

Teixeira Duarte, S.A.

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# Plan for Prevention of Risks of Corruption and Related Infractions

Annual Assessment Report  
April 2026

**PLAN FOR PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS**  
ANNUAL ASSESSMENT REPORT | APRIL 2026

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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 €

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

**1. LEGAL FRAMEWORK**

On December 9<sup>th</sup> 2021, the Decree-law 109-E/2021 was published establishing the National Anti-Corruption Mechanism (MENAC) and the General Regime for the Prevention of Corruption (RGPC), which came into force on June 7<sup>th</sup> 2022.

RGPC made it mandatory, for all eligible entities, to implement a Normative Compliance Programme (PCN), being the Plan for Prevention of Risks of Corruption and Related Infractions (PPR) one of its corner stones, pursuant to the provisions of no.1, article 5, of the Appendix to Decree-law 109-E/ 2021, of December 9<sup>th</sup>.(Decree-law 109-E/ 2021).

The PPR is a risk management tool whose objective is the identification, assessment, mitigation, monitoring and control of risks of corruption and related infractions, in order to ensure the effectiveness of the preventive and corrective measures provided for therein, as well as their adjustment and updating to meet the organisational reality and the context of the entities involved.

In this context, on August 21<sup>st</sup> 2023, Teixeira Duarte, S.A. (TD,SA.) approved, in a meeting of the Board of Directors, its PPR, which was adopted by the eligible entities of the Teixeira Duarte Group (TDG), under the terms and for the purposes provided in no. 3, article 6, of the Decree-law 109-E/ 2021.

Fulfilling the obligation also provided by paragraph b), no. 4, article 6, of the Appendix to the Decree-Law no. 109-E/2021, this Annual Assessment Report (Report), which sums up namely the level of implementation of the preventive and corrective measures set out in the PPR, as well as the actions carried out by TD,SA. within the scope of the PCN.

**2. NORMATIVE COMPLIANCE PROGRAMME**

**2.1. MAIN ACTIVITIES CARRIED OUT**

Below, are highlighted the main activities carried out by TD,SA, in 2025, within the scope of the PCN:

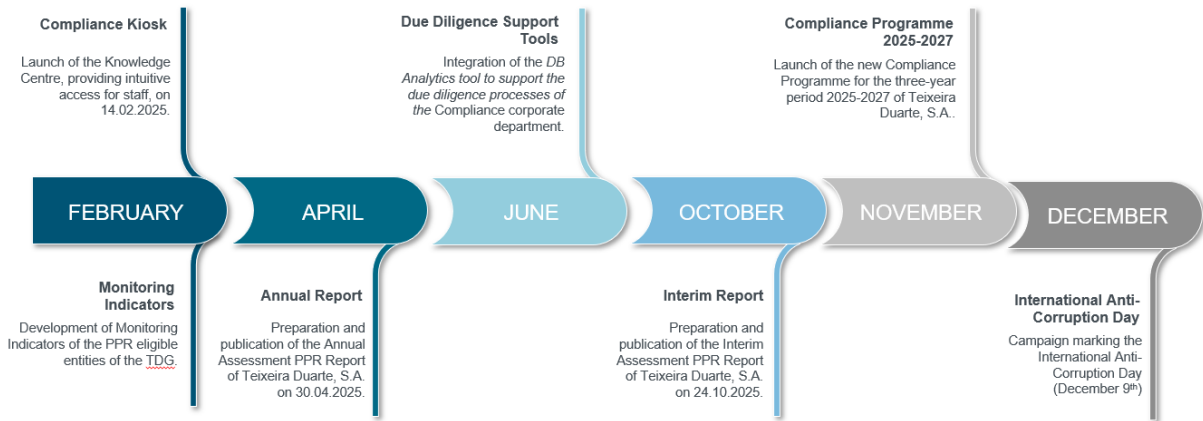


Figure 1 - Activities carried out within the scope of the PCN 2025

## 2.2. LEGAL COMPLIANCE ANALYSIS AND RESULTS

To ensure the systematic assessment of the fulfilment level of compliance with the legal requirements provided in Decree-law no. 109-E/2021, the **items identified or updated in 2025** are presented below, highlighted in blue, as well as the **evolution of the recommendations made before**, in the light of the audit and assessment carried out within the scope of the PCN:

### STRENGTHS

- Integration of the culture and ethical values of TDG in the performance of its employees' roles and in the expansion of its markets of operation.
- Implementation of an external platform for the Whistleblowing Channel (*IntegrityLog*), fulfilling the legal framework applicable to the protection of whistleblowers, pursuant to Law no. 93/2021, of December 20<sup>th</sup>;
- Provision of training sessions on Prevention of Corruption and on how to use the Ethics Channel of the TDG, in accordance with the Decree-Law no. 109-E/2021, of December 9<sup>th</sup>, and Law no. 93/2021, of December 20<sup>th</sup>;
- Existence of a structured PCN assessment and improvement system based on thematic audits, led by the Compliance corporate department, and in independent assessment actions, with systematic identification of strengths, opportunities to improve and areas to be developed;
- Development of a systemic indicator for the automatic monitoring of TDG eligible entities under the criterion of 50 or more employees, for PPR adoption purposes;
- Structured normative documents set within the scope of corruption prevention, namely the *Business Conduct Policy*, the *Giveaways, Gifts, Hospitality and Entertainment Policy*, and the *Anti-Money Laundering and Countering the Financing of Terrorism Policy*;
- Implementation of a structured and coherent Compliance Programme, aligned with the principles of the ISO 37301, with set objectives, its own normative tools, monitoring and reporting mechanisms, training and communication sessions and risk management, ensuring a Compliance Management System;
- Continuous monitoring of the legal and regulatory provisions applicable to TDG, carried out by the Compliance corporate department, through informative bulletins of a juridical nature, communications from MENAC and important information regarding corruption prevention and related matters;
- Development of a monitoring plan for the singular and collective sanction regime applicable to TDG, with special emphasis on the legal regime applicable to entities with head office in Portugal.
- Integrity of financial and non-financial records of TDG reflected in the information provided in the Report and Accounts, ensured through audits carried out by an external entity and with the follow-up of the Supervisory Board;
- Use of a systemic tool (*InsiderLog*), of monitoring and registration of the employees with access to privileged or confidential information, strengthening control mechanisms and the prevention of potential conflicts of interest or the unlawful use of information; and
- Formalisation and adequate logging of the decisions of the TDG Board of Directors, with follow-up and logging ensured by the Corporate and Business departments.







### TO BE IMPROVED

- Update PPR with the identification of the eligible entities pursuant to the Decree-Law 109-E/2021, ensuring its scope of application is adequate to the organisational reality of TDG;
- To incorporate cybersecurity risks into the corruption and related infractions risk matrix, taking into account the strategic importance of the Information Technology department, the growing exposure to external threats, and the identification of risks associated with interactions with third parties and technology suppliers;
- Update the risk map for the Equipment Management department, taking into account developments in the activities carried out and the respective operational processes, particularly with regard to the disposal and auction of assets, in order to ensure that the associated risks and existing preventive measures are adequately addressed.







**TO BE DEVELOPED**

- Strengthen the mechanisms for coordination and information sharing between the corporate Compliance and Internal Audit departments, so that any situations, indications or weaknesses of an ethical or behavioural nature identified during internal audit work are taken into account as part of the monitoring carried out by the corporate Compliance department.

**PREVIOUS YEAR(S) ANNUAL ASSESSMENT REPORT FOLLOW UP**

Classification	Description	Current Status	Evolution in 2025
To Be Improved	Raising employees awareness regarding PPR execution reports (Interim and Annual), Conflict of Interests and Third Parties Due Diligence.	 Partially implemented	✓ Provision of an internal Knowledge Centre (Compliance Kiosk) dedicated to various Compliance-related matters 2025.
To Be Improved	Formalisation of the commitment to the principles and values of the Code of Ethics and Conduct by new and current employees, using an internal tool.	 Not implemented	-
To Be Improved	Update of the normative documents regarding the matter of Corruption and Related Infractions, namely the Conflict of Interests Policy and the Giveaways, Gifts, Entertainment and Hospitality Procedure.	 Partially implemented	✓ Publication of the new Giveaways, Gifts, Hospitality and Entertainment Policy in 2024. ✓ The creation of a Conflict of Interests corporate policy is a goal set in the Compliance Programme 2025-2027.
To Be Improved	Revision and formalisation, in written, of the promotional and hospitality expenses approval flow.	 Implemented	✓ Publication of the new Giveaways, Gifts, Hospitality and Entertainment Policy in 2024.
To Be Improved	Monitoring of the completion rate of the training sessions provided by TDG by upper hierarchical levels with the support of Human Resources.	 Partially implemented	Monitoring carried out manually while a systemic solution is being assessed in coordination with the Information Technology corporate department and Human Resources.
To Be Improved	Development of a corruption and related infractions risk assessment system with active participation of the persons in charge of risk management.	 Not implemented	This improvement point is also a goal which was set in the Compliance Programme 2025-2027.

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To Be Improved	Half-yearly monitoring of the number of employees in TDG companies to assess compliance with the legal criterion for the GRPC applicability to legal entities with 50 (fifty) or more employees.	 Implemented	Development of a systemic indicator for the automatic follow-up of eligible entities in 2025.
To Be Improved	Establishment of a frequency for the renewal of Corruption Prevention and Ethics Channel trainings, every 3 (three) years.	 Implemented	✓ The periodicity of compulsory training on Compliance was set on 2 (two) years, in accordance with the decision of the <i>Chief Compliance Officer</i> .
To Be Improved	Expand the composition of the PPR Control System Audit Programme by including additional relevant departments involved in conducting legal compliance audits, particularly the corporate Internal Audit department;	 Not implemented	This matter was the subject of an audit conducted by the Compliance corporate department in 2026, leading to the identification of the need to the future development of the model of articulation between Internal Audit and Compliance.
To Be Improved	Strengthen the security measures for confidential information under the responsibility of the Accounting, Legal, Corporate Governance and Legal Affairs departments, as well as the Directorate-General for Human Resources, by implementing additional physical barriers to those already in place (e.g., floor access blocking door);	 Not implemented	It should be noted that the Corporate and Legal departments are currently developing a Personal Data Retention Policy as an organisational measure to safeguard the nature of the personal data processed, in addition to the security measures recommended in the PPR.
To Be Improved	Promote alignment with and cultural reinforcement of Corruption Prevention measures through training sessions or direct communication whenever a new entity becomes eligible and begins to adopt the TDSA's PPR, ensuring that employees are duly informed of their inclusion in the said Plan.	 Not Applicable	No new entities were eligible for the PPR since 2023.
To Be Developed	Update the Code of Ethics and Conduct with the identification of the disciplinary and criminal sanctions applicable to acts of corruption and related infractions.	 Partially implemented	✓ The new model of the Code of Ethics and Conduct, going through an " <i>Approval and Implementation</i> " stage, includes a specific chapter in " <i>Code infraction</i> ", which alludes to disciplinary sanctions.






To Be Developed	Development of a tighter control of the potential existence of financial (and non-financial) flows irregularities regarding recurrent gifts, entertainment and hospitality.	 Implemented	✓ Provision of a new reporting form for corporate courtesies, with the new amount limits.
To Be Developed	Improving of the criteria and controls regarding due diligence of business partners, third parties contracting and hiring of top managers with great responsibility.	 Partially implemented	✓ Integration of the tool <i>DB Analytics</i> to support the due diligence preliminary analysis carried out by the Compliance corporate department.
To Be Developed	Definition of the periodical communication campaigns regarding matters of corruption and related infractions prevention ( <i>newsletter</i> ).	 Partially implemented	✓ The Internal Knowledge Centre ( <i>Compliance Kiosk</i> ) is composed of a field dedicated to "News". ✓ The consolidation of a "Compliance Bulletin" as a periodical instrument to raise internal awareness is a goal set in the Compliance Programme 2025-2027.
To Be Developed	Development of internal policies and manuals regarding the activities and controls carried out in the Activity Sectors, Corporate Departments and Support Structures of the TDG.	 Partially implemented	✓ It is a continuous work to be developed together with the said departments.
To Be Developed	Formalise the recording of the analysis of any potential impacts arising from the reorganisation of TDG portfolios, in order to clearly and thoroughly document the decision regarding the maintenance or discontinuation of the current PPR.	 Not implemented	-

Table 1 - Follow Up of previous points

### 2.3. CODE OF CONDUCT

The Code of Ethics and Conduct (Code) of TD,SA. was implemented in 2018, gathering the principles, values and rules which guide the operation of all entities encompassed by the TDG, constituting one of the structuring instruments of the PCN.

Throughout the last two years, the Code went through a process of development and updating, aiming at reinforcing its adequacy to the requirements of Decree-Law no. 109-E/2021, as well as to other laws and regulations applicable, and its articulation with policies and internal procedures within the scope of the RGPC.

As part of this review process, the chapters of the Code have been reorganised along thematic and functional lines, with a view to enhancing the clarity, accessibility and effectiveness of the document as a guide to ethical conduct.

Summing up, the new structure of the Code-is organised around the following main axes:

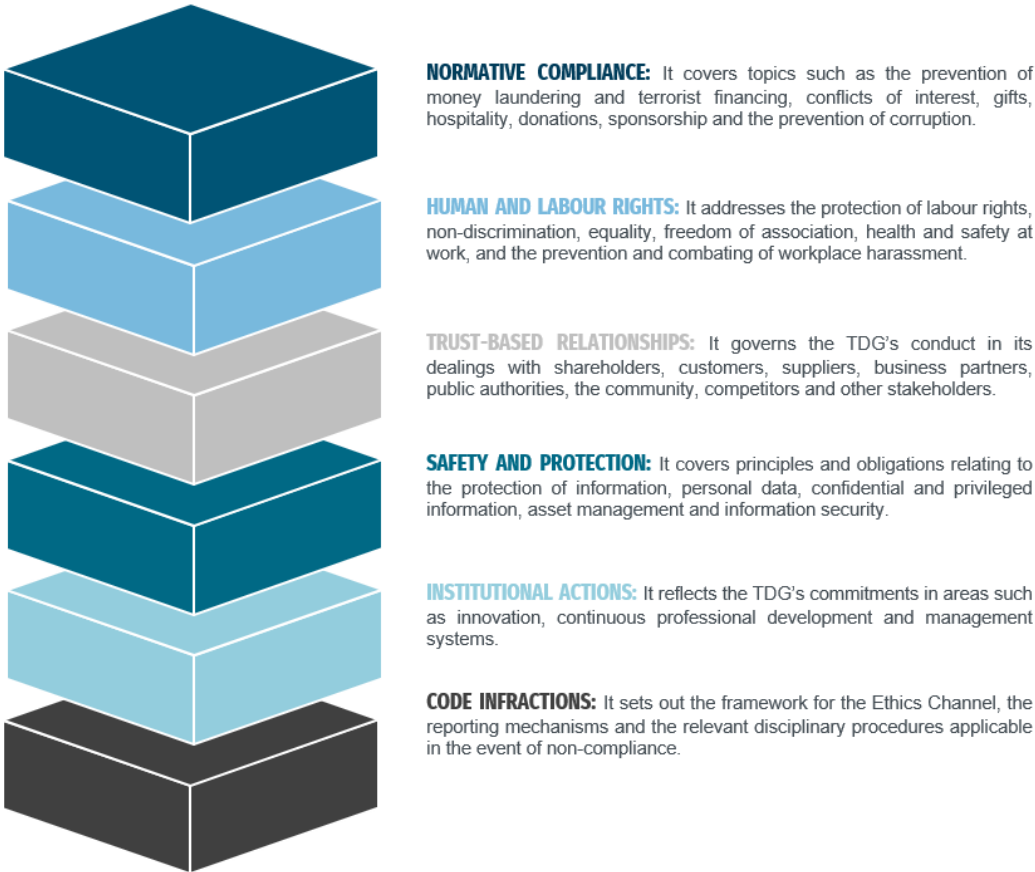


Figure 2 - New structure of the Code of Ethics and Conduct of TDG

The revised version of the Code is, currently, in its final approval phase prior to implementation, and is expected to come into force during the **second half of 2026**.

**2.4. WHISTLEBLOWING CHANNEL**

Fulfilling the provisions of article 8, of the Appendix to the Decree-Law no. 109-E/2021, TDG has an **Ethics Channel**, integrated in the PCN and articulated with the Code and the PPR, destined to report facts or situation susceptible of constituting irregularities, unlawful behaviour, corruption acts or related infractions.

**Ethics Channel** is composed of the following means of communication:

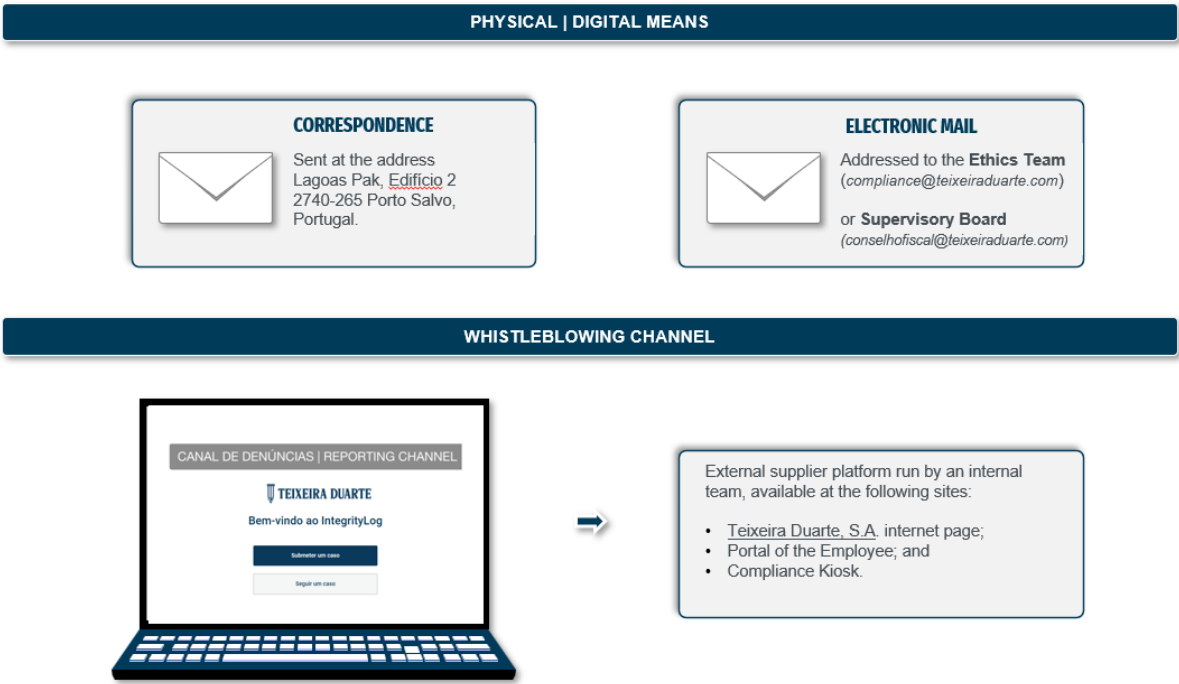


Figure 3 - Whistleblowing Means of Communication

Under the terms and for the purposes of Law No. 93/2021, of December 20<sup>th</sup>, it should be noted that only the **Whistleblowing Channel** ensures the possibility of legally submitting reports **anonymously**.

Without prejudice of the means used, all reports received through the **Ethics Channel** - including the Whistleblowing Channel, electronic mail and correspondence - benefit from the guarantees legally granted, specially with regard to the protection against retaliation, confidentiality, integrity of the information and appropriate conservation of the records.

During 2025, **19 reports** were received through the Ethics Channel, which were duly analysed, following the applicable internal procedures. Of the reports received, **none involved** facts susceptible of constituting **corruption acts or related infractions**.

**2.5. TRAINING**

Training has an important role in the PCN, under the terms of article 9, of the Appendix to the Decree-Lei no. 109-E/2021, constituting an essential tool for the mitigation of the risks of corruption and or related infractions and to bolster a culture of integrity, transparency and effectiveness of internal control mechanisms.

In this context, TD,SA. training programme comprises namely specific training on **Corruption Prevention** and **Ethics Channel**, structured in a *e-learning format* and made available to all employees.

## CORRUPTION PREVENTION



Figure 4- Training on Corruption Prevention

Training on **Prevention of Corruption** deals in a structured manner with the following matters:

- (i) concept of corruption;
- (ii) legal framework applicable;
- (iii) corruption subjects;
- (iv) associated means and practices;
- (v) sanctions and penalties;
- (vi) types of related infractions; and
- (vii) PPR adopted by TDG.

Launched in **June 2023**, this training programme aims to strengthen individual and collective commitment to the prevention and detection of unlawful conduct and to ensure that the organisations covered comply with the applicable legal framework.

Considering the goals of the **Compliance Programme 2025-2027**, a **revision** of the **PPR** is planned and will entail, at a later stage, the update of the contents of the training, thus ensuring its alignment with the revised version and with the relevant regulatory and organisational evolutions.

## ETHICS CHANNEL

The **Ethics Channel** training is focused on the whistleblowing mechanisms and on the whistleblowers protection guarantees, including:

- (i) legal framework;
- (ii) intervenors in the reports flow;
- (iii) reporting procedures;
- (iv) protection guarantees to whistleblowers;
- (v) reporting means available for the Ethics Channel; and
- (vi) deadlines established for the treatment of the reports.



Figure 5 – Training on Ethics Channel

Made available on **October 12<sup>th</sup>, 2023**, this training session aims at ensuring employees get to know the tools available to report irregularities and that they understand the guarantees associated to their use.

In line with the goals of the **Compliance Programme 2025-2027**, and considering the revision of the **Whistleblowing Policy**, it is also programmed the update of this training contents, ensuring its alignment with the legal framework and with the reporting flows in force at TD,S.A..

Within the scope of the monitoring of the participation, of the entities to which the PPR is applicable, in the **mandatory training sessions**, in the **Portuguese market**, the respective levels of-completion are listed below:

Entities Involved	Corruption Prevention	Ethics Channel
Teixeira Duarte Eng. e Construção	51%	21%
TDGI – Tecnologia de Gestão de Imóveis, S.A	13%	14%
TDGI Manutenção, A.C.E	25%	86%
Teixeira Duarte – Gestão de Participações e Investimentos Imobiliários, S.A	44%	59%
Somafel – Engenharia e Obras Ferroviárias, S.A.	24%	14%
EPOS – Empresa Portuguesa de Obras Subterrâneas, S.A.	12%	13%
Lagoas Hotel, S.A.	84%	91%

Figure 6 - Training Completion Rate Table

It is worthy of note that, as set out in the **Compliance Programme 2025-2027**, TD,SA. defined as a goal to gradually reach levels of completion of **nearly 100%** in the mandatory Compliance training sessions by the target employees.

## 2.6. COMMUNICATION

TD,SA. has been developing, progressively and systematically, **communication mechanisms in Compliance related matters**, with the purpose of strengthening the knowledge, the awareness and the involvement of its employees, as well as to ensure full compliance with applicable legal obligations.

In this context, and in accordance with the provisions of article 9, of the Decree-Law 109-E/2021, TD,SA. has an integrated communication structure based on the following channels and tools:

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- **Portal of the Employee (intranet) | Institutional Site**

In accordance with article 6, of the Appendix to the Decree-Law 109-E/2021, TD,SA. ensures that the PPR and its reports are made available – both to its employees and to the general public – via the Portal of the Employee (Intranet) and via TD,S.A.'s institutional website. (<https://teixeiraduarte.com/>), ensuring the fulfilment of the legally provided transparency obligations.

In addition to this mandatory disclosure function, the **Portal of the Employee** also serves as a central channel for internal communication on Compliance matters, and is used to publish and update policies, procedures, training materials, guidelines and other relevant communications within the scope of the PCN.

Throughout 2025, the following reports were submitted, accompanied by the relevant supporting evidence:

Content	Date of publication	Target-audience	Channel used
Compliance Kiosk: a new Knowledge Centre for the employees of the TDG.	14/02/2025	Employees	Intranet
PPR Annual assessment report	06/05/2025	Public in general	Official Website
	07/05/2025	Employees	Intranet
PPR Interim assessment report	27/10/2024	Public in general	Official Website
		Employees	Intranet
Teixeira Duarte approves the Compliance Programme 2025-2027	12/11/2025	Employees	Intranet

Table 2 - Communications made during 2025

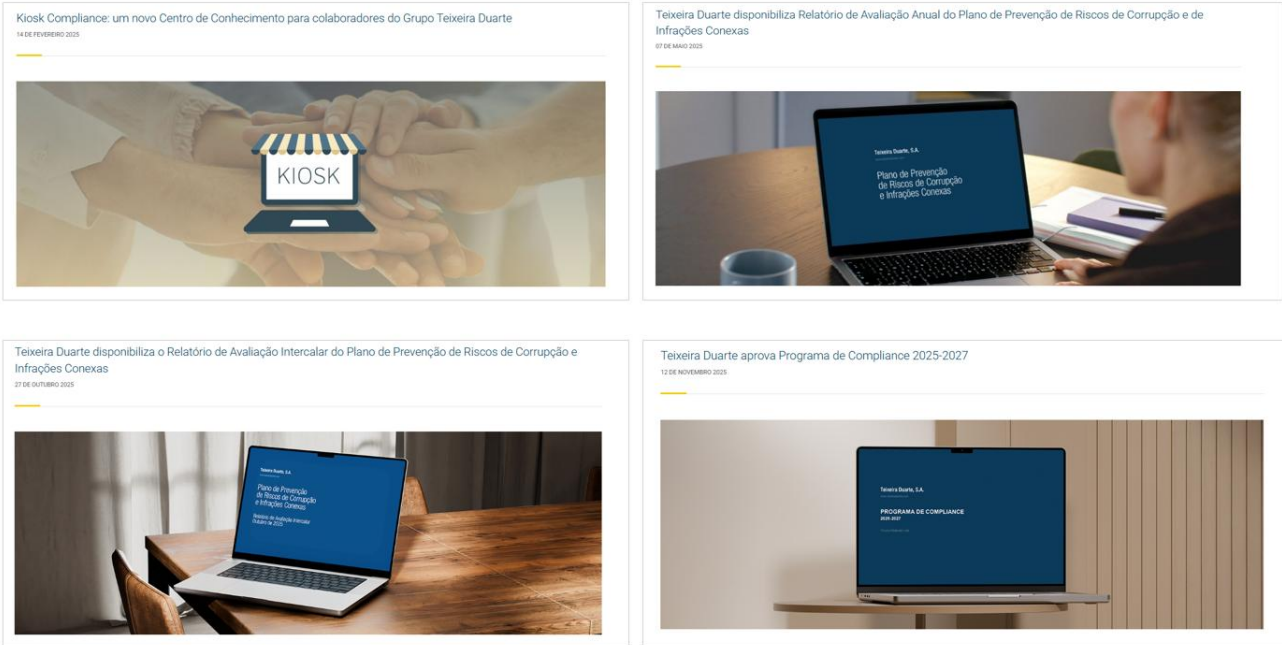


Figure 7 - Intranet Communications Mosaic

- **Platform RGPC (MENAC)**

Pursuant to no. 9 of article 6 of the Appendix to the Decree-Law no. 109-E/2021, the communications laid down on no. 4 are also carried out through the electronic platform RGPC, run MENAC, in operation since November 25<sup>th</sup>, 2024.

In this context, the **7 organisations in the GTD currently covered in Portugal**-are duly registered on the platform; all legally required notifications have been submitted, accompanied by the relevant supporting documentation-and these are currently marked as “**under processing**”.

- **Internal Communication Campaigns | Lockscreen**

In addition, internal communication campaigns were launched through institutional screen lock messages, with the aim of raising staff awareness of compliance matters, including promoting the Compliance Kiosk and initiatives linked to International Anti-Corruption Day, which is observed on December 9<sup>th</sup>.



Figure 8 - Mosaic with the campaigns carried out in 2025

- **Compliance Kiosk**

TD,SA. has also available the **Compliance Kiosk**, operating since February 14<sup>th</sup>, 2025, as an internal platform of continuous report and support to the employees.

**Compliance Kiosk** is the means to disclose news and information content, namely data related to the Corruption Perceptions Index, information on the RGPC platform, as well as shortcuts to Compliance main tools, including whistleblowing channels, reporting of gifts and the consultation of applicable normative documents.

**2.7. ASSESSMENT SYSTEM**

Pursuant to the provisions of article, of the Appendix to Decree-Law no. 109-E/2021, TD,SA. has implemented mechanisms to assess its PCN, with the aim of assessing its effectiveness and ensuring its continuous improvement.

The assessment system adopted is based on an integrated and multi-level approach which involves:

- i. **The audit and assessment carried out by the Compliance corporate department** to the eligible entities and areas, as continuous monitoring tool of the PPR execution; and
- ii. **Independent audit led by the Management Systems Support Structure to the Compliance corporate department**, to ensure the independence of assessment process and verify the legal compliance of the requirement set out in Decree-Law no. 109-E/2021.

During the 2025 financial year, the audit and assessment plan conducted by the Compliance corporate department was carried out between March 23<sup>rd</sup> and April 13<sup>th</sup>, 2025, focusing on areas deemed most susceptible to risks associated with the implementation of the Giveaways, Gifts, Hospitality and Entertainment Policy, as set out below:

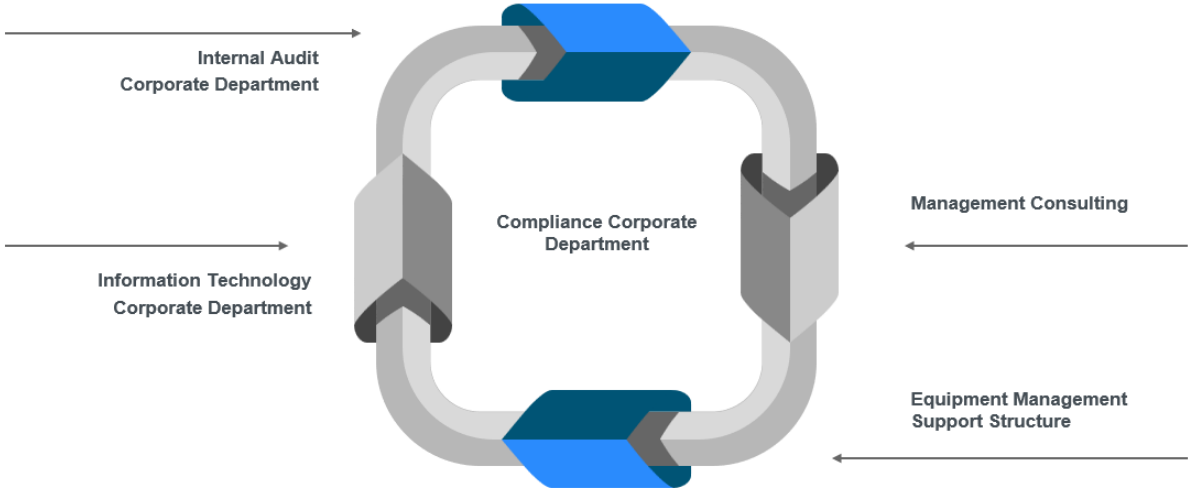


Figure 9 - 2024 Legal Compliance Audit Plan

During the audit, a comprehensive analysis was carried out of the overall context of the audited areas, including aspects such as their organisational structure, the number of staff and the main functions performed. The maturity levels of the areas in terms of training and awareness were also assessed, as well as the suitability of the risks identified in the PPR, with a view to calibrating them against the operational reality of each area.

In addition, an-analysis was carried out of the preventive measures and controls adopted, as well as other elements considered relevant to assessing the effectiveness of the prevention system, with the areas demonstrating a high degree of participation and collaboration throughout the process. In this context, evidence of existing controls was provided and relevant input was shared with a view to the continuous improvement of the system.

In addition, the **Compliance corporate department** was also submitted to an independent audit, led by the **Management Systems Support Structure**, which was carried out on **April 23<sup>rd</sup>**.

The audit was carried out in order to support the internal verification of eventual irregularities according to the Decree-Law no. 109-E/2021, being the results presented in line with Recommendation no. 1/2026 of MENAC, namely:

Instrument	Framing Status
Code of Conduct	<p>The Code of Ethics and Conduct in force when of the assessment:</p> <ul style="list-style-type: none"> <li>• did not identify clearly the disciplinary and criminal sanctions associated to acts of corruption and related infractions, pursuant to no. 2, of article 7, of the RGPC; and</li> <li>• lacked-the three-year period revision, pursuant to no. 4, of article 7, of the RGPC.</li> </ul> <p>√Development and approval of a new Code of Ethics and Conduct, in line with the requirements of article 7, of the RGPC, including the identification of disciplinary and criminal sanctions, which should come into force in 2026.</p>
Plan for Prevention of Risks of Corruption and Related Infractions (PPR)	No irregularities were detected whereby no corrective measures are required.
Whistleblowing Channel	No irregularities were detected whereby no corrective measures are required.
Training	No irregularities were detected whereby no corrective measures are required.

*Table 3 - PCN Instruments Irregularities*

Notwithstanding, the main improvement points and opportunities of development identified within the scope of the assessment carried out are detailed-in 2.2. Of this Report, namely in "**Legal Requirements Compliance Analysis**".

### 3. MONITORING OF PREVENTIVE AND CORRECTIVE MEASURES

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

### 4. RECOMMENDATIONS

In light of the analysis set out in this Report and the results of the evaluation and audit activities carried out under the PCN, the following recommendations are put forward, aimed at promoting continuous improvement, strengthening the effectiveness of prevention mechanisms and consolidating the RGPC:

1. **PPR Revision and Continuous Update** - to ensure its permanent adequacy to the evolvement of the activities, processes and organisational structure organisational of TDG, as well as to the legal and regulatory framing applicable and to the identification of new relevant risks;

2. **Integration of the Assessment Results in the PCN Continuous Improvement Cycle** - ensuring that the strengths identified are consolidated and that opportunities for improvement and areas for development are systematically monitored, by defining and monitoring the relevant preventive and corrective measures;
3. **Strengthening of the Effectiveness of Compliance Mandatory Training Sessions** - by raising awareness among the relevant organisations and departments, with a view to gradually achieving completion rates close to 100%, as set out in the 2025-2027 Compliance Programme.

## 5. CONCLUSION

Based on the analysis carried out in this Report, it can be concluded that the PCN of TD,SA. has achieved a **very satisfactory** outcome, demonstrating a high degree of compliance with the requirements set out in Decree-Law No. 109-E/2021, as well as consistent progress in the maturity of its communication and monitoring mechanisms.

Throughout the 2025 financial year, there was a significant strengthening of the structural components of the PCN, notably the updating and consolidation of the Code of Ethics and Conduct, the strengthening of communication and training mechanisms, the active management of the Ethics Channel, and the implementation of an evaluation system based on audits and continuous improvement.

Nevertheless, it is recognised that the process of reviewing the PPR, as well as increasing the involvement of operational departments in risk mapping and management, are further steps to be taken in order to fully consolidate the integration of the PPR into the organisational dynamics of TDG.

In this context, the recommendations set out in this Report reflect an approach of continuous improvement, aligned with the 2025-2027 Compliance Programme and TD,SA.'s strategy, with a view to ensuring the effectiveness and robustness of its PCN in the medium and long term.

Carlos  
Ferraz

Signed  
digitally by Carlos  
Ferraz  
Data: 2026.04.29  
08:48:31 +01'00'

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.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	3	6	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Procurement	Passive Corruption	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.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	4	16	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027

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.	Implemented (partially)	30/06/2026
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	45	180	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	45	180	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
Internal Audit	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	7	14	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	7	14	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Internal Audit	Active Corruption	Donations of sponsorship of political parties or other entities (public or private) with the obvious or apparent objective pressure, influence peddling or illegitimate lobbying in favour of a TDG company.	2	10	20	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	4	8	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	10	40	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	2	1	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	19	152	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Internal Audit	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	1	3	3	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	4	27	108	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	21	42	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	1	1	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	18	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Internal Audit	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
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.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Active Corruption	Donations of sponsorship of political parties or other entities (public or private) with the obvious or apparent objective pressure, influence peddling or illegitimate lobbying in favour of a TDG company.	4	10	40	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Commercial	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	4	16	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	19	76	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	19	76	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	21	42	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027

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	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.	Implemented (partially)	30/06/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	27	54	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Commercial	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	63	252	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	63	252	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027
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.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Compliance	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	11	22	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	7	28	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	15	120	Develop communication / training campaigns regarding compliance issues in connection with the PPR.	Fully implemented on 23/06/2023	-
	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.	Implemented (partially)	30/06/2026
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	27	54	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Develop communication / training campaigns regarding compliance issues in connection with the PPR.	Fully implemented on 23/06/2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	1	13	13	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	1	3	3	Develop communication / training campaigns regarding compliance issues in connection with the PPR.	Fully implemented on 23/06/2023	-
Board of Directors	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	8	45	360	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	8	45	360	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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 Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	8	11	88	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	8	15	120	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	45	360	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Board of Directors	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	21	84	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	8	81	648	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	8	45	360	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	8	21	168	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	8	27	216	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	4	2	8	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	1	33	33	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	8	63	504	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	4	16	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Board of Directors	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	5	20	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Conscious modification of accounting records for tax evasion.	2	39	78	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Distortion of Competition	Agreement 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.	Implemented (partially)	30/06/2026
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	8	63	504	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	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.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Active Corruption	Donations of sponsorship of political parties or other entities (public or private) with the obvious or apparent objective pressure, influence peddling or illegitimate lobbying in favour of a TDG company.	4	10	40	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	11	44	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027

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	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.	Implemented (partially)	30/06/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	27	108	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	8	63	504	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Accounting, Finances and Shared Processes	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)	31/12/2027
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	2	2	4	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	8	15	120	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	2	8	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-	
Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	3	12	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027	
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.	Implemented (partially)	30/06/2026	
Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	2	7	14	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027	

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Equipment Management	Active Corruption	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.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	7	28	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	7	14	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	9	36	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027

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	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.	Implemented (partially)	30/06/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	12	48	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	4	6	24	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Equipment Management	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	8	27	216	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
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.	Implemented (partially)	30/06/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	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 Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Innovation	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	10	80	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	11	22	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	1	27	27	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	4	27	108	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-

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	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.	Implemented (partially)	30/06/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	63	252	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
Legal	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	4	10	40	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	13	52	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	10	40	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	13	52	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	2	1	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	15	60	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Legal	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	9	36	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	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 Programme.	Fully implemented on 23/06/2023	-

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
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.	Implemented (partially)	30/06/2026
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	63	252	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
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.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
Proposals' Logistics	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours	4	4	16	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
		or benefits for themselves or for third parties.						
Active Corruption		Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
Passive Corruption		Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	7	28	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
Passive Corruption		Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
Influence Peddling		Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Distortion of Competition	Agreement between companies to obtain advantages and / or benefits for themselves or for others, distorting free market competition.	4	45	180	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Distortion of Competition	Agreement to raise, increase or fix the price of goods or services to manipulate the market.	4	45	180	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Operation	Active Corruption	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.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	8	4	32	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	4	21	84	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027

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	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.	Implemented (partially)	30/06/2026
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	8	13	104	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Money Laundering	Exercise of a TDG company's activity in a territory with a high level of perceived corruption or risk of money laundering and terrorist financing, without prior due diligence.	2	9	18	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Periodical internal audit of the risk activities, to monitor and search for improvement opportunities.	Implemented (partially)	31/12/2027
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Operation	Fraud	Misappropriation of cash funds or of public subsidies for the payment of fake expenses or payment / financing of licit or illicit activities.	4	5	20	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	8	7	56	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	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.	Implemented (partially)	31/12/2027
	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.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
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.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	2	8	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	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.	Implemented (partially)	30/06/2026
	Active Corruption	Payments to public agents or public / private entities through the unlawful use of corporate card or expenses refund.	4	1	4	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Money Laundering	Hiring of candidates classified as politically exposed persons without due diligence.	8	13	104	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	3	12	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	8	13	104	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Human Resources	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	8	21	168	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Fraud	Conscious modification of accounting records for tax evasion.	4	21	84	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	9	18	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	5	10	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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 Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	9	18	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	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.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Management Systems	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
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.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	4	15	60	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	4	4	16	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	8	27	216	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
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)	31/12/2027
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	27	216	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	1	3	3	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Money Laundering	Involvement in money laundering schemes with the purpose of dissimulating the illicit provenance of capital, namely through the acceptance of payments in cash and / or transactions of large amounts or of goods of high unit value.	2	27	54	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Money Laundering	Lack of verification of cash payments provenance or receipt of investments and funds of significant amounts.	4	9	36	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-

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	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	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	4	9	36	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Fraud	Produce a purchase order for a service that has not been provided or has been partially provided, invoiced by service providers or suppliers, in exchange for an unlawful benefit.	1	2	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	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)	31/12/2027

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 Programme.	Fully implemented on 23/06/2023	-
Sustainability	Active Corruption	Payments to public agents or public / private entities to obtain benefits or advantages.	2	5	10	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	15	30	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	4	8	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Active Corruption	Use a position of authority (within TDG) or relationships with people in a position of authority to obtain favours or benefits for themselves or for third parties.	2	4	8	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026

Main activity areas with risk of practice of acts of corruption and related infractions.	Risk Identification		Risk Classification			Classification of the Measures		
	Infraction Type	Risk Description	Probability	Impact	Risk level	Measures to be implemented (preventive and corrective)	Status	Deadline
Sustainability	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	2	45	90	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	2	3	6	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	3	6	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Fraud	Records tampering to obtain subsidies or credits from stakeholders and / or government entities.	2	45	90	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-

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.	Implemented (partially)	30/06/2026
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	2	3	6	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
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.	Implemented (partially)	30/06/2026
	Active Corruption	Entice a third party to engage in corrupt behaviour taking into account the country in which the TDG company is operating.	2	9	18	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Active Corruption	Offer gifts, entertainment and / or hospitality services to public agents or public / private entities to obtain benefits or advantages.	2	2	4	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-

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.	Implemented (partially)	30/06/2026
	Passive Corruption	Receipt of a benefit or advantages, or the promise thereof, from a public or private agent, in breach of the duties of the position held in the TDG.	8	45	360	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027
	Passive Corruption	Receiving unlawful advantage for the selection, hiring and / or to favour suppliers or service providers.	4	15	60	Implementation of training regarding the Ethics Channel within the scope of the PPR Training Programme.	Fully implemented on 23/06/2023	-
	Influence Peddling	Insinuation or use of the name Teixeira Duarte as tool to obtain advantages or benefits from public agents.	2	1	2	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Influence Peddling	Hiring candidates related to public agents in return for obtaining unlawful advantage or influence peddling.	1	2	2	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027

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 Programme.	Fully implemented on 23/06/2023	-
	Fraud	Practice of overpricing or over-invoicing of contracts and / or services provision to obtain benefits or advantages for oneself or third parties.	4	6	24	Revision of the Code of Ethics and Conduct taking into consideration the new legislation in force.	Implemented (partially)	30/06/2026
	Fraud	Tampering with or absence of accounting record of the stock of materials, machinery, equipment or goods, subtracted for own or third parties' benefit.	4	27	108	Elaboration and / or updating normative documents regarding corruption and related infractions.	Implemented (partially)	31/12/2027