

Prismapor, Lda

Interim Evaluation Report on the Corruption Risk Prevention and Related Offenses Plan

Prismapor – Produtos Elétricos, Lda

October 2025

Approved by the Management of Prismapor, Lda, on October 20, 2025

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General Framework

The General Regime for the Prevention of Corruption (RGPC) was established by Decree-Law No. 109-E/2021 of December 9 and entered into force on June 7, 2022.

In compliance with the provisions of the RGPC—specifically Article 6—**Prismapor, Lda** adopted, in February 2025, a **Corruption and Related Offenses Prevention Plan (PPR)**, which takes into account the provisions set forth in paragraph 3 of Article 6 of the RGPC.

In addition to preparing the PPR, entities covered by the RGPC are also required to monitor its implementation, in accordance with paragraph 4 of Article 6 of the same law. This monitoring includes:

- a) Preparation, in the month of October, of an **interim evaluation report** concerning situations identified as high or very high risk;
- b) Preparation, in the month of April of the following year, of an **annual evaluation report**, which must include, in particular, the quantification of the degree of implementation of the preventive and corrective measures identified, as well as an outlook for their full implementation.

Accordingly, and in compliance with subparagraph (a) of paragraph 4 of Article 6 of the RGPC, **Prismapor, Lda** has prepared this **Interim Evaluation Report**.

PPR Implementation: Interim Evaluation — October 2025

Methodology

Within the scope of this interim risk evaluation, only risks classified as **high** or **very high** were considered, based on the methodology applied in the Corruption and Related Offenses Risk Prevention Plan.

Accordingly, a **status review** is conducted regarding the implementation of the preventive and corrective measures identified to mitigate these risks, including an assessment of their **degree of implementation** and **effectiveness**.

Degree of Compliance with Mitigation Measures

The evaluation of the Plan's implementation involved the participation of the key stakeholders who contributed to the development of the **Corruption and Related Offenses Risk Prevention Plan**.

No risks classified as **high** or **very high** were identified in the PPR. The Plan identified **two risks of moderate severity** across four distinct areas of work.

To mitigate these two moderate-level risks, specific **mitigation measures** were established, which have ensured the absence of corruption and related offences to date, proving to be **100% effective**.

Conclusion

Considering the results presented in this evaluation, it is concluded that the implementation of the preventive measures outlined in the PPR is **appropriate and effective**, contributing positively to the reduction of the negative impact of the identified risks.

Accordingly, the measures implemented should **remain in force**, and their **continuity should be ensured**.

The Compliance Responsible

ANNEX 1 – Status of Mitigation Measures

The following table lists all identified risks, the corresponding mitigation measures, and their **implementation status**. Regarding the implementation status, the table reflects the **execution progress** of each measure, its **effectiveness**, and the identification (or not) of any **corrective actions**, in accordance with the guidelines of **Guide No. 1/2023** from MENAC.

Area	Risks	Risk Analysis and Classification			reventive/Corrective Measures (Implemented)	Effectiveness (Y/N)	Corrective/Preventive Measures (To Be Implemented)	Responsible
		PO	IP	GR				
Secretariat	Use or Disclosure of Insider and/or Confidential Information for Personal or Third-Party Benefit.	2	2	4	<ul style="list-style-type: none"> • Code of Ethics and Conduct • Declaration of Absence of Conflicts of Interest • Awareness Training on the Consequences of Corrupt Actions and Disclosure of Confidential Information 	yes	Focus on RGPC Training	Management
Budgets	Use or Disclosure of Insider and/or Confidential Information for Personal or Third-Party Gain.	2	2	4				
Logistics	Use or Disclosure of Privileged and/or Confidential Information for Personal or Third-Party Benefit.	3	1	3				

Prismapor, Lda

Commercial Activity	Conflict of Interest in the Preparation of Commercial Contracts	2	2	4				
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