Teixeira Duarte, S.A.

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Plan for Prevention of Risks of Corruption and Related Infractions

Interim Assessment Report
October 2025

TEIXEIRA DUARTE

GRUPO TEIXEIRA DUARTE 100 ANOS CONSTRUINDO UM MUNDO MELHOR

IDENTIFICATION OF THE COMPANY

Teixeira Duarte, S.A.

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

Share Capital: 210.000.000 €

Single Number of Legal Person and of Registration at the Commercial Registry of Cascais - Oeiras 509.234.526

1. LEGAL FRAMING

On December 9th, 2021, it was published the Decree-law 109-E/2021, (Decree-law 109-E/2021), which created the Mecanismo Nacional Anticorrupção (MENAC) and established the General Regime for the Prevention of Corruption (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 its Plan for Prevention of Risks of Corruption and Related Infractions (PPR), in a meeting of the Board of Directors, which covers the entire organisation and activity of the Teixeira Duarte Group (TDG).

2. MONITORING OF THE PREVENTIVE AND CORRECTIVE MEASURES - HIGH RISK / VERY HIGH RISK

For the purposes of the provisions of paragraph a), number 4 of Article 6 of the Decree-law 109-E/2021, of December 9th, it is presented the Mid-Term Assessment Report (Report) that comprehends namely the monitoring of the preventive and corrective measures related to the risks identified as **high** risk or **very high** risk, to be considered in the methodology of risk level in the PPR and their implementation status.

The period subject to this monitoring of the measures associated with these risks is comprised between August, the date on which the current PPR came into force, and October 2025, the month this report was elaborated.

TDSA's PPR presents the following, as main situations identified as high or very high risk of the practice of corruption and related infractions:

Main activity areas with risk of practice of acts of corruption and related infractions.	Infraction Type	Risk Description	Risk Level
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.	108
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	108
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	108

Internal Audit	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.	40
	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.	152
	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.	108
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	108
	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.	42
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	36
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	54
Commercial	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	52
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	36
	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.	40
	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.	76
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	76
	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.	42

	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	36
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	108
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	54
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	252
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	252
Compliance	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.	120
	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.	54
	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.	54
Board of Directors	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	360
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	360
	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.	312
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	88
	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.	120

	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.	360
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	84
	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.	648
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	360
	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.	168
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	216
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	504
	Fraud	Conscious modification of accounting records for tax evasion.	78
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	504
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	504
Accounting, Finances and Shared Processes	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	60
	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.	40
	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.	44
	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.	108
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	108

	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.	504
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	216
	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.	54
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	120
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	120
	Fraud	Conscious modification of accounting records for tax evasion.	216
Equipment management	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	52
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	36
	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.	36
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	36
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	48
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	216
Innovation	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.	80
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	36
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	108

	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	252
Legal	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	40
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	52
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	40
	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.	52
	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.	60
	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.	54
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	36
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	252
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	252
Proposals' Logistics	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	52
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	36
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	180
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	180
Operation	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	120

	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	120
	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.	84
	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.	108
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	104
	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.	56
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	56
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	168
Human Resources	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	36
	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.	36
	Money Laundering	Hiring of candidates classified as politically exposed persons without due diligence.	104
	Influence Peddling	Hiring candidates related to public agents in return for obtain unlawful advantage or influence peddling.	104
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	168
	Fraud	Conscious modification of accounting records for tax evasion.	84
Management Systems	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	38
	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.	54
Corporate	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	52

	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	60
	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.	216
	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.	216
	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.	54
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	36
	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.	54
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	36
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	360
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.	90
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	90
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.	88
	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.	360
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	60
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	108

With regard to the risks identified above, the following measures were set, presented in a consolidated manner being that they are applicable to most of the risk areas:

Mitigation Measure	Status	Completion Date / Estimate	Applicable Domains
Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented	Completed in 2023	Operation
Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	Ongoing in 2025	Accounting, Finances and Shared Processes
Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	Foreseen to 2026	Procurement Commercial Equipment Management
Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	Foreseen to 2026	Procurement Internal Audit Commercial *Compliance* Board of Directors Accounting, Finances and Shared Processes Equipment Management Innovation Legal Proposals' Logistics Operation Human Resources Management Systems Corporate Sustainability Information Technology

Elaboration and / or updating of normative documents regarding Corruption and Related Infractions	Fully implemented	Completed on 20/08/2024 - Divulgation of the Anti-Money Laundering and Countering the Financing of Terrorism Policy. Completed on 02/01/2025 - Divulgation of the Giveaways, Gifts, Hospitality, and Entertainment Policy.	Procurement Internal Audit Commercial *Compliance* Board of Directors Accounting, Finances and Shared Processes Equipment Management Innovation Legal Proposals' Logistics Operation Human Resources Management Systems Corporate Sustainability Information Technology
Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme	Fully implemented	Completed on 12/10/2023	Procurement Internal Audit Commercial *Compliance* Board of Directors Accounting, Finances and Shared Processes Equipment Management Innovation Legal Proposals' Logistics Operation Human Resources Management Systems Corporate Sustainability Information Technology

Develop communication / training campaigns regarding *compliance* issues in connection with the PPR.	Fully implemented	Completed on 15/12/2023 - Divulgation of the campaign for the International Anti-Corruption Day, December 9th. Completed on 31/01/2024 - Development of an easier option to access Compliance issues using the TDG employees restricted access portal. Completed on 14/02/2025 – Divulgation of a new internal Knowledge Centre dedicated to multiple Compliance issues (*Compliance Kiosk*).	*Compliance*

3. CONCLUSION AND RECOMMENDATIONS

In light of the mitigation measures presented, it is concluded that, since the design of the Plan for Prevention of Risks of Corruption and Related Infractions (PPR), there has been a **consistent effort and significant progress** in the process of fostering a culture of integrity and consolidating good governance practices within the Teixeira Duarte Group.

The actions implemented reflect **tangible progress in mitigating the risks identified as high and critical**, particularly through the updating of normative instruments and the strengthening of training and communication initiatives.

Nevertheless, it remains essential to maintain the current pace of work and to deepen the cross-functional integration of preventive measures. It is therefore recommended to:

1. Continue updating and consolidating the corporate Compliance documents, in particular the Code of Ethics and Conduct, the Corporate Procedure on Relations with Competitors, and the forthcoming Corporate Policy on Conflicts of Interest;
2. Map the measures already implemented and identify new mitigation actions, in coordination with the high-risk business areas, to be included in the Audit Programme scheduled for 2026; and
3. Develop and implement a structured system for the management and continuous monitoring of corruption and related offences risks, aimed at automating and enhancing the efficiency of the process, while ensuring the active and purposeful participation of the business areas involved.

Porto Salvo, October 24th, 2025

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

Carlos Jorge Cavaca Ferraz