



Plan for the Prevention  
of Corruption and  
related offences Risks  
(PPR)

colepPackaging

## 1 Introduction and scope

To foster the implementation of the "National Anti-Corruption Strategy 2020-2024" approved earlier by the Portuguese Government, on the 9th of December was published the Decree-Law no 109-E/2021, which created the National Anti-Corruption Mechanism (MENAC) and established the General Regime of Prevention of Corruption applicable in Portugal (hereinafter "RGPC").

The new General Regime of Prevention of Corruption aims for, among other objectives, (i) improving knowledge, training, and institutional practices on transparency and integrity; (ii) engaging the private sector in preventing, detecting, and combating corruption, and (iii) strengthening the link between public and private institutions.

Within the scope of the rules provided for in the RGPC, the covered entities must ensure the adoption of a regulatory compliance program for the prevention of corruption that complies with, at least, the following requirements:

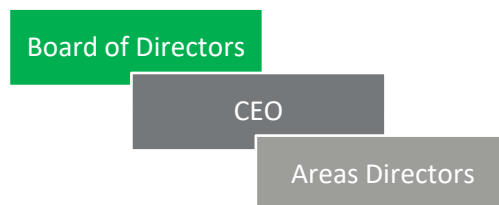
- ❖ Appointment of a compliance officer responsible for the execution and enforcement of the anti-corruption regime
- ❖ Adoption and Implementation of a plan for the prevention of risks of corruption and related infractions (PPR)
- ❖ Adoption of a code of conduct
- ❖ Implementation of an internal reporting channel
- ❖ Implementation of a training program on policies and procedures related to the prevention of risks of corruption and related infractions
- ❖ Implementation of internal control procedures, and
- ❖ Implementation of a third-party risk evaluation system.

Colep Packaging Portugal, S.A. (hereinafter "COLEP Packaging" or "Company"), being a Portuguese company that employs more than fifty employees, falls under the scope of the new anti-corruption regime, and is considered an obliged entity for its purposes.

In this context, COLEP Packaging is fully committed to complying with the new obligations and duties arising from the prevention of corruption and related offences regime in the Portuguese jurisdiction. Moreover, the Company undertakes to act in accordance with the highest standards on anti-corruption measures and per any future guidelines issued by the relevant supervisory authorities.

Proof of this commitment is the fact that, as a matter of fact, COLEP Packaging already had some of these controls in place, but only had to adapt them to the requirements of this regime. For example, COLEP Packaging already had a code of conduct implemented, as well as an internal reporting channel, and also some risk controls regarding third parties. Under this framework, it was necessary to implement the other required measures and adapt the existing ones to the criteria of the RGPC. However, acting in accordance with the greater purpose of fitting to this reality and complying with the legal provisions, the Company undertakes to fulfil this commitment.

## 2 COLEP Packaging's Organic structure



## 3 Plan for the Prevention of Risks of Corruption and related offences risks

### 3.1 Scope

In view of COLEP Packaging's commitment to addressing any eventual corruption and related offence risk which the Company may be exposed to or be involved in, it designed a strategy to implement the following Plan for the Prevention of Risks of Corruption and related offences risks (hereinafter "Plan" or "PPR").

This Plan and the principles and obligations set herein are directly applicable to COLEP Packaging's entire organization and internal areas.

Namely, this Plan addresses:

- The areas of activity of the Company with risk of committing acts of corruption and related infractions
- The probability of occurrence and foreseeable impact of each situation, to allow the risks to be classified
- The preventive and corrective measures to reduce the probability of occurrence and impact of the risks and situations identified
- In situations of high or maximum risk, the most exhaustive prevention measures, with priority being given to their execution
- The general person responsible for executing, controlling, and revising the PPR, which may be responsible for regulatory compliance.

For the purpose of the implementation of the PPR and the respective risk assessment exercise, COLEP Packaging took into consideration a prior analysis of the crime catalogue referred to in article 3 of RGPC, to identify the relevant corruption and related offences, considering the activity carried out by the Company and the infractions in which a private sector legal person can be criminally liable, according to article 11 of the Portuguese Penal Code (attachment I).

### 3.2 Roles and Responsibilities

For the proper enactment of this Plan and actions described herein, COLEP Packaging has appointed Raquel Passos Miranda as the person responsible for implementing, monitoring, and reviewing the PPR.

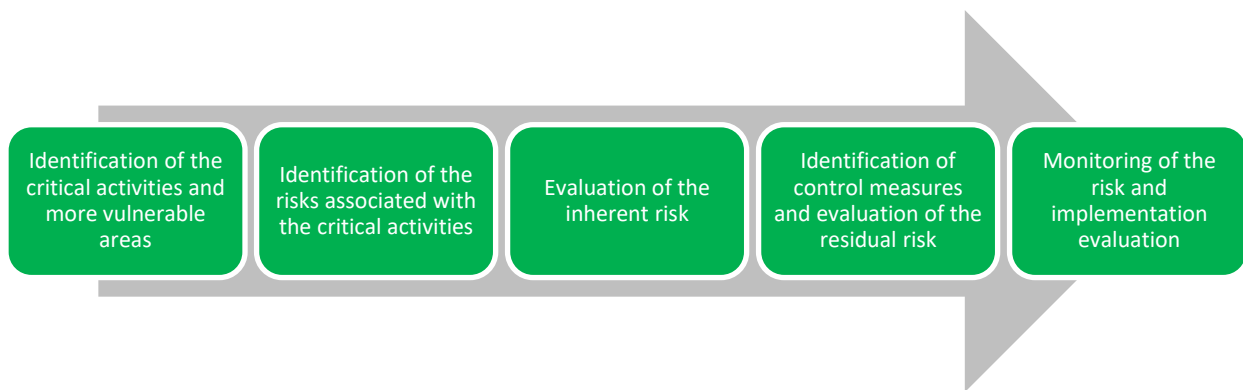
The activities described herein as preventive measures to address the corruption risks are enforced and are expected to be complied with by each and every COLEP Packaging employee, according to their designated function and direct responsibility.

The Board of Directors of COLEP Packaging, as the ultimate responsible for fostering a compliance culture in the organization, commits to set the tone at the top shall refrain from carrying out any activity which can lead to the involvement of the Company in corruption.

### 3.3 Identification and assessment of corruption and related offence risks

#### 3.3.1 Methodology

The identification and assessment of corruption and related offences risks to which COLEP Packaging may be exposed followed the methodology described herein:



- I. **Identification of the critical activities within the Company more vulnerable to the corruption risks and related infractions**, in accordance with the rules which govern these processes, when applicable, and the best practices on corruption and related offences risk assessment.
- II. **Identification of the risks associated with critical activities**, through: (i) a basic description of the corruption risks associated with the activity; (ii) identification of the general criteria for identifying corruption risk in each activity; (iii) identification of the key activities and processes exposed to corruption risks; (iv) identification of the risk events associated with the activities and processes and the (v) assignment of activities and risk events in the functional areas of the Company.
- III. **Evaluation of the risks according to a scale of low (L), medium (M) or high (H) risk, depending on the probability of occurrence and the degree of impact, and subsequent attribution of an overall risk level (inherent risk).**

#### The inherent risk

This exercise aims to identify the natural corruption and related offences risk which the Company is exposed to regarding the internal processes and not taking into consideration any potential controls which mitigate or control the aforementioned risks.

When assessing the inherent impact, that is, the direct and indirect consequences to the organization caused by the exposure to the concrete risk, the organization has considered the potential:

- **economic impact**, namely whether there is an underlying fine and/or ancillary penalty and if the risk is susceptible to cause financial losses or damages to the equipment's used in the pursuit of the activity,
- **reputational impact**, when the risk is prone to provoke a distrust for business partners and stakeholders (i.e., clients, investors, employees, etc.) of the Company or cause a loss of business opportunities, and
- **operational impact**, whether the materialisation of this risk is susceptible to halt or disrupt the operation of the Company.

#### The inherent probability

Simultaneously, when assessing the inherent probability of the materialisation of risks, namely, the greater or lesser degree of certainty regarding the occurrence of the identified risk, the following illustrative factors were taken into consideration:

- **frequency of the specific activity** when developing the Company's business,
- **reiteration of the risk**, namely whether this risk has materialised in the organization in the past, and
- **the risk diversity**, the number of functional areas where this risk can be materialised.

#### IV. Identification of preventive controls and measures implemented in the Company to mitigate the overall inherent risk and evaluation of risks according to a scale low (L), medium (M) or high (H) risk (residual risk)

#### The residual risk

A second risk assessment was conducted after the mapping and description of the existing corrective and mitigation measures implemented under the risk management system of COLEP Packaging.

When assessing the internal controls, the following criterion was considered:

- **automatization level of the control**, depending on the way the control is carried out, namely, manual, automatic, and semi-automatic control,
- **the nature of the control**, the purpose of the control, and
- **the adequacy of the control**, whether the control is considered sufficient to prevent or mitigate the specific risk.

The result of this assessment is the vulnerability of the Company or the residual risk, which means the risk that persists after the implementation of the preventive or mitigation controls in the organization.

**V. Monitor the implementation of the control measures identified and implement any corrective measures deemed necessary.**

As a next and consequent step, the Company shall continue to monitor the risks identified and the implementation process of the control measures to ensure that these fully reflect the current situation of the Company and in the case where a risk is considered high, a plan for its mitigation shall be developed and implemented.

Notwithstanding the eventual action plans designed to mitigate specific risks, COLEP Packaging in the normal developing of its activity, strives and takes the necessary actions to ensure that its internal control system is updated and suitable to address any risks, corruption related or not, that it may be exposed to.

Moreover, COLEP Packaging shall develop the periodic evaluation assessments of the Plan and elaborate the respective reports on a timely manner as described herein.

**3.3.2 Areas of activity of the Company with risk of committing acts of corruption and related infractions**

Key Activity	Areas	Main activities and processes potentially exposed to corruption risk
<b>Relations with public officials and authorities (direct relationship)</b>	<ul style="list-style-type: none"> <li>- Human Resources Activities</li> <li>- Commercial Activities</li> <li>- Finance Activities</li> </ul>	<ul style="list-style-type: none"> <li>- License acquisition or renewal</li> <li>- Obtaining authorizations</li> <li>- Inspections</li> </ul>
<b>Relations with Clients</b>	<ul style="list-style-type: none"> <li>- Commercial Activities</li> <li>- Supply Chain Activities</li> <li>- Finance Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Contract negotiation, execution, and management</li> <li>- Acceptance of cash payments</li> <li>- Acceptance of payments in advance</li> <li>- Claim management</li> <li>- Offering of gifts or hospitality</li> </ul>
<b>Relations with suppliers and business partners</b>	<ul style="list-style-type: none"> <li>- Procurement Activities</li> <li>- Supply Chain Activities</li> <li>- IT Activities</li> <li>- Finance Activities</li> <li>- M&amp;A Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Supplier selection, contracting, and outsourced activities</li> <li>- Placing orders to suppliers</li> <li>- Payment of suppliers and service providers</li> <li>- M&amp;A Transactions</li> </ul>
<b>Corporate Social Responsibility</b>	<ul style="list-style-type: none"> <li>- Human Resources Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Funding of charitable organizations</li> <li>- Making donations and other financial contributions</li> </ul>
<b>Finance</b>	<ul style="list-style-type: none"> <li>- Finance Activities</li> <li>- Supply Chain Activities</li> <li>- IT Activities</li> <li>- Human Resources Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Invoicing and payment management (from invoicing to payment, including validation processes)</li> <li>- Management and validation of expense accounts of all employees</li> <li>- Processes related to investor relations and other financial organizations</li> <li>- Administration, accounting, bank reconciliation</li> </ul>

		<ul style="list-style-type: none"> <li>- Authorization of travel expenses, gifts, and hospitality</li> <li>- Capability to dispose of the Company's assets / to make transfers on behalf of the Company</li> </ul>
<b>Communication</b>	<ul style="list-style-type: none"> <li>- Human Resources Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Organising promotional events</li> <li>- Making institutional visits</li> <li>- Media relations</li> </ul>
<b>Preparation, filling, and payment of taxes</b>	<ul style="list-style-type: none"> <li>- Human Resources Activities</li> <li>- Finance Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Preparing the Company's financial and fiscal statements</li> <li>- Tax incentives</li> </ul>
<b>Grants, public subsidies, and financing</b>	<ul style="list-style-type: none"> <li>- Finance Activities</li> <li>- Human Resources Activities</li> <li>- Operations Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Reception of subsidies or public funds</li> <li>- Bank financing</li> <li>- Management of funds received</li> </ul>
<b>Information management</b>	<ul style="list-style-type: none"> <li>- Human Resources Activities</li> <li>- Finance Activities</li> <li>- Commercial Activities</li> <li>- Operations Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Access to personal data</li> <li>- Access to third parties' software or electronic documents</li> <li>- Access to third parties' confidential information</li> <li>- Access to internal / external sensitive financial data</li> </ul>
<b>Industrial/intellectual property</b>	<ul style="list-style-type: none"> <li>- R&amp;D Activities</li> <li>- Operations Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Development of inventions/utility models</li> <li>- Developing designs or industrial models that may be subject to third party intellectual/industrial property rights</li> <li>- Use of licensed software</li> </ul>
<b>Environment</b>	<ul style="list-style-type: none"> <li>- Licencing Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Development of activities that may have an impact on the environment</li> <li>- Obtaining permits regarding waste disposal, gas emission and usage of underwater resources with APA</li> <li>- Reporting to public authorities on polluting substances</li> </ul>
<b>Logistical/ Import/Export</b>	<ul style="list-style-type: none"> <li>- Supply Chain Activities</li> <li>- Procurement Activities</li> <li>- Commercial Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Responsibility for the transport of purchased or sold products</li> <li>- Contracting forwarding agents</li> <li>- Payments for customs clearance or transporting goods</li> </ul>
<b>Human Resources</b>	<ul style="list-style-type: none"> <li>- Human Resources Activities</li> </ul>	<ul style="list-style-type: none"> <li>- Recruitment</li> <li>- Payroll management (calculation, preparation, and payment)</li> <li>- Recruitment with temporary work agencies</li> <li>- Plan(s) and/or scheme(s) of incentives or benefits directed at employees</li> </ul>

### 3.3.3 Risk Assessment Matrix

Taking into consideration the corporate purpose of COLEP Packaging, namely the industry business and sale of packaging and related products, including the auxiliary or complementary activities that are directly or indirectly related to its corporate purpose, as well as the sector and jurisdictions where the Company operates, the relevant corruption and related offences risks are as follows:

\*I= Impact

\*\*P= Probability

Risk Activity	Inherent Risk			Mitigation and control measures	Residual Risk		
	I*	P**	Score		I*	P**	Score
<b>Relations with public officials and authorities (direct relationship)</b>	H	L	M	<ul style="list-style-type: none"> <li>- Ethical criteria and guidelines for actions established in the <b>Code of Conduct</b> concerning, among others, compliance with the law and corporate social responsibility (anti-corruption, procurement, donations, and political parties financing), fair competition and prevention of conflicts of interest (gifts, invitations, dealings with family members, personal relationships)</li> <li>- <b>Anti-corruption policy</b> setting out the general rules of conduct and internal procedures to be followed at work and in the relationships with suppliers, customers, and other external entities</li> <li>- <b>Internal reporting channel</b> available to report suspected irregularities</li> <li>- <b>Financial and accounting procedures</b></li> <li>- <b>Legal Litigation Policy</b></li> <li>- <b>Powers of Attorney</b> procedures and power mandates adapted considering the amounts involved, specific activities, and requiring more than one representative when the operation entails significant amounts or responsibilities</li> </ul>	M	L	L



Relations with Clients	M	M	M	<ul style="list-style-type: none"> <li>- <b>Commercial Policy</b> which governs the main responsibilities, decisions, and general principles and standardizes the fundamental procedures of the Company's commercial activity.</li> <li>- <b>Powers of Attorney</b> procedures and power mandates adapted considering the amounts involved, specific activities, and requiring more than one representative when the operation entails significant amounts or responsibilities</li> <li>- <b>Anti-corruption policy</b> setting out the general rules of conduct and internal procedures to be followed at work and in the relationships with suppliers, customers, and other external entities</li> <li>- <b>Claims management Policy</b></li> <li>- <b>Quality Policy</b></li> <li>- <b>Internal reporting channel</b> available to report suspected irregularities</li> </ul>	M	L	L
Relations with suppliers and business partners	H	M	M	<ul style="list-style-type: none"> <li>- <b>Powers of Attorney</b> procedures and power mandates adapted considering the amounts involved, specific activities and requiring more than one representative when the operation entails significant amounts or responsibilities</li> <li>- <b>Standard model supplier contracts</b>, used whenever COLEP Packaging starts the negotiation. In other cases, contract legal review is needed before signing</li> <li>- <b>No amenities or gifts</b> granted by suppliers can be accepted by COLEP Packaging employees</li> <li>- <b>Rules on authorities and responsibility on tenders</b>, offer comparison and business allocation</li> <li>- <b>Rules on documentation &amp; storage of tenders</b>, offer comparison and business allocation</li> <li>- Instruction defining how <b>suppliers' assessment</b> and services supplier's assessment should be processed</li> <li>- Definition of the <b>mandatory requirements</b> that all suppliers, contractors must meet to be able to do business with the Company regarding key social, ethical, and environmental topics.</li> <li>- Implementation of <b>ERP system</b> for acceptance and payment of invoices</li> <li>- <b>Responsible Supplier Policy</b> (Encloses a set of mandatory requirements which all suppliers, contractors and their subsidiaries need to meet to be able to do business with COLEP Packaging)</li> </ul>	M	M	M

				<ul style="list-style-type: none"> <li>- <b>Anti-corruption policy</b> setting out the general rules of conduct and internal procedures to be followed at work and in the relationships with suppliers, customers, and other external entities</li> <li>- <b>Internal reporting channel</b> available to report suspected irregularities</li> </ul>			
<b>Corporate Social Responsibility</b>	M	L	M	<ul style="list-style-type: none"> <li>- <b>Ethics Letter</b>, which defines the main principles of conduct which govern the operations of COLEP Packaging</li> <li>- Ethical criteria and guidelines for actions established in the <b>Code of Conduct</b> regarding Corporate social responsibility</li> <li>- <b>Financing of Political parties is prohibited</b></li> <li>- Beneficiary Entities classification's matrix and documented workflow of the approval process</li> <li>- <b>Group level guidelines</b> on the adoption of a <b>social responsibility policy</b> that determines the level of commitment and involvement with local communities mainly on cultural, social, and educational areas.</li> <li>- A prior <b>assessment at a group level</b> may be conducted regarding intended donations and sponsorships</li> </ul>	L	L	L
<b>Finance</b>	H	M	M	<ul style="list-style-type: none"> <li>- <b>Financial and accounting procedures</b></li> <li>- <b>Transfer Price Policy</b></li> <li>- <b>Rules on authorization of payments</b> and definition of approval levels for all payment operations</li> <li>- <b>Rules on petty cash</b>, in terms of responsibility, reconciliation and advances</li> <li>- <b>Rules on issuance, acceptance, and discounting of letters of credit</b></li> <li>- <b>Prohibition of non-documented or confidential expenditure</b></li> <li>- <b>Inventory control procedures</b></li> <li>- Implementation of ERP system for acceptance and payment of invoices</li> <li>- Outsourcing of accounting activities and services</li> <li>- Annual approval of the consolidated and individual accounts and financial statements</li> </ul>	M	M	M
<b>Communication</b>	M	L	M	<ul style="list-style-type: none"> <li>- Group level guidelines on activities related with institutional communications</li> <li>- General guidelines set at a group level regarding the corporate image, visual identification, and logo</li> <li>- Appointment of the responsible person for interaction with the media and the delivery of all external messages to the media on behalf of the Company</li> </ul>	L	L	L

<b>Preparation, filling, and payment of taxes</b>	H	L	M	<ul style="list-style-type: none"> <li>- Financial and accounting procedures</li> <li>- Rules on authorization of payments and definition of approval levels for certain payment operations</li> <li>- Annual approval of the consolidated and individual accounts and financial statements</li> </ul>	M	L	L
<b>Grants, public subsidies, and financing</b>	M	M	M	<ul style="list-style-type: none"> <li>- Financial and accounting procedures</li> <li>- External support on preparing the application procedures</li> <li>- Follow up and monitoring procedures on the use of public subsidies</li> <li>- Definition of authorisation levels on Bank account management and reconciliation</li> <li>- Rules on authorization of payments and definition of approval levels for certain payment operations</li> <li>- Powers of Attorney procedures and power mandates adapted considering the amounts involved, specific activities and requiring more than one representative when the operation entails significant amounts or responsibilities</li> </ul>	M	L	L
<b>Information management</b>	H	M	M	<ul style="list-style-type: none"> <li>- Ethical criteria and guidelines for actions established in the Code of Conduct, with respect to, among others, compliance with the law and processing of confidential and sensitive information and protection of personal data</li> <li>- Data Archive and Data Retention Policy</li> <li>- Privacy Policy</li> <li>- Computer use Policy</li> <li>- Corporate Policy on the use of electronic communication systems</li> <li>- Use of non-disclosure agreements with both employees and external entities/clients/business providers to ensure the confidentiality of the information shared</li> <li>- Integrated document management platform</li> <li>- Codification Structure for Documents and Forms</li> </ul>	M	L	L
<b>Industrial/Intellectual property</b>	H	L	M	<ul style="list-style-type: none"> <li>- Commercial Agreements Guidelines ruling contractual matters (including Intellectual Property contracts)</li> <li>- IP requests are made by outsourced specialists</li> </ul>	M	L	L
<b>Environment</b>	H	M	M	<ul style="list-style-type: none"> <li>- Ethical criteria and guidelines for actions established in the Code of Conduct, with respect to, among others, compliance with the law and reduction of the environmental impact of its activities</li> </ul>	M	L	M

				<ul style="list-style-type: none"> <li>- Quality Policy</li> <li>- Environmental Procedure which establishes among other rules the responsibilities for interacting with public authorities in environmental matters</li> <li>- Definition of the mandatory requirements that all suppliers, contractors must meet to be able to do business with the Company regarding key social, ethical, and environmental topics</li> </ul>			
<b>Logistical/Import/Export</b>	M	M	M	<ul style="list-style-type: none"> <li>- Financial and accounting procedures</li> <li>- General guidance for modes of transport and rules for sea and inland waterway transport (on risks, costs, and insurance issues)</li> </ul>	M	L	L
<b>Human Resources</b>	M	M	M	<ul style="list-style-type: none"> <li>- Ethical criteria and guidelines for actions established in the Code of Conduct with respect to, among others, compliance with the law; respect for social and human rights; fair and safe work environment and conflict of interest's prevention.</li> <li>- Ethics Letter, which defines the main principles of conduct which govern the operation of COLEP Packaging, namely: compliance with the applicable laws and regulations; Fundamental human rights; Social rights; Integrity and health, safety, and dignity in the workplace</li> <li>- Group policy on the Payroll and HR controls</li> <li>- Group Policy on Travel &amp; Mobility boundaries and procedures</li> <li>- Car Policy defining the specific rules applicable to Company cars at COLEP Packaging's Portugal sites.</li> <li>- IT tools for authorisation and settlement of expenses (per diems, travel, etc.)</li> <li>- Written principles, defined at a group level regarding the compensation policy of the subsidiaries</li> <li>- Disciplinary procedures and measures applicable to the employees for failure to comply with their duties and responsibilities.</li> <li>- Anti-corruption policy setting out the general rules of conduct and internal procedures to be followed at work and in the relationships with suppliers, customers, and other external entities</li> <li>- Internal reporting channel available to report suspected irregularities</li> </ul>	L	L	L

### 3.3.4 Control Mechanisms

COLEP Packaging benefits from a set of control mechanisms that comprise its internal control system. These are established both at the Group Level, which the Company integrates and at a local level taking into account the activities and legal obligations of COLEP Packaging.

Namely, in matters of corruption and related offences, COLEP Packaging implements the following general controls, which set forward the main principles of conduct to prevent and fight corruption and related offences:

- **Code of Conduct** applicable to all employees, collaborators, management, and governing bodies of COLEP Packaging.
- **Ethics letter**, which defines the main principles of conduct which govern the business operations of COLEP Packaging.
- COLEP Packaging makes available an **internal reporting channel** to its employees, clients, suppliers and outsourcers, business partners, local government, and other stakeholders to report risk situations ("*Linha Direta da COLEP Packaging*").
- Appointment of an **Ethics Committee**, an internal committee responsible for monitoring and interpreting ethical guidelines and for providing clarifications on how to act when necessary.
- **Anti-corruption Policy** setting out the general rules of conduct and internal procedures to be followed at work and in relationships with suppliers, customers, and other external entities to avoid corruption risks.
- **Risk Management and Insurance Policy** at a corporate group level that governs the management of risks, namely on how they are regularly reviewed, evaluated, and prioritized to reflect the material changes in the organization.
- COLEP Packaging adopts and implements a **training and assessment plan for new recruits/employees** which can vary depending on the area in which the employee will integrate, and which determines the contents, trainers, date, and duration of the training sessions.
- **Training sessions on ethics.**
- **Contracts Management Policy/Procedure** which sets out the applicable framework for the revision, approval, and signature of the contracts entered into by the Company.
- **Disciplinary procedures** and measures applicable to the employees for failure to comply with their duties and responsibilities. These rules detail the phases of the disciplinary proceeding as well as the persons and areas responsible for these actions.
- Audit trail maintenance and organization of all information and documentation produced in compliance with the mandatory legal deadlines and in compliance with rules on data protection.

Additionally, to address the specific activities and processes which can eventually expose the organization to corruption and related offences, COLEP Packaging implements, among others, the above summarized controls respectively for each key activity.

### 3.3.5 Programmed Activities

In the corruption and related offences risk assessment exercise, which is described herein, there were no risk activities events considered high-risk activities. Notwithstanding future risk assessments, COLEP Packaging concludes that, at this stage, there is no need to adopt stricter prevention measures or to prioritise the execution of such measures in view of preventing high risks.

To ensure the ongoing monitoring of anti-corruption risks, COLEP Packaging commits to develop and implement the following controls:

- Review and update the current policies to reflect the recent corporate reorganization of COLEP Group.
- Periodic training sessions on anti-corruption focusing specifically on anti-corruption and promotion of awareness-raising campaigns.
- Review of the contract's models with service providers with anti-corruption clauses, when deemed appropriate.
- Review and update the GTCP (General Conditions of Purchase) published in the COLEP Packaging website, with anti-corruption clauses.
- Maintenance of documented information to ensure that processes and related controls are conducted as planned and are in accordance with the requirements set out in the applicable policies and procedures in place.
- Monitoring of the risk controls: collecting information from the heads of the key function areas, regarding the degree of implementation of the controls proposed within this Chapter and justifications regarding deviations from their planning.
- Internal Audits at the group level.
- Implementation of the third-party risk assessment procedures.

Moreover, COLEP Packaging commits to monitor and accompany the development of the enforcement of this new regime and any guidelines issued by the competent supervising authority and align their programmed activities accordingly.

### 3.3.6 Revision and Execution of the PPR

COLEP Packaging compromises to review this PPR every three years or whenever a change occurs in attributions or organic and corporate structure which justifies the review of the content of the PPR.

COLEP Packaging also compromises to publish the latest version of the PPR on the Intranet and COLEP Packaging's official website to promote transparency and ensure adequate implementation throughout the Company.

Finally, COLEP Packaging also compromises to monitor the implementation of the PPR and, for such purpose, undertakes to prepare the assessment reports required under the RGPC, namely the:

- **Semi-annual assessment report**, in October, whenever a high or maximum risk is identified.
- **Annual report on the implementation of the PPR**, in April of every year, including a self-assessment of the compliance with the mitigation and corrective measures identified and, if applicable, the envisaged plan to be fully compliant.

These reports will be made available in COLEP Packaging's Intranet and dully disclosed to all employees.

## 4 Attachments

### 4.1 Attachment I – List of relevant infractions

For the purpose of the implementation of the PPR, corruption and related offences are to be understood as the following offences considering a prior analysis of the crime catalogue referred in article 3 of RGPC in which a private sector legal person can be considered an infringer and taking into account the activity carried out by the Company and sector in which COLEP Packaging operates.

ARTICLE	DIPLOMA	CRIME OR RELATED INFRACTION	DESCRIPTION
372 (2)	Portuguese Penal Code (PPC)	Undue receipt and offer of advantage	A crime of receiving or offering undue advantage is committed by a person, by himself or through an intermediary, with his consent or ratification, gives or promises to give to an official, or to a third party by his indication or knowledge, an economic or non-economic advantage, which is not due to him, in the exercise of his functions or because of them.
374	PPC	Active corruption	A crime of active corruption is committed by any person who, by himself or through an intermediary, with their consent or ratification, gives or promises to a public official, or to a third party by indication or with the knowledge of the public official, a pecuniary or a non-pecuniary advantage so that the public official will perform any act or omission contrary to the duties of the office.
335	PPC	Influence peddling	A crime of influence peddling is committed by anyone who, either by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, in order to abuse their real or supposed influence over any public entity, whether national or foreign, or when the purpose of such conduct is to obtain any favourable illicit decision.
368-A	PPC	Money laundering	A crime of money laundering is committed by whoever: (i) convert, transfer, aid or facilitate any operation for the conversion or transfer of advantages, obtained by himself or a third party, directly or indirectly, for the



ARTICLE	DIPLOMA	CRIME OR RELATED INFRACTION	DESCRIPTION
			purpose of concealing their illicit origin, or of preventing the perpetrator or participant in such offences from being criminally prosecuted or subjected to a criminal reaction; ii) who conceals or disguises the true nature, origin, location, disposition, movement or ownership of the advantages, or the rights thereto; and also iii) who, not being the author of the typical illegal act from which the advantages originate, acquires, holds or uses them, with knowledge, at the time of acquisition or at the initial moment of holding or use, of that capacity. The crime of money laundering necessarily presupposes the carrying out of a previous crime, which was at the origin of the illicitly obtained funds, which may or may not have been committed in Portuguese territory under the terms of paragraphs 1 and 4 of the said Article.
7	Law no. 20/2008 of 21 April	Active corruption with prejudice to international trade	A crime of active corruption with prejudice to the international trade is committed by any person who, by himself or herself or through his or her consent or ratification, through an intermediary, gives or promises to a national, foreign or international official, or a national or foreign political office-holder, or to a third party with their knowledge, an economic or non-economic advantage that is not due to him or her, in order to obtain or retain a business, a contract or another undue advantage in international trade.
8	Law no. 20/2008 of 21 April	Private corruption	The crime of passive corruption in the private sector is committed by a private sector employee who, by himself or herself or through his or her consent or ratification by an intermediary, requests or accepts for himself or herself or for a third party, without being due to him or her, an economic or non-economic advantage, or the promise thereof, for any act or omission which constitutes a violation of his or her functional duties. If such conduct can cause a distortion of competition or a patrimonial damage to third parties, the agent is punished with a prison sentence of between one and eight years.

ARTICLE	DIPLOMA	CRIME OR RELATED INFRACTION	DESCRIPTION
9	Law no. 20/2008 of 21 April	Active corruption in the private sector	A crime of active corruption in the private sector is committed by any person who by himself or herself or, with his or her consent or ratification, through an intermediary, gives or promises to give to a worker in the private sector, or to a third party with his or her knowledge, an economic or non-economic advantage, which is not due to him or her, in order for him or her to carry out any act or omission constituting a violation of his or her functional duties.
23	Decree Law no. 28/84 of 20 January	Fraudulent misrepresentation of goods	A crime of fraudulent misrepresentation of goods is committed by any person who, with intent to deceive another in business relations, manufactures, transforms, releases for free circulation, imports, exports, re-exports, places under a suspensive regime, holds in deposit or in exhibition for sale, sells or puts in circulation in any other way goods: (a) counterfeit or pirated, falsified, or depreciated goods, passing them off as authentic, unaltered, or intact, b) Of a different nature or quality and quantity inferior to what they claim to possess or appear to possess.
34	Decree Law no. 28/84 of 20 January	Violation rules on declarations on investigations, manifests, pricing schemes or company movements	A crime of violation of the rules on declarations regarding enquiries, manifests, price systems or company movements is committed by any person who, as a result of enquiries or manifests legally established or ordered by the competent minister, for the purpose of knowing the existing quantities of certain goods, refuses to provide declarations or information, provides them falsely, with omissions or deficiencies, or refuses to provide any other elements required for the same purpose.
35	Decree Law no. 28/84 of 20 January	Speculation	A crime of speculation is committed by whoever: a) Sells goods or provides services at prices higher than those permitted by the legal regimes to which they are subject,

ARTICLE	DIPLOMA	CRIME OR RELATED INFRACTION	DESCRIPTION
			<p>b) Altering, under any pretext or by any means and with the intention of obtaining illegitimate profit, the prices that would result from the regular exercise of the activity for the goods or services or, regardless of that intention, those resulting from the legal regulations in force,</p> <p>c) Selling goods or rendering services at a price higher than that indicated in labels, tags, placards, or lists drawn up by the seller or service provider itself,</p> <p>d) Sell goods that, per unit, should have a certain weight or measure, when they are below that weight or measure, or contained in packages or containers whose quantities are below those mentioned therein.</p>
36	Decree Law no. 28/84 of 20 January	Fraud in obtaining or diverting a subsidy, grant or credit	<p>A crime of fraud in obtaining or diverting a subsidy, grant or credit is committed by any staff member who obtains a subsidy or grant:</p> <p>(a) by providing the competent authorities or entities with inaccurate or incomplete information about himself or herself or a third party and concerning facts important to the granting of the subsidy or grant,</p> <p>(b) omitting, contrary to the provisions of the legal regime of the subsidy or grant, information on important facts for its award,</p> <p>c) Using a document proving the right to the subsidy or grant or important facts for its concession, obtained through inaccurate or incomplete information.</p>
37	Decree Law no. 28/84 of 20 January	Embezzlement of a subsidy, grant or subsidized credit	<p>A crime of embezzlement of a subsidy, grant or subsidised credit is committed by any person who uses the benefits obtained as a subsidy or grant for purposes other than those for which they were legally intended or uses the benefit obtained as a subsidised credit for a purpose other than that provided for in the credit line determined by the legally competent entity.</p>

ARTICLE	DIPLOMA	CRIME OR RELATED INFRACTION	DESCRIPTION
38	Decree Law no. 28/84 of 20 January	Fraud in obtaining credit	<p>A crime of fraud in obtaining credit is committed by whoever, when presenting a proposal for granting, maintaining, or modifying the conditions of a credit intended for an establishment or company:</p> <p>a) Provides inaccurate or incomplete written information intended to accredit or important for the decision on the application,</p> <p>b) Use inaccurate or incomplete documents relating to the economic situation, namely balance sheets, profit and loss accounts, general descriptions of assets or expert opinions,</p> <p>c) Conceal deteriorations in the economic situation that have occurred in relation to the situation described at the time of the credit application and that are important for the decision on the application.</p>
18	Law no. 34/87 of 16 July	Active corruption to a political officeholder	<p>The crime of active corruption is committed by any person who, by himself or herself or through an intermediary, with his or her consent or ratification, gives or promises a holder of political office, or a third party by indication or with his or her knowledge, an economic or non-economic advantage for him or her to perform or refrain from performing any act contrary to the duties of office.</p>