

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

1. Objective

Interim assessment of implementation of the Plan for the Prevention of the Risks of Corruption and Related Offences (PPR).

The objective is to validate the implementation of the Regulatory Compliance Programme Control System, identify the highest risk situations and the corresponding controls applied, and plan future actions to maintain and enhance the Regulatory Compliance Programme.

2. Implementation of the regulatory compliance programme

In June 2022, jp.group, the group of which JP Sá Couto, SA is a member, initiated the implementation of a Compliance Programme aimed at preventing, detecting and sanctioning acts of Corruption and Related Offences.

The implementation of the Compliance Programme was developed to identify the risks of corruption and related offences, as well as the necessary actions for their mitigation. The jp.group has also adopted a Code of Conduct that establishes the set of principles governing the activities of the companies that make up the jp.group, along with a set of ethical and deontological rules to be observed by the respective members of the Governing Bodies and by all Employees, in their relations with Customers, Suppliers and other Stakeholders, as well as an Anti-Corruption Policy aimed at implementing the principles of action and the duties outlined in the jp.group's Code of Conduct regarding the prevention of corruption and related offences and professional ethics, requiring all parties interacting with the jp.group to comply with all legislation and regulations applicable to the prevention and combating of corruption and related offences.

Due to the need for the establishment of an ethical barrier, embodied by the awareness of its employees and key position holders regarding the issue of corruption, a training programme has been designed, in two strands (managers and employees), in order to promote awareness and enable timely detection and mitigation of transgressions.

An internal whistleblowing channel has also been implemented, properly communicated to all employees, in order to provide a secure way of reporting concerns.

3. PPR implementation

The PPR identifies, analyses and classifies the risks of corruption and related offences to which JP Sá Couto, SA is exposed, while also indicating the preventive and corrective measures required for their mitigation.

The PPR was approved by the Compliance Officer, published on the jp.group website and communicated to all employees via internal communication.

The PPR did not identify any situations of maximum risk arising from the activity of JP Sá Couto, SA, and it is considered that the controls applied to each risk area adequately mitigate the risks identified.

This PPR will be reviewed in 2025, as described in the chapter "Plan Implementation, Advertisement and Review".

4. Third-party risk monitoring

Although planned, and having already developed the third-party risk assessment procedures, the immediate implementation of this control system was not considered feasible in 2022, and is expected to begin in 2023.

5. Reference documents

PPR -Plan for the Prevention of Risks of Corruption and Related Offences [version October 2022].

Processes that make up the Integrated Management System (Minutes of appointment of the Regulatory Compliance Officer, Manual of methods and procedures, Prior assessment procedure, Code of Conduct, Policy for the Prevention of Corruption and Related Offences, Measurement of the effectiveness of anti-corruption programs, Indicators, adoption of an internal whistleblowing channel, among others).

6. Conclusions

This assessment took into account freely accessible internal information and the recent implementation of the PPR.

In light of the planned changes in jp.group's Management Plan, the PPR should be continuously monitored and reviewed, based on indicators specifically designed for this process, aiming to optimise the management of corruption risks and related offences. The PPR must be reviewed in a timely manner.

This review should include an annual opinion from all management representatives regarding aspects of the PPR within their processes and activities throughout the year.

Matosinhos, 31/10/2022