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# AMORIM

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## Plan for the Prevention of Risks of Corruption and Related Offences

*Version: 0.1*

*Approval: Board of Directors, 22/02/2023*

*Prepared by: Compliance Officer*

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AMORIM

*Informal Translation*



# I. Background

The phenomenon of corruption is present in all societies and spans various historical moments, affecting social development and economic growth, generating the discrediting of institutions and reputational crises.

This phenomenon has warranted the growing concern of the public authorities in Portugal.

Accordingly, Council of Ministers Resolution No. 37/2021 of 6 April, the 2020-2024 National Anti-Corruption Strategy was approved, which brought in a legislative package to fight corruption.

The approval, publication and entry into force of Decree-Law no.109-E/2021 of 9 December (“**DL no.109-E/2021**”), enshrined the new legal framework for the prevention and repression of corruption and related offences. It establishes the mandatory adoption of a set of prevention measures by entities with 50 or more employees.

Similarly, the Penal Code now provides for the possibility of special mitigation of the penalties to be applied to legal persons if they have adopted and implemented compliance programmes that promote the prevention of such a crime or similar crimes, prior to the crime actually being committed.

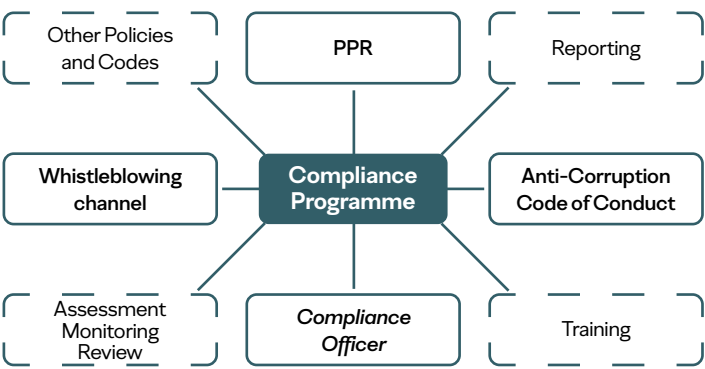
Corticeira Amorim, SGPS, S.A. (“**Corticeira Amorim**”) undertakes to ensure, through appropriate compliance programmes, all the necessary conditions exist for compliance with the rules on the prevention of corruption.

It has accordingly adopted this Plan for the Prevention of Risks of Corruption and Related Offences (“PPR”), in compliance with the provisions of Decree-Law no.109-E/2021.

Corticeira Amorim has, in addition to this PPR, (i) a Code of Business Ethics and Professional Conduct; (ii) a Suppliers’ Code of Conduct; (iii) an Anti-Corruption Code; (iv) an internal training plan on the subject; (v) a whistleblowing channel and (vi) a compliance officer, in compliance with the provisions of article 5 of DL no. 109-E/2021.

This PPR, which will constantly be monitored and periodically reviewed, identifies, analyses and classifies, for each Group entity and area - business and support - the potential risks of corruption or related offences associated with

Corticeira Amorim’s business activity. It systematises the measures already in place to prevent these risks, as well as the corrective measures to reduce the probability of occurrence and the impact of the identified risks and situations.



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# II. Organisation and Functioning of Corticeira Amorim

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Corticeira Amorim is the holding company of an economic group with its registered office in Portugal. It also operates internationally.

It is the largest cork processing group in the world, comprising several companies, including the following specialised Business Units: Amorim Florestal, S.A., Amorim Cork, S.A., Amorim Cork Flooring, S.A., Amorim Cork Composites, S.A., and Amorim Cork Insulation, S.A.

The role of Amorim Florestal, S.A. is to procure, stock and prepare the raw material (cork), so as to supply the other Corticeira Amorim business units.

Amorim Cork, S.A. produces, supplies and distributes cork stoppers.

Amorim Cork Flooring, S.A. produces cork flooring and wall decorations.

Amorim Cork Composites, S.A. researches, develops and produces high performance cork composite solutions.

Amorim Cork Insulation, S.A. produces agglomerates for acoustic, thermal and anti-vibration insulation.

The corporate governance model adopted by Corticeira Amorim is currently the Anglo-Saxon model. This consists of an enlarged Board of Directors, which includes an Audit Committee, composed of independent members, as well as double supervision, by that Audit Committee and the Statutory Auditor.

The company also has the following specialised internal committees, chaired by an independent director and composed mainly of members of the respective bodies: Risk Committee, ESG (Environmental, Social & Governance) Committee and Appointments, Evaluation and Remuneration Committee.

The Board of Directors is responsible for managing the activities of Corticeira Amorim and deciding on any matter relating to its administration. It ensures compliance with the resolutions of the General Meeting or the orientation of the Audit Committee, in cases where this is required

by law or by the articles of association. The above-mentioned committees also assist it with its work.

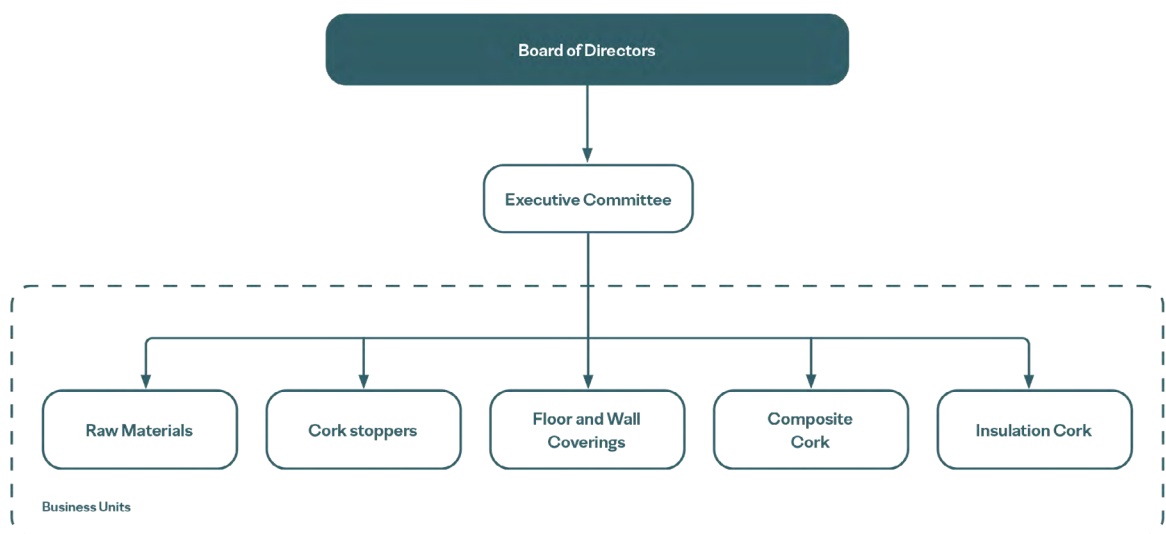
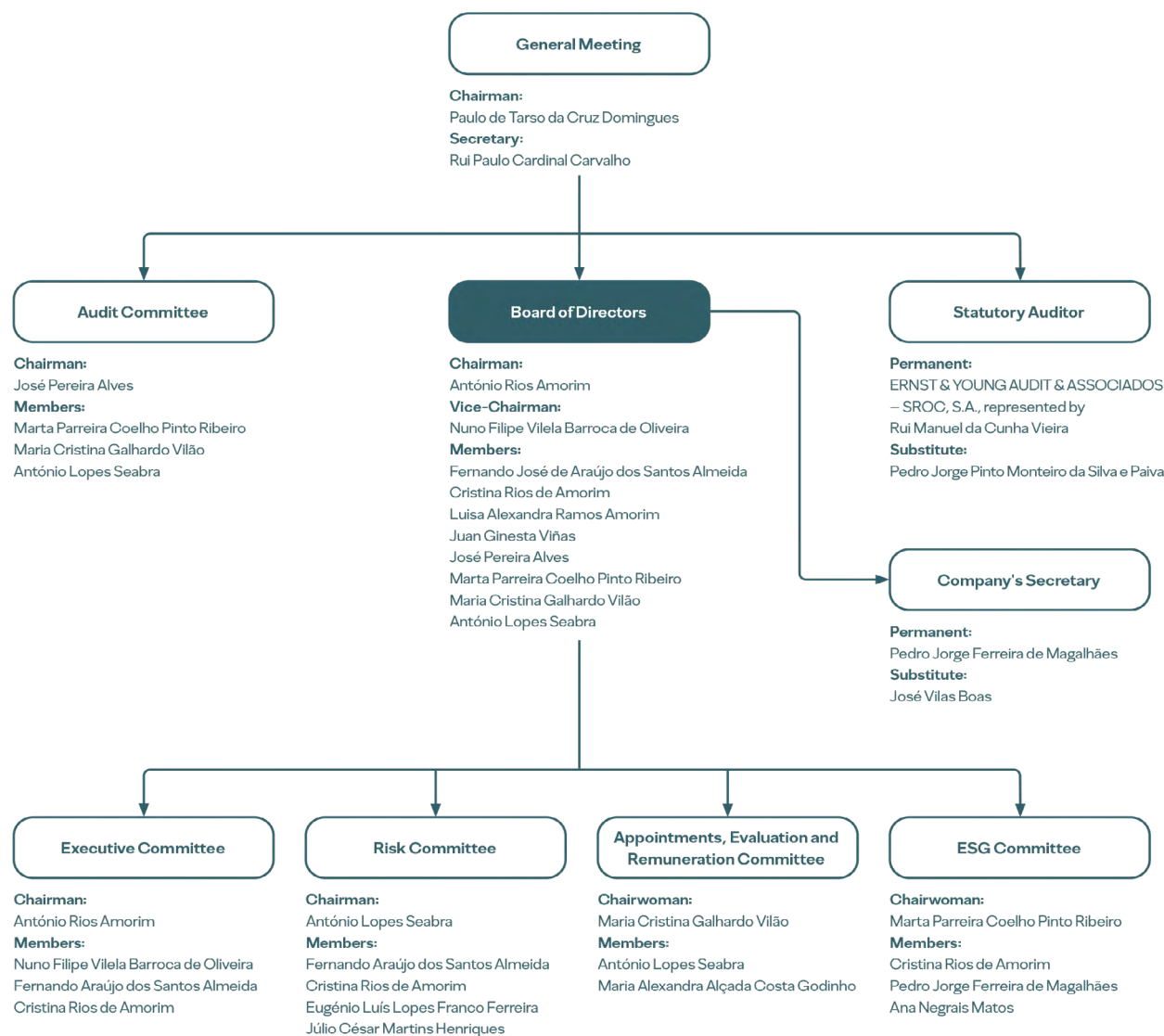
The Board of directors has delegated the executive management in an executive committee made up of four members. The terms of office of both bodies are coincidental (three calendar years).

The various Business Units mentioned above are coordinated by Corticeira Amorim's Executive Committee. Each of those Business Units has its own Board of Directors and an Executive Committee composed of independent managers, different from the Chairman of the Board of Directors (common to Corticeira Amorim).

Corticeira Amorim is a listed company and all its shares are admitted to trading on the Euronext exchange (Euronext Lisbon - Sociedade Gestora de Mercados Regulamentados, S.A.).

Corticeira Amorim complies, for this reason, with a set of rules imposed, in particular, by the Portuguese Securities Code. It focuses in particular on the matters covered by this PPR, such as those relating to the remuneration of members of the management and supervisory bodies or transactions with related parties.

Corticeira Amorim’s Organisation Chart



[For further details, see Corporate Governance Report, available at <https://www.amorim.com/en/investors/corporate-governance/corporate-governance-report/>]

# III. Risks of Corruption and Related Offences

## A. Crimes of corruption and related offences

Corruption and related offences, in accordance with the provisions of Decree-Law 109-E/2021, are defined as the following crimes: active corruption, passive corruption, receiving and offering an undue advantage, embezzlement, illegal profiteering from a public act, extortion, abuse of power, administrative misconduct, influence peddling, money laundering, fraud in obtaining a subsidy, grant or credit and misappropriation of the same.

Considering the business activity engaged in by Corticeira Amorim, it may, in theory, be held liable for the crimes identified in the table below:

Legal type	Description Penalties	Legislation (Portugal)
Active corruption	<ul style="list-style-type: none"><li>• Whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises to give to an official, or to a third party by indication or with his/her knowledge, a monetary or non-monetary advantage for the performance of an act or omission in the exercise of his/her duties, even if the action or omission does not imply a violation of the duties of office.</li><li>• Punishable by imprisonment for up to 5 years or a fine of up to 360 days (€1,800 - €180,000), in the case of natural persons.</li><li>• A legal person may be sentenced to pay a fine of up to 600 days, between €60,000 and €6,000,000.</li></ul>	Penal Code Article 374
Offering undue advantage	<ul style="list-style-type: none"><li>• Whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises to give to an official, or to a third party by indication or with his/her knowledge, a monetary or non-monetary advantage which is not due to him/her for the performance of his/her duties, or because of them.</li><li>• Punishable by imprisonment for up to 3 years or a fine of up to 360 days. (€1,800 - €180,000), in the case of natural persons.</li><li>• A legal person may be sentenced to pay a fine of up to 360 days, between €36,000 and €3,600,000.</li></ul>	Penal Code Article 372
Active corruption damaging international trade	<ul style="list-style-type: none"><li>• Whoever by him/herself or with his/her consent or ratification, through an intermediary, gives or promises to a national, foreign or international official, or to a national or foreign political officeholder, or to a third party with their knowledge, a material or non-material advantage that is not due to them, in order to obtain or retain a business deal, a contract or another undue advantage in international trade.</li><li>• Punishable by imprisonment from 1 to 8 years, in the case of natural persons.</li><li>• A legal person may be sentenced to pay a fine of up to 960 days, between €96,000 and €9,600,000.</li></ul>	Law no. 20/2008 of 21 April  (Criminal liability for crimes of corruption in international trade and private activity) Article 7
Passive corruption in the private sector	<ul style="list-style-type: none"><li>• Whoever [private sector employee], by him/herself or with his/her consent or ratification, through an intermediary, requests or accepts for him/herself or a third party, without being owed such, a monetary or non-monetary advantage, or the promise thereof, for an act or omission that constitutes an infringement of his/her functional duties.</li><li>• Punishable by imprisonment for up to 8 years or a fine of up to 600 days (€3,000 - €300,000), in the case of natural persons.</li><li>• A legal person may be sentenced to pay a fine of up to 960 days, between €96,000 and €9,600,000.</li></ul>	Law no. 20/2008 of 21 April  (Criminal liability for crimes of corruption in international trade and private activity) Article 8

Legal type	Description Penalties	Legislation (Portugal)
Active corruption in the private sector	<ul style="list-style-type: none"> <li>• Whoever by him/herself or with his/her consent or ratification, through an intermediary, gives or promises to a worker in the private sector, or to a third party with his/her knowledge, a monetary or non-monetary advantage, which is not due, for the performance of an act or omission which constitutes an infringement of his/her functional duties.</li> <li>• Punishable by imprisonment for up to 5 years or a fine of up to 600 days (€3,000 - €300,000), in the case of natural persons.</li> <li>• A legal person may be sentenced to pay a fine of up to 600 days, between €60,000 and €6,000,000.</li> </ul>	<p>Law no. 20/2008 of 21 April</p> <p>(Criminal liability for crimes of corruption in international trade and private activity)</p> <p>Article 9</p>
Influence peddling	<ul style="list-style-type: none"> <li>• Whoever, by him/herself or through an intermediary, with his/her consent or ratification, requests or accepts, for him/herself or for a third party, a monetary or non-monetary advantage, or the promise thereof, in order to abuse their real or supposed influence over any public entity; or whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises a monetary or non-monetary advantage to the above-mentioned persons.</li> <li>• Punishable by imprisonment for up to 5 years or a fine of up to 240 days (€1,200 - €120,000), in the case of natural persons.</li> <li>• A legal person may be sentenced to pay a fine of up to 600 days, between €60,000 and €6,000,000.</li> </ul>	<p>Penal Code</p> <p>Article 335</p>
Money Laundering	<ul style="list-style-type: none"> <li>• Whoever converts, transfers, aids or facilitates any conversion or transfer operation of advantages obtained, for him/herself or a third party, directly or indirectly, for the purpose of concealing their illegal origin or avoiding prosecution for the crime(s) committed.</li> <li>• Punishable by imprisonment of up to 16 years, in the case of natural persons.</li> <li>• A legal person may be sentenced to pay a fine of up to 1920 days, between €192,000 and €19,200,000.</li> </ul>	<p>Penal Code</p> <p>Article 368-A</p>
Fraud in obtaining a subsidy or grant	<ul style="list-style-type: none"> <li>• Whoever obtains a subsidy or grant: <ul style="list-style-type: none"> <li>a) Providing the competent authorities or entities with inaccurate or incomplete information about themselves or third parties and concerning facts important to the granting of the subsidy or grant;</li> <li>b) Omitting information on facts that are relevant for the awarding of the grant;</li> <li>c) Using a document proving entitlement to the subsidy or grant or important facts for its award obtained through inaccurate or incomplete information.</li> </ul> </li> <li>• Punishable by imprisonment from 1 to 8 years, in the case of natural persons.</li> <li>• A legal person may be sentenced to pay a fine of up to 960 days, between €96,000 and €9,600,000, or even the penalty of winding up the company.</li> </ul>	<p>Decree-Law no. 28/84 of 20 January</p> <p>(Anti-economic offences and against public health)</p> <p>Article 36</p>
Fraud in obtaining credit	<ul style="list-style-type: none"> <li>• Whoever, when presenting a proposal for granting, maintaining or modifying the conditions of a credit intended for an establishment or company: <ul style="list-style-type: none"> <li>a) Provides inaccurate or incomplete written information intended to enhance the application or which may impact on the decision to be taken regarding the application;</li> <li>b) Uses inaccurate or incomplete documents relating to the economic situation, namely balance sheets, profit and loss accounts, general descriptions of assets or expert opinions;</li> <li>c) Conceals downturns in the economic situation discovered subsequent to submission of the credit application and which may impact on the decision to be taken regarding the application.</li> </ul> </li> <li>• Punishable by imprisonment for up to 5 years or a fine of up to 200 days (€1,000 - €100,000), in the case of natural persons.</li> <li>• A legal person may be sentenced to pay a fine of up to 600 days, between €60,000 and €6,000,000, or even the penalty of winding up the company.</li> </ul>	<p>Decree-Law no. 28/84 of 20 January</p> <p>(Anti-economic offences and against public health)</p> <p>Article 38</p>
Misappropriation of a subsidy, grant or subsidised credit	<ul style="list-style-type: none"> <li>• Whoever uses benefits obtained as a grant, subsidy or subsidised credit for purposes other than those for which they are legally intended or those provided for in the credit line as established by the legally competent entity.</li> <li>• Punishable by imprisonment for up to 6 years or a fine of up to 200 days (€1,000 - €100,000).</li> <li>• A legal person may be sentenced to pay a fine of up to 720 days, between €72,000 and €7,200,000, or even the penalty of winding up the company.</li> </ul>	<p>Decree-Law no. 28/84 of 20 January</p> <p>(Anti-economic offences and against public health)</p> <p>Article 37</p>

## B. Definition of Risk Levels

The definition of the degrees of risk, for the purposes of the present PPR, is based on two variables: (i) the probability of occurrence of situations entailing risk and (ii) the foreseeable impact of the infringements that the same may give rise to (or the seriousness of the consequences).

The probability of the occurrence of situations involving risk may be classified as follows:

- Very likely to occur;
- Probably occurring;
- May occur;
- Unlikely to occur;
- Very unlikely to occur.

In turn, the foreseeable impact of the offences it may give rise to can be classified as follows:

• **High:** the risk situation may cause significant financial losses and reputational damage, damaging the Group's credibility.

• **Moderate:** the risk situation may lead to financial losses and disturb the normal functioning of the Group.

• **Low:** the risk situation does not have the potential to cause financial loss and the offences in question do not cause relevant damage to the Group's reputation.

The combination of these two variables results in the following matrix of risk degrees:

Degrees of Risk		Probability of Occurrence (PO)				
		Very likely (5)	Likely (4)	May occur (3)	Unlikely (2)	Very unlikely (1)
Foreseeable Impact (IP)	High (3)	15	12	9	6	3
	Moderate (2)	10	8	6	4	2
	Low (1)	5	4	3	2	1

## C. Matrix of Risks of Corruption and related offences

Caption:

AUC (Audit Committee)

IC (Internal Control- prior verification)

IA (Internal Audit- a posteriori verification)

CO (Compliance Officer)

HR (Human Resources)

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
Insulation Cork BU Amorim Cork Insulation, S.A.	Sales	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>	• Use of intermediaries	<ul style="list-style-type: none"> <li>• Corruption<sup>1</sup></li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	<b>9</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Internal whistleblowing channel</li> <li>• Internal Control Procedures Manual (Section 6 - Invoicing and Credit Control)</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO  CO AUC IC/IA  IC/IA CO  HR  HR CO
	Purchase of raw cork	<ul style="list-style-type: none"> <li>• Purchase of raw materials not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouring of a certain supplier or service provider</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>	• Use of intermediaries	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> <li>• Money Laundering</li> </ul>	3	3	<b>9</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> implementation/follow-up of the Procurement Policy</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO  CO CO IC/IA AUC IC/IA  CO  IC/IA HR  HR

<sup>1</sup> The reference to "corruption" may include (i) active corruption, (ii) active corruption in the private sector, (iii) passive corruption in the private sector or, also, (iv) active corruption prejudicing international trade, in the case of business carried out with foreign public entities (namely in the scope of the activity of the subsidiaries).



Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
<b>Raw Materials BU</b> Amorim Florestal, S.A.	Purchase of raw materials	<ul style="list-style-type: none"> <li>• Purchase of raw materials not resulting from real needs and/or in non-market conditions</li> <li>• Discretionary nature of the process of assessment of cork for purchase</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>	<ul style="list-style-type: none"> <li>• Use of intermediaries</li> <li>• Relationship with public officials and/or Politically Exposed Persons</li> <li>• Related Party Transactions</li> <li>• Transactions with internationally sanctioned countries</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> <li>• Money Laundering</li> </ul>	4	3	<b>12</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• Transactions with Related Parties' Regulation</li> <li>• Internal whistleblowing channel</li> <li>• Documentary archive</li> <li>• <b>Corrective Measure:</b> system for automatic identification of Related Parties</li> <li>• <b>Corrective Measure:</b> implementation/follow-up of the Procurement Policy</li> <li>• <b>Corrective Measure:</b> KYC procedures</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO IC/IA AUC AUC IC/IA AUC/IA IC/IA IA/CO CO HR IC/IA HR
	Bank account movements	<ul style="list-style-type: none"> <li>• Improper payments</li> <li>• Omission and/or manipulation of information with the aim of steering decisions</li> </ul>	<ul style="list-style-type: none"> <li>• Requirement of a single signature to authorise the payments of a bank account in a Spanish subsidiary (exception)</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> <li>• Money Laundering</li> </ul>	3	2	<b>6</b>	<ul style="list-style-type: none"> <li>• Internal Control Procedures Manual (Section 7 - Cash book and Financial Operations)</li> <li>• Rules for making payments in bank accounts</li> <li>• Validation of invoices before payment through the IT platform (SAP)</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• A posteriori control of bank statements</li> <li>• Documentary archive</li> </ul>	IC/IA IC/IA IC IC/IA IA IA
<b>Cork Stoppers BU</b> Amorim Cork, S.A.	Sales	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Omission and/or manipulation of information with the aim of steering decisions</li> </ul>	<ul style="list-style-type: none"> <li>• Use of intermediaries</li> <li>• Transactions with internationally sanctioned countries</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	4	2	<b>8</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Internal Control Procedures Manual (Section 6 - Invoicing and Credit Control)</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> KYC procedures</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO IC/IA AUC IA/CO CO HR HR

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
Cork Stoppers BU Amorim Cork, S.A.	Purchase of raw cork	<ul style="list-style-type: none"> <li>• Purchase of raw materials not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>	<ul style="list-style-type: none"> <li>• Related party transactions</li> <li>• Discretionary nature of the process of assessment of cork for purchase</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> <li>• Money Laundering</li> </ul>	4	3	12	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Transactions with Related Parties' Regulation</li> <li>• System for automatic identification of Related Parties</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO AUC AUC/IA AUC HR CO HR
	Purchase of non-cork raw materials	<ul style="list-style-type: none"> <li>• Purchase of goods and services not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Purchasing policy</li> <li>• Procedures Manual of Central Procurement Department</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO IC / IA IC / IA AUC HR CO HR
	Marketing and advertising/promotional activity	<ul style="list-style-type: none"> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> </ul>	2	3	6	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO HR HR

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
<b>Floor &amp; Wall Coverings BU</b> Amorim Cork Flooring, S.A.	Sales	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Omission and/or manipulation of information with the aim of steering decisions</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>	<ul style="list-style-type: none"> <li>• Sale of floor and wall coverings by foreign subsidiaries</li> <li>• Use of intermediaries</li> <li>• Binding with the signature of only one director on contracts in subsidiaries with a duration of up to one year</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Internal Control Procedures Manual (Section 6 - Invoicing and Credit Control)</li> <li>• Sales Units Rules May 2020</li> <li>• Rules for Company's Car Use</li> <li>• Authority Limits Manual</li> <li>• Recruitment of local directors through specialised companies</li> <li>• Limitation on the signing of contracts in subsidiaries according to the duration of the contract (over one year)</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> <li>• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> due diligence procedures for foreign subsidiaries and their representatives</li> </ul>	CO  CO  IC / IA  IC / IA  IC / IA  HR  IC / IA  AUC  HR  HR  IA  CO  IA
	Access to funds	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Improper payments</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of a credit card</li> <li>• Requesting occasional cash advances for travel expenses</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>• Rules for travelling and accommodation expenses</li> <li>• Requirement to fill in a specific form for this purpose</li> <li>• Submission of invoices corresponding to the expenses</li> <li>• Segregation of functions and "four eyes" rule</li> </ul>	IC / IA  IC / IA  IC / IA  IC / IA
	Purchase of non-cork goods	<ul style="list-style-type: none"> <li>• Purchase of goods and services not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouring of a certain supplier or service provider</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Purchasing policy</li> <li>• Procedures Manual of Central Procurement Department</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO  CO  CO  IC / IA  IC / IA  AUC  HR  CO  HR

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
<b>Cork Composites BU</b> Amorim Cork Composites, S.A.	Sale of composite agglomerates for construction, industry, retail, aerospace, etc. made from cork by-products	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>	<ul style="list-style-type: none"> <li>• Sale by foreign subsidiaries</li> <li>• Use of intermediaries</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	4	2	<b>8</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Internal Control Procedures Manual (Section 6 - Invoicing and Credit Control)</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• Internal whistleblowing channel</li> <li>• Requirement of two signatures to enter into contracts, including in subsidiaries</li> <li>• Validation by the General Management of the BU of the percentage commission to be paid to commission agents;</li> <li>• Payment upon presentation of the invoice by the commission agent</li> <li>• No powers of representation granted to commission agents</li> <li>• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> due diligence procedures for foreign subsidiaries and their representatives</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO IC IC / IA AUC IC / IA IC / IA IC / IA IA/CO IC / IA CO IA HR / IC CO HR
	Purchase of specialised services (digital marketing, trade fairs, laboratory tests, construction services, etc.)	<ul style="list-style-type: none"> <li>• Purchase of services not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>	<ul style="list-style-type: none"> <li>• Occasional small cash payments</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	2	<b>6</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Purchasing policy</li> <li>• Procedures Manual of Central Procurement Department</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO IC / IA IC / IA AUC HR CO HR
	Access to funds	<ul style="list-style-type: none"> <li>• Improper payments</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Fixed cash fund of EUR 2,000</li> <li>• Occasional requests for cash advances for travel expenses</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	<b>9</b>	<ul style="list-style-type: none"> <li>• Submission of invoices corresponding to the expenses</li> <li>• Obligation to return amounts for which there is no corresponding invoice</li> </ul>	IC / IA IC / IA



Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
Procurement (supports all Business Units)	Negotiation of non-cork raw and subsidiary materials	<ul style="list-style-type: none"> <li>• Purchase of raw materials not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> <li>• Situations of conflict of interests</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Transactions with Related Parties' Regulation</li> <li>• System for automatic identification of Related Parties</li> <li>• Strict control procedures implemented</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> due diligence procedures for foreign subsidiaries and their representatives</li> <li>• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO CAU AUC / IA IC / IA AUC IA IC / IA CO HR CO HR
	Purchase of maintenance goods	<ul style="list-style-type: none"> <li>• Purchases not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> <li>• Situations of conflict of interests</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> supplier evaluation and selection procedures</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO AUC IC / IA CO HR CO HR

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
Procurement (supports all Business Units)	Negotiation of investments (construction of factories, production lines, machinery, etc.)	<ul style="list-style-type: none"> <li>• Purchase of raw materials not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing purchasing decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> <li>• Situations of conflict of interests</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	4	3	12	• Code of Business Ethics and Professional Conduct	CO
								• Anti-Corruption Code of Conduct	CO
								• Suppliers' Code of Conduct	CO
								• Procedures Manual of Central Procurement Department	IC / IA
								• Internal Control Procedures Manual (Section 3 - Investments)	IC / IA
								• Internal Control Procedures Manual (Section 5 - Procurement)	IC / IA
								• Validation of the selection by the Managing Director of the BU and by the Director of the procurement area	IC / IA
								• Transactions with Related Parties' Regulation	AUC
								• System for automatic identification of Related Parties	AUC / IA
								• Strict control procedures implemented	IC / IA
								• Internal whistleblowing channel	AUC
								• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures	IC / IA
								• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts	CO
Energy (supports all Business Units)	Obtaining licences for the electrical installations of the industrial units	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>	• Relationship with public entities/officials	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	• Code of Business Ethics and Professional Conduct	CO
								• Anti-Corruption Code of Conduct	CO
								• Suppliers' Code of Conduct	CO
								• Internal whistleblowing channel	AUC
								• <b>Corrective Measure:</b> effective communication/dissemination of the above policies	HR
								• <b>Corrective Measure:</b> internal training	HR
	Undergoing energy-related audits - consumption	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>	• Relationship with public entities	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	• Code of Business Ethics and Professional Conduct	CO
								• Anti-Corruption Code of Conduct	CO
	Purchase of energy for the various BU	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	9	• Suppliers' Code of Conduct	CO
								• Purchasing policy	IC/IA
								• Procedures Manual of Central Procurement Department	IC/IA
								• Final validation by the Chairman of Corticeira Amorim	IC/IA
								• Internal whistleblowing channel	AUC
								• Effectiveness of the whistleblowing channel	AUC / CO
								• <b>Corrective Measure:</b> effective communication/dissemination of the above policies	HR
								• <b>Corrective Measure:</b> internal training	HR

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
<b>Shipping logistics</b> (supports all Business Units)	Import and export logistics	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Use of intermediaries</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	<b>9</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• Cash payments are forbidden</li> <li>• Internal whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> <li>• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures</li> </ul>	CO  CO  CO  IC/IA  IC/IA  AUC  HR  HR  IC/IA
	Subcontracting transport services	<ul style="list-style-type: none"> <li>• Subcontracting of services not resulting from real needs and/or in non-market conditions</li> <li>• Omission and/or manipulation of information with the aim of influencing contracting decisions</li> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> </ul>	3	2	<b>6</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Cash payments are forbidden</li> <li>• Whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO  CO  CO  IC/IA  AUC  HR  HR
	Customs clearance processes	<ul style="list-style-type: none"> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Situations of conflict of interests</li> </ul>	<ul style="list-style-type: none"> <li>• (Indirect) Relationship with public entities</li> <li>• Use of intermediaries</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	3	<b>9</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Whistleblowing channel</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> <li>• <b>Corrective Measure:</b> supplier and intermediary evaluation and selection procedures</li> </ul>	CO  CO  CO  AUC  HR  HR  IC/IA

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
<b>Corporate Human Resources</b> (supports all Business Units)	Recruitment of staff (senior managers)	<ul style="list-style-type: none"> <li>• Lack of impartiality and fairness in the selection criteria</li> <li>• Undue favouring or disadvantaging of an applicant</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> <li>• Situations of conflict of interests</li> </ul>	• Relationship with Politically Exposed Person	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> </ul>	3	3	<b>9</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Recruitment policy</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• Whistleblowing channel</li> <li>• Request for proof of applicant's academic qualifications</li> <li>• Multi-stage selection process</li> <li>• Presence of the HR Director in the different stages, namely in the final validation of the applicant (carried out by the Managing Director of the BU or the Chairman of Corticeira Amorim)</li> <li>• Requests for references to third parties in the final phase of the recruitment process (often through specialised companies)</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> <li>• <b>Corrective Measure:</b> declarations of commitment by applicants</li> </ul>	CO  CO  HR  IC / IA  AUC  HR  HR / IA  HR / IA  HR / IA  HR  HR  HR
	Salary processing for middle and senior management (including variable remuneration)	<ul style="list-style-type: none"> <li>• Non-compliance with the rules on variable remuneration</li> <li>• Improper payments</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> </ul>	2	3	<b>6</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Whistleblowing channel</li> <li>• Remunerations Policy (Three-yearly)</li> <li>• Internal Control Procedures Manual (Section 8 - Human Resources)</li> <li>• Appointments, Evaluation and Remunerations Committee Regulation</li> <li>• Performance Management System (with set objectives in the system)</li> <li>• Payments to all employees by bank transfer</li> </ul>	CO  CO  AUC  CO / AERC  IC / IA / HR  CO  HR  HR / IA



Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
<b>Human Resources</b> (Each BU)	Recruitment of staff (middle managers and others)	• Lack of impartiality and fairness in the selection criteria		• Corruption	2	1	<b>2</b>	• Code of Business Ethics and Professional Conduct	CO
		• Undue favouring or disadvantaging of an applicant		• Offering undue advantage				• Anti-Corruption Code of Conduct	CO
		• Offering or accepting favours in exchange for advantages and/or benefits						• Recruitment policy	HR
		• Situations of conflict of interests						• Internal whistleblowing channel	AUC
								• Minutes of admission of employees within the scope of the BU (containing the signatures of those approving them)	HR / IA
								• Approval by the Managing Director of the BU	HR / IA
								• Validation of the Managing Director's approval by the BU's HR director	HR / IA
<b>Financial Department</b> (Supports all BU)	Submission of credit applications within the scope of credit lines with banks	• Providing inaccurate or incomplete written information, namely about the company's financial situation, in order to obtain credit		• Fraud in obtaining credit	2	3	<b>6</b>	• Internal Control Procedures Manual	IC / IA
		• Use of benefits obtained under subsidised credit for purposes other than those foreseen		• Misuse of subsidised credit	1	3		• Requirement for various levels of approval depending on the values involved	IC / IA
							<b>3</b>	• Code of Business Ethics and Professional Conduct	CO
								• Anti-Corruption Code of Conduct	CO
<b>Information Systems and Technology</b> (OSI – Sistemas Informáticos e Eletrotécnicos, Lda.)	Purchase of specific technology and information system services (for all areas and countries)	• Purchase of services not resulting from real needs and/or in non-market conditions		• Corruption	2	3	<b>6</b>	• Suppliers' Code of Conduct	CO
		• Omission and/or manipulation of information with the aim of influencing purchasing decisions		• Offering undue advantage				• Anti-Corruption Code of Conduct	CO
		• Undue favouring of a certain supplier or service provider		• Influence peddling				• Suppliers' Code of Conduct	CO
		• Offering or accepting favours in exchange for advantages and/or benefits						• Internal whistleblowing channel	AUC
		• Use and/or disclosure of privileged information for personal benefit or that of third parties						• Transactions with Related Parties' Regulation	AUC
								• Audit Committee Regulation	CO / AUC
								• Verification by Corticeira Amorim's Audit Committee of budgets, the nature of transactions, margins and market prices	AUC
								• <b>Corrective Measure:</b> supplier evaluation and selection procedures	IC / IA
								• <b>Corrective Measure:</b> inclusion of anti-corruption clauses in contracts	IC / IA
								• <b>Corrective Measure:</b> effective communication/dissemination of the above policies	HR
								• <b>Corrective Measure:</b> internal training	HR

Area / Business Unit	Business Activity	Risk Situations	Risk-generating Factors	Associated Offences	PO	IP	Degree of Risk	Preventive/Corrective Measures	Officer Responsible for the Measures
<b>Investor Relations</b>	Interactions with investors	<ul style="list-style-type: none"> <li>• Use and/or disclosure of privileged information for personal benefit or that of third parties</li> <li>• Situations of conflict of interests</li> </ul>	• Relationship with public officials and/or Politically Exposed Persons	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> </ul>	3	3	<b>9</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Internal whistleblowing channel</li> </ul>	CO CO AUC
	Interactions with the CMVM	<ul style="list-style-type: none"> <li>• Undue favouritism of third parties</li> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>	• Relationship with public officials and/or Politically Exposed Persons	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Offering undue advantage</li> <li>• Influence peddling</li> </ul>	3	2	<b>6</b>	<ul style="list-style-type: none"> <li>• <b>Corrective Measure:</b> KYC procedures</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	IA / CO HR HR
	Interactions with rating agencies	<ul style="list-style-type: none"> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>		<ul style="list-style-type: none"> <li>• Corruption</li> </ul>	3	3	<b>9</b>		
<b>All</b>	Offering gifts	<ul style="list-style-type: none"> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>	• Relationship with public officials and/or Politically Exposed Persons	<ul style="list-style-type: none"> <li>• Active Corruption</li> <li>• Active corruption in the private sector</li> <li>• Passive corruption in the private sector</li> <li>• Offering undue advantage</li> </ul>	5	3	<b>15</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Internal whistleblowing channel</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• Registering offers</li> <li>• <b>Corrective Measure:</b> KYC procedures</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO AUC IC / IA * IA / CO HR HR
	Accepting gifts	<ul style="list-style-type: none"> <li>• Offering or accepting favours in exchange for advantages and/or benefits</li> </ul>		<ul style="list-style-type: none"> <li>• Passive corruption in the private sector</li> </ul>	4	3	<b>12</b>	<ul style="list-style-type: none"> <li>• Code of Business Ethics and Professional Conduct</li> <li>• Anti-Corruption Code of Conduct</li> <li>• Suppliers' Code of Conduct</li> <li>• Internal whistleblowing channel</li> <li>• Segregation of functions and "four eyes" rule</li> <li>• Registering offers</li> <li>• <b>Corrective Measure:</b> effective communication/dissemination of the above policies</li> <li>• <b>Corrective Measure:</b> internal training</li> </ul>	CO CO CO AUC IA * HR HR

\*Hierarchy (or Audit Committee in the case of administrators or managers)

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# IV. Implementation, Monitoring and Review of the PPR

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Corticeira Amorim maintains a system of internal control and monitoring of the business and operations carried out, which must be adjusted to the specific risks of corruption and conflict of interests of the activity conducted by the same.

The Group's management bodies are responsible for promoting the implementation of procedures and adequate control systems for monitoring compliance with this PPR, as well as any other supplementary rules approved and implemented by the Group to prevent corruption.

The Compliance Officer appointed by the Board of Directors of Corticeira Amorim, Pedro Magalhães, is responsible for implementing, controlling and reviewing the PPR.

Corticeira Amorim, in the implementation of its PPR, draws up:

- i) In the month of October, an interim report of identified situations of high or maximum risk of corruption or related offences;

- ii) An annual evaluation report is drawn up in April of the year following that of implementation, which quantifies the degree of implementation of the identified preventive and corrective measures as well as forecasts their full implementation.

The PPR will be reviewed every three years or whenever a review of the risks is justified, namely by virtue of a change in the duties or in the organisational or corporate structure of the Group that may warrant a review of the risk matrix.

Corticeira Amorim ensures that the PPR and the above-mentioned reports are made public to its employees, through the intranet and its official web page, within 10 days of their implementation and respective reviews or preparation.

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