

Teixeira Duarte, S.A.

www.teixeiraduarte.com

Plan for Prevention of Risks of Corruption and Related Infractions

Annual Assessment Report
April 2025

IDENTIFICATION OF THE COMPANY..... 3

1. LEGAL FRAMING..... 4

2. NORMATIVE COMPLIANCE PROGRAMME..... 4

2.1. MAIN ACTIVITIES CARRIED OUT 4

2.2. LEGAL REQUIREMENTS CONFORMITY ANALYSIS..... 5

2.3. CODE OF CONDUCT..... 7

2.4. WHISTLEBLOWING CHANNEL 7

2.5. TRAINING 8

2.6. COMMUNICATION..... 9

2.7. ASSESSMENT SYSTEM.....11

3. MONITORING OF PREVENTIVE AND CORRECTIVE MEASURES12

4. RECOMMENDATIONS.....12

5. CONCLUSION.....12

IDENTIFICATION OF THE COMPANY

Teixeira Duarte, S.A.

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

Share Capital: 210.000.000 €

Legal Person and Cascais - Oeiras Commercial Registry Number 509.234.526

1. LEGAL FRAMING

On December 9th, 2021, Decree-law 109-E/2021 was published, establishing the Mecanismo Nacional Anti-corrupção (MENAC) and the Regime Geral de Prevenção da Corrupção (RGPC), which came into force on June 7th, 2022.

The RGPC established the Normative Compliance Programme (PCN) which determines the Plan for Prevention of Risks of Corruption and Related Infractions (PPR) as one of the elements to be implemented and executed by the eligible entities, as set forth in Article 5 of the appendix to Decree-law 109-E/ 2021, of December 9th.

The PPR is a risk management tool whose objective is the identification, assessment, mitigation, monitoring and control of risks of corruption and related infractions, in order to ensure the effectiveness of the preventive and corrective measures provided for in it, as well as their updating in accordance with the Company's needs.

In this context, on August 21st, 2023, Teixeira Duarte, S.A. (TDSA) approved, in a meeting of the Board of Directors, its Plan for Prevention of Risks of Corruption and Related Infractions (PPR), which covers the entire organisation and activity of the Teixeira Duarte Group (TDG).

Pursuant to the provisions set forth in paragraph b), no. 4, article 6 of the Appendix to Decree-Law 109-E/2021, of December 9th, this Annual Assessment Report (Report) is submitted, comprising namely the level of implementation of the identified preventive and corrective measures, as well as the main activities carried out within the scope of the RGPC.

2. NORMATIVE COMPLIANCE PROGRAMME

2.1. MAIN ACTIVITIES CARRIED OUT

Below, are highlighted the main activities carried out by TDSA in 2024, within the scope of the PCN:

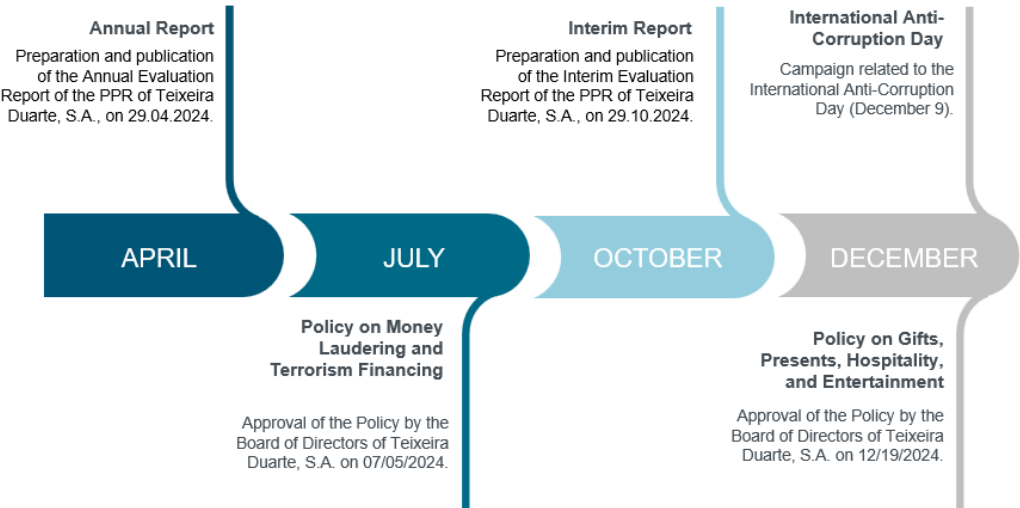


Figure 1 - Activities carried out in 2024

2.2. LEGAL REQUIREMENTS CONFORMITY ANALYSIS

With the aim of continuing to verify compliance with the legal requirements established in Decree-Law No. 109-E/2021, of December 9th, the following outlines the new strengths, areas for improvement, and aspects to be developed identified in 2024, as well as the progress made on previously issued recommendations.

STRENGTHS

- Representation of the culture and ethical values of TDG in the performance of its employees' roles and in the expansion of its markets of operation.
- Integrity of financial and non-financial records of TDG in the accounting report, namely the Report and Accounts, through the audit carried out by an external entity and by the Supervisory Board;
- Existence of human and technical resources for the implementation, maintenance and improvement of the RGPC;
- Provision of didactic training related to Corruption Prevention and the TDG Ethics Channel, in accordance with Decree-Law no. 109-E/2021, of December 9th and of the Law no. 93/2021, of December 20th;
- Implementation of an external platform of the Whistleblowing Channel, pursuant to Law no. 93/2021, of December 20th;
- Development of a monitoring plan for the singular and collective sanction regime applicable to TDG, with special emphasis on the regime applicable to companies with head office in Portugal.
- Periodical follow-up of the implementation of the internal control system, namely by means of periodical audits carried out by the Management Systems Support Structure;
- Development of a systemic indicator for the automatic monitoring of TDG entities eligible under the criterion of 50 or more employees;
- Use of a systemic tool (InsiderLog) for monitoring and recording all employees with access to privileged/confidential TDG information;
- Decisions and resolutions of the TDG Board of Directors are duly formalised and recorded, with full oversight and follow-up by the Corporate Governance and Legal Affairs department, including numbered minutes identifying all members involved in the decision-making process; and
- Daily monitoring of new legal and regulatory provisions applicable to the TDG by the Corporate Compliance department, through legal and anti-corruption/criminal activity newsletters and communications from MENAC.

TO BE IMPROVED











- Expand the composition of the PPR Control System Audit Programme by including additional relevant departments involved in conducting legal compliance audits, particularly the Corporate Internal Audit department;
- Strengthen the security measures for confidential information under the responsibility of the Accounting, Legal, Corporate Governance and Legal Affairs departments, as well as the Directorate-General for Human Resources, by implementing additional physical barriers to those already in place (e.g., floor access blocking door);
- Promote alignment with and cultural reinforcement of Corruption Prevention measures through training sessions or direct communication whenever a new entity becomes eligible and begins to adopt the TDG's PPR, ensuring that employees are duly informed of their inclusion in the said Plan.

TO BE DEVELOPED

- Formalise the recording of the analysis of any potential impacts arising from the reorganisation of TDG portfolios, in order to clearly and thoroughly document the decision regarding the maintenance or **discontinuation** of the current PPR.

PREVIOUS YEAR(S) ANNUAL ASSESSMENT REPORT FOLLOW UP

PLAN FOR PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS
ANNUAL ASSESSMENT REPORT | APRIL 2025

Classification	Description	Current Status	Evolution in 2024
To Be Improved	Raising employees' awareness regarding PPR execution reports (Interim and Annual), Conflict of Interests and Third Parties Due Diligence.	 Partially implemented	Provision of an internal Knowledge Centre dedicated to various Compliance-related matters.
To Be Improved	Formalisation of the commitment to the principles and values of the Code of Ethics and Conduct by new and current employees, using an internal tool.	 Not implemented	-
To Be Improved	Update of the normative documents regarding the matter of Corruption and Related Infractions, namely the Conflict of Interests Policy and the Gifts, Entertainment and Hospitality Procedure.	 Partially implemented	Advertising of the new Gifts, Hospitality and Entertainment Policy in 2024.
To Be Improved	Revision and formalisation, in written, of the promotional and hospitality expenses approval flow.	 Implemented	Advertising of the new Gifts, Hospitality and Entertainment Policy in 2024.
To Be Improved	Monitoring of the completion rate of the trainings provided by TDG by upper hierarchical levels with the support of Human Resources	 Partially implemented	Monitoring carried out manually while a systemic solution is being assessed in coordination with the Corporate Information Technology and Human Resources departments.
To Be Improved	Development of a corruption and related infractions risk assessment system with active participation of the persons in charge of risk management.	 Not implemented	-
To Be Improved	Half-yearly monitoring of the number of employees in TDG companies to assess compliance with the legal criterion for the RGPC applicability to legal entities with 50 (fifty) or more employees.	 Implemented	Development of a systemic indicator for the automatic follow-up of eligible entities.
To Be Improved	Establishment of a frequency for the renewal of Corruption Prevention and Ethics Channel trainings, every 3 (three) years.	 Not implemented	-
To Be Developed	Update the Code of Ethics and Conduct with the identification of the disciplinary and criminal sanctions applicable to acts of corruption and related infractions.	 Partially implemented	Provision of an internal Knowledge Centre dedicated to various Compliance-related matters.
To Be Developed	Development a tighter control of the potential existence of financial (and non-financial) flows irregularities regarding recurrent gifts, entertainment and hospitality.	 Implemented	Provision of a new reporting form for corporate courtesies, with the new amount limits.

To Be Developed	Improving of the criteria and controls regarding due diligence of business partners, third parties contracting and hiring of top managers with great responsibility.	 Not implemented	-
To Be Developed	Definition of periodical communication campaigns regarding matters of corruption and related infractions prevention (<i>newsletter</i>).	 Partially implemented	The internal Knowledge Centre dedicated to various Compliance matters includes a newsletter function; yet to be determined the publication frequency.
To Be Developed	Development of internal policies and manuals regarding the activities and controls carried out in the Activity Sectors, Corporate Areas and Support Structures of the TDG.	 Partially implemented	This is an ongoing effort in collaboration with the said departments – in 2024, new policies were established for Procurement and Information Security.

2.3. CODE OF CONDUCT

TDSA's Code of Ethics and Conduct (Code) was established in 2018 and gathers the main principles, values and rules adopted by all companies of TDG.

This Code remains under revision and is currently being restructured to meet the requirements of Decree-Law No. 109-E/2021, of December 9th, as well as other applicable legal and regulatory instruments.

2.4. WHISTLEBLOWING CHANNEL

As a key instrument for the monitoring and mitigation of acts of corruption and related infractions, TDG has implemented an Ethics Channel that enables the reporting of matters related to these issues.

These irregularities may also be reported through the following channels:

- i) **Mail:** to the address Lagoas Park, Edifício 2 - 2740-265 Porto Salvo, Portugal;
- ii) **Electronic mail:** addressed to the Ethics Team (compliance@teixeiraduarte.com) or Supervisory Board (conselhofiscal@teixeiraduarte.com) or;
- iii) **Whistleblowing channel:** external supplier platform managed by an internal team (<https://teixeiraduarte.integrity.complylog.com/>).



Figure 2- Whistleblowing channel (IntegrityLog)

Pursuant to Law No. 93/2021, of December 20th, it should be noted that only the **Whistleblowing Channel** ensures the possibility of submitting reports anonymously, in accordance with the legally established provisions.

Notwithstanding, all communications made through the Ethics Channel - including the Whistleblowing Channel, email, and postal correspondence - are afforded the safeguards of protection against acts of retaliation (whether of a pecuniary or non-pecuniary nature), as well as the preservation, integrity, confidentiality, and thoroughness of the reported information.

2.5. TRAINING

Training is one of the key components of the PCN (Normative Compliance Programme), serving as a fundamental tool for mitigating the risks of corruption and related infractions, as well as for strengthening transparency, integrity, and the effectiveness of controls. In this context, the TDSA Training Programme includes:

CORRUPTION PREVENTION

Corruption Prevention training consists of the following content: (i) Concept of corruption; (ii) Legislation; (iii) Subjects of corruption; (iv) Means for corruption; (v) Penalties; (vi) Types of related infractions; (vii) Corruption and related infractions risk prevention plan. It was made available in June 2023.



Comece ou reinicie o curso

07. ÉTICA E COMPLIANCE

Prevenção da Corrupção

O fenómeno da corrupção tem sido, cada vez mais objeto de estudo nas últimas décadas, devido aos imensos prejuízos resultantes deste tipo de prática, seja no setor público, no setor privado, bem como na sociedade civil. Diante da importância do tema, bem como dos esforços para evitar este tipo de comportamento, a Teixeira Duarte preparou esta formação de modo a sensibilizar todos os colaboradores para o tema. Melhorar o conhecimento dos colaboradores sobre o plano de prevenção de riscos de Corrupção aprovado no Grupo TD. Objetivos:

- Reforçar a importância do compromisso de todos, em prevenir e detetar atos de corrupção, e infrações conexas
- Garantir a eficiência dos controlos internos, em matéria de transparência integridade, e, efetividade
- Demonstrar quais são as sanções aplicáveis, a nível individual e coletivo, perante os atos de corrupção, e infrações conexas
- Assegurar a conformidade legal da Teixeira Duarte com a legislação aplicável.

CARGA HORÁRIA (FORMA...: 00:30 DATA DE CRIAÇÃO DO C...: 15/06/2023

Figure 3 – Training on Corruption Prevention by E-Learning

ETHICS CHANNEL

Ethics Channel training consists of the following content: (i) Legal framework; (ii) Subjects of the reporting flow; (iii) How to make a report; (iv) Protection for whistle-blowers; (v) Reporting channels for the Ethics Channel; and (vi) Deadlines in the reporting flow. Made available on October 12th, 2023.



07. ÉTICA E COMPLIANCE

Canal de Ética

O Grupo Teixeira Duarte tem implementado um Canal de Ética o qual permite a comunicação dos factos relacionados com a corrupção, bem como qualquer outro incumprimento que possa envolver práticas ilícitas.

CARGA HORÁRIA (FORMA...: 00:30 DATA DE CRIAÇÃO DO C...: 18/12/2023

[Iniciar esse curso](#)

Figure 4 – Training on Ethics Channel by E-Learning

Although such training sessions are incorporated into the onboarding plan for new employees and are accessible to all TDG staff - across all markets and activity sectors - **completion rates** of eligible entities in the **Portuguese market** are presented below, in accordance with the eligibility criteria set out in Decree-Law No. 109-E/2021:

Entities TDG	Corruption Prevention	Ethics Channel
Teixeira Duarte Eng. e Construção	71%	18%
TDGI – Tecnologia de Gestão de Imóveis, S.A	65%	13%
TDGI Manutenção, A.C.E	9%	4%
Teixeira Duarte – Gestão de Participações e Investimentos Imobiliários, S.A	45%	41%
Somafel – Engenharia e Obras Ferroviárias, S.A.	58%	4%
EPOS – Empresa Portuguesa de Obras Subterrâneas, S.A.	80%	7%

Figure 5 – Training Completion Rate Table

2.6. COMMUNICATION

In order to comply with the provisions of paragraph 6 of article 6 and of article 9, both of the Annex to Decree-Law No. 109-E/2021, of December 9th, TDSA provides an internal tool exclusively for TDG employees, accessible via its intranet.

PLAN FOR PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS
ANNUAL ASSESSMENT REPORT | APRIL 2025

Through this tool, publications of reports within the scope of the PPR are communicated, as well as newly issued regulatory documents from the Corporate Compliance department, to ensure employees' awareness and engagement with these and other compliance-related matters.

Additionally, on TDSA's official website (<https://teixeiraduarte.com/>) it is also possible to access the PPR and its respective reports, the content of which is in the public domain.

The summary table below presents the communications made in 2024 on these matters, as well as the respective evidence.

Content	Date of publication	Target-audience	Channel used
Annual assessment report (April 2024)	06/05/2024	Public in general	Official Website
	07/05/2024	Employees	Intranet
Policy for Preventing and Combating Money Laundering and Terrorism Financing	21/08/2024	Employees	Intranet
Interim assessment report (October 2022)	29/10/2024	Public in general	Official Website
		Employees	Intranet

Teixeira Duarte disponibiliza Relatório de Avaliação Anual do Plano de Prevenção de Riscos de Corrupção e de Infrações Conexas

07 DE MAIO 2024



Teixeira Duarte aprova Política de Prevenção e Combate ao Branqueamento de Capitais e ao Financiamento do Terrorismo

20 DE AGOSTO 2024



Teixeira Duarte disponibiliza o Relatório de Avaliação Intercalar do Plano de Prevenção de Riscos de Corrupção e de Infrações Conexas

29 DE OUTUBRO 2024



Figure 6 - Intranet Communications Mosaic

TDSA also conducted a campaign on the occasion of the "International Anti-Corruption Day", observed on December 9th, running from 02.12.2024 a 11.12.2024. The campaign involved changing the computer screen lock of all employees across the various markets where TDG operates, featuring the following message:



Figure 7 - International Anti-Corruption Day Campaign

2.7. ASSESSMENT SYSTEM

In addition to the preparation of the Interim and Annual Evaluation Reports, TDSA’s PCN also includes an audit programme conducted by the Management Systems Support Structure, aimed at periodically and independently assessing legal compliance with the requirements set forth in Decree-Law No. 109-E/2021, of December 9th, with particular focus on elements related to the Internal Control System.

In 2024, the respective audit plan was carried out between February 20th and April 3rd, considering the following risk areas, based on a selection criterion prioritising areas where the management position has changed at least one year prior:

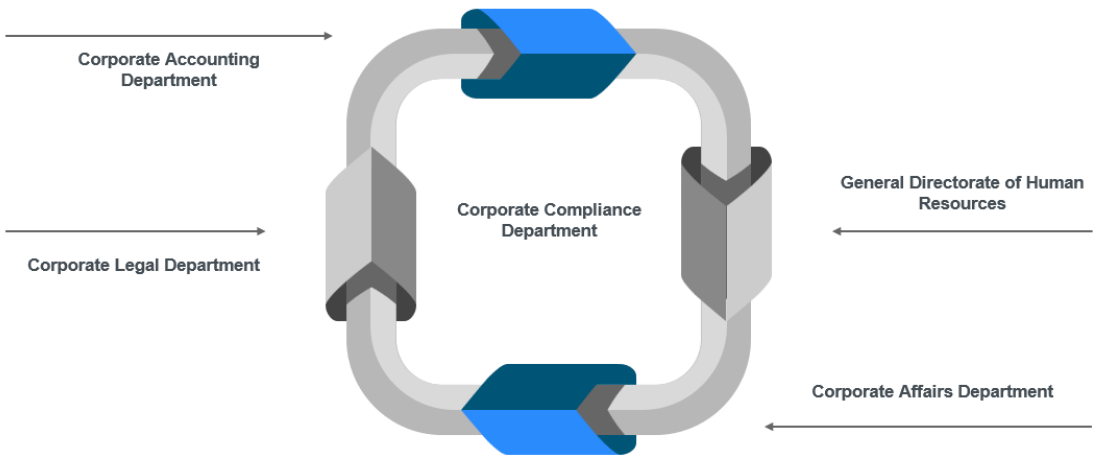


Figure 8 – 2024 Legal Compliance Audit Plan

The Corporate Compliance department is included annually in the audit plan, given its responsibility for implementing the PPR and managing other compliance-related matters.

The results of the respective plan can be found in section 2.2 of this Report, specifically under "Legal Requirements Compliance Analysis."

3. MONITORING OF PREVENTIVE AND CORRECTIVE MEASURES

For the purposes of paragraph b), no. 4, article 6 of Decree-law 109-E/2021, of December 9th, in the appendix I of this report are presented the preventive and corrective measures, regarding the risks identified in the PPR, and their respective degree of implementation and estimated dates for their full implementation.

4. RECOMMENDATIONS

Based on the analysis carried out throughout this report, as well as the results obtained from the audit programme, monitoring activities, and training sessions promoted under the PPR, the following recommendations are presented with the aim of continuously strengthening compliance and mitigating the risks of corruption and related infractions:

1. Strengthening training and communication initiatives – Maintain and expand training programmes and internal communication campaigns, focusing on topics such as anti-corruption, organisational ethics, and the correct use of the Ethics Channel, ensuring greater engagement and participation from employees;
2. Ongoing update of regulatory documents – Ensure the periodic review of key documents, such as the Code of Ethics and Conduct and other Compliance policies, so as to reflect relevant legislative, regulatory, and organisational changes;
3. Enhancing the analysis and implementation of the Risk Matrix – Promote the improvement of the Risk Matrix related to corruption and associated offences, ensuring a clear and objective linkage of controls to each identified risk, as well as a realistic assessment of residual risk, thereby enabling more effective and targeted risk mitigation.

5. CONCLUSION

Based on the information presented in this report, it is concluded that the Normative Compliance Programme (PCN) of Teixeira Duarte, S.A. satisfactorily meets the requirements set out in Decree-Law No. 109-E/2021, of December 9th. The PCN proves to be robust and consistent, supported by well-structured regulatory instruments, an independent audit programme, comprehensive training initiatives, and effective communication channels.

There has been positive progress in organisational culture-building efforts and in strengthening the effectiveness of management and control mechanisms, reflecting a strong institutional commitment to integrity, compliance, and risk prevention.

Nonetheless, opportunities for improvement remain, particularly with regard to the management of corruption and related offence risks within the Risk Matrix, with special attention to the clear linkage between controls and identified risks, and to the realistic assessment of residual risk.

Person Responsible for the Plan for Prevention of Risks of Corruption and Related Infractions

APPENDIX I

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Procurement	Active corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	2	8	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	7	14	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	3	6	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Procurement	Passive corruption	Receiving benefits or advantages, or promise of, from a public or private agent, thus violating the duties of the position held in the TDG.	4	5	20	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	7	28	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	4	16	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Procurement	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	4	27	108	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	45	180	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	45	180	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
Internal Audit	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	7	14	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	7	14	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Internal Audit	Active Corruption	Donations of sponsorship of political parties or other entities (public or private) with the obvious or apparent objective pressure, influence peddling or illegitimate lobbying in favour of a TDG company.	2	10	20	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	4	8	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	10	40	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	2	1	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	19	152	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Internal Audit	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	1	3	3	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	4	27	108	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	21	42	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
Internal Audit	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Internal Audit	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	1	1	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	18	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Commercial	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	13	52	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	9	36	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Donations of sponsorship of political parties or other entities (public or private) with the obvious or apparent objective pressure, influence peddling or illegitimate lobbying in favour of a TDG company.	4	10	40	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
Commercial	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	4	16	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Commercial	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	2	8	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	19	76	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	19	76	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	21	42	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	36	9	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Commercial	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	27	54	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	63	252	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	63	252	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Compliance	Active corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	13	26	Develop communication / training campaigns regarding compliance issues in connection with the PPR.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	13	26	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
Compliance	Active corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	11	22	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	7	28	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	15	120	Develop communication / training campaigns regarding compliance issues in connection with the PPR.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Compliance	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	1	15	15	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	27	54	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Develop communication / training campaigns regarding compliance issues in connection with the PPR.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Compliance	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	1	13	13	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	1	3	3	Develop communication / training campaigns regarding compliance issues in connection with the PPR.	Fully implemented on 23/06/ 2023	-
Board of Directors	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	8	45	360	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	8	45	360	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Board of Directors	Active Corruption	Donations or sponsorship to political parties or other entities (public or private) with the obvious or apparent objective pressure, influence peddling or illegitimate lobbying in favour of a TDG company.	8	39	312	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	8	11	88	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	8	15	120	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	45	360	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Board of Directors	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	21	84	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	8	81	648	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	8	45	360	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	8	21	168	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
Board of Directors	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	8	27	216	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Board of Directors	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	4	2	8	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	1	33	33	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	8	63	504	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	4	16	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	5	20	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Conscious modification of accounting records for tax evasion.	2	39	78	Implementation of training regarding the Ethics Channel	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Accounting, Finances and Shared Processes						within the scope of the PPR Training Programme.		
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	8	63	504	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	8	63	504	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	5	20	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	15	60	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Accounting, Finances and Shared Processes	Active Corruption	Donations or sponsorship of political parties or other entities (public or private) with the obvious or apparent objective pressure, influence peddling or illegitimate lobbying in favour of a TDG company.	4	10	40	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	11	44	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	1	4	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	27	108	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Accounting, Finances and Shared Processes	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	8	63	504	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	8	27	216	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Money laundering	A company of the TDG operating in a territory with high corruption perception rate or with risk of money laundering and terrorist financing, without due diligence.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Accounting, Finances and Shared Processes	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	2	2	4	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	8	15	120	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	8	15	120	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	2	8	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	3	12	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Equipment Management	Fraud	Conscious modification of accounting records for tax evasion.	8	27	216	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	2	7	14	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	13	52	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	9	36	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	7	28	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Equipment Management	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	7	14	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	9	36	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	9	36	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	12	48	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by	4	6	24	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Equipment Management		service providers or suppliers, in exchange for an unlawful benefit.						
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	6	24	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	8	27	216	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
Innovation	Active corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	13	26	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours	2	10	20	Implementation of training regarding the Ethics Channel	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Innovation		or benefits for themselves or for third parties.				within the scope of the PPR Training Programme.		
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	10	80	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	11	22	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	1	27	27	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Innovation	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	63	252	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
Legal	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	10	40	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Legal	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	13	52	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	10	40	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	13	52	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	2	1	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	15	60	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Revision of the Code of Ethics and Conduct taking into	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Legal	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	27	54	consideration the new legislation in force. Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	9	36	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services	2	2	4	Implementation of training regarding the Ethics Channel	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Legal		provision to obtain benefits or advantages for oneself or third parties.				within the scope of the PPR Training Programme.		
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	63	252	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	63	252	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
Proposals' Logistics	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	13	52	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Proposals' Logistics	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	4	16	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	7	28	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
Proposals' Logistics	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Operation	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	45	180	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	45	180	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	8	15	120	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Operation	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	8	15	120	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	8	4	32	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	21	84	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	27	108	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	8	13	104	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Operation	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	9	18	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	4	5	20	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	8	7	56	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Human Resources	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	8	7	56	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	30/04/2026
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	8	21	168	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	7	28	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	2	8	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Human Resources	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	9	36	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Money Laundering	Hiring of candidates classified as politically exposed persons without due diligence.	8	13	104	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Human Resources	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	8	13	104	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	8	21	168	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Management Systems	Fraud	Conscious modification of accounting records for tax evasion.	4	21	84	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	19	38	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	9	18	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	5	10	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Management Systems	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	9	18	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Management Systems	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
Corporate	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	13	52	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	15	60	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Corporate	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	8	27	216	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	27	216	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	1	3	3	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Corporate	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	4	9	36	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Money laundering	A company of the TDG operating in a territory with high corruption perception rate or with risk of money laundering and terrorist financing, without due diligence.	2	27	54	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	1	2	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services	1	3	3	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Corporate		provision to obtain benefits or advantages for oneself or third parties.						
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	8	45	360	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
Sustainability	Active corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	5	10	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	15	30	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	4	8	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	4	8	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Sustainability	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	2	45	90	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	45	90	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by	2	2	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Information Technology		service providers or suppliers, in exchange for an unlawful benefit.						
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	7	14	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	9	18	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
Information Technology	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	8	11	88	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Information Technology	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	45	360	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	15	60	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	1	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	6	24	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/ 2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction type	Risk description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	6	24	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	31/01/2026
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	4	27	108	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2025