording of their content are ensured.
4. COET decisions are taken by a majority of votes cast, with the Chairperson having a casting vote.

Article Seven

Conflict of Interest

1. COET members shall abstain from participating in processes leading to deliberations in which they may find themselves in a situation of conflict of interest.
2. Whenever a COET member has or may have, on his/her own behalf or on behalf of a third party, a personal interest in a matter subject to deliberation or discussion by this committee, He/she must inform the committee of this fact, which will judge to what extent said personal interest may be perceived, particularly by third parties, as capable of influencing an impartial and objective decision, in which case the member in question will be prevented from participating in the discussion and deliberation.

Chapter IV

TREATMENT OF COMPLAINTS

Article Eight

Register of offences

1. HRM is responsible for recording all complaints received under the Code of Ethics and the Code of Good Conduct to Prevent and Fight Harassment at the Workplace Such record shall:
 - a) be drawn up in detail, containing at least the identification of the complaint, the date it was received and a summary description of its nature;
 - b) be forwarded to COET no later than 7 (seven) working days after receipt of the complaint, with a proposal for preliminary admission or outright rejection, as the case may be.
2. COET processes the complaints referred to in the previous paragraph according to the following methodology:
 - a) According to the record drawn up by the HRD, COET preliminarily admits or preliminarily rejects each complaint, and any rejection must be substantiated, resulting in the complaint being closed;~
 - b) The decision to reject a complaint may be taken by email and must be ratified at the first subsequent COET meeting and included in the respective minutes;
 - c) The preliminary admission decision will give rise to:
 - (i) An investigation conducted by the COET, which will, if necessary, have the collaboration of the legal department or the support of specialised internal or external services;
 - (ii) A final decision, either to close the complaint or to classify it as an actual offence against the Code of Ethics or the Code of Good Conduct to Prevent and Fight Harassment at the Workplace.
 - d) If COET concludes that there has been an offence, it will draw up a report and send it to the corporate or management body competent in the matter, which will include the grounds for the decision taken on the complaint under investigation, as well as a proposal for the

measures to be taken, which may be of a preventive, corrective, disciplinary or judicial nature.

3. Except in the case of an anonymous complaint, the complainant must be informed as soon as possible of the preliminary rejection or admission of the complaint in question.

Article Nine **Confidentiality**

1. COET members are strictly bound by the duty of confidentiality with regard to the content of any complaints, the decision-making process and the decisions taken at meetings, as well as with regard to all matters that come to their attention in the course of their duties and that justifiably merit confidential treatment.
2. All complaints shall be processed with strict confidentiality by all Employees involved in their recording and processing, and such Employees will be bound by the duty of confidentiality from the outset.
3. The identity of the complainant will be kept confidential unless the complainant expressly and unequivocally requests otherwise.
4. The confidentiality required does not prevent the complainant from being contacted and heard by COET, whenever this becomes necessary to determine facts that are relevant to the rigorous handling of the matter being reported.

Article Ten **Rights and guarantees**

1. Any complaints regarding offences shall be treated in a strictly independent and impartial way. No one with a conflict of interest with the complainant may intervene in the process.
2. Notwithstanding the applicable laws and regulations, the complainants acting in good faith shall not be subject to any form or manner of retaliation, discrimination, threat, sanction, or prejudicial treatment by any of the CTT Group's companies.
3. Both the complainant and the accused shall be granted the rights provided for in the rules of data protection and information security.

Article Eleven **Archiving and storage of data**

1. The system and the mechanisms used for recording and processing of offences are subject to the necessary security measures to ensure the flawless enforcement of the principles and guarantees set out in Regulation (EU) 2019/679 of the European Parliament and of the Council of 27 April 2016 (General Regulation on Data Protection) ("GRDP") and in Law no. 58/2019 of 8 August.
2. The Ethics Committee shall ensure the handling and safeguarding of records, and related documentation as set out in paragraph 1 of the Procedures for Handling Communications.

Chapter V **FINAL PROVISIONS**

Article Twelve
Internal Regulation

1. Each year, COET shall reflect on the application of these Regulations and shall draw up any proposals for amendments it deems necessary to ensure the full performance of its duties and the adequate exercise of its competences.
2. The proposals for amendments referred to in the previous paragraph shall be submitted to the CGENC and subsequently approved by a Board decision.
3. This Regulation may also be amended on the Board's initiative or at the request of the CGENC.

Article Thirteen
Entry into force

This Internal Regulation shall enter into force the day after its approval by the Board.