

ODDS:GATE

PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS

INTERIM ASSESSMENT REPORT

(Identified high and maximum risk situations)

Oddsgate, S.A.

October 2025

(English Translation)

1. NORMATIVE FRAMEWORK AND OBJECTIVES

Arising from the **National Anti-Corruption Strategy 2020–2024**, published in the Diário da República, **Decree-Law No. 109-E/2021 of 9 December** (“DL 109-E/2021”), which established the **National Anti-Corruption Mechanism (MENAC)** and approved the **General Corruption Prevention Regime (RGPC)**, entities subject to its provisions are required to **adopt and implement a Compliance Program (PCN)** in order to **prevent, detect, and sanction** any acts of corruption and related offences committed **against or through the respective entity**.

Such program must include the elements set out in **Article 5 of the RGPC**, namely:

- (i) a plan to prevent risks of corruption and related offenses.
- (ii) a code of conduct;
- (iii) a training program; and
- (iv) a whistleblowing channel.

In compliance with the RGPC, **ODDSGATE, S.A.** (“ODDSGATE”) prepared, approved and implemented, on **June 6, 2025**, its respective (i) **Corruption Risk Prevention Plan (PPR)**, (ii) **Code of Conduct**, (iii) **Training Program**, and (iv) a **whistleblowing channel**, as legally required. Subsequently, on **June 26, 2025**, ODDSGATE also submitted through the MENAC digital platform the elements and information requested.

In accordance with the RGPC, namely the provisions of Article 6, paragraph 4, subparagraph (a), ODDSGATE prepared its interim evaluation report during the month of October, with the purpose of demonstrating the implementation and effectiveness of the measures set out in its PPR, with particular focus on monitoring the situations **classified in that Plan as high or maximum risk**.

2. IDENTIFICATION OF THE RISK SITUATIONS ASSESSED

Under the risk matrix defined in ODDSGATE's PPR, three categories of risk were identified: **Low**, **Moderate**, and **High**.

During the preparation of the Plan, only one situation was classified as **moderate risk, with no high or maximum risks identified** (see PPR).

Activity	Risk Description	Risk Assessment and Classification	Preventive/Corrective Measures
Attracting / Hiring Clients and Maintaining Business Relationships with Pre-Existing Clients	Establishing business relationships with clients who are the subject of investigations and/or judicial decisions in criminal proceedings relating to corruption offenses or related offenses or who are Politically Exposed Persons	Moderate	- Creation and monitoring of shared document management for mandatory archiving of all contracts signed by ODDSGATE. - Implementation and reinforcement of internal Compliance policies, specifically prepared, such as: (i) Anti-bribery Policy, (ii) Due Diligence Policy; (iii) Confidential Data & Information Policy. - Carrying out Know Your Customer (KYC) procedures before establishing any business relationship with a new client and, periodically, for clients with longer contracts and their archive. - Code of Conduct. - Internal whistleblowing channel.

(Pls. refer to the Corruption Risk Prevention Plan)

3. CONCLUSION

As detailed in ODDSGATE's PPR, and based on the risk matrix prepared therein, **no high or maximum risks were identified**.

Accordingly, **there are no risks to report in this interim assessment report**.

4. FOLLOW-UP ACTIONS

Although no high or maximum risks were identified under the PPR's risk assessment, **ODDSGATE will continue to implement and strengthen the measures** established in that Plan, namely:

- the implementation of new policies and the review of existing ones;
- the initiation of training activities, under the Training Plan approved and submitted to MENAC, covering, among other topics, Ethics and Integrity, Code of Conduct, and Corruption Prevention, to take place by the end of 2025 and the beginning of 2026;
- annual assessment, in accordance with the RGPC, namely of the effectiveness of the whistleblowing internal channel.

The Officer responsible for regulatory compliance and for the implementation, control and review of ODDSGATE's Corruption Risk Prevention Plan,

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

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