

VANGEST

# Implementation Progress Report

Plan of Corruption Risk Prevention and  
Related Offences

# Plan of Corruption Risk Prevention and Related Offences

## 1. Objective

Interim evaluation of the application of the Corruption Risk Prevention and Related Offences Plan (PPR).

The aim is to validate the application of the Compliance Programme Control System, identify situations of maximum risk, and the corresponding controls applied, as well as to plan future actions for the maintenance and enhancement of the Internal Compliance Programme.

## 2. Implementation of the Compliance Programme

In March 2023, Vangest began implementing a Compliance Plan, aimed at preventing corruption risks and related offences, comprising a comprehensive framework integrated into the Management System.

The implementation of the Compliance Plan has been examined to better identify corruption risks and related offences, and the necessary actions for their mitigation.

Vangest also revised its Code of Conduct, which incorporates a set of principles, values, and rules of conduct for all executives and employees regarding professional ethics, aimed at communicating to all parties dealing with the organisation the Anti-Corruption Policy. This policy serves as a guideline for the organisation's activities and the conduct of business in an ethical, transparent, and honest manner, requiring all parties associated with the organisation to comply with all applicable laws and regulations for combating corruption and related offences.

Given the need to create an ethical barrier, by raising awareness among employees and key personnel on the topic of corruption, a training programme was developed, addressing two groups (executives and employees). This programme aims to enable the timely detection and mitigation of transgressions. Over 90% of the employees of all companies within the Vangest group have already received training in this area, delivered by the Compliance Officer.

An internal whistleblowing channel has also been implemented, duly communicated to all employees, to provide a secure means for reporting concerns.

## 3. Implementação do PPR

The PPR identifies, analyses, and classifies the risks of corruption and related offences to which the organisation is exposed, outlining the preventive and corrective measures for mitigating these risks.

This PPR, after approval by the Board of Directors, was published on the organisation's website on 12 May 2023 and communicated to all employees via internal communication.

The PPR does not identify any situations of maximum risk in Vangest's operations, as it is considered that the controls applied in each risk area adequately mitigate the identified risks.

The PPR is scheduled for review in 2026, in line with the procedures described in the chapter "Implementation, Publicity, and Review of the Plan."

## 4. Third-Party Risk Monitoring

Although provided for, and with third-party risk assessment procedures already developed, it is deemed unfeasible to immediately implement this control system in 2023, with its commencement expected in 2024.

All employees are expected to support the proper functioning of our Privacy Management System by reporting any data breaches or security incidents and adhering to internal privacy regulations. Employees whose work involves data collection must ensure that the legal basis for processing—such as consent, contractual obligation, or legitimate interest—is identified and adhered to. In case of doubt, they should consult their supervisor or the Security and Privacy Team.

Vangest does not recruit workers below the legal minimum working age. For minor interns or workers aged 16 and above who meet the legal requirements to work, all legal provisions designed to protect these workers will be followed. This includes regulations on the nature of the work, working hours, rest breaks, and health and safety protections.

If an employee becomes aware of a fraudulent hiring situation where someone falsely claimed to be of legal age, they must report this to their supervisor or the Administration.

## 5. Reference Documents

— PPR – Corruption Risk Prevention and Related Offences Plan

— Documents integral to the Integrated Management System:

- Minutes of the appointment of the Compliance Officer;
- Manual of methods and procedures, Prior evaluation procedure;
- Code of Conduct, Anti-Corruption Policy; and
- Measurement of the effectiveness of anti-corruption programmes, Indicators.

## 6. Conclusions

The evaluation took into account freely accessible internal information and the recent implementation of the PPR.

Given the planned changes in Vangest's Management Plan, the PPR should be monitored and tracked, based on the specially structured indicators for this process, in order to optimise the management of corruption risks and related offences. The PPR should be reviewed when appropriate and whenever necessary.

It is suggested that this review includes an annual opinion from all key structure managers on aspects of the PPR within their processes and activities over the year, including, where applicable, a description of actions and/or changes that impact the determination of the risk level.

Marinha Grande, 23 October 2023

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