



2Windservice

ANTI-BRIBERY AND CORRUPTION POLICY

Preamble

2windservice Lda (the "Company") is a highly respectable and recognizable organization. It has gained its name and reputation among its competitors and consumers through its commitment to conducting business according to moral, ethical, and legal standards. The Company does not allow and tolerate any kind of bribery and corruption.

This Anti-Bribery and Corruption Policy (the "Policy") discourages and prohibits any kind of bribe or corrupt practice with any kind of stakeholder, including offering, promising, or providing any kind of means or value to any stakeholder, including customer, government official, business partner, or a third party to induce any improper action in relation to our business.

Objective

This Policy outlines the Company's moral and legal responsibility to counter bribery and corruption and provide tools and methods to keep check and balance on such practices.

Corruption

For the purpose of this Policy, bribery offense includes bribes, kickbacks, extortions, either active or inducement of any kind.

Penalty

Violation of this Policy is highly discouraged. If any employee of the Company is found in violation of this Policy can face severe civil and criminal penalties in addition to disciplinary proceedings.

Scope

This Policy applies to all the employees, directors, officers, and any third party which is directly engaged with our business. Further, the Policy applies to any subsidiary, branch office, or liaison office of the Company, regardless of its location.

Applicable Laws

This Policy is governed by the anti-corruption and anti-bribery laws of Portugal.

Prohibition of Bribery

- The company employees are prohibited from offering, promising, or sanctioning any kind of payment to government officials to secure improper business advantage or influence bureaucratic work.



- The Company prohibits employees from taking any ill gain or advantage through improper means from any private entities.

Employees are strictly advised to obtain approval from the Company to advance any item of value to any government official or private entity.

Provision of any kind of travel, gifts, cash, or meals to any government official or any person in exchange for any ill gain is prohibited.

Use of donations for any unfavorable gain or to influence any person is strictly prohibited. The Company will sanction any kind of charitable gesture or donation through the proper procedure.

Sometimes it must be necessary to appropriate funds to promote or demonstrate Company products or services, but it must not be used to influence the normal functioning of such officer. Before appropriating such funds, approval from the concerned department is necessary.

It is strictly prohibited to employ any government official, employee of a private entity, or their relatives to influence or gain an undue benefit. If the employment of such a person is necessary, prior approval of the Company's legal counsel is necessary.

Political contributions advanced to influence government officials are strictly prohibited. All political contributions will go through the proper channel outlined in a separate policy.

Third parties associated with the Company, either directly, are strictly prohibited from making any corrupt practice on behalf of the Company.

All payments to third parties in exchange for their services and contributions to the Company must be recorded appropriately and evidenced. Additionally, third parties interacting with a government official on behalf of the Company must be documented.

All third parties are obligated to do due diligence before engaging with government officials on behalf of the Company.

To ensure compliance with this Policy, the Company may conduct periodic audits of the Company. All employees, directors, officers, and stakeholders are obligated to cooperate with the audit process.

All directors, officers, employees, and stakeholders are obligated to report any violation of this Policy to the Company's legal team. Failure to report such an incident constitutes a violation of this Policy and leads to disciplinary action.

The Policy shall come into effect on 01.01.2024.

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