



Anti-Corruption and Anti-Bribery Policy

COMPANY POLICY · VERSION 1.1 · SEPTEMBER 2026

First written edition (v1.0), September 2026. These principles have applied to Eagle Dream since its incorporation. Version 1.1 updates the applicable-law reference and adds an external route for raising concerns.

Eagle Dream Lda. ("Eagle Dream") conducts its business honestly and ethically, takes a zero-tolerance approach to bribery and corruption in every country where it operates, and expects the same from everyone who works on its behalf.

1. Scope

This policy applies to the directors and employees of Eagle Dream and to all subcontractors, associates, agents and other third parties engaged by Eagle Dream to deliver services (together, "Representatives"). Compliance is a condition of every subcontracting agreement.

2. What is prohibited

- Offering, promising, giving, requesting or accepting a bribe, kickback or any improper advantage, directly or through a third party, to obtain or retain business or influence a decision.
- Facilitation payments (small payments to speed up routine actions by officials), even where local practice tolerates them.
- Gifts, hospitality or entertainment that are lavish, frequent, offered during a tender or negotiation, or intended to influence a decision. Modest, transparent business hospitality is acceptable.
- Political contributions on behalf of Eagle Dream, and donations used to disguise an improper advantage.
- Inaccurate books and records. All payments, expenses and gifts are recorded completely; no undisclosed accounts are kept.

3. Conflicts of interest

- Any Representative who holds a shareholding or other interest in Eagle Dream and at the same time serves a client in a personal capacity or through another intermediary declares that interest in writing to the client before Eagle Dream is engaged by that client.
- A Representative with such an interest takes no part in the client's decision to select, evaluate, approve or pay Eagle Dream. Those decisions rest with the client's own procurement and management under the client's rules, and pricing is set at arm's length.
- Where a client asks for a specific named individual and that individual contracts through Eagle Dream, the engagement is recorded as a client-initiated, named-resource engagement and stated in the declaration.
- Existing agreements with agencies and intermediaries are honored. Eagle Dream does not use a Representative's position at a client to circumvent them or to obtain confidential information.

4. Subcontractors and third parties

- Eagle Dream performs due diligence before engaging a subcontractor, proportionate to the role and the risk.
- Every subcontractor agreement includes an anti-corruption clause requiring compliance with this policy and with the client's code of conduct for business partners.
- Subcontractors may not pass work to further parties without Eagle Dream's written consent and the same commitments.
- A breach by a subcontractor is grounds for immediate termination of the engagement.

5. Applicable law

This policy follows the Portuguese Penal Code, Law 20/2008 and Decree-Law 109-E/2021 (Portuguese anti-corruption regime), the UK Bribery Act 2010, the US Foreign Corrupt Practices Act, the anti-corruption laws of every country in which we work, and the codes of conduct for business partners of the clients we serve. Where these differ, the stricter standard applies.

6. Raising concerns and consequences

Any suspected breach is reported to the Managing Director at info@eagledream.pt, or directly to the client's ethics channel where the client has one. A concern that involves the Managing Director, or that cannot be raised internally, can be taken to the client's ethics channel or to the Portuguese National Anti-Corruption Mechanism (MENAC). Reports are treated confidentially and no one suffers retaliation for raising a concern in good faith. Breaches lead to disciplinary action, termination of the contract and, where required, referral to the authorities.