

Teixeira Duarte - Engenharia e Construções, S.A.

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Corruption and Similar Infractions Risk Prevention Plan

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IDENTIFICATION OF THE COMPANY

Teixeira Duarte – Engenharia e Construções, S.A.

Head Office: Lagoas Park, Edifício 2- 2740-265 Porto Salvo

Share Capital € 280.000.000

Legal Person and Cascais - Oeiras Commercial Registry Number 500.097.488

Holder of the Construction Permit no. 24-PUB

1. LEGAL FRAMING

On the 18th of March 2021, it was approved the 2020 - 2024 Anti-Corruption National Strategy (Strategy), under the terms of the Ministers Council Resolution no. 37/2021, of the 6th of April, which established six priorities: *i)* improve the knowledge, the training and the institutional practices with regard to transparency and integrity; *ii)* prevent and detect the corruption risks in the public action ; *iii)* engage the private sector in the prevention, detection and repression of corruption ; *iv)* strengthen the articulation between public and private institutions ; *v)* ensure a more effective and uniform enforcement of the legal mechanisms regarding the repression of corruption, improve the response time of the judicial system and ensure adequate and effective punishment ; *vi)* periodically elaborate and divulge reliable information on the corruption phenomenon.

Pursuing this intent, on the 9th of December 2021, it was published the Decree-law no. 109-E/2021, of the 9th of December (Decree-law 109-E/2021), which created the Anti-corruption National Mechanism and established the legal framework of corruption prevention which implements programs of legislation fulfilment. The programs of legislation fulfilment must include prevention and risk management plans, codes of ethics and conduct, training programs, whistleblowing channels and the nomination of a person in charge of the legislation fulfilment.

The article 6, of the appendix to the Decree-law 109-E/2021, sets forth that the entities with head office in Portugal, with 50 or more employees, as is the case of Teixeira Duarte – Engenharia e Construções, S.A., must adopt and implement a Corruption risk and similar infractions prevention plan (Prevention Plan) covering the whole organisation and activity, including the areas of administration, direction, operational and of support, and comprising:

- a) The identification, analysis and classification of risks and situations which may expose the entity to corruption acts and similar infractions, including those associated to the exercise of functions by the holders of the administration and direction bodies, considering the reality of the sector and geographical areas where the entity operates;
- b) Preventive and corrective measures allowing for the reduction of the probability of occurrence and of the impact of the risks and situations identified.

In addition, the Prevention Plan must include the activity areas of the entity with risk of practice of corruption acts and similar infractions and the occurrence probability and foreseeable impact of each situation, in order to allow risk classification.

For the purposes of the present Prevention Plan, corruption and similar infractions relate to crimes of corruption, unlawful receiving and offering advantage, embezzlement, graft, misappropriation, misuse of power, forfeit, influence peddling , money laundering or fraud in obtaining or diversion of subsidy, subvention or credit, set forth in the Penal Code, approved in the appendix attached to the Decree-law no. 48/95, of the 15th of March, in its current edition, in the Law no. 34/87, of the 16th of July, in its current edition, in the Military Justice Code, approved in appendix to the Law no. 100/2003, of the 15th of November , in the no. 50/2007, of the 31st of August, in its current edition, in the Law no. 20/2008, of the 21st of April, in its current edition, and in the Decree-law no. 28/84, of the 20th of January, in its current edition.

In this context, on the 9th of May 2022, Teixeira Duarte - Engenharia e Construções, S.A. approved, in meeting of Board of Directors, its Risk of Corruption and Similar Infractions Prevention Plan.

2. INTRODUCTION

The Risk Management assumes an important role in the management structure of the Group Teixeira Duarte, to which belongs Teixeira Duarte - Engenharia e Construções, S.A.: the functioning rules and the guiding principles which have defined the operation of the Group Teixeira Duarte, allowing for the successful overcome of the challenges encountered throughout over 100 years of activity, which are a reason for pride and an incentive for the Group's growth.

Based on the Mission and Values and enshrined in its Policy and in the Code of Ethics and Conduct, the activity of Teixeira Duarte – Engenharia e Construções, S.A. And of its employees is guided by the assumption of actions which give priority to the prevention

and prohibition of non-compliance practices, such as bribery, corruption or the violation of principles of corporate ethics and thus abide by the anti-corruption laws and regulations applicable in the countries where it operates, as well as the internal rules of Teixeira Duarte.

Bearing in mind its principles of operation, Teixeira Duarte - Engenharia e Construções, S.A. elaborated this Risk and Similar Infractions Prevention Plan - always taking into consideration the different realities of operation, both geographical and sectoral - which aims at identifying and classifying the risks and situations which might expose the entity to corruption and similar infractions acts and, also, establish and implement a set of measures and procedures based on the Policy, the Code of Ethics and Conduct and in the Mission and Values of Teixeira Duarte, in order to ensure a greater effectiveness and evidence of the compliance with the law and internal rules, allowing for the reduction of the probability of occurrence and the impact of the identified risks and situations, thus contributing to an environment of integrity and ethics culture in the development of Teixeira Duarte – Engenharia e Construções, S.A.'s activity.

3. MISSION AND VALUES AND CODE OF ETHICS AND CONDUCT

Teixeira Duarte's Mission and Values have always been transmitted to all workers by example and daily practice and constitute the essence of its ethics and shape the conduct of its employees, having been described at Teixeira Duarte as a faithful reflection of its past and as pillars for its future.

The central core of Teixeira Duarte's Ethics is based on its mission and values which are defined below:

The Mission – To Do, contributing towards the construction of a better world – defines what moves its Employees on a daily basis, and constitutes the goal shared by all regardless of their area of activity, geography, or work team.

"To Do" because the intention is always to make it happen.

"Contributing" because we must have the notion that no one does anything alone.

For the "Construction" of which we are all a part of.

Of "a better world" which is the goal we all share.

The Values are the way one should act to achieve that goal and characterise the Company's involvement with all related parties. They are:

Skill – Value based on Teixeira Duarte's origin and design: "Engineering House", where, from the research and domain of the principles of science, one innovates and develops knowledge and techniques to apply, with efficiency and minimum waste, in the resolution of practical issues, forming, encouraging and trusting the people in-house.

Truth – Consists in the clear appreciation of the facts, exposing things as they are, with good faith and rigour, assuming errors and limitations such as successes and capabilities and always reporting in a transparent and appropriate way according to the Company's scope of action and responsibilities.

Commitment – Corresponds to the responsible and committed manner in which challenges and responsibilities are accepted, based on the importance of the "Word given" and the fulfilment of all obligations, as much towards third parties as to loyalty and complicity towards own colleagues and to the Company itself, with respect for others, for the dignity of all mankind and for the sustainability of the community.

It is worthy of note that Teixeira Duarte– Engenharia e Construções, S.A. has an Ethics and Conduct Code which confirms the mission and values that define Teixeira Duarte's ethics and establishes rules that reinforce, develop or complement them, thus defining the Conduct of all recipients. Actually, "Teixeira Duarte – Engenharia e Construções, S.A.'s Ethics and Conduct Code" establishes, with a mandatory nature (I) the General Rules of Conduct aiming at compliance with the law , respect for the human person and the community, respect for the environment and compliance with internal rules; (II) the rules of conduct applicable in the relationship between employees and the company; and (III) the rules of conduct between employees and third parties, in particular public authorities, clients and suppliers and the competition, including, in this latter chapter, topics such as independence and collaboration with public authorities, measures to prevent money laundering, terrorism financing, conflicts of interest and corruption.

It is set forth in the said Code that, with regard to the monitoring of the implementation of its regulations, it is the duty of the Employees - and Indirect Recipients, in accordance with the terms and scopes mentioned above - to watch over the fulfilment of the Ethics and Conduct Code, by divulging it, by invoking it in their defence, by applying it and by demanding its application to their hierarchies, including these hierarchies, and to communicate eventual irregularities identified by the means and procedures implemented by each company for that purpose, which tend to be defined as Ethics Channel.

4. THE ORGANISATION

"Teixeira Duarte - Engenharia e Construções, S.A.", as main company of the Teixeira Duarte Group in the Construction sector, currently develops its activity in the areas of Geotechnics and Foundations, Rehabilitation, Maritime Works, Buildings, Infrastructures (including participation in Railway Works), Metalworking and Underground Works, which divide the production and commercial aspects into structures that are essential to management training and in the monitoring of their career and that integrate Exploration and Management Centres, equally deploying a set of Support Structures specific for this construction sector, in particular in the areas of Formwork and Pre-Stressing (including a Rebar Cages Production Centre), Equipment Management and Logistics proposals and a Materials Laboratory. Also integrated in "Teixeira Duarte– Engenharia e Construções, S.A." there are other Structures that, despite more focused on the Construction activity, also support other sectors of the Group in the area of Management and Supply Systems.

In addition to these structures, the Company also has an important Design Centre, through are carried out technical engineering studies and designs, for the whole Group, which has proven to be of the utmost importance in the submittal of bids and designs with solid technical grounds.

Besides all those structures more directly linked to the Company's operational area, there is a set of Central Structures and Services with special responsibilities of cross-sectional support to the Group Teixeira Duarte, which constitute the so-called Corporate Area.

The Board of Directors of Teixeira Duarte - Engenharia e Construções, S.A., composed of four Members, besides the attributions and competences assigned by law, by the by-laws or by delegation of the General Assembly, is responsible for:

- a) Manage the Company's activities, subordinating itself to the deliberations of the shareholders or to the interventions of the surveillance body or statutory auditor only in the cases the Law or the by-laws so require.
- b) Exercise, without prejudice of the dispositions of the previous paragraph, the largest powers of administration of the Company and practice all acts and operations leading to the execution of its social object;
- c) Define the strategies of the Company and promote the elaboration of its plans and budgets, as well as the periodical reports regarding their execution;
- d) Negotiate and enter all contracts, whatever their extent, shape or nature, the Company be a party of;
- e) Deliberate the Company acquires, alienates or encumbers any rights and movable and immovable assets, including vehicles, and rights over industrial property, licences and permits, as well as quotas, shares, bonds or other titles;

- f) Adjust and contract financing or loans and carry out other financing operations, under the terms legally authorised, in any institutions or markets, as well as posting / providing or receiving bonds or real or personal guarantees on behalf of the Company, namely sureties and pledges;
- g) Represent the Company, on or off court, actively and passively, promote, reply, compromise or desist in any lawsuits and engage in all sorts of arbitrations;
- h) Deliberate the participation of the Company in the establishment, share capital subscription, assumption of interests or to take part in other companies, groupings or associations of any sort and to cooperate, collaborate or establish consortia with other entities, as well as providing technical services of administration and management or human resources and financial support to subsidiaries companies or to any other with which subordination agreements have been entered in;
- i) Delegate any of its members with the necessary powers to, together or individually, carry out certain tasks or specific activities;
- j) Nominate attorneys-in-fact or proxies of the Company to practise certain acts or category of acts with powers and attributions inscribed in the respective power of attorneys issued for that purpose;
- k) Designate the Secretary of the Company and its Deputy.

The Corruption Prevention Legal Framework establishes in paragraph a), of no. 2, of the article 6, that the Prevention Plan must indicate the areas of activity of the entity with risk of practice of acts of corruption and similar infractions. Thus, it must be noted that Teixeira Duarte - Engenharia e Construções, S.A., in its Prevention Plan, identified, as main areas at risk, other than the Board of Directors itself, the production, commercial and procurement areas, as it is easy to verify in chapter eight of this plan.

5. PERSON IN CHARGE OF THE EXECUTION OF THE PREVENTION PLAN

In accordance with the paragraph e) of the no. 2 of the article 6, of the Corruption Prevention Legal Framework attached to the Decree-law 109-E/2021, of the 9th of December, Teixeira Duarte – Engenharia e Construções, S.A. designated, as person in charge of the execution, control and revision of the Risk and Similar Infractions Prevention Plan, Carlos Jorge Cavaca Ferraz.

6. RISK MANAGEMENT AND MATRIX

The risk management is a process through which entities analyse, methodically, the risks inherent to their activities with the objective of attaining a sustained advantage in each individual activity and in all the activities carried out by the company.

Teixeira Duarte - Engenharia e Construções, S.A. applies a Risk Management Matrix which includes the identification of risks of corruption and similar infractions, namely competition, money laundering, terrorism financing, conflicts of interests and of corruption.

The risk management process of the Group Teixeira Duarte, to which belongs Teixeira Duarte – Engenharia e Construções, S.A., incorporates several risk assessments with different levels and complexity, taking into consideration the issues to process and following the identification of the type of risks associated to the various activity areas of the Group. Therefore, for the purposes of the elaboration of this Corruption and Similar Infractions Risk Prevention Plan and for the definition of a risk matrix, were developed different methods of identification, analysis, evaluation, treatment, control, report and revision, on order to achieve the objectives set for the implementation of the risk management system. These are methods of a qualitative basis using weighting systems with multiple factors (probability estimation, impact on the organisation or risk control effectiveness), which will be detailed below:

6.1. Risk Identification

The risk identification is done by the members of the Board of Directors of Teixeira Duarte - Engenharia e Construções, S.A. and of Teixeira Duarte - Gestão de Participações e Investimentos Imobiliários, S.A., who will assess and identify the dangers, through meetings and interviews with interested parties and, also, through the analysis of documents with data collection and treatment. The dangers or the practice of acts which may involve a risk are structured according to the nature of the non-compliance and the category of the risk.

6.2. Inherent risk

The inherent risk results from the combination between the probability of occurrence or of materialisation of the danger and its impact in the organisation and ranges from 1 (residual risk) to 5 (very high risk).

		Impacto				
		Insignificante	Baixo	Moderado	Elevado	Catastrófico
Risco Inerente						
1 - residual						
2 - baixo						
3 - moderado						
4 - elevado						
5 - muito elevado						
Probabilidade	Muito baixa	1	1	1	1	2
	Baixa	2	1	1	2	3
	Moderada	3	1	2	3	4
	Elevada	4	1	2	4	5
	Muito elevada	5	2	3	4	5

Table1 Inherent risk

6.3. Occurrence probability

The determination of the probability of occurrence was achieved with resource to a semi-quantitative multi-factor assessment. The probability ranges from 1 (very little probable or very low probability) to 5 (very probable or very high probability). In the Semi-quantitative multi-factor assessment, the factors may have a numeric weighting, determined by the importance of the factor in the assessed danger.

Classificação	Probabilidade da atividade de não-conformidade	Interação com Entidades Públicas	Suscetibilidade de ocorrência deste tipo de perigo na organização	Suscetibilidade de ocorrência do perigo em que a organização opera	Índice de Percepção de Corrupção CPI	Complexidade do esquema	Nº de pessoas para perpetrar o esquema	Nº de pessoas envolvidas na aprovação
		Atividade envolve interação com funcionários públicos ou equiparados?	Existe na organização um potencial de ocorrência deste tipo de perigo?	Existem incidentes de não-conformidade da mesma natureza, em organizações da mesma área de negócio que sejam de conhecimento público?	Qual o índice de percepção de corrupção no país? Atualizar quadro CPI sempre que necessário	Tem algum esquema de não-conformidade? Se sim, qual a complexidade?	O esquema de não-conformidade envolve mais do que uma pessoa? Se sim, quantas?	O esquema de aprovação envolve mais do que uma pessoa?
0	Não Aplicável	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1	Muito baixa	Sem interação	Nenhum caso	Nenhum caso	>85	Muito complexo	Cinco ou + pessoas	Cinco ou + pessoas
2	Baixa	Pouca interação	Poucos casos	Poucos casos	>70	Complexo	Quatro pessoas	Quatro pessoas
3	Média	Alguma interação	Alguns casos	Alguns casos	>55	Alguma complexidade	Três pessoas	Três pessoas
4	Elevada	Bastante interação	Bastantes casos	Bastantes casos	>40	Pouco complexo	Duas pessoas	Duas pessoas
5	Muito elevada	Muita interação	Muitos casos	Muitos casos	>0	Nada complexo	Só uma pessoa	Só uma pessoa

Table2 Occurrence probability

6.4. Non-compliance Impact

For the determination of the impact of the non-compliance on the organisation, it was adopted a methodology used for the probability, i.e., a semi-quantitative multi-factor assessment, ranging from 1 (insignificant impact) to 5 (catastrophic impact).

Classificação	Grau de impacto potencial da não-conformidade na empresa e nos negócios	Impacto de potenciais incidentes na empresa	Impacto de potenciais incidentes nas empresas da mesma área de negócio	Valores potenciais de multas	Restrições regulatórias de operação / expansão	Impacto sobre operações	Impacto sobre recrutamento e retenção de funcionários	Impacto sobre retenção de clientes
		Qual o grau de impacto da consequência de atos de não-conformidade na empresa ou o grau de impacto que poderia ter tido?	Qual o grau de impacto da consequência de atos de não-conformidade em empresas da mesma área?	Qual a expressão das multas aplicadas?	Houve restrições legais ou regulatórias na atividade da empresa?	Qual o impacto sobre as operações?	Houve impacto sobre o recrutamento de funcionários?	Houve impacto na avaliação de clientes?
0	Não Aplicável	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1	Impacto insignificante	Impacto insignificante	Impacto insignificante	Sem expressão	Não	Sem expressão	Sem expressão	Reclamações mínimas
2	Baixo impacto	Pequeno impacto	Pequeno impacto	Pouca	Pouca	Pouco	Pouco	Declínio mínimo das relações
3	Impacto moderado	Impacto moderado	Impacto moderado	Algum	Alguma	Algum	Algum	Perda ou declínio das relações
4	Impacto elevado	Impacto importante	Impacto importante	Bastante	Bastante	Bastante	Bastante	Relacionamentos tensos
5	Impacto catastrófico	Impacto catastrófico	Impacto catastrófico	Muita	Muita	Muito	Muito	Perda de relações

Table 3 Impact of the non-compliance

6.5. Anti-corruption control, its effectiveness and residual risk

The pre (existent) controls in the organisation were systematised as follows:

- system controls;
- preventive controls;
- detection controls;
- schematics specific controls (when applied).

The level of implementation in the organisation of these controls is classified from 1 to 5. It has a value of 1, for the controls which are effectively implemented in the organisation, and of 5, when these controls do not exist. To each type of risk corresponds a type of control, with different weighting and attributed according to the importance of the control regarding the type of risk. The weighting of the implementation levels for each type of control results in the effectiveness of the risk control, being 1 a control very effective and 5 not effective at all. The residual risk is determined through the conjugation of the inherent risk with the controls effectiveness. The value is 1 when the risk is residual and 5 when the risk is high.

		Eficácia do Controlo				
		Muito Eficaz	Eficaz	Média	Pouco Eficaz	Nada Eficaz
Risco Inerente	Muito baixa	1	1	1	1	1
	Baixa	2	1	1	2	2
	Moderada	3	1	2	3	4
	Elevada	4	1	2	4	5
	Muito elevada	5	2	3	4	5

Table 4 Residual risk

6.6. Risk Tolerance

Perfil de Risco	
1	Adverso
2	Conservador
3	Equilibrado
4	Dinâmico
5	Arrojado

The organisation risk tolerance is assumed by the organisation administration through a qualitative evaluation. For the determination of the risk tolerance, it is taken into consideration the categories of risk and the types of risk (which may be checked in the table below). Teixeira Duarte – Engenharia e Construções, S.A.'s tolerance to the risk ranges from 1 (profile adverse to risk) to 5 (audacious profile).

6.7. Risk acceptance and re-evaluation

The residual risks with a value higher than the organisation's tolerance for each type of danger are considered as not acceptable, thus requiring the respective re-evaluation. The re-evaluation may concern the level of implementation of the control (control effectiveness) or the risk tolerance. The re-evaluation includes planning the introduction of new controls or the increase of their level of implementation, in order to reduce the residual risk. If there is no will to or if there are no conditions in the organisation to increase the level of implementation of the controls, the solution is the re-evaluation of the organisation's tolerance to the risk.

7. CONTROL SYSTEMS OF THE RISKS AND SIMILAR INFRACTIONS PREVENTION PLAN

The Prevention Plan is a management tool dynamic and of communication of the risks of corruption and of similar infractions, being subject to control and monitoring, in order to ensure the effectiveness of the measures comprised therein, as well as its use in accordance with the needs of the company.

The execution of the Prevention Plan is subject to a control system which includes:

- a) The elaboration of a mid-term assessment report, to be submitted until the end of October, every year, whenever it is verified, following the application of the risk matrix in the assessment of the organisation's risks, the identification of high risks for the organisation.
- b) The elaboration, the month of April of the following year of its execution, of an annual evaluation report, including the quantification of the level of implementation of the preventive and corrective measures identified, as well as its estimated full implementation.

The Prevention Plan will be revised every three years, or whenever a revision is required to meet a possible alteration of its attributions or its organic structure, and will be published in the internet site of Teixeira Duarte – Engenharia e Construções, S.A. (www.teixeiraduarteconstrucao.com) and in the Portal of the Employee of the Group Teixeira Duarte.

8. CORRUPTION AND SIMILAR INFRACTIONS RISK ASSESSMENT PLAN

Considering the risk matrix defined above, Teixeira Duarte – Engenharia e Construções, S.A. submits its Corruption Risk and Similar Infraction Evaluation Plan which is attached to the Risk and Similar Infraction Evaluation Plan of Teixeira Duarte – Engenharia e Construções, S.A..

Porto Salvo, on the 9th of May 2022

Teixeira Duarte – Engenharia e Construções, S.A.

Manuel Maria Calainho de Azevedo Teixeira Duarte

Pedro Miguel Martins Cardoso Costa

Sérgio Paulo Reis Pereira

Paulo Alfredo de Carvalho Serradas

Appendix - Corruption and Similar Infractions Risk Assessment

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
Board of Directors	Corporate ethics risks	Bribery and corruption	Absence of independence and neutrality in the decisions or unsubstantiated decision with breach of functional values, such as independence, objectivity, impartiality.	3	3	4	<p>Corruption and Similar Infractions Prevention Plan</p> <p>Company's code of ethics and conduct of mandatory fulfilment, which is intended to all board members, employees and other representatives of the Company;</p> <p>Involvement of the Board of Directors in the processes of evaluation and implementation of the risk control measures;</p> <p>Control of the compliance with laws and regulations applicable;</p> <p>Collegial deliberation system in accordance with the Company's by-laws.</p>	<p>Implementation of compulsory training on compliance issues, corruption and awareness for the members of the Board of Directors;</p> <p>Revision of the Code of Ethics and Conduct taking into consideration new legislation in force, also applicable to the Board of Directors of the Company;</p>
	Corporate ethics risks	Bribery and corruption	Passive corruption of the members of the organisation Board of Directors, through influence peddling.	3	4	4	<p>Record of the deliberations of the Board of Directors in minutes accessible to all;</p> <p>Nomination of a Chief <i>Compliance Officer</i> with the objective of implementing an effective <i>Compliance</i> Program which help to achieve the compliance of the Company and, as a consequence, of the Board of Directors;</p>	<p>Elaboration of criteria which allow for the distinction between the decisions made by the Board of Directors and decisions of strategic management;</p> <p>Revision of the whistleblowing policy in order to adjust it to the new legislative realities.</p>
	Corporate ethics risks	Bribery and corruption	Favouring of third parties by members of the Board of Directors to their own benefit.	3	3	4	<p>Record of the deliberations of the Board of Directors in minutes accessible to all;</p> <p>Nomination of a Chief <i>Compliance Officer</i> with the objective of implementing an effective <i>Compliance</i> Program which help to achieve the compliance of the Company and, as a consequence, of the Board of Directors;</p>	<p>Revision of the whistleblowing policy in order to adjust it to the new legislative realities.</p>
Board of Directors	Internal organic risks	Breach of confidentiality	Use of privileged information by members of the Board of Directors to their own benefit.	4	4	5	<p>Periodical execution of internal audits;</p>	

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
	Internal organic risks	Internal non-compliance	Decisions in favour of conflicting interests by the Board of Directors' members, against or in violation of the Company's own interests.	3	4	4	Conflict of Interests Policy	
Commercial	Unlawful competition	Corporate ethics risks	Agreement between competitors to raise, fixate or maintain the selling price of goods or services, thus restraining competition.	3	4	4	Holding training sessions on corruption matters and awareness sessions to employees, including those working in areas geographically exposed to higher risk; Involvement of the Board of Directors in the evaluation and implementation of the risk control measures;	Revision of the whistleblowing policy in order to adjust it to the new legislative realities. Implementation of an employees and managers rotation system , in areas of high level of corruption risk;
	Unlawful competition	Corporate ethics risks	Agreement between companies to share information, market manipulation (market shares, clients' division and geographical areas).	3	4	4	Existence of Internal Control Procedures for the evaluation of the implemented measures;	Revision of the conflict of interests policy implemented by the Company;
	Unlawful competition	Corporate ethics risks	Previous agreement on the awardee of a contract, with price increase;	3	4	4	Existence of flowcharts with detailed procedures and multiple levels of approval in order to avoid the concentration of decisions in just one person;	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force; Revision of the procedures implemented to avoid corruption and similar infractions; Assess the implementation of performance assessment models with

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
Commercial	Internal non-compliance	Internal organic risks	Decisions in favour of conflicting interests, against or in violation of the Company's own interests.	4	4	5	Existence of restrained access procedures to bank accounts using signatures or authorised passwords;	particular specifications regarding ethics and compliance;
	Bribery and corruption	Corporate ethics risks	Sponsoring with clear or apparent objective of pressure or influence of procurement decisions.	4	4	5	Functions segregation and sequential revision; Periodical execution of internal audits;	Update of the training sessions program regarding corruption matters and awareness sessions to employees, including those working in areas geographically exposed to higher risk, taking into consideration the new legislative realities;
	Bribery and corruption	Corporate ethics risks	Donations to political parties with a clear or apparent objective of pressure or influence over decisions (except legitimate donations);	4	4	5	Carry out end of contract interviews with suppliers and third parties, in order to assess the performance of the employees involved in the process; Periodical communication with clients about the policy of gifts, hospitality and entertainment implemented in the organisation;	Improvement of the implemented procedures to avoid corruption by the employees of the commercial sector.
Commercial	Bribery and corruption	Affects the continuity of business of one single Company.	Obtaining previous information of public tender procedures through the payments or favours rendered to public agents.	3	4	4	Implementation of a management procedure for the evaluations of clients; Company's Whistleblowing Policy; Corruption and Similar Infractions Risk Prevention Plan Conflict of Interests Policy	

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
Commercial	Bribery and corruption	Corporate ethics risks	Commercial practices or other sort of hospitality with clear or apparent objective of pressure or influence of decisions. Expensive meals and trips (except occasional offer of business meals, travel expenses out of the business scope, and others)	4	3	4	Nomination of a Chief <i>Compliance Officer</i> with the objective of implementing an effective <i>Compliance</i> Program which help to achieve the compliance of the Company;	
	Bribery and corruption	Corporate ethics risks	Non-respect of the procedures set forth by the Company in order to unlawful attainment of an advantage.	4	4	5		
	Bribery and corruption	Corporate ethics risks	Exercise of private activity during working hours with conflict of interests and breach of the functional duties and values, such as independence, integrity, objectivity, impartiality and confidentiality.	4	1	1		

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	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
	Bribery and corruption	Corporate ethics risks	Gifts or other sort of gratifications with clear or apparent objective of pressure or influence of decisions. Gifts of average and high value (except merchandising, promotional objects, and others).	4	3	4		
Production	Bribery and corruption	Corporate ethics risks	Commercial practices or other sort of hospitality with clear or apparent objective of pressure or influence of decisions. Expensive meals and trips (except occasional offer of business meals, travel expenses out of the business scope, and others)	3	2	2	<p>Holding training sessions on corruption matters and awareness sessions to employees, including those working in areas geographically exposed to higher risk;</p> <p>Functions segregation and sequential revision;</p> <p>Periodical execution of internal audits;</p> <p>Carry out end of contract interviews with suppliers and third parties, in order to assess the performance of the employees involved in the process;</p> <p>Periodical communication with clients about the policy of gifts, hospitality and entertainment implemented in the organisation;</p>	<p>Revision of the whistleblowing policy in order to adjust it to the new legislative realities.</p> <p>Implementation of an employees and managers rotation system , in areas of high level of corruption risk;</p> <p>Revision of the conflict of interests policy implemented by the Company;</p> <p>Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force;</p> <p>Improvement of the implemented procedures to avoid corruption by the employees of the production sector;</p> <p>Assess the implementation of performance assessment models with</p>
	Bribery and corruption	Corporate ethics risks	Commercial practices or other sort of hospitality with clear or apparent objective of pressure or influence of decisions. Gifts of average and high value (except merchandising, promotional objects, and others).	3	2	2		

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
Production	Internal non-compliance	Internal organic risks	Decisions in favour of conflicting interests, against or in violation of the Company's own interests.	3	2	2	Accounting control procedures and analysis, approval and payment of the supplier's invoice; Employees performance assessment model;	particular specifications regarding ethics and compliance; Update of the training sessions program regarding corruption matters and awareness sessions to employees, including those working in areas geographically exposed to higher risk, taking into consideration the new legislative realities;
	Bribery and corruption	Corporate ethics risks	Sponsoring with a clear or apparent objective of pressure or influence over decisions (except legitimate donations);	3	3	3	On site performance procedures to comply with legal requirements and the Company's ethics; Nomination of a Chief <i>Compliance Officer</i> with the objective of implementing an effective <i>Compliance</i> Program which help to achieve the compliance of the Company;	
	Internal non-compliance	Internal organic risks	Log an invoice corresponding to goods not delivered.	3	2	2	Corruption and Similar Infractions Risk Prevention Plan	
Production	Environmental non-compliance	Corporate ethics risks	Disposal of waste in a non-authorized location when the contract and the law obliges to their disposal in a duly authorised landfill.	3	2	2	Existence of flowcharts with detailed procedures and multiple levels of approval in order to avoid the concentration of decisions in just one person; Conflict of Interests Policy	

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
	Bribery and corruption	Corporate ethics risks	Payments of small amount with the clear objective of speeding certain procedures which the public agent has the duty of performing.	3	2	2		
	Bribery and corruption	Corporate ethics risks	Requests from public agents in exchange of favours (lunches, house works, vehicle, gardens maintenance).	3	2	2		
	Bribery and corruption	Affects the continuity of business of one single Company.	Invoicing of services not rendered.	3	3	3		
	Internal non-compliance	Employees' conduct risks.	Accept not reputable suppliers or not accepting good clients due to the wrongful application of previously defined acceptance criteria.	3	3	3	Periodical execution of internal audits; Corruption and Similar Infractions Risk Prevention Plan Conflict of Interests Policy	Revision of the whistleblowing policy in order to adjust it to the new legislative realities.

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
Procurement	Internal non-compliance	Corporate ethics risks	Decisions in favour of conflicting interests, against or in violation of the Company's own interests.	3	3	3	<p>Employees performance assessment model;</p> <p>Functions segregation and sequential revision;</p> <p>Existence of flowcharts with detailed procedures and multiple levels of approval in order to avoid the concentration of decisions in just one person;</p> <p>Existence of restrained access procedures to bank accounts using signatures or authorised passwords;</p> <p>Accounting control procedures and analysis, approval and payment of the supplier's invoice;</p>	<p>Implementation of an employees and managers rotation system , in areas of high level of corruption risk;</p> <p>Revision of the conflict of interest policy implemented by the Company.</p>
	Bribery and corruption	Corporate ethics risks	Payments of small amount with, usually made in certain countries, with the objective of speeding certain procedures which the client has the duty of performing.	3	3	3	<p>Revision of the Code of Ethics and Conduct taking into consideration new legislation in force, also applicable to the Board of Directors of the Company;</p> <p>Revision of the procedures implemented to avoid corruption and similar infractions;</p>	<p>Assess the implementation of performance assessment models with particular specifications regarding ethics and compliance;</p>
Procurement	Internal non-compliance	Employees' conduct risks.	Existence of fraud in the management and analysis of pricing proposals with the intent of privileging suppliers.	3	3	3	<p>Update of the Training sessions program regarding corruption matters and awareness sessions to employees, including those working in areas geographically exposed to higher risk, taking into consideration the new legislative realities.</p>	<p>Update of the Training sessions program regarding corruption matters and awareness sessions to employees, including those working in areas geographically exposed to higher risk, taking into consideration the new legislative realities.</p>
	Internal non-compliance	Internal organic risks	Log an invoice corresponding to goods not delivered.	3	3	3		

Main activity areas with risk of practice of acts of corruption and similar infractions.	Risk Identification			Risk Classification			Mitigation Measures (preventive and corrective)	
	Risk category	Infraction type	Risk description	Probability	Impact	Risk level	Implemented	To be implemented
	Bribery and corruption	Employees' conduct risks.	Receive a part of the amount of a purchase or of a contract, directly or through an intermediary.	3	1	1		

