

Annual implementation assessment report for the Plan for the Prevention of the Risks of Corruption and Related Offences (PPR)

1. Introduction and objective

Following the approval of the National Anti-Corruption Strategy 2020-2024, the National Anti-Corruption Mechanism and the General Regime for the Prevention of Corruption were established through Decree-Law no. 109-E/2021 of 9 December (DL 109-E/2021).

Decree-Law 109-E/2021 established the obligation for companies based in national territory that employ more than fifty employees to develop a Regulatory Compliance Programme.

Guiding its actions by the highest standards of business ethics, JP Sá Couto, S.A. ("JP Sá Couto") has developed and implemented a Plan for the Prevention of Risks of Corruption and Related Offences (PPR), in accordance with the provisions of Article 5 of DL 109-E/2021, which approved the General Regime for the Prevention of Corruption.

The purpose of this report is to provide an annual assessment of the implementation of the PPR. It is intended to quantify the degree of implementation of the Regulatory Compliance Programme Control System, particularly the quantification of the degree of implementation of the preventive and corrective mitigation measures identified in the PPR at JP Sá Couto.

2. Monitoring and evaluation

The PPR is the result of an analysis of JP Sá Couto's activities and identifies, analyses and classifies the risks of corruption and related infractions to which JP Sá Couto is exposed, indicating the preventive and corrective measures to mitigate these risks.

This PPR, once approved by the Board of Directors, was published in the <https://www.groupjp.com/en/ethics-and-conduct/> and communicated to all employees.

Within the scope of the PPR, JP Sá Couto identified 27 risks of corruption and related offences to which it was exposed, which were classified according to the applicable risk matrix. The PPR does not identify situations of maximum risk.

In order to mitigate the identified risks of corruption and related offences, JP Sá Couto has adopted and implemented a set of prevention and/or mitigation mechanisms deemed appropriate to the identified risks, including but not limited to the following:

1. Code of Ethics and Conduct;
2. Policy for the Prevention of Corruption and Related Offences;
3. Implementation of a Whistleblowing Channel;
4. Whistleblowing Policy
5. Training for key stakeholders;
6. Audit Programme

Considering the monitoring of the prevention and/or mitigation mechanisms implemented under the PPR, it was concluded that all measures proposed to mitigate the risks identified in the PPR have been effectively and adequately implemented.

JP Sá Couto has adopted a Code of Ethics and Conduct that establishes a series of principles, values and rules of conduct applicable to all jp.group employees, irrespective of their employment contract or professional duties. This code also applies to entities contracted by or acting on behalf of jp.group companies, particularly in situations where the actions of the former could lead to accountability for the latter.

With the aim of informing all stakeholders, a Policy for the Prevention of Corruption and Related Offences has been developed, this policy serves as a guideline for JP Sá Couto's operations and for conducting business in an ethical, honest, and transparent manner, it requires all parties engaging with JP Sá Couto to comply with all applicable laws and regulations, particularly those relating to the prevention of corruption and related offences.

The Code of Ethics and Conduct has been communicated to employees and is accessible at <https://www.groupjp.com/en/ethics-and-conduct/> thus ensuring that all stakeholders are bound by it.

An internal whistleblowing channel was implemented, this channel, which is certified according to the ISO 27001 Standard, ensures the confidentiality and anonymity of whistleblowers and the security of the data entered into the platform.

Platform managers and the investigation team have received training on report processing, in accordance with the GDPR legislation.

Mechanisms for the prevention of retaliation against whistleblowers have been established, with the expectation that the sanction incurred by those who retaliate may result in dismissal without the right to compensation or indemnity, and a Whistleblower Policy has been drawn up, which is also available at <https://www.groupjp.com/en/ethics-and-conduct/>.

As part of the strategy to create an ethical barrier, the awareness of JP Sá Couto's staff and key position holders at JP Sá Couto on the subject of corruption, a training program was designed, aimed at all its managers and employees, in order to ensure that they know and understand the policies and procedures for the prevention of corruption and related offences implemented, raising awareness and enabling the timely detection and mitigation of possible transgressions.

In future, the training plan on the contents of the regulatory compliance program will comply with the legal requirements and those of the anti-corruption management system frequency of training takes into account the different exposure of stakeholders to the corruption risks identified.

The effective monitoring of third-party risk is scheduled, through the response to a supplier qualification questionnaire, directed at the main suppliers, for the year 2025.

3. Conclusions

This report took into account the freely accessible internal information and the implementation and monitoring of the PPR.

The PPR has been accompanied and monitored, based on indicators specifically structured for this purpose, striving to optimise the management of corruption risks and related offences. The prevention and/or mitigation mechanisms identified in the PPR are implemented adequately and effectively.

JP Sá Couto has not identified any risks classified as high or very high, nor has it identified any acts or situations related to corrupt practices or related offences, and no reports have been registered up to the date of preparation of this report.

At jp.group, we are strongly committed to the highest standards of business ethics. We aim to foster a transparent environment and thereby maintain the trust of our people and all stakeholders.

The PPR should be reviewed in 2026, or as deemed necessary.

This report will be disclosed to JP Sá Couto employees and other stakeholders through its publication on <https://www.groupjp.com/en/ethics-and-conduct/>.

Matosinhos, 29 April 2025