

dstgroup

Annual report assessing the risks of corruption and related offences

Braga, April 2024



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Introduction

As part of the entry into force of Decree-Law No 109-E/2021 on the General Procedure for the Prevention of Corruption ("RGPC"), the dstgroup has implemented a Plan for the Prevention of Risks of Corruption and Related Offences ("PPR"), with a view to identifying the risks of corruption and related offences and draw up preventive and corrective measures.

The purpose of this report is the annual monitoring of the PPR, namely the assessment of situations identified in the PPR that present a risk of corruption and related offences, as established in article 6, paragraph 4, of the RGPC. This assessment will identify the applicable risks, the preventive and corrective measures adopted, as well as quantify their degree of implementation and forecast their full implementation, where applicable.

This annual assessment report was approved on April 23, 2024.

Methodology

The procedures carried out to assess/test the preventive measures to mitigate the risks of corruption and related offences identified in the PPR were as follows:

- Interviews with the departments responsible for the activities associated with the risks identified;
- Conducting tests, on a sample basis, of the main controls implemented;
- Analysis of internal rules and other applicable documentation relating to the internal control system in the area of the prevention of corruption and related offences.

Identification of risks of corruption and related offences

For the purposes of this report, all the risks considered in the dstgroup's PPR have been identified and are available at: <https://www.dstqps.com/assets/Plano-de-prevencao-dos-riscos-de-corrupcao-e-infracoes-conexas.pdf>

All the risks identified contain their risk assessment and respective mitigation measures.

Assessment of the implementation of the preventive and corrective measures identified

For the purposes of this report, an exhaustive assessment was made of the mitigation measures implemented for all risks.

Below is a detailed assessment of each of the measures that have either not yet been adopted or have not proven effective. All the others have been adopted and have proved effective, with no corrective measures to adopt.

Preventive measures	The measure is	Efficacy of the measure	Corrective measures to be adopted	Implementation forecast	Areas
Application of a conflict of interest management policy	No	No. Being implemented.	The written formalization of this policy is underway. However, all these questions are currently being addressed to the Regulatory Compliance Officer.	September 2024	Commercial; Purchasing; Strategic Planning and Tax
Obligation to periodically fill in a Conflict of Interest Statement	No	No. Being implemented.	The written formalization of this policy is underway. However, all these questions are currently being addressed to the Regulatory Compliance Officer.	September 2024	Commercial; Purchasing; Strategic Planning and Tax
Compliance of the policy regarding offers and hospitality with previously established criteria and procedures	No	No. Being implemented.	The written formalization of this policy is underway. However, all these issues are being addressed to the Regulatory Compliance Officer and approved by the Board of Directors.	September 2024	Commercial, Production
Compliance with the policy for awarding donations utilizing previously established criteria and procedures	No	No. Being implemented.	The written formalization of this policy is underway. However, nowadays all donations are approved by the Board of Directors.	September 2024	Strategic Planning and Tax

Conclusion

Overall, it can be concluded that the dst group has adopted the vast majority of its preventive measures and that they are proving to be effective. The remaining measures, as indicated in the table above, have temporary corrective measures that are under development and are expected to be fully implemented during 2024. It should be noted that none of the measures being implemented are high or very high risk in nature. It can therefore be concluded that, in all materially relevant aspects, the aforementioned preventive and corrective measures identified have been adequately and effectively implemented.