

## Annual assessment report on the implementation of the Risks of Corruption and Related Offences Prevention Plan

[Pursuant to Article 6(4)(b) of Decree-Law no. 109-E/2021 of 9 December]

A. Reference Period	
Start date	Start date
End date	End date

A. Assessment of the implementation of the Risk Prevention Plan ("RPP")			
	YES	NO	<b>Observations<sup>1</sup></b> <small>(must be filled in if the answer is no, including an explanation of the reasons and the measures to be taken)</small>
a) Does the identification, analysis, and classification of risks and situations that may expose the entity to acts of corruption and related offences — including those associated with the exercise of functions by members of management and governing bodies, taking into account the sector's reality and the geographical areas in which the entity operates — as set out in the RPP, remain adequate, accurate, complete, and up to date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
b) Do the preventive and corrective measures set out in the RPP, aimed at reducing the likelihood of occurrence and the impact of the risks and situations identified therein, remain adequate and up to date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
c) Is the code of conduct of the covered entities adequate and up to date to reduce the likelihood of occurrence and the impact of the risks and situations identified in the RPP?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
d) Is the code of conduct of the covered entities made available to all employees of the institution, both through the intranet and via its official website?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
e) Are the internal training programmes adequate to ensure that both management and employees of the covered entities are aware of and understand	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A

<sup>1</sup> Fill in N/A when not applicable.

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the anti-corruption and related offences prevention policies and procedures implemented?			
f) Have the anti-corruption and related offences prevention policies and procedures implemented by the covered entities been communicated to the entities with which they interact?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
g) Is the internal control system implemented in the covered entities subject to regular monitoring by the compliance officer?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
h) Is the regular monitoring of the implementation of the internal control system reported to the management body of the covered entities (or equivalent) and/or to the competent committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
i) Are the procedures set out in the RPP, as well as the internal control system, subject to periodic evaluation carried out as part of the internal audit function?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
j) Are the internal reporting channels in place within the covered entities capable of ensuring the completeness, integrity, and preservation of reports, the confidentiality or anonymity of whistleblowers, and the confidentiality of third parties mentioned in the report, as well as preventing access by unauthorized persons?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
k) In the follow-up to received reports, is the prohibition of retaliatory acts against whistleblowers effectively ensured and upheld?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A

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**Degree of implementation of the preventive/corrective measures set out in the RPP**

Pursuant to Article 6(4)(b) of Decree-Law No. 109-E/2021, of December 9, the annual evaluation report must include a quantification of the degree of implementation of the identified preventive and corrective measures, as well as a forecast of their full implementation.

The corrective measures identified in the Risk Prevention Plan (RPP) are, for the most part, already implemented and in effect. It is anticipated that, by the time the next annual report is prepared, they will be fully established, without prejudice to any interim evaluations that may be necessary with regard to situations classified as high or maximum risk, as part of the report referred to in Article 6(4)(a) of the aforementioned legal act.

Additionally, and specifically, without prejudice to the occasional issuance of recommendations aimed at raising awareness depending on the varying levels of exposure of employees to the risks identified in the RPP — as part of a continuous monitoring approach of the implementation level of the mitigation measures and of the overall compliance programme — training sessions are expected to be held, before the next interim report, on the current policies and procedures for the prevention of corruption and related offences.

José Villas Boas  
Compliance Officer