



BOAVENTURA
PORTUGAL

**Corruption and Related
Offences Risk Prevention Plan
Curtumes Boaventura Lda.**

Revision Log

Code	Description	Type
N/A	Corruption and Related Offences Risk Prevention Plan	Creation

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1. Introduction

On 9 December 2021, Decree-Law No. 109-E/2021 was published in the Official Gazette, establishing the National Anti-Corruption Mechanism (MENAC) and approving the General Anti-Corruption Regime (RGPC). The Decree-Law seeks, through the creation of MENAC and the RGPC, to prevent, detect, repress and sanction acts of corruption and related offences. Accordingly, entities covered by the RGPC must adopt and implement a regulatory compliance programme, which must include a Corruption and Related Offences Risk Prevention Plan (CRCP or Plan), a code of ethics and conduct, a whistleblowing channel and a training plan, among other specific measures for public and private sector entities.

The RGPC, which entered into force in June 2022, applies to legal persons headquartered in Portugal that employ 50 or more workers, and to branches in Portuguese territory of legal persons headquartered outside Portugal that employ 50 or more workers. Given this scope, the Company is considered to fall within the RGPC.

Accordingly, this Plan seeks to fulfil the obligations set out in the RGPC, in particular Article 6 thereof, and to promote a culture of integrity and transparency to which the Company is committed. The CRCP results from an extensive analysis of the entire Company, identifying risks in each area of activity, as well as the preventive and corrective measures used as control mechanisms.

Pursuant to the aforementioned article, the CRCP must include:

- a) The areas of activity of the entity at risk of committing acts of corruption and related offences;
- b) The likelihood of occurrence and the foreseeable impact of each situation, so as to allow risk grading;
- c) In situations of high or maximum risk, the most comprehensive prevention measures, with their execution being a priority;
- d) The designation of the person generally responsible for the execution, control and review of the plan, who may be the compliance officer.

The preparation of this Plan involved a team comprising Department Directors, both in terms of identifying corruption and related offence risks and in presenting preventive measures, so that the document accurately reflects the reality of the Company.

The robustness of existing and future internal control mechanisms is considered essential, directing them towards the prevention of corruption and related offence risks and strengthening the competencies of all staff with regard to this topic.

The Plan has the following objectives:

- To raise awareness among Management, Supervisors and Employees on this topic;
- To present risk situations in the existing work areas;
- To identify and define new prevention and correction procedures for risk situations.

2. Institutional Framework

The organisation fully complies with environmental standards and regulatory provisions on health and safety at work applicable to its activity, as well as all applicable legislation in force and other applicable requirements.

Curtumes Boaventura Lda. primarily directs its sales to two major market segments: footwear manufacturers and the upholstery market.

The articles produced by the company are finished bovine hides for footwear or upholstery, manufactured in various thicknesses and with a wide range of finishes.

Being among the top 5 Portuguese tanning industries, the organisation's key strengths include a strong focus on technological development, with some unique and innovative equipment in Portugal.

The importance of the technological component is particularly evident in factors that are key to competitiveness, including quality, productivity, efficiency, production flexibility and responsiveness.

2.1 Policy, Mission and Vision

Policy – Faced with increasingly strong competition and growing market demands, Curtumes Boaventura has adopted a policy oriented towards respect for Society and the Satisfaction of Stakeholders, based on four pillars:

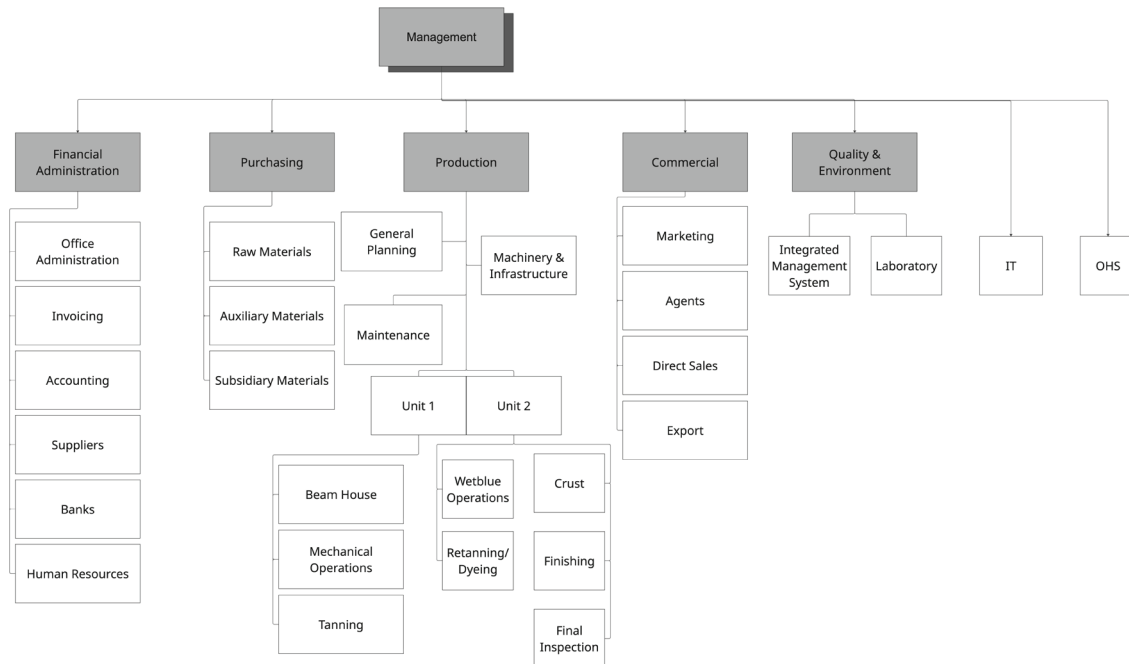
QUALITY, ENVIRONMENT, INNOVATION AND SUSTAINABILITY

Mission – To guarantee the satisfaction and success of all Stakeholders, adopting an attitude of integrity and a spirit of collaboration, rationalising resources and developing environmental awareness.

Vision – To be leaders in our market, meeting not only the needs, but also the expectations of all Stakeholders. To this end, we take a proactive stance, making use of the most modern technologies to ensure continuous improvement of processes and the highest quality of our products, while always preserving the Environment.

2.2 Organisational Chart

The Company's organisational structure is based on a clear and objective definition of reporting lines and autonomy, the competencies of each area, and the degree and scope of cooperation between them, as represented in the organisational chart.



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3. Scope of Application

This plan applies to all members of the governing bodies, employees, volunteers, interns, suppliers, service providers and all third parties who establish or may establish a direct relationship with the Institution or act on its behalf.

4. Definition of Corruption and Related Offences

Corruption and related offences are understood to mean the crimes of corruption, improper receipt and offering of advantages, embezzlement, financial participation in business, concussion, abuse of power, malfeasance, influence peddling, money laundering or fraud in the obtaining or misappropriation of subsidies, grants or credit, as provided for in the Penal Code, approved as an annex to Decree-Law No. 48/95 of 15 March in its current wording, in Law No. 34/87 of 16 July in its current wording, in the Military Justice Code approved as an annex to Law No. 100/2003 of 15 November, in Law No.

50/2007 of 31 August in its current wording, in Law No. 20/2008 of 21 April in its current wording, and in Decree-Law No. 28/84 of 20 January in its current wording. It should be noted that the current versions of the aforementioned instruments are equally covered, as are future instruments governing matters to be considered in this context.

5. Identification of Corruption and Related Offences Risks

5.1 Concept of Risk and Risk Management

The concept of Risk is broadly used to define the combination of the likelihood of a random, future event and the resulting impact should it occur. Thus, the mere existence of a given activity opens the possibility for events or situations to arise whose consequences constitute risk, i.e. opportunities to gain advantages or threats to success.

Risk Management is understood as the process through which the risks associated with the respective activities are analysed, with a view to identifying and estimating the likelihood of occurrence, through measures that allow risks to be reduced and/or assumed.

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Risk management requires a disciplined approach across several phases:

- Risk Identification – Recognition and classification of facts whose likelihood of occurrence and foreseeable impact represent risks of corruption and related offences and similar conduct.
- Risk Level (RL) – The combination of the degree of likelihood with the degree of impact, resulting in the Risk grading.

The preparation of the Plan, the existence of internal control procedures and activities, the dissemination of relevant information about risk situations, the preventive/corrective measures, and the monitoring of the effectiveness of those measures are all factors that contribute to keeping the occurrence of corruption and related offence risks at a residual level.

Risk Management is shared by the entire Company — Management and employees alike — creating a collective commitment to prevention.

5.2 Risk Factors and Prevention Measures

Ideal risk management must be based on the recognition and classification of situations whose likelihood of occurrence and impact of consequences represent risks of corruption and related offences.

Once characterised in terms of likelihood of occurrence and foreseeable impact, it is essential to identify existing measures and define new measures to be implemented, strengthening prevention mechanisms and consequently reducing the likelihood of occurrence or, where it is impossible to prevent situations entirely, minimising the likelihood of such events occurring.

5.3 Methodology for Identifying and Assessing Risk Situations

Once risk situations have been identified, and in accordance with their characterisation regarding risk level, it is important to define the possible treatment options, namely what preventive and corrective measures will be implemented, including:

- Measures to avoid the risk by eliminating its cause;
- Measures to mitigate or reduce the risk, minimising the likelihood of occurrence or the severity of the impact;
- Measures of acceptance or tolerance of the risk and its effects, in accordance with the level of risk accepted by the Company.

A set of criteria was established to assess the risk level, combining impact and likelihood, based on the following matrix. Risk situations are classified using a point system (minimum, low, moderate, high or maximum), with green, yellow or red colours assigned accordingly.

Foreseeable Impact (FI)

	1	2	3
Likelihood of Occurrence (LO)	Minimum	Low	Moderate
1	Low	Moderate	High
2	Moderate	High	Maximum
3	High	Maximum	Maximum

Likelihood of Occurrence:

1	2	3
<i>Low Risk.</i>	<i>Moderate Risk.</i>	<i>High Risk.</i>
<i>Low likelihood of occurrence. Can be avoided through existing implemented procedures.</i>	<i>Moderate likelihood of occurrence. Can be prevented through additional actions or supplementary decision-making.</i>	<i>High likelihood. Difficult to prevent even with supplementary decisions or new actions.</i>

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Foreseeable Impact:

1	2	3
<i>Reversible effects.</i>	<i>Moderate effects.</i>	<i>Severe effects.</i>
<i>Situation with low financial impact, though it may still reduce the Company's efficiency.</i>	<i>Situation may entail moderate financial losses and disrupt the Company's normal operations.</i>	<i>Situation with significant financial losses for the Company and third parties, with irreversible damage to efficiency, effectiveness, integrity and reputation.</i>

6. Risk Analysis and Control Methodology

To monitor the effective application and implementation of the Corruption and Related Offences Risk Prevention Plan, the Company establishes the following actions:

Analysis	Activity	Questions
Create an internal control system	Create prior control mechanisms	<ul style="list-style-type: none"> Are existing control mechanisms documented?
Develop and apply risk situation management plans	Carry out risk situation treatment and control	<ul style="list-style-type: none"> Is it possible to reduce and control the likelihood and consequences of the risk situation?
Manage the risk situation management plan	Implement, monitor, review and update the CRCP	<ul style="list-style-type: none"> When is it implemented? How frequently is it monitored? When should it be reviewed? What is the effectiveness of the review? When should it be updated? Has the risk level changed? Has the Company structure changed?

7. Monitoring, Evaluation and Supervision of the Corruption and Related Offences Risk Prevention Plan

The Corruption and Related Offences Risk Prevention Plan is a dynamic instrument that requires ongoing monitoring of its compliance, usefulness and effectiveness with regard to the preventive and corrective measures proposed for the Company. Its success depends on various factors, including an objective identification of the main persons responsible for its implementation, as well as monitoring of the execution of the measures envisaged and assessment of their usefulness and effectiveness.

The CRCP is reviewed by the Compliance Officer, with the support of the Working Team, ensuring its execution and implementation.

Law 109-E/2021, in Article 6, paragraph 4, states that the execution of the CRCP is subject to oversight, within the following terms:

a) Preparation, in October, of an interim evaluation report in situations identified as high or maximum risk;

b) Preparation, in April of the year following the year to which the execution relates, of an annual evaluation report, containing in particular the quantification of the degree of implementation of the preventive and corrective measures identified, as well as the anticipated timeline for their full implementation.

The CRCP must also be subject to mandatory review every 3 years, or whenever a significant change occurs in the organisational or corporate structure, or in the functional content of the Company.

The CRCP is available on the institutional website and posted on the information board, and its creation was communicated to all employees within the 10 days stipulated by current legislation, following approval by Management.

Management

Assinado por: **NARCISO GONÇALO MAXIMIANO FERREIRA**
Num. de Identificação: 04575850
Data: 2025.04.03 09:41:00+01'00'
Certificado por: **SCAP**
Atributos certificados: **Gerente de CURTUMES BOAVENTURA LDA (VAT PT-501122850)**



Alcanena, 31 March 2025

ANNEXES

Area	Risk	Risk Assessment				Implemented Preventive/Corrective Measures	Measures to Implement	Responsible
		Probability	Impact	Risk Rating	Risk Level			
Management	Parallel negotiations for undue advantage	1	3	3	Moderate	Code of Ethics and Conduct; Internal and external audits; Periodic meetings with Finance	Training/awareness in anti-corruption	Compliance Officer; Management-meetings with Finance
	Use of strategies inducing undue advantage	1	3	3	Moderate			
	Breach of duties inherent to functions for undue advantage	1	2	2	Low			
Finance	Alteration of payment and receipt data for undue advantage	1	2	2	Low	Code of Ethics and Conduct; Internal and external audits; Segregation of duties; Weekly cross-checks; Final approval by department head; Invoice validation by Management; Verification by Certified Accountant (CC); Validation by Statutory Auditor (ROC)	Training/awareness in anti-corruption	Compliance Officer; Finance Director
	Tampering with the contracting process for personal or third-party benefit	1	1	1	Minimum			
	Improper recording of invoices for personal or third-party benefit	1	2	2	Low			
	Manipulation of employee payments for personal or third-party benefit	1	1	1	Minimum			
Production	Improper receipts from suppliers and customers	2	2	4	Moderate	Code of Ethics and Conduct; Internal and external audits; Dual validation (Management and Finance)	Training/awareness in anti-corruption	Compliance Officer; Production Manager
Commercial	Improper receipts from suppliers and customers	2	2	4	Moderate	Code of Ethics and Conduct; Internal and external audits; Discounts and prices validated by Management; Dual validation (Management and Finance)	Training/awareness in anti-corruption	Compliance Officer; Commercial Director
	Obtaining undue advantages from suppliers in the acquisition of raw materials and materials	2	2	4	Moderate			
	Offering discounts to customers for undue advantage	1	1	1	Minimum			
Quality & Environment	Obtaining undue advantages from suppliers in the acquisition of materials	2	2	4	Moderate	Code of Ethics and Conduct; Internal and external audits; Dual validation (Management and Finance); Validation of production forms by Production Manager	Training/awareness in anti-corruption	Compliance Officer; Quality & Environment Director
	Carrying out activities that may cause environmental damage to the detriment of the Company	1	1	1	Minimum			
	Offering inducements to inspection bodies for the Company's benefit	1	1	1	Minimum			
	Manipulation of production information to the detriment of the Company	1	1	1	Minimum			
Cross-cutting	Breach of duties of transparency, impartiality and objectivity	2	2	4	Moderate	Code of Ethics and Conduct; Internal and external audits	Training/awareness in anti-corruption	Compliance Officer