

Annual Evaluation Report on the Plan for the Prevention of Risks of Corruption and Related Infractions (2024)

April 2025

Brisa Group



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1. FRAMEWORK

On June 8, 2022, Decree-Law No. 109-E/2021, of December 9, came into force, creating the National Anti-Corruption Mechanism (“MENAC”) and approving the General Regime for the Prevention of Corruption (“RGPC”).

With the purpose of preventing, identifying and sanctioning acts of corruption and related infractions, the RGPC requires obliged entities to adopt and implement a regulatory compliance program that includes a Plan for the Prevention of Risks of Corruption and Related Infractions (“PPR”). As a company with over 50 employees and headquartered in Portugal, Brisa – Auto-Estradas de Portugal, S.A. falls within the scope of the RGPC and is therefore subject to this obligation.

The PPR published by the Brisa Group identifies and classifies the risk indicators that may expose the Group's entities to acts of corruption and related infractions, as well as the control mechanisms and preventive and corrective measures that are in place or are being implemented to mitigate these risks.

In order to ensure the effectiveness of the measures provided therein, the PPR is subject to semi-annual control and monitoring. This includes an interim evaluation report in October, applicable to situations identified as high or maximum risk, and an annual evaluation report in April of the following year, containing in particular the quantification of the degree of implementation of the identified preventive and corrective measures, as well as the forecast of their full implementation. Additionally, following Recommendation No. 7/2024, of May 28 and the subsequent implementation of the Reporting Platform, the monitoring of the theme – including the situations of irregularities signaled or detected in compliance with the RGPC instruments - are reported on a monthly basis.

Accordingly, and in compliance with the obligation set out in point b) of paragraph 4 of article 6 of the RGPC, the Brisa Group presents the Annual Evaluation Report of the PPR, which quantifies the degree of implementation of the identified preventive and corrective measures, as well as the forecast for their full implementation.

2. METHODOLOGY

Coordination of the preparation and creation process for the PPR Execution Assessment Reports is responsibility of the Compliance Officer.

This annual report evaluates the level of execution of the PPR, highlighting the risks identified, and presenting the measures provided for in the PPR to prevent or correct these risks.

In this annual assessment, the state of implementation of preventive/corrective measures was also evaluated, as well as their current relevance and effectiveness in effectively mitigating the risks of corruption and related offenses, along with the forecast for their full implementation in cases where this has not yet occurred. Additionally, the analysis included in the monthly reports - mandatory since July 2024 - was duly considered.

3. ANNUAL ASSESSMENT

In general terms, the Brisa Group considers that the execution of the Plan for the Prevention of Risks of Corruption and Related Infractions, as well as the Compliance Program - particularly regarding the

implementation and effectiveness of the proposed measures - is aligned with current legislation and the Group's internal policies, registering a positive evolution.

In the Brisa Group's PPR, 1 (one) situation of high risk of corruption and related infractions was identified: Offer to a policy maker or public official to intervene in the process of awarding/renewing a concession, license or other similar.

For the purposes of point b), paragraph 4 of article 6 of the Annex to Decree-Law 109-E/2021, the following section presents the monitoring of preventive and corrective measures related to the risks identified in the PPR, its implementation status and prevision for full implementation:

Preventative/Corrective Measures	Implementation Status	Prevision for Full Implementation
Formal implementation of the Compliance Program, transversal and effective, which assists in regulatory compliance by the company	Implemented	N/A
Updating the training program on corruption and carrying out awareness activities for employees	Implemented	Ongoing
Carrying out compliance tests	Implemented	Ongoing
Regular review of internal regulations in order to monitor legal changes	Implemented	Ongoing
Annual confirmation of independence and conflicts of interest	Implemented	Ongoing
Formalization of procedures relating to relationships with public agents and politically exposed people	Implemented	N/A
Implementation of performance evaluation models with specific ethics and compliance provisions	Implemented	N/A
Processes for prior assessment of the risk profile of third parties based on public database access tools	Partially implemented	June 2025

In addition to the measures identified in the PPR, the Brisa Group has undertaken a series of initiatives to further strengthen the culture of Ethics and Transparency that guides its operations and those of its employees:

i) Revision of the Code of Ethics and Conduct

Throughout 2024, Brisa revised its Code of Ethics and Conduct. This new version reflects an updated context to address various business challenges and emerging trends, with a commitment to applying the highest standards of ethics and conduct.

This revision also includes the formalization of provisions governing employee behavior, including interactions with public officials.

ii) Implementation of a Compliance and Anti-Corruption Management System

To establish the Compliance function, a Compliance and Anti-Corruption Management System was developed, aligned with international best practices, namely ISO 37301 – Compliance Management Systems and ISO 37001 – Anti-Bribery Management Systems.

The system was designed at the corporate level to ensure that the adopted methodologies are applicable across the Brisa Group, regardless of activities, businesses, or geographies. Depending on the compliance domain, the corporate team assumes different roles, including leading the identification of legislation, risk characterization, implementation of mitigation plans, and monitoring of Ethics and Anti-Corruption.

iii) Training and Communication

Brisa Group is committed to continuous and cross-functional training of its employees. A training program on “Ethics and Transparency” was developed to complement the existing “Ethics and Whistleblowing” training.

This program was tailored to different target audiences and included various initiatives, both in-person sessions and e-learning formats.

Additionally, communication campaigns were carried out to raise employee awareness on the topic, including the dissemination of content and news celebrating Global Ethics Day and International Anti-Corruption Day.

iv) Compliance Testing

Throughout the year, several monitoring activities were conducted on key processes typically associated with corruption risk, namely:

- Representation expenses;
- Donations, contributions, and sponsorships;
- Gifts, entertainment, and hospitality.

The Compliance Department presented the results of the monitoring activities to the heads of the respective departments, with the aim of raising employee awareness and promoting compliance with applicable laws and regulations.

4. CONCLUSIONS

As a result of the continuous monitoring of anti-corruption prevention mechanisms introduced through the implementation of the Compliance program, the following conclusions are drawn.

- The preventive/corrective measures outlined in the Corruption and Related Offenses Risk Prevention Plan have a 100% implementation rate, either fully or partially;
- The implemented measures have proven effective in mitigating the risks of corruption and related offenses;
- A deadline has been set for the full implementation of the preventive/corrective measure currently marked as “Partially Implemented” with full implementation expected by the end of the first half of 2025.

Recommendation No. 7/2024, dated May 28, and the implementation of the Reporting Platform enable continuous monitoring of the effects of the applied strategy and ensure timely and periodic reporting. Since the introduction of the PPR, up to the present report, no changes or new situations have arisen that require the implementation of additional measures.

Brisa Group reaffirms its commitment to Corruption Prevention and, in addition to the aforementioned measures, is currently in the process of implementing and certifying its Compliance and Anti-Corruption Management System (ISO 37301 and ISO 37001).

5. FINAL PROVISIONS

Brisa Group employees are informed of this mid-term evaluation report, through the intranet and the Brisa Group's official website, within 10 days of its preparation.

São Domingos de Rana, 2025 April 30th