

Annual Report on the Implementation of the Corruption and Related Offenses Risk Prevention Plan

April 2026

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1 Context

This Annual Report on the Implementation of the Corruption and Related Offenses Risk Prevention Plan, hereinafter referred to simply as the Implementation Report, aims to fulfil the legal requirement set forth in Article 6(4)(b) of Decree-Law No. 109-E/2021, dated December 9. Specifically, it complies with the obligation to prepare an annual assessment report in April of the year following the implementation period, which must quantify the degree of implementation of the preventive and corrective measures identified, as well as forecast their full implementation.

Accordingly, following the implementation of the Corruption and Related Offenses Risk Prevention Plan in 2022, this annual implementation report is now presented, with the purpose of analysing the implementation of the preventive measures outlined in the aforementioned Plan.

The Corruption and Related Offenses Risk Prevention Plan of Whitestar, implemented in 2022 (hereinafter referred to as the Plan), was developed to meet the obligations set forth in the General Corruption Prevention Framework. It also reflects work previously carried out within the Compliance Program (Risk, Compliance, and Audit), which was already in place.

2 Assessment of the Implementation of the Measures Set Out in the Plan

All risk prevention measures included in the Plan had already been implemented prior to the formalization of the current corruption risk prevention plan. The Plan is available for consultation by all employees via the intranet (Document Management platform).

It is also confirmed that the controls are reviewed periodically to ensure their adequacy and effectiveness in mitigating and preventing the identified risks.

To further strengthen awareness of existing risks and controls, various awareness and training actions were carried out throughout 2024, focused on the topic of corruption and related offenses. These included, but were not limited to, Conflict of Interest, Gifts and Hospitality, Anti-Money Laundering and Counter-Terrorism Financing and the Code of Ethics and Conduct.

3 Amendments to the Plan

Whitestar has a Risk and Incident Management platform (RMS) in place, which ensures continuous communication by the risk owners identified in each business unit, as well as the ongoing need and opportunity to review and revalidate the impact and likelihood of each identified risk.

4 Conclusions and Recommendations

Whitestar, as an obligated entity under the terms of Decree-Law No. 109-E/2021, dated December 9 – which establishes the general regime for corruption prevention – hereby complies with the requirement set forth in Article 6(4)(b), which mandates the preparation of an annual assessment report.

In this regard, the present assessment report serves to support the contents of the related Plan and confirms compliance with its provisions.

The implementation of the measures referenced herein will continue to be monitored by the respective teams. Following this assessment, it is proposed that the Report be made available through publication on the Document Management platform (Governance).

According to the current Plan, and given that no incidents or supervening circumstances have occurred that would necessitate changes to the identified risks, it is appropriate to maintain the risks, their ratings, and associated controls. It is hereby confirmed that, to date, there are no records of incidents related to this topic, and therefore no corrective actions are outstanding or pending implementation.

To improve the monitoring process of the Plan, it is recommended that the following measures be applied throughout 2026:

- Department heads should maintain active involvement in the Plan, particularly in identifying new corruption and related offense risks, proposing new preventive measures, and reviewing existing risk prevention measures.
- Ongoing awareness and training initiatives should be carried out to reinforce understanding of corruption and related offense risks, with a subsequent recommendation for all employees to report any irregularities, thereby fostering greater engagement and a strong risk prevention culture.