

CORRUPTION RISK PREVENTION PLAN

ANNUAL EVALUATION REPORT

Oddsgate, S.A.
Abril 2026

1. INTRODUCTION

Following the publication of the National Anti-Corruption Strategy 2020–2024 in the Official Gazette, Decree-Law No. 109-E/2021 of 9 December (“DL 109-E/2021”) was issued, establishing the National Anti-Corruption Mechanism (“MENAC”) and approved the General Regime for the Prevention of Corruption (“RGPC”), setting out the entities required to comply with it, which are now obliged to adopt and implement a Compliance Program (“PCN”) in order to prevent, detect and sanction acts of corruption and related offences, within the meaning of Article 3 of the RGPC, carried out against or through the entity in question, thereby promoting a culture of integrity, transparency and organizational accountability, which must include the elements set out in Article 5 of the RGPC, namely:

- (i) a Corruption Risk Prevention Plan;
- (ii) a Code of Conduct;
- (iii) a Training Programme; and
- (iv) a Whistleblowing Channel.

In compliance with the RGPC, ODDSGATE, S.A. (“ODDSGATE”) prepared, approved and implemented, on 6th June 2025, its respective (i) Corruption Risk Prevention Plan (“PPR”), (ii) Code of Conduct, (iii) Training Programme, and (iv) Whistleblowing Channel, as legally required, and subsequently submitted the relevant documents and information requested through the MENAC digital platform on 26/06/2025.

The PPR implemented was the result of an internal analysis of ODDSGATE’s areas of activity, which identified and classified the main risks of corruption and related offences, as well as the corresponding preventive and corrective measures designed to mitigate them.

Accordingly, pursuant to the RGPC, namely Article 6.º (4) (b), ODDSGATE has prepared its annual evaluation report, to be submitted during the month of April of the year following that to which the implementation relates, with the purpose of assessing, in particular, whether the implemented PPR has, in general terms, been complied with, by measuring the level of implementation of the measures included in its Compliance Program since its implementation, with reference to the year 2025, specifically from 06/06/2025 onwards, including, where applicable, a quantification of the degree of implementation of the identified preventive and corrective measures, as well as an indication of their current implementation status or expected implementation.

2. IMPLEMENTATION OF THE COMPLIANCE PROGRAM

The current PPR of ODDSGATE was implemented only in June 2025; therefore, the period under analysis is necessarily limited and corresponds to an initial phase of implementation and operationalization.

During this period, the essential compliance instruments were adopted, including, in particular, the Whistleblowing Channel and the Code of Conduct of ODDSGATE, in accordance with the requirements set out in the RGPC.

The level of implementation of the PPR is thus at an early stage, although its execution is generally in line with the timetable and implementation priorities defined by Oddsgate.

Likewise, it is also planned for 2026 to review certain current internal policies of ODDSGATE, namely those relating to confidential information, firewall, backups, network access and authentication, passwords, among others, with a view to strengthening the internal control framework and mitigating risks.

3. IDENTIFICATION AND RISK ASSESSMENT

During the period under analysis, no new corruption or related offence risks were identified; only the moderate risk, which had already been identified in the PPR, remains.

The existing risks maintain the classification assigned in the PPR approved in June 2025; to date, no significant changes have occurred that would justify their reassessment.

It should be noted that, in early 2026, ODDSGATE reviewed its Know Your Customer (KYC) procedure, namely by refining the relevant preliminary questionnaire to be provided before establishing any business relationship with a new client, thereby making it more rigorous and strengthening the mechanisms for identification and risk assessment.

4. WHISTLEBLOWING CHANNEL

During the period under analysis, no reports were received and no internal proceedings related to corruption or related offences were initiated; furthermore, no evidence was identified that would justify the opening of an investigation.

5. INCIDENTS AND NON-COMPLIANCE

No incidents of corruption or related offences were recorded.

No breaches of the PPR were identified.

No relevant emerging risks were detected.

6. TRAINING PROGRAMME

The Training Programme was approved in June 2025. During the period under review, it remains in the preparation phase, namely regarding the selection of the training team and the development of the training content specified in the plan.

Its implementation will take place during 2026, in accordance with the PCN.

7. CONCLUSION AND RECOMMENDATIONS

The Compliance Program has been implemented by ODDSGATE in accordance with the RGPC.

To date, no reports, incidents or non-compliance situations have been recorded, nor have any moderate or high risks been identified, apart from the risk previously identified.

In this regard, the overall level of corruption risk at ODDSGATE remains low, with the exception of the moderate-risk activity (Client acquisition / contracting and maintenance of business relationships with existing clients) as identified in the PPR.

During 2026, ODDSGATE will fully implement the Training Programme, as well as continue to monitor risks, enhance the dissemination and accessibility of the Whistleblowing Channel, and periodically review its internal policies, particularly those related to compliance, with a view to the continuous improvement of its internal control system, transparency and the prevention of corruption and related offences.

The Compliance Officer responsible for the implementation, control and review of the PPR of ODDSGATE,

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Lawyer and Senior Legal & Compliance Officer

This version shall be published in Portuguese with an English translation. In case of discrepancy, the Portuguese version shall prevail.

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