



Risk Prevention Plan

Index

1. FRAMEWORK.....	3
2. SCOPE AND PURPOSE.....	4
3. REGULATORY COMPLIANCE OFFICER	4
4. GOVERNANCE STRUCTURE.....	5
5. CORRUPTION AND RELATED OFFENCES	7
6. METHODOLOGY	9
7. MONITORING AND REVIEW	14
8. DISCLOSURE	14
ANNEX	15

1. FRAMEWORK

The General Regime for the Prevention of Corruption (hereinafter referred to as the «RGPC»), approved by Decree-Law 109-E/2021 of 9 December, established the obligation for public or private entities with 50 or more employees to adopt a compliance programme that includes at least a plan for the prevention of risks of corruption and related offences, a code of conduct, a training programme and a whistleblowing channel.

The Martifer Group has been listed on Euronext Lisbon since 2007 and has several entities spread across three business units - metal construction, shipbuilding and renewables & energy.

Although this plan applies across the board to all Martifer Group entities, its focus, even by legal requirement, is mainly on the MARTIFER - CONSTRUÇÕES METALOMECÂNICAS, S.A. entity. (hereinafter «**MARTIFER CONSTRUÇÕES**»), WEST SEA - ESTALEIROS NAVAIS, UNIPessoal, LDA. (hereinafter just «WEST SEA») and NAVALRIA – DOCAS, CONSTRUÇÕES E REPARAÇÕES NAVAIS, S.A. (doravante apenas «NAVALRIA»).

All Martifer Group entities, and in particular MARTIFER CONSTRUÇÕES, WEST SEA and NAVALRIA, are guided by high standards of responsibility, promoting the construction of a business universe focussed on ethics and integrity. In this context, and in recognition of the importance and value of the risk management instrument in the fight against corruption and related offences by the group companies based in Portugal, namely MARTIFER CONSTRUÇÕES, WEST SEA and NAVALRIA, this Plan for the Prevention of Risks of Corruption and Related Offences (hereinafter referred to as the «Plan») has been adopted and implemented, duly complying with the legal obligations imposed by the RGPC, provided for in Decree-Law no. 109-E/2021 of 9 December.

2. SCOPE AND PURPOSE

The Plan applies to all members of the Martifer group companies, and in particular MARTIFER CONSTRUÇÕES, WEST SEA and NAVALRIA, including all partners, directors and managers, suppliers, internal and external service providers, contractors, subcontractors, trainees, workers, temporary workers and volunteers.

All Members must conduct themselves in accordance with the rules and principles set out in this Plan and, in the pursuit of their professional activities, their conduct in dealing with third parties must be in line with its terms, with the Code of Ethics and Conduct, and also with all applicable legislation and regulations.

The purpose of this Plan is to identify, for each business unit, the risks of corruption and related offences, as well as the identification of measures to prevent their occurrence:

- identifying, analysing and classifying the risks and situations that may expose the companies of the Martifer group, and in particular MARTIFER CONSTRUÇÕES, WEST SEA and NAVALRIA, to acts of corruption and related offences, including those associated with the exercise of functions by the members of the management and executive bodies, taking into account the reality of the sector and the geographical areas in which it operates;
- preventive and corrective measures to reduce the probability of occurrence and the impact of identified risks and situations.

3. REGULATORY COMPLIANCE OFFICER

The monitoring, control and execution of this Plan is guaranteed by the Regulatory Compliance Officer, who carries out his duties with independence and decision-making autonomy, having access to internal information and the technical and human resources necessary to carry out his duties.

As this organisation is in a group relationship, it shares the same Regulatory Compliance Officer with the Martifer Group. Supported by the Corporate Legal Department and the *Chief Compliance Officer* of the Martifer Group, it is up to the Regulatory Compliance Officer to guarantee and control the execution and revision of the Plan. The Regulatory Compliance Officer makes part of and reports directly to the management of the Martifer Group's metal and shipbuilding business units, as well as to the management of Martifer SGPS, S.A.

The Regulatory Compliance Officer is assisted in his duties of monitoring the implementation of the Plan by members of the various departments with auditing functions, the legal department or the human resources department.

4. GOVERNANCE STRUCTURE

The companies MARTIFER CONSTRUÇÕES, WEST SEA and NAVALRIA are part of the "MARTIFER" corporate group, following the group's corporate culture, adopting high standards of professional responsibility and ethics and taking a consistent approach to preventing corruption and related offences.

MARTIFER CONSTRUÇÕES is a commercial company incorporated under Portuguese law that specialises in the manufacture of metal structures and metal constructions, engineering and related technical activities, consultancy in the preparation of industrial engineering projects, construction and civil engineering and public works. Transformation of aluminium profiles, execution of aluminium frames, façade systems, design, execution and commercialisation of industrial equipment, import and export, representations, trade in construction materials, industrial and real estate design, civil locksmithing, execution and assembly of metal structures and constructions. Manufacture of wind engines and turbines, wind turbines, licensing, financing, development, construction of wind farms, management and supervision of project planning, construction and

maintenance, design of machinery, apparatus and industrial installations, production, transport and distribution of electricity.

WEST SEA is a commercial company under Portuguese law dedicated to carrying out economic activities related to the shipbuilding and repair industry, as well as activities related to the manufacturing of components for wind turbines and to the metalworking industry, including the performance of all types of ancillary and related acts necessary for the pursuit of its corporate purpose and also the exercise of industry and trade in military goods and technologies.

NAVALRIA is a commercial company under Portuguese law that is dedicated to carrying out economic activities related to the construction and repair industry of small and medium-sized vessels and ship dismantling.

MARTIFER CONSTRUÇÕES belongs to the metal construction business unit and WEST SEA and NAVALRIA belongs to the shipbuilding business unit, both of which are structured by organisational units that report to the Executive Committee.

It is important to emphasise that there are different departments within the group that are transversal to all the group's entities and, precisely for this reason, their intervention in the various business units / entities of the Martifer Group has been taken into account in this Plan. From a risk management perspective, the various activities carried out by these same joint departments are listed below:

Areas of activity	Corporate Centres
Purchases (Goods/Services) across the various Martifer Group companies	Procurement
Treasury Management	Finance
Financial Management	
Financial Reporting and Taxation	Planning and Management Control
Accounting management	
Investor Relations	

Areas of activity	Corporate Centres
Defining and managing human resources policies	Human Resources
Legal and regulatory support across the various Martifer Group companies	Legal

5. CORRUPTION AND RELATED OFFENCES

The Martifer Group repudiates any practice of corruption or related offences or even other forms of undue influence, imposing strict compliance with the law and internal policies in all its internal and external relations, whether with private or public entities.

Everyone must comply with the applicable national and international rules on combating corruption and related offences, and any behaviour that could constitute the commission of the crime of corruption or any related offence provided for by law is expressly prohibited, namely the following:

LEGAL TYPE	CONDUCT	REGULATORY FRAMEWORK
Corruption	Performing an act or omitting to perform an act, whether lawful or unlawful, in exchange for receiving an undue pecuniary or non-pecuniary advantage, for oneself or for a third party.	Articles 372 to 374a of the Portuguese Penal Code
Undue receipt or offer of an advantage	When the official, in the performance of his duties or because of them, by himself or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage that is not due to him.	Article 372(1) of the Portuguese Penal Code
Embezzlement	When the official unlawfully appropriates, for their own benefit or that of another person, money or any movable item,	Article 375(1) of the Portuguese Penal Code

	whether public or private, that has been given to them, is in their possession or is accessible to them by reason of their duties.	
Economic participation in business	When an official who, with the intention of obtaining, for himself or for a third party, unlawful economic participation, damages in a legal transaction the property interests which, in whole or in part, he is responsible for administering, supervising, defending or realising by reason of his function.	Article 377(1) of the Portuguese Penal Code
Concussion	When the official, in the exercise of their functions or de facto powers deriving from them, by themselves or through an intermediary with their consent or ratification, receives, for themselves, for the State or for a third party, through inducement into error or taking advantage of the victim's error, a pecuniary advantage that is not owed to them, or is greater than that owed, namely a contribution, fee, emolument, fine or penalty.	Article 379 of the Portuguese Penal Code
Abuse of power	When the official abuses their powers or violates the duties inherent in their functions, with the intention of obtaining, for themselves or for a third party, an illegitimate benefit or causing harm to another person.	Article 382 of the Portuguese Penal Code
Prevarication	When the official, in the context of investigative, judicial, misdemeanour or disciplinary proceedings, knowingly carries out acts or fails to carry out acts that were required by virtue of the office he holds, with the intention of harming or benefiting someone.	Article 369 of the Portuguese Penal Code
Influence peddling	When someone, by themselves or through an intermediary, with your	Article 335 of the Portuguese Penal Code

	consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, in order to abuse their influence, real or supposed, with any public entity.	
Bleaching	When the official converts, transfers, assists or facilitates any operation of conversion or transfer of advantages, obtained by him or by a third party, directly or indirectly, in order to conceal their illicit origin, or to prevent the perpetrator or participant of such offences from being criminally prosecuted or subjected to a criminal reaction.	Article 368a of the Portuguese Penal Code
Fraud in obtaining a subsidy or grant	When the official provides the competent authorities or bodies with inaccurate or incomplete information about him/herself or third parties and about facts that are important for the award of a subsidy or grant; omits information about important facts; uses a supporting document obtained through inaccurate or incomplete information; in order to obtain a subsidy or grant.	Art. 36 of Decree-Law no. 28/84 of 20 January

6. METHODOLOGY

Bearing in mind the objectives and scope of this Risk Prevention Plan (RPP), as well as the mission of the Martifer Group and the different activities carried out by its employees, it is important to understand the degree of risk and the likelihood of a future event of corruption or related offence occurring, with a view to preventing and mitigating it. To this end, this Plan was drawn up using the following methodology:

- Risk Identification;

- Risk Assessment:

- Identification of controls to mitigate risks;
- Identification of those responsible for monitoring controls;

- Definition of the action plan for monitoring risks and respective mitigation measures.

With regard to the identification of risks, the circumstances and/or activities likely to lead to irregular situations are defined, namely:

- * Processing inappropriate payments through intermediaries, subcontractors or co-contractors;
- * Accepting or awarding gifts and/or presents;
- * Relations with public officials and/or politically exposed persons;
- * Undue payments and/or facilitation;
- * Billing for fictitious services;
- * Award grants, sponsorships and/or donations;
- * Influencing the outcome of a job/project;
- * Acquisition of entities or transactions with risky third parties;
- * Favouritism in hiring processes.

The risk assessment analyses the probability of occurrence of each of the potential situations that could expose the entity to acts of corruption and related offences, and their possible impact (financial and reputational). Once the risk situations and the level of risk have been defined, the preventive measures are defined in order to guarantee the appropriate mitigation of the risks identified.

Risk Assessment Matrix

Once the risk has been identified, it is assessed as to its likelihood of occurrence and impact, according to the following tables:

Probability of occurrence	Low	Medium	High
	1	2	3
	Low probability of occurrence (less than 20%)	Probability of occurrence (between 20% and 80%)	Probability of occurrence greater than 80%

Impact	Bass	Medium	High
	1	2	3
	Damage to organisational performance (customer dissatisfaction, litigation, etc.) with limited financial impact.	Loss of operation management in a reference period of less than 24 hours (credibility and/or trust of <i>stakeholders</i> , contracts, etc.) with moderate financial impact (<i>Average Sales Day</i>)	Loss of operation management over a reference period of more than 24 hours
Reputational damage in terms of local visibility	Reputational damage in terms of national visibility	Damage to the image and reputation of integrity, litigation, as well as effectiveness and performance with a high financial impact (<i>Sales Day Peak</i>)	
		Reputational damage in terms of international visibility	

By relating the potential impact of business risks and the likelihood of these risks materialising, the **risk level** will be designated on a scale of: **1** - as low risk; **2** - as medium risk; and **3** - as high risk.

It thus becomes possible to establish a *scoring* model with an order of prioritisation for the treatment of critical risks according to the level of *score* they obtain.

To this end, the risk is calculated using the formula:

(Risk = Probability of occurrence X Impact)

Impact	High (3)	Medium (3)	High (6)	High (9)
	Medium (2)	Low (2)	Medium (4)	High (6)
	Low (1)	Low (1)	Low (2)	Medium (3)
		Low (1)	Medium (2)	High (3)
	Probability of occurrence			

Finally, in view of the risk classification listed, internal control is assessed according to the following table:

Internal control	Limited	Partial	Total
	1	2	3
	It has no impact on the risk identified. It is not possible to lower the risk level to acceptable values.	Reduces the level of risk identified to the inherent risk.	Mitigates or completely eliminates the identified risk.

Control mechanisms

For the risks identified, a set of measures has been implemented to reduce both the likelihood of their occurrence and the degree of their impact. Alongside these measures, it is also important to note that the Martifer Group has a set of global controls, which reflect the Group's fundamental principles and values and emphasise its position in the uncompromising fight against corruption and related offences:

- Code of Ethics and Conduct;
- Global Anti-Corruption Policy;
- Complaints channel;
- Regulations on Reporting Offences;
- Human Resources Policies and Internal Regulations;
- Purchasing procedures;
- Payment approval matrix;
- Risk assessment procedures when contracting with clients;
- Procedures for recording customer and supplier data;
- Customer acceptance procedures; and
- Procedures for using Information and Communication Technologies (ICT).

Risk and Control Matrix

The Risks and Controls Matrix identifies a set of risks in the different areas of activity of the Martifer Group, which have been analysed in terms of their likelihood of occurrence and impact.

The respective mitigation controls, applicable prevention policies and existing mitigation measures are also identified.

According to the criteria listed above, the risks are:

- Inherent Risk: risks classified in terms of probability of occurrence and impact, which results in the valuation of inherent risk and existing risk levels;
- Internal Control Assessment: Based on the mitigation controls, applicable prevention policies and existing mitigation measures, internal control is assessed;

- Residual Risk: after applying the internal control assessment, the risks are categorised in terms of the probability of occurrence and the impact, which results in the residual risk being valued.

Attached to this Plan is the risk matrix and the preventive measures established in accordance with the methodology and risk assessment described here.

7. MONITORING AND REVIEW

Implementation of the Plan is subject to monitoring, which will be carried out as follows:

- Preparation of an interim assessment report in October for situations identified as high or maximum risk;
- The annual evaluation report is drawn up in April of the following year. It includes a quantification of the degree of implementation of the preventive and corrective measures identified, as well as a forecast of their full implementation.

The Martifer Group will review the Plan every three years or whenever there is a change that justifies the revision of any of its elements.

8. DISCLOSURE

The Martifer Group ensures that the Plan for the Prevention of Risks of Corruption and Related Offences and the respective interim and annual assessment reports are made available to all its members via the Martifer Group's intranet and its website www.martifer.com, as well as on the entity's website, if any.

ANNEX

Process	Risk	Risk Assessment			Evaluation of Internal Control	Residual Risk	Preventive and Corrective Measures
		Probability	Impact	Inherent Risk			
Business development	Inadequate payments through intermediaries to obtain a contract / market	High	Medium	High	Total	Low	<p>Ensuring compliance with payment and procurement procedures:</p> <ul style="list-style-type: none"> - Segregation of duties between the teams that propose payments and the teams that make them; - Correspondence of payment to specific documents; - Presentation of a budget only as an intention to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context. <p>Third parties (except clients) with whom a business relationship is to be established with any MARTIFER Group entity are subject to a business relationship assessment process using proprietary tools that include decision trees in terms of risk assessment, approval and assessment of independence issues. These tools include review and analysis in terms of anti-corruption.</p> <p>Training on corruption and awareness-raising activities for employees. These tools include review and analysis in terms of anti-corruption.</p> <p>Organisation of corruption awareness training for employees.</p>
Business development	Inadequate payments through subcontractors and co-contractors to obtain a market / contract	High	Medium	High	Total	Low	<p>Ensuring compliance with payment and procurement procedures:</p> <ul style="list-style-type: none"> - Segregation of duties between the teams that propose payments and the teams that make them; - Matching payments to specific documents; - Presentation of a budget only as an intention to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context. <p>Third parties (except for clients) with whom a business relationship is to be established with a MARTIFER Group entity are subject to a business relationship assessment process using proprietary tools that include decision trees in terms of risk assessment, approval and assessment of independence issues. These tools include review and analysis in terms of anti-corruption.</p> <p>Carrying out training on corruption and awareness-raising activities for employees. Joint-ventures are subject to a specific review and approval process depending on their nature.</p>
Business development	Inappropriate gifts or payments related to the award of a contract / market	Medium	Low	Low	Partial	Low	<p>The granting of offers or invitations is subject to a prior approval process with different levels whenever certain reference limits defined in the Global Policy of the Martifer Group are exceeded.</p> <p>All gifts and invitations that exceed the reference value are duly registered and documented.</p> <p>All employee expenses are subject to limits and approvals.</p>
Business development	Conflict of interest and/or influence peddling in the context of a tender (private client)	Low	Medium	Medium	Limited	Medium	<p>Existence of a conflict-of-interest policy, which includes analysing conflicts of interest of clients or candidates for clients.</p> <p>This policy considers additional approval levels depending on the risk.</p> <p>The granting of offers or invitations is subject to a prior approval process with different</p>

Process	Risk	Risk Assessment			Evaluation of Internal Control	Residual Risk	Preventive and Corrective Measures
		Probability	Impact	Inherent Risk			
							<p>levels whenever certain reference limits defined in the MARTIFER Group's Global Policy are exceeded.</p> <p>All gifts and invitations that exceed the reference value are duly registered and documented.</p> <p>Training on conflicts of interest and awareness-raising activities for employees.</p>
Business development	Inadequate payments through intermediaries to obtain a contract / market	High	Medium	High	Total	Low	<p>Ensuring compliance with payment and procurement procedures:</p> <ul style="list-style-type: none"> - Segregation of duties between the teams that propose payments and the teams that make them; - Correspondence of payment to specific documents; - Presentation of a budget only as an intention to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context. <p>Third parties (except clients) with whom it is intended to establish a business relationship with any entity of the Martifer Group, are subject to a business relationship assessment process using proprietary tools that include decision trees in terms of risk assessment, approval and assessment of independence issues.</p> <p>These tools include review and analysis in terms of anti-corruption.</p> <p>Carrying out training on corruption and awareness-raising activities for employees.</p>
Business development	Conflict of interest and/or influence peddling in the context of a tender (public client)	Low	Medium	Low	Partial	Low	<p>Existence of a conflict of interest policy, which includes analysing conflicts of interest of clients or candidates for clients.</p> <p>This policy considers additional approval levels depending on the risk. Existence of a money laundering policy that includes analysing politically exposed persons (PEPs), close members or persons closely associated with PEPs.</p> <p>Clients with whom a business relationship is to be established are subject to a Know Your Client process, which includes assessing the client's risk and the risk of each individual project.</p> <p>The granting of offers or invitations is subject to a prior approval process with different levels whenever certain reference limits defined in the Global Policy of the MARTIFER Group are exceeded.</p> <p>All gifts and invitations that exceed the reference value are duly registered and documented.</p> <p>Training on conflicts of interest and awareness-raising activities for employees.</p>
Business development	Billing for the sale of goods / provision of fictitious services or over/under billing a client in exchange for an undue advantage	Low	Low	Low	Partial	Low	<p>Ensuring compliance with payment and purchasing procedures:</p> <ul style="list-style-type: none"> - Segregation of duties between the teams that propose payments and the teams that make them; - Matching payments to specific documents; - Presentation of a budget only as an intention to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context. <p>Third parties (except for clients) with whom a business relationship is to be established with a MARTIFER Group entity are subject to a business relationship assessment process</p>

Process	Risk	Risk Assessment			Evaluation of Internal Control	Residual Risk	Preventive and Corrective Measures
		Probability	Impact	Inherent Risk			
							using proprietary tools that include decision trees in terms of risk assessment, approval and assessment of independence issues. These tools include review and analysis in terms of anti-corruption. Training on corruption and awareness-raising activities for employees.
Partners / sponsors / Lobbying	Illicit subsidies, sponsorships and donations to obtain a contract / market	Low	Low	Low	Partial	Low	Third parties (except for clients) with whom it is intended to establish a business relationship with an entity of the MARTIFER Group, including those consisting of the awarding of subsidies, sponsorships or donations, are subject to a process of evaluation of the business relationship through the use of proprietary tools that include decision trees in terms of risk assessment, approval and evaluation of independence issues. These tools include review and analysis in terms of anti-corruption. Specific anti-corruption clauses have been defined for inclusion in contracts. Existence of a conflict-of-interest policy, which includes analysing conflicts of interest. Carrying out training on corruption and conflicts of interest, and awareness-raising activities for employees.
Partners / sponsors / Lobbying	Lobbying with public decision-makers to favour any MARTIFER Group entity or sector.	Medium	Low	Medium	Limited	Medium	Existence of a Code of Ethics and Conduct that all employees must comply with. Existence of a conflict-of-interest policy, which includes analysing the conflict of interest of politically exposed persons (PEPs), close members or persons closely associated with PEPs - clients and candidates for clients. Carrying out training on corruption and conflicts of interest, and awareness-raising activities for employees. Employees wishing to hold positions in other organisations are subject to declaration and approval.
Procurement	Payment of a fictitious service or favouritism to a supplier in exchange for an undue advantage	Low	Low	Low	Total	Low	Existence of a Code of Ethics and Conduct that all employees must comply with. Ensuring compliance with payment procedures: - Segregation of duties between the teams that propose payments and the teams that make them; - Matching payments to specific documents; - Presentation of a budget only as an intention to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context. Third parties, including suppliers (except clients) with whom a business relationship is to be established with a MARTIFER Group entity, are subject to a business relationship assessment process using proprietary tools that include decision trees in terms of risk assessment, approval and assessment of independence issues. These tools include review and analysis in terms of anti-corruption. Carrying out training on corruption and awareness-raising activities for employees.
Payments	Payments to a public official (or similar) to obtain preferential treatment	Low	Low	Low	Total	Low	Existence of a Code of Ethics and Conduct that all employees must comply with. Training sessions on corruption and awareness-raising activities for employees. Ensuring compliance with payment and purchasing procedures: - Segregation of duties between the teams that propose payments and the teams that make them; - Matching payments to specific documents; - Presentation of a budget only as an intention

Process	Risk	Risk Assessment			Evaluation of Internal Control	Residual Risk	Preventive and Corrective Measures
		Probability	Impact	Inherent Risk			
							to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context.
Payments	Facilitation payments	Low	Low	Low	Total	Low	Ensuring compliance with payment and purchasing procedures: - Segregation of duties between the teams that propose payments and the teams that make them; - Matching payments to specific documents; - Presentation of a budget only as an intention to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context. Training on corruption and awareness-raising activities for employees.
Payments	Undue payments concealing the beneficial owner	Low	Low	Low	Partial	Low	Ensuring compliance with payment and purchasing procedures: - Segregation of duties between the teams that propose payments and the teams that make them; - Matching the payment to specific documents; - Presentation of a budget only as an intention to carry out the expenditure, not understood as approval of the expenditure itself; - Limits on the approval of supplier documents provided for in budgets once they have been accepted; - Additional approval of purchases not provided for in the budget, after acceptance of the budget and approval of the expenditure to be incurred in this context. The tool that evaluates business relationships requires the identification of the actual beneficiaries Suppliers with whom a business relationship is to be established are subject to a Know Your Supplier process which includes an assessment of the supplier's risk in terms of anti-corruption.
Human Resources	Favouritism in hiring in exchange for an undue advantage	Low	Medium	Low	Partial	Low	The granting of offers or invitations is subject to a prior approval process with different levels when certain reference limits are exceeded. All gifts and invitations that exceed the reference value are duly registered and documented. Set of control mechanisms associated with the recruitment process: - Approval of the need for recruitment in a specific tool - Review and approval of the candidate evaluation form; - Analysis and verification of results, review of candidates' backgrounds; - Reviewing and verifying the affiliations of client candidates; - Carrying out training on corruption and awareness-raising activities for employees.
External growth	Acquisition of an entity or transactions with risky third parties	Medium	Medium	Medium	Partial	Medium	Third parties, including a partner with whom a business relationship is to be established with a MARTIFER Group entity, are subject to a business relationship assessment process using proprietary tools that include decision trees in terms of risk assessment, approval and assessment of independence issues. These tools include review and analysis in terms of anti-corruption. The Due Diligence for each acquisition includes sending an anti-corruption

Process	Risk	Risk Assessment			Evaluation of Internal Control	Residual Risk	Preventive and Corrective Measures
		Probability	Impact	Inherent Risk			
							questionnaire for completion. Review of the Due Diligence and decision on detailed investigations. Set of control mechanisms implemented in the payment and procurement process.
Information Systems / Access to Privileges and Data	Undue access to information classified as confidential and to personal and sensitive data	Low	High	High	Partial	Low	Existence of a Code of Ethics and Conduct that all employees must comply with. Existence of a Manual for the Use of ICT and Document Management. Existence of logging of critical systems. Definition of a system for controlling employee access and identities. Ensuring compliance with the procedure for implementing segregation of duties. Clear identification of users with administrator privileges (not nominal).
Information Systems / Access to Privileges and Data	Total or partial sharing with third parties (competitor) of classified data (clients, commercial conditions, among others) and/or personal data	Low	High	High	Partial	Low	Existence of a Code of Ethics and Conduct that all employees must comply with. Existence of a Manual for the Use of ICT and Document Management. Existence of logging of critical systems. Definition of a system for controlling employee access and identities. Ensuring compliance with the procedure for implementing segregation of duties. Clear identification of users with administrator privileges (not nominal). Limited use and reduced to what is absolutely necessary for users of "sys admin" in scripting, procedures and statements of SQL.
Information Systems / Access to Privileges and Data	Unavailability or serious degradation of critical business support systems	Low	High	High	Partial	Low	Existence of a Code of Ethics and Conduct that all employees must comply with. Existence of logging of critical systems. Definition of a system for controlling employee access and identities. Clear identification of users with administrator privileges (not nominal). Limited use and reduced to what is absolutely necessary of users of "sys admin" in scripting, procedures and statements of SQL.
Information Systems / Access to Privileges and Data	Failure to mitigate / prevent cybersecurity attacks	High	High	High	Partial	High	Existence of a Code of Ethics and Conduct that all employees must comply with. Existence of a Manual for the Use of ICT and Document Management. Definition and control of access and identities (user, password, MFA). Network segregation. Implementation of firewall systems and segregation of external and internal networks. Implementation of VPN use for remote access. Ensure the existence of an immutable third copy of the systems, inaccessible from the Internet of the critical systems. Carrying out cybersecurity training and awareness-raising activities for employees.
Information Systems / Access to Privileges and Data	Undue application of exceptional commercial conditions	Low	Medium	Medium	Partial	Low	Existence of a Code of Conduct that all employees must comply with. Existence of logging of critical systems. Definition and control of access and identities (user, password, MFA).

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