

Teixeira Duarte, S.A.

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Plan for Prevention of Risks of Corruption and Related Infractions

Annual Assessment Report
April 2024

PLAN FOR PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS
ANNUAL ASSESSMENT REPORT | APRIL 2024

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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, it was published the Decree-Law 109-E/2021 (Decree-Law 109-E/2021), which created the National Anti-Corruption Mechanism (NACM) and established the General Regime for Prevention of Corruption (GRPC). which came into force on June 7th, 2022.

The GRPC established the Normative Compliance Programme (NCP) 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 out in article 5 of the Appendix to Decree-Law 109-E/ 2021, of December 9th.

The PPR is a risk management tool that aims to identify, assess, mitigate, monitor, and control risks of corruption and related infractions, in order to ensure the effectiveness of the preventive and corrective measures it provides for, as well as updating them in accordance with the Company’s needs.

In this context, on August 21st, 2023, Teixeira Duarte, S.A. (TDSA) approved at 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).

Under the terms and for the purposes of Article 6(4)(b) of the Annex to Decree-Law 109-E/2021, of December 9th, this Annual Assessment Report (Report) is presented containing, namely, the degree of implementation of the preventive and corrective measures identified, as well as the main activities carried out within the scope of the GRPC.

2. NORMATIVE COMPLIANCE PROGRAM

2.1. MAIN ACTIVITIES CARRIED OUT

Below are the main activities carried out by TDSA in 2023, within the scope of the NCP:

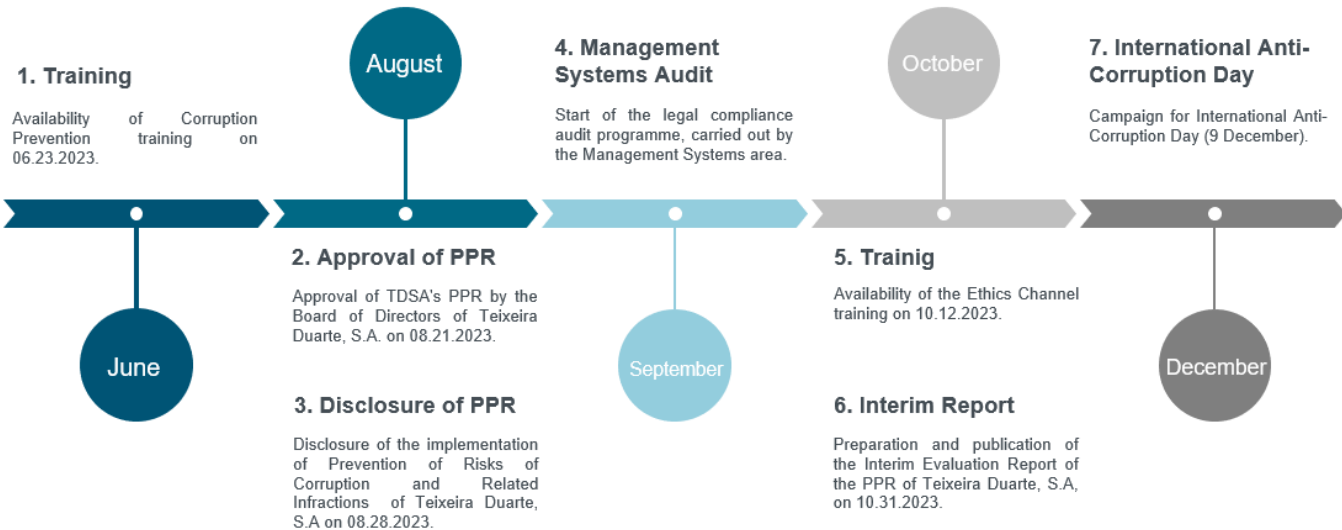


Figure 1 - Activities Carried Out in 2023

2.2. LEGAL REQUIREMENTS CONFORMITY ANALYSIS

In order to verify the compliance with the conditions set in Decree-law 109-E/ 2021, of December 9th, a profound analysis of the legal requirements was carried out, resulting in a diagnosis segregated into three levels:

STRONG POINTS

- Representation of TDG's culture and ethical values in the performance of its employees' duties and in the expansion of its markets of operation;
- Integrity of TDG's financial and non-financial records in the accountability report, namely as Report and Accounts, through an 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 GRPC;
- Provision of didactic training on 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 Whistleblowing Channel platform, under the terms of 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 based in Portugal.
- Regular monitoring of the implementation of the internal control system, namely through periodical audits carried out by the Management Systems Support Structure; and
- Control of accounting records and assets using the SAP tool.

IMPROVEMENT POINTS

- Raising employees awareness regarding PPR execution reports (Interim and Annual), Conflict of Interests and Third Parties Due Diligence;
- Formalisation of the commitment to the principles and values of the Code of Ethics and Conduct by new and current employees, through an internal tool.
- Updating of the normative documents related to Corruption and Related Infractions, namely the Conflict of Interests Policy and the Gifts, Entertainment and Hospitality Procedure;
- Revision and formalisation, in written, the flow of the approval chain for promotional and hospitality expenses;
- Monitoring the completion rate of the trainings courses provided by TDG by higher hierarchical levels with the support of the Human Resources department;
- Development of a risk assessment system for corruption and related infractions with the active participation of the responsible for risk management;
- Half-yearly monitoring of the number of employees of TDG companies in order to assess the legal criterion for the applicability of the GRPC to legal entities employing 50 (fifty) or more employees;
- Definition of the periodicity for renewal of Corruption Prevention and Ethics Channel trainings programmes, every 3 (three) years.

POINTS FOR DEVELOPMENT

- Updating the Code of Ethics and Conduct with the identification of disciplinary and criminal sanctions associated with acts of corruption and related infractions;
 - Developing strong control over the possibility of existence of irregularities in financial (and non-financial) flows relating to gifts, entertainment and hospitality on a recurring basis;
 - Improving of the criteria and controls regarding due diligence of business partners, third parties contracting and hiring of top managers with great responsibility;
 - Definition of periodical communication campaigns on matters relating to the prevention of acts of corruption and related infractions prevention (*newsletter*); and
- Development of internal policies, procedures and manuals relating to the activities and controls practised in the TDG's Operating Areas, Corporate Areas, and Support Structures.

2.3. RESPONSIBLE FOR NORMATIVE COMPLIANCE

Under the terms and for the purposes of Article 5(2) of the Annex to Decree-Law 109-E/2021 of December 9th, TDSA's Board of Directors (Minute no. 323) resolved on September 29th, 2022, to appoint the Chief Compliance Officer as the TDG's responsible for normative compliance.

2.4. PLAN FOR PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS (PPR)

For the purposes of Article 6(3) of the Annex to Decree-Law 109-E/2021, TDSA approved, at a meeting of its Board of Directors, a PPR covering the entire organisation and activity of TDG.

Therefore, 2023 was the first year of execution of the PPR for TDSA, thus including:

- The issue of an Interim Assessment Report and its dissemination;
- The legal compliance audit programme; and
- The issue of this Annual Assessment Report.

2.5. 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 TDG companies.

This Code is currently being revised and updated in order to fully comply with the requirements of Decree-Law 109-E/2021, of December 9th, among others.

2.6. WHISTLEBLOWING CHANNEL

As it is a fundamental instrument for monitoring and mitigating acts of corruption and related infractions, the TDG has implemented an Ethics Channel, which allows the communication of facts related to corruption and related infractions.

Irregularities may also be reported through the following channels:

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

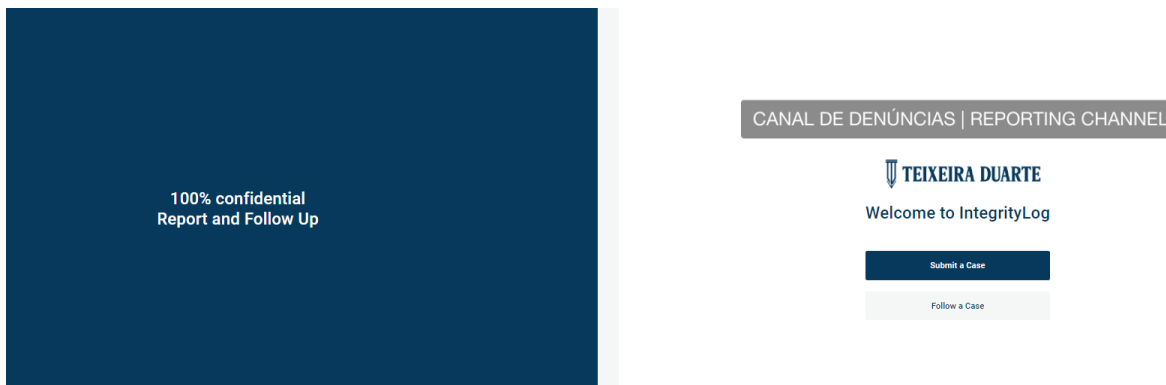


Figure 2 - Whistleblowing Channel (IntegrityLog)

Under the terms and for the purposes of Law no. 93/2021, of December 20th, the Ethics Channel is committed to ensure the protection of the whistleblowers through the possibility of reporting infringements anonymously, without retaliation (material or immaterial damage) and the guarantee of the conservation, integrity, confidentiality, and exhaustiveness of the information reported.

2.7. TRAINING

Training is one of the essential components of the NCP, is an instrument used to improve knowledge in terms of mitigating risks of corruption and related infractions, as well as transparency, integrity, and effectiveness controls.

In June 2023, TDSA made available the "Corruption Prevention" training to all TDG employees in all geographies through an e-learning platform,

This training consists of the following content: (i) concept of corruption; (ii) legislation; (iii) subjects of corruption; (iv) means of corruption; (v) penalties; (vi) types of related infractions; (vii) plan for prevention of risks of corruption and related infractions.

The current completion rate is 93%, and this training has already been incorporated into the onboarding plan for new TDG employees, with the purpose of internalising this knowledge preventively within the TDG.



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.

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Figure 3 - Training on Corruption Prevention by E-Learning

On October 12th, 2023, TDSA also provided the "Ethics Channel" training to all TDG employees in all geographies through an e-learning platform,

This training was publicised through the company's own channels, and during legal compliance audits, the various managers were directed to encourage their teams to complete the training given the relevance of the topic.

This training has the following content: (i) legal framework; (ii) subjects of the reporting flow; (iii) how to make a report; (iv) protection of whistleblowers; (v) reporting channels of the Ethics Channel; and (vi) deadlines of the reporting flow.

This training has also been incorporated into the onboarding plan for new TDG employees, with the purpose of internalising this knowledge preventively within the TDG.



Figure 4 - Training on Ethics Channel by E-Learning

2.8. COMMUNICATION

In order to comply with the provisions of Article 6(6) and Article 9 of the Annex to Decree-Law 109-E/2021 of December 9th, TDSA has a tool for internal and exclusive use of TDG employees, available at its intranet.

Through this tool, relevant information on corruption and related infraction is communicated and disseminated to employees, and regulatory documents on these matters can also be consulted.

All the documents relating to the PPR can also be consulted on TDSA's official website (<https://teixeiraduarte.com/>).

The summary table below lists the communications made throughout in 2023 on these matters, as well as their evidences:

Content	Date of Publication	Target Audience	Channel Used
Corruption Prevention Training	23/06/2023	Employees	Intranet
TDSA's Plan for Prevention of Risks of Corruption and Related Infractions	28/08/2023	General Public	Official Website
Ethics Channel Training	12/10/2023	Employees	Intranet
Interim Assessment Report (October 2022)	31/10/2023	General Public	Official Website
	06/11/2023	Employees	Intranet

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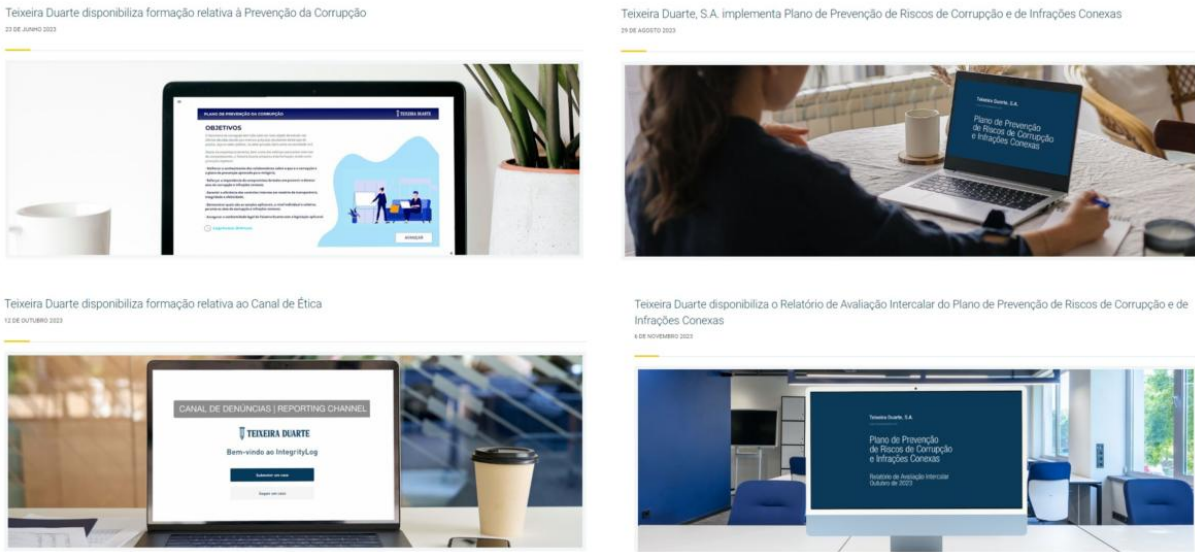


Figure 5 - Intranet Communications Mosaic

TDSA also carried out a campaign for the "International Anti-Corruption Day," which falls on December 9th, from November 27th, 2023, to December 10th, 2023, which consisted of changing the screen lock on the computer of all employees in the various countries where TDG operates, with the following communication:



Figure 6 - Campaign International Anti-Corruption Day

2.9. ASSESSMENT SYSTEM

In addition to the preparation of the Interim Assessment Report in October 2023 and the current Annual Assessment Report in April, TDSA has implemented an Assessment System for the PPR, which includes an audit programme conducted by the Management Systems Support Structure.

The aim of this programme is periodically and independently assess the legal compliance with the requirements set out in Decree-Law 109-E/2021, of December 9th, especially those associated with the Internal Control System. The following execution plan has been implemented for this purpose:

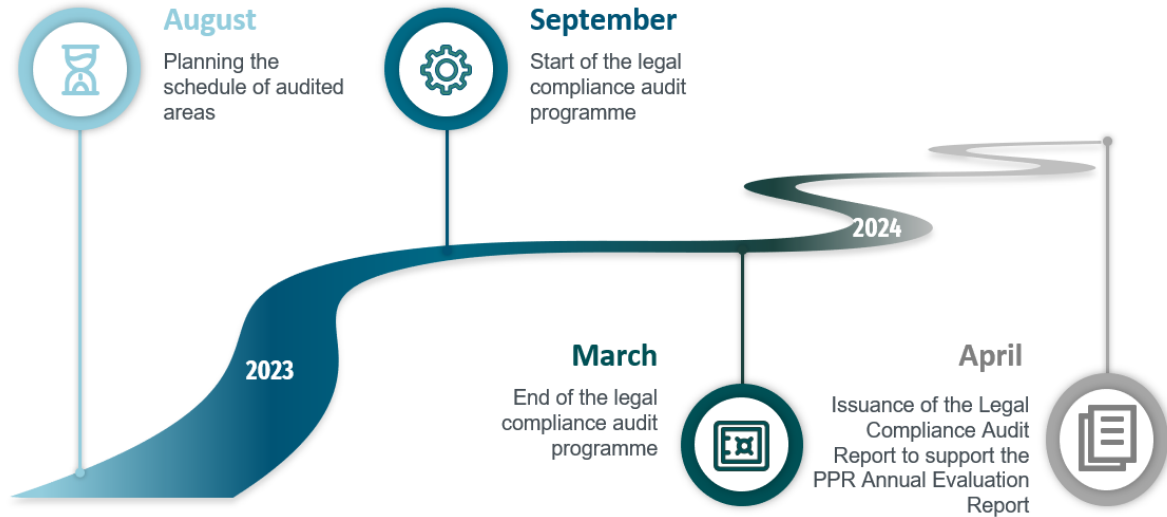


Figure 7 - Audit Execution Plan

The audit plan conducted by the Management Systems Support Structure was executed from September 26th, 2023, to March 25th, 2024, covering a total of 18 audited areas that showed full cooperation during the interviews. The results of the respective plan can be found in point 2.2 of this Report, namely as "Legal Requirements Conformity Analysis."

3. MONITORING OF PREVENTIVE AND CORRECTIVE MEASURES

For the purposes of Article 6(4)(b) of the Annex to Decree-Law 109-E/2021, of December 9th, the appendix I of this report presents the preventive and corrective measures for the risks identified in the PPR, and their respective degree of implementation and estimated dates of full implementation.

4. RECOMMENDATIONS

Taking into account the analysis and the assessment of the implementation and effectiveness of the Mitigating Measures proposed in the PPR, the following recommendations are proposed:

1. Development of the points for improvement and implementation of the points to be developed highlighted in point 2.2 of this Report, namely " Legal Requirements Conformity Analysis" over the course of 2024 and 2025;
2. Continuing and finalising the process of developing the Mitigation Measures that have been partially implemented;
3. Start developing the Mitigation Measures that are in "Not Implemented status";
4. Update the risk matrix of Appendix I with the controls already implemented by the Corporate Areas to assess the residual risk.

5. CONCLUSION

In view of the information presented in this Report, it was possible to conclude that NCP of Teixeira Duarte S.A **satisfactorily** complies with the requirements established in Decree-Law 109-E/2021, December 9th, 2021, considering that i) it has

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implemented a PPR; ii) it has a Code of Ethics and Conduct; iii) it has implemented a Whistleblowing Channel and iv) it has provided specific training programme on corruption and related infraction for all its employees.

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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	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	5	20	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	May, 17th, 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
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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024

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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	4	16	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	May, 17th, 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 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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024

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 Program.	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	May, 17th, 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	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	May, 17th, 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
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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024

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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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 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.	8	39	312	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024

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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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
Board of Directors						within the scope of the PPR Training Program.		
	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	September 30th, 2024
	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)	December 23th, 2024
Accounting, Finances and Shared Processes	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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024

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	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 Program.	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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	Fully implemented on 23/06/ 2023	-
	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	May, 17th, 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	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	May, 17th, 2025
	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	September 30th, 2024

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	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)	December 23th, 2024
	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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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
Equipment Management	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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	6	24	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	May, 17th, 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	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	September 30th, 2024
	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)	December 23th, 2024
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	September 30th, 2024
	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)	December 23th, 2024
	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	10	20	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Program.	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	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024

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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024

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						consideration the new legislation in force.		
	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	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Program.	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	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	September 30th, 2024
	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)	December 23th, 2024
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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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	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						within the scope of the PPR Training Program.		
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
Operation	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	May, 17th, 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	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	May, 17th, 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	27	108	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	September 30th, 2024
	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)	December 23th, 2024

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 Program.	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	May, 17th, 2025
	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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.	8	7	56	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Not implemented	May, 17th, 2025
	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	September 30th, 2024
Human Resources	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024

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	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)	December 23th, 2024
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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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.	8	27	216	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	September 30th, 2024

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	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	December 23th, 2024

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	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024

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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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
Sustainability	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	September 30th, 2024
	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)	December 23th, 2024
Information Technology	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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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
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	September 30th, 2024
	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)	December 23th, 2024
	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 Program.	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	September 30th, 2024
	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)	December 23th, 2024

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	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 Program.	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	6	24	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Not implemented	September 30th, 2024
	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)	December 23th, 2024