

TRAINING PROGRAM ON THE GENERAL REGIME FOR CORRUPTION PREVENTION 2025-2028

Compliance Program – Revision 0 – January 2025



PRISMAPOR - Produtos Eléctricos, Lda.

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List of Abbreviations and Acronyms

APCER	–	Portuguese Association for Certification
FERMA	–	<i>Federation of European Risk Management Associations</i>
IP	–	Predictable Impact
ISO	–	<i>International Organization for Standardization</i>
MENAC	–	National Anti-Corruption Mechanism
NR	–	Risk Level
PCN	–	Compliance Program
PPRIC	–	Corruption and Related Offenses Risk Prevention Plan
PO	–	Probability of Occurrence
EL	–	Electrical Panels
RGPC	–	General Regime for Corruption Prevention

1. FRAMEWORK

In compliance with the provisions of Decree-Law No. 109-E/2021, of December 9, which created the National Anti-Corruption Mechanism (MENAC) and established the General Regime for Corruption Prevention (RGPC), Prismapor, Lda. will adopt and implement a Compliance Program (PCN) that includes, at least, a Corruption and Related Offenses Risk Prevention Plan (PPRCIC), a Code of Conduct, a Whistleblowing Channel, and a Training Program, with the ultimate goal of preventing, detecting, and sanctioning acts of corruption and related offenses committed against or through this organization.

Thus, regarding training, it is mandatory for Prismapor, Lda. to conduct internal training and awareness programs for all its employees, so they are familiar with and understand the corruption and related offenses prevention procedures implemented. The content and frequency of these trainings will be adapted to each individual's position in the organizational chart, according to their exposure to identified risks.

It is necessary for all employees of Prismapor, Lda. to properly comply with the measures and precautions provided, especially those related to the exercise of their duties.

MENAC, through the publication of Guide No. 1/2023, states that "the control of procedures and the prevention of risks is not achieved solely by the mere production of instruments and their availability through platforms and intranet portals and internet sites for communication to authorities and oversight entities (...)".

It also mentions that "the training and communication component thus assumes a crucial role in establishing and deepening this dynamic, as it will be an appropriate way to disseminate the content, scope, objectives, and measures of attention and care associated with and provided in the documents and instruments for promoting and strengthening integrity, risk prevention, and signaling and screening for occurrences of this nature that have or may occur."

Therefore, in order to comply with legal requirements and as part of the implementation of the Compliance Program, Prismapor, Lda. presents the training program in this area.

2. ACTION PLAN FOR THE GENERAL REGIME FOR CORRUPTION PREVENTION TRAINING

Since this training is very specific, Prismapor, Lda. believes it is necessary to create a training program based on a simplified model, structured in four stages, which are as follows:

- Diagnose the training needs;
- Plan the training;
- Create informational materials on the subject;
- Organize training activities.

2.1. DIAGNOSE THE TRAINING NEEDS

In the first stage, Prismapor, Lda. focused on identifying the key areas that should be addressed in the training to be developed. Prismapor, Lda. concluded that it was necessary to provide context for the emergence of the General Regime for Corruption Prevention (RGPC) and inform about the legal obligations arising from it. Prismapor, Lda. understood that only then could they move on to the next stage.

In the second stage, Prismapor, Lda. considered that the training should focus on the whistleblowing channels and the individual documents that constitute the Compliance Program (PCN): the Corruption and Related Offenses Risk Prevention Plan (PPRCIC) and the Code of Conduct.

In the final stage, Prismapor, Lda. believes that the training should also cover issues such as ethics, conflicts of interest, and transparency within the scope of its activities.

In conclusion, Prismapor, Lda. understands that it is important to train employees on these new instruments, but it is equally important to raise awareness about their importance and the impact they have on promoting effective, efficient, and transparent activities.

2.2. PLAN THE TRAINING

Prismapor, Lda. proceeded with the planning of the training, setting global objectives to be achieved for each action - Table 1.

Table 1. Training Planning

Description	Objective	Target Audience
Action on the Corruption Prevention Regime (General Context)	Information on the RGPC and its obligations, its importance, and impacts on Prismapor, Lda.	New employees / All employees
Action on the Corruption and Related Offenses Risk Prevention Plan (PPRCIC)	Raise awareness about the importance of the PPRCIC for Prismapor, Lda. Risk areas / measures applied to all services and to each specific service	All employees
Action on the Code of Conduct	Gain knowledge about the Code of Conduct of Prismapor, Lda. and the need for its compliance in the context of corruption prevention.	All employees
Action on the Whistleblowing Channel	Information on Law No. 93/2021, of December 20, and sanctions; Information on the existence of the whistleblowing channel and the procedures for reporting.	All employees
Action on Ethics, Conduct, and Transparency	General concepts on ethics, conflicts of interest, and transparency.	All employees

Chronologically, the training program will be developed over the 2025-2028 period, and, at that time, based on the evaluation reports of the PPRCIC, as well as the revisions of the Code of Conduct, Prismapor, Lda. may implement a new plan adapted to the new reality.

The training will be developed and carried out internally at Prismapor, Lda., as well as the informational materials to be involved in the training activities. The sessions will be conducted by the person responsible for compliance or by other individuals whose technical knowledge makes them suitable for carrying out the activities.

2.3. CREATE INFORMATIONAL MATERIALS

At this stage, Prismapor, Lda. sought to identify the specific objectives of each training session, taking into account the target audience, and thus, informational sheets for each training were developed.

The training will be disclosed through internal communications posted at Prismapor, Lda.

2.4. ORGANIZAR ATIVIDADES FORMATIVAS

The training sessions will be scheduled in such a way that all means and resources involved in the training process are coordinated.

At the beginning of each year, a report will be prepared evaluating the training sessions conducted in the previous year, based on the feedback from the trainees through evaluation questionnaires.

3. INFORMATIONAL SHEETS FOR THE TRAINING ACTIONS

- MODULE 1 – Action on the General Regime for Corruption Prevention (General Context)Table 2;
- MODULE 2 – Action on the Corruption and Related Offenses Risk Prevention Plan Table 3;
- MODULE 3 – Action on the Code of Conduct - Table 4;
- MODULE 4 – Action on the Whistleblowing Channel - Table 5;
- MODULE 5 – Action on Ethics, Conduct, and Transparency - Table 6.

Table 2. MODULE 1 – Action on the General Regime for Corruption Prevention (General Context)

Duration and Frequency	To be defined
Target Audience	All employees / New employees
Location	In-person or via Teams (to be defined)
Objectives	- Information on the main obligations arising from these new regulations, proposing procedures to ensure compliance with legal requirements.
Evaluation Method	No evaluation
Informational Resources	Support documentation
Start Date / End Date	From January 2025 to December 2028

Table 3. MODULE 2 – Action on the Corruption and Related Offenses Risk Prevention Plan

Duration and Frequency	To be defined
Target Audience	All employees
Location	In-person or via Teams (to be defined)
Objectives	- Knowledge of the legal regulations and their main obligations in terms of corruption prevention - Understand what a Compliance Program consists of
Evaluation Method	No evaluation
Informational Resources	Support documentation
Start Date / End Date	From January 2025 to December 2025

Table 4. MODULE 3 – Action on the Code of Conduct

Duration and Frequency	Under analysis
Target Audience	All employees
Location	In-person or via Teams (to be defined)
Objectives	- Understand what the Code of Conduct consists of and its importance in Prismapor, Lda.'s operations
Evaluation Method	No evaluation
Informational Resources	Support documentation
Start Date / End Date	From January 2025 to December 2025

Table 5. MODULE 4 – Action on the Whistleblowing Channel

Duration and Frequency	Under analysis
Target Audience	All employees
Location	In-person or via Teams (to be defined)
Objectives	- Understand the regulatory obligations arising from Law No. 93/2021, of December 20 – General Regime for the Protection of Whistleblowers and Offenses; - Learn about the whistleblowing channels implemented at Prismapor, Lda. and their operation.
Evaluation Method	No evaluation
Informational Resources	Support documentation
Start Date / End Date	From January 2025 to December 2025

Table 6. MODULE 5 – Action on Ethics, Conduct, and Transparency

Duration and Frequency	Under analysis
Target Audience	All employees
Location	In-person or via Teams (to be defined)
Objectives	<ul style="list-style-type: none"> - Understand the concepts of ethics and conduct - Understand the concepts of conflicts of interest and transparency
Evaluation Method	No evaluation
Informational Resources	Support documentation
Start Date / End Date	From January 2025 to December 2025

4. APPROVAL OF THE TRAINING PLAN

The management of Prismapor validates and approves this training plan within the framework of the General Regime for Corruption Prevention for the 2025–2028 period.

31/01/2025

The Management