

Interim assessment report of identified high-risk situations of the Risks of Corruption and Related Offences Prevention Plan

Informal Translation

[Pursuant to Article 6(4)(a) of the General Corruption Prevention Framework, annexed to Decree-Law no. 109-E/2021 of 9 December]

A. Reference period	
Start date	22/02/2023
End date	25/10/2023

B. Assessment of situations rated as high/maximum risk in the Risks of Corruption and Related Offences Prevention Plan ("RPP")					
<p>In accordance with the provisions of Article 6(4)(a) of the General Corruption Prevention Framework, annexed to Decree-Law no.109-E/2021 of 9 December, the interim assessment report focuses on situations identified as high or maximum risk in the RPP.</p> <p>The RPP categorised the following activities as high or maximum risk:</p>					
Activity / Area	Assigned risk classification	Should the risk classification assigned in the RPP be maintained?	Are the measures provided for in the RPP being implemented?	Observations	Residual risk ¹
Offer of business courtesies	15	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	A	Low
Receipt of business courtesies	12	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	B	Low
Purchase of raw materials / BU raw materials	12	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	C	Low
Purchase of raw materials - cork / Cork Stoppers BU	12	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	D	Low
Investment negotiation / Procurement	12	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	E	Low

¹ It is the risk that persists after taking into account all the mitigating (preventive and corrective) measures that have been defined to mitigate the identified risks of each area of activity.

	Observations
A/B	Corticeira Amorim's Board of Directors approved the Anti-Corruption Code of Conduct on 22/02/2023. This code includes, in its annexes, forms for registering the offer/receipt of business courtesies, as well as a form to request exceptional approval of the offer/receipt of business courtesies. A revision of the Code of Business Ethics and Professional Conduct was also approved on the same day, as well as the procedure for internally reporting irregularities (whistleblowing procedure). These policies are publicised both internally and externally, as well as the RPP.
C/D/E	On 22/02/2023, Corticeira Amorim's Board of Directors approved, in addition to the aforementioned policies, the Suppliers' Code of Ethics and Conduct, in order to mitigate the risks identified in the RPP. This code has been publicised to the Group's employees, suppliers, and business partners.

C. Additional information

Following the provisions of Law no. 93/2021 of 20 December, Corticeira Amorim has strengthened its compliance with the obligations set out therein by implementing a system for receiving and tracking internal complaints, by means of a computer platform that can be extended to all Group companies.

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Compliance Officer