



HYPERION ENERGY INVESTMENTS SGPS, S.A. (“HYPERION”)

Schedule 1 Anti-Bribery and Corruption (“ABC”) Policy

Version	Document name	Date	Signed by
01	Hyperion ABC Policy_v20240725	25 July 2024	Aytea A-Amandi, CEO
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At Hyperion, we are committed to maintaining the highest standards of integrity and ethical conduct. We recognize the detrimental impact of bribery on fair competition, public trust, and sustainable business practices. Our anti-bribery policy is designed to ensure compliance with applicable laws and regulations, prevent bribery in all its forms, and provide guidance on how to navigate potential risks. We believe that by upholding a strong anti-bribery stance, we can promote a culture of transparency, fairness, and trust within our organization and the broader business community.

Our anti-bribery policy includes the following key principles:

1. **Zero-Tolerance Approach:** We maintain a zero-tolerance approach towards bribery in any form. This applies to all employees, contractors, suppliers, and business partners, including small entities. We expressly prohibit giving, offering, promising, accepting, requesting, or authorizing bribes, kickbacks, or facilitation payments of any kind. We expect everyone associated with our organization to adhere to the highest ethical standards and to reject any form of bribery, whether it involves public officials, private individuals, or organizations.
2. **Training and Awareness:** We provide small programs to educate our employees about the risks and consequences of bribery, especially when engaging with public officials. Our initiatives aim to enhance awareness, promote ethical decision-making, and equip individuals with the knowledge and tools necessary to identify and address potential bribery situations.
3. **Gifts and Entertainment:** While business relationships may be enhanced and strengthened through appropriate gifts and entertainment, including business meals, they must not be intended or perceived as improperly influencing anyone, whether public officials, private individuals, or organizations. All gifts and entertainment expenses must be for legitimate business purposes, must not be lavish, excessive, or repetitive, and must be properly authorized and recorded in the company's books and records.

Please refer to Hyperion's Travel & Expense Rules and Thresholds Standard for further details on Gifts and Entertainment

4. **Charitable Donations and Community Contributions:** We strive to be a good corporate entity and may support the local communities in which we operate with charitable donations or contributions to community causes. However, any such activity must not be intended or perceived as improperly influencing anyone. All corporate donations or contributions must be reviewed in advance to identify any risks and must be related to our business (duly frame worked under our ESG purposes), for a reasonable value, and properly authorized and recorded in the company's books and records.

Please refer to Hyperion's Travel & Expense Rules and Thresholds Standard for further details on Charitable Donations or Contributions

5. **Hiring:** All decisions related to hiring, whether for paid or unpaid positions, must be based solely on merit and never in return for business advantages.
6. **Political Donations:** We expressly prohibit corporate political donations and its staff must remain mindful of any personal political donations that could be perceived as being made on behalf of the company.

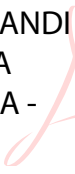
Please refer to Hyperion's Travel & Expense Rules and Thresholds Standard for further details on Political Donations

7. **Due Diligence:** We conduct thorough, risk-based due diligence on our business partners prior to engagement, to ensure they share our commitment to ethical conduct. This includes checking counterparties for adverse media through open source checks, and assessing their anti-bribery policies and procedures, integrity, and track record. For any material contracts we have a RFP with several entities which are selected with criteria different from price and we give special attention to quality of the services and culture (subjective elements) such as market exposure and background check about any misbehave activities. We expect full cooperation with our due diligence processes and that business partners promptly address any identified concerns. We include provisions in contract engagements that require business partners to adhere to applicable anti-bribery and corruption laws.
8. **Record Keeping:** We maintain complete and accurate books, records, and accounts, and all transactions must be properly recorded in a timely manner with reasonably identifiable detail and supporting documentation. We expressly prohibit mischaracterization of any transactions in our books and records.
9. **Reporting Mechanisms and Whistleblowing:** We maintain confidential and accessible simple reporting mechanisms, such as a dedicated email (compliance@hyperionrenewables.com), to encourage the reporting of any suspicions or incidents related to bribery. We assure everyone can report concerns without fear of retaliation, and we will thoroughly investigate all reported matters, taking appropriate action in accordance with the law.
10. **Continuous Improvement:** We are committed to continuously reviewing and improving our anti-bribery policy, procedures, and controls. We actively seek feedback from everyone to identify areas for enhancement and ensure that our policy remains effective in addressing emerging bribery risks.
11. **Compliance and Enforcement:** Non-compliance with our anti-bribery policy, whether by employees, will result in appropriate disciplinary actions, which may include termination of contracts or partnerships. We also cooperate fully with law enforcement authorities to combat bribery and uphold the rule of law. For the purpose of article 7.º of Decree-Law no. 109-E/2021, of 9 December - General Regime For The Prevention Of Corruption ("*Regime Geral de Prevenção da Corrupção* – RGPC"), we signal herein the applicable disciplinary and criminal sanctions: article 128.º (Employee Duties) and article 328.º (Disciplinary Sanctions), both from the Portuguese Labour Code and article 373.º (Corruption), article 372.º (Undue receipt or offer of an advantage), article 375.º (Embezzlement – *Peculato*), article 376.º (Embezzlement of Use – *Peculato de uso*), article 377.º (Economic Participation in Business), article 379.º

(Concussion), article 382.º (Abuse of Power), article 335.º (Influence Peddling) and 368-A (Money Laundering), all from the Portuguese Criminal Code.

By adopting this anti-bribery policy, we demonstrate our unwavering commitment to ethical conduct and fair business practices. We encourage everyone to join us in upholding these principles, as together we can contribute to a business environment that fosters trust, promotes integrity, and drives sustainable growth for all stakeholders.

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