

Responsible Lobbying Policy

1. Purpose and Scope

This Policy sets out GMA Creative Firm's approach to political engagement and lobbying, ensuring transparent, consistent and responsible conduct in government affairs. It develops, autonomously and in detail, the commitment that is also set out in the company's Code of Ethics (0007) - which is likewise public - and applies to all GMA Creative Firm's operations.

2. Statement of Non-Involvement in Lobbying

GMA Creative Firm publicly declares that it carries out no lobbying activity. The company makes no political contributions, financial or in kind, to political parties, politicians or candidates.

3. Approach to Responsible Lobbying

Should the company engage in the future in corporate advocacy, it commits to observing the following principles:

- Acting solely to contribute to a positive impact on society or the environment, always basing its position on reliable data and scientific evidence;
- Not delegating lobbying activities to intermediary organisations; any future involvement will require strict controls to ensure consistency with this Policy and the law;
- Maintaining the zero-tolerance policy on bribery and corruption set out in the Code of Ethics (0007), in line with the United Nations Convention against Corruption (UNCAC).

4. Governance, Control and Risk Management

The Impact & Sustainability Manager is responsible for applying this Policy and integrating it into the company's operations. The company identifies, manages and monitors non-compliance risks through regular assessments, and evaluates compliance with its governance and control framework. The Policy is embedded in operations as follows: any contact with political decision-makers or public position taken on behalf of GMA Creative Firm is validated in advance by the Managing Partners, and compliance with the Policy is verified annually in the Annual Management Review (0009).

Any stakeholder who wishes to clarify questions or report concerns about the company's political engagement and lobbying practices may do so safely and confidentially through the Grievance Management Policy (0005).

5. Approval and Public Availability

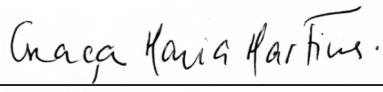
This Policy is formally approved by the Managing Partners, the highest governing body of GMA Creative Firm, who assess its compliance and review it annually. The Policy is published on the company's website (gma.com.pt) and is accessible to all stakeholders.

6. Review

This Policy is reviewed at least annually, or whenever significant changes occur in legislation, the company's activity or applicable standards.

7. Approval

Approved on 5 October 2026

Signature: 
Graça Martins · Managing Partner

Signature: 
Pedro Carrolo · Managing Partner