



Plan for the Prevention of Risks of Corruption and Related Offences

HOLDINGS
coba

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1. INTRODUCTION

We live in a complex, global, technological, intercultural world. In a society dominated by information and communication networks, where the decision-making legitimacy no longer comes from hierarchy, but from consensus, where development depends on trust and values such as everybody's cooperation and participation and, therefore, where universal values and criteria of action are needed.

Management of a Corporate Business Group must be committed to ensuring the definition of appropriate internal rules and systems guaranteeing that the entire Group and its employees are governed by the same standards, in law enforcement, applicable regulations and practices, as well as codes of conduct or performance expected in their behaviours and in daily activities, in both the way they interact within the Group, and in the way they guide all their public actions that might interfere with it.

With the aim of the COBA Group being recognized for its high ethical standards, increasingly valued by its clients, suppliers, shareholders, partners, and peers, and without prejudice to being certain that in the present, as in the past and certainly in the future, each and every employee of the COBA Group has always adhered to the performance of their duties in the highest standards of personal and professional integrity, regardless of the existence or absence of an Ethics Code. In 2017, the COBA Group deemed it appropriate and timely to develop and implement the Code of Conduct and Ethics (CCE).

Subsequently, the CCE underwent a series of changes and updates with the ultimate goal of ensuring its adherence to the growing demands and requirements of clients and partners in this regard.

Considering the change in the legal framework imposed by Decree-Law No. 109-E/2021, of December 9, which provides a set of changes resulting from the creation of the General Regime for Prevention of Corruption (GRPC), in addition to introducing various updates to the CCE, the Group adopted the current Plan for the Prevention of Risks of Corruption and Related Offences (PPRCRO).

For the purpose of preventing, detecting and sanctioning acts of corruption and related offences, the GRPC establishes, for entities subject to its provisions, whether public or private, the obligation to adopt and implement a Compliance Programme comprising at least the following elements:

- (i) a Plan for the Prevention of Risks of Corruption and Related Offences;
- (ii) a Code of Conduct;
- (iii) a Whistleblowing Channel; and
- (iv) a Training Programme.

In line with its commitment to ethics and integrity in all its business activities and partnerships, the COBA Group has been defining and implementing mechanisms in this area through a dedicated Compliance Programme, which includes the

Compliance Policy and the Anti-Corruption and Anti-Bribery Policy.

This Programme reinforces the Company's general principles of conduct and the duties of its employees and business partners with regard to unlawful practices, corruption and related offences, as provided for and defined in its Integrity Policy.

This Plan for the Prevention of Risks of Corruption and Related Offences has therefore been prepared in response to the obligations established under the RGPC, while also reflecting the work already carried out by the Group within the framework of its implemented compliance system.

Accordingly, the Plan results from an assessment of the Group's activities through which the factors capable of exposing its entities to acts of corruption and related offences were identified and classified, as well as the existing control mechanisms designed to mitigate such risks.

2. SCOPE OF APPLICABILITY

The PPRCRO is intended for all the companies that integrate the COBA Group and all their employees, regardless of the contractual relationship or hierarchical position that they occupy.

The list of participated/associated companies of the COBA Group is presented below:

COBA Group Companies	
COBA Holdings	COESA
COBA S.A.	Consulstrada
COBA Algeria	LandCOBA
COBA Angola	LandPRO
COBA Moçambique	Tetraplano

In accordance with the guidelines of Decree-Law No. 109-E/2021, dated December 9, there should be clear communication from the Group's Administration regarding the existence and implementation of the PPRCRO.

3. GROUP HISTORY

The COBA Group is a multinational and multidisciplinary Group of Engineering and Environment Services, founded in 1962.

The Group provides consultancy services ranging from basic and planning studies, design and analysis of technical, environmental and economic feasibility, detailed design and construction design, as well as project management and supervision of works, until the monitoring of the operation and observation of its behaviour.

With offices in three continents and experience in sixty countries, the Group has several companies corresponding to functional specializations or geographic areas.

The knowledge accumulated over the last six decades, the maintenance of its employees at the forefront of its technical areas, the stability of its permanent staff and the international experience are reflected upon its capacity to provide clients,



both public and private, with solutions tailored to their needs and context.

Throughout its life, the Group participated, alongside public authorities or with private promoters, in the feasibility of projects with varied dimensions, some of them structuring and of great impact in improving the living conditions of the populations in the various countries where it has developed its activity.

The Group currently has a high number of competences and technical areas allowing the creation of multidisciplinary teams that results in an integrated vision of the projects.

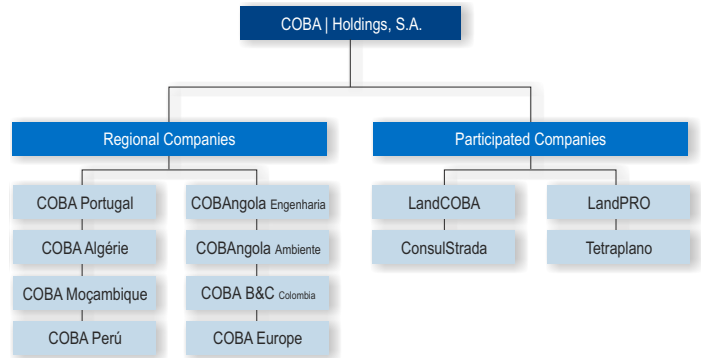
As part of its project, the Group has always provided training to young staff, either by their integration in work teams during professional internships, or by hiring them for the COBA Group's companies.

Given its wide geographic presence, the Group has always sought to understand the common practices and know-how of the countries with which it interacts, thus maintaining close relationships with clients, partners or employees in the most diverse geographies.

The COBA Group is headed by COBA Holdings, S.A., a company that, in addition to holding the equity interests in the various companies that make up the Group, provides them with a set of shared services essential for the activity of all.

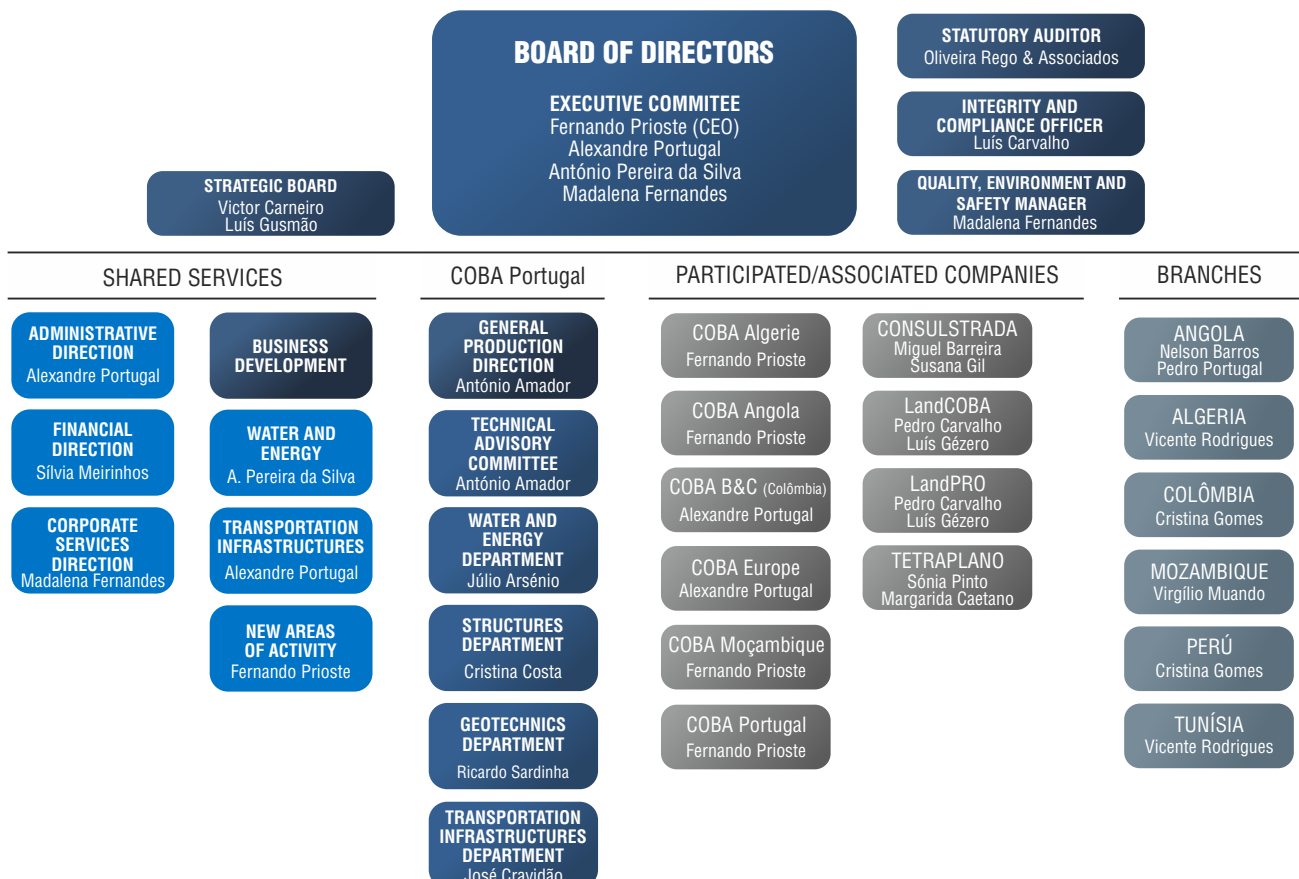
Currently, the Group's companies are divided into two main groups: the companies derived from the group's parent company (COBA SA), which represent it in each of the countries

(in Angola, Algeria, Colombia, Mozambique, Peru, and Portugal), and the affiliated companies: Coesa, Consulstrada, LandCOBA, LandPRO, and Tetraplano.



The companies within the Group follow a functional organizational chart, which synthesizes the internal structure for interaction among the different entities and defines the individuals responsible for each of them.

This document begins by presenting the hierarchical structure, including the Board of Directors, its direct dependencies, and the overall model of the relationship between the various entities of the Group. Subsequently, it outlines the Shared Services, which include the Administrative, Financial, and Corporate Services Directions, as well as the Business Development, which encompasses the Commercial areas in different geographical locations.



At COBA Portugal (COBA S.A), the core of the Group, the services comprising the General Production Direction are identified, representing the central technical domain in the fields with which the Group interacts: Water and Energy, Structures, Geotechnics, and Transportation Infrastructures. Additionally, within the General Production Direction, there is the Technical Advisory Committee, which represents the pinnacle of the Group's technical expertise. It comprises specialists in diverse fields, serving as a crucial support in technical matters for both services and the COBA Group.

In addition to the aforementioned areas, it is also important to highlight the Compliance and Integrity Officer and the Statutory Auditor, positions held by external entities independent of the Group's management.

The Compliance and Integrity Officer, someone independent from the Company's governing and management bodies, can receive communications regarding any irregularities of a general, operational, or financial nature, and/or violations of the Code of Conduct and Ethics or the Group's policies and procedures. These communications can be directed through e-mail or by letter.

The Statutory Auditor is responsible for overseeing various aspects of tax and legal matters within the Group, adhering to applicable technical standards and ensuring formal and material truth. To achieve this, the Auditor conducts all necessary examinations and verifications for the legal review and certification of accounts. The Auditor also assesses the management report prepared by the Board of Directors, examines the accounts for the financial year, and produces the annual report on the conducted audit along with the Statutory Audit Report document. Additionally, the Auditor assumes the role of the Sole Auditor.

4. RISK MANAGEMENT

Risk, according to the definition by the Institute of Internal Auditors, consists of "the possibility of an event occurring that will have an impact on the achievement of objectives. Risk is measured in terms of impact and probability", and may stem from factors internal or external to the company.

Several factors enhance situations that lead to varying degrees of management risk, corruption, or other related infractions, namely:

- Quality of the company's management - integrity of managers and decision-makers;
- Company ethics and conduct of its employees;
- The conducive environment;
- Employee motivation;
- Inadequacy of the internal control system.

According to the definition by ERM-Enterprise Risk Management do Committee of Sponsoring Organizations of the Treadway

Commission, risk management is defined as 'a process developed by the management, directors, and other employees of an organization, applied in defining a strategy across the entire company, designed to identify potential events that may affect the organization and manage the risk within the level of risk the organization is willing to accept, to ensure a reasonable level of confidence in meeting the organization's objectives.'

COBA Group's management takes responsibility for promoting high standards of ethics and integrity and establishing a culture within the organization that demonstrates to all employees the importance of internal controls.

COBA Holdings' Executive Committee and the other individuals responsible for the companies within the Group are tasked with approving and reviewing relevant strategies and policies, understanding the company's major risks, establishing acceptable levels for such risks, and ensuring that executives take necessary measures to identify, measure, monitor, and control these risks.

Risks are identified by executives who are responsible for implementing the strategies and policies approved by the people responsible for each company. They also develop processes to measure, monitor, and control the identified risks while maintaining an organizational structure that clearly outlines responsibilities.

For the purpose of risk identification, a methodology recommended by the Association of Certified Fraud Examiners was followed. It involves categorizing fraud risks, providing a broad scope that encompasses what can be understood as corruption risks and related offenses.

As a result, four major categories of these risks were defined, namely:

- Corruption;
- Conflicts of interest;
- Manipulation of information;
- Improper appropriation of assets.

Each of these categories is further broken down into subcategories, and there may be additional subsequent breakdowns.

It is important to emphasize that the criterion adopted for risk identification was based solely on the potentiality of, in the abstract, situations of risk occurring and not on the detection, past or present, of cases that could be classified as instances of undesirable deviations from applicable rules.

Each specific area underwent a joint assessment where risk situations were identified, along with measures to mitigate the probability of their occurrence.

The following table identifies the participants, their respective roles, and responsibilities within the scope of this plan.



Decision-maker	Function and Responsibilities
Executive Committee (EC) or Managers	- Manages the Plan; - Defines the architecture and criteria for risk management, determining the revision of the Plan when deemed necessary.
Directors, Deputy Directors, as well as Division, Unit, and Section Heads	- Responsible for the organization, implementation, and monitoring of the Plan in their respective area; - Accountable for the effectiveness of risk control measures within their sphere of operation; - They must identify and communicate to the Executive Committee any occurrence of high or new risks that need prevention.
Employees	- They must be aware of the existence of risks, understand the level of associated responsibility, and contribute to the continuous improvement of risk management. - They must systematically and immediately communicate to their respective Direction any identified risks or failures in existing control measures.

Responsibilities associated with the dedicated Compliance Programme and, consequently, the Plan for the Prevention of Risks of Corruption, are founded first and foremost on the commitment of the Group's governing bodies, which establish the tone at the top by promoting a culture of Compliance.

As part of its commitment to progress, growth and continuous improvement, the Group's Board of Directors approves and promotes the implementation of the PPRCRO, incorporating it into its operations through specific procedures and corresponding control mechanisms, ensuring compliance with anti-corruption requirements within business processes and fostering awareness of ethics and integrity issues.

The implementation of this dedicated Compliance Programme, and more specifically of the Plan for the Prevention of Risks of Corruption and Related Offences, is also based on the definition of responsibilities which, in turn, derive from the governance model adopted for Compliance Management and which shall:

- Identify, assess and classify the risks and situations that may expose the Company to acts of corruption and related offences, in coordination with the relevant departments and Business Units;
- Identify preventive and corrective measures aimed at reducing the likelihood and impact of the identified risks and situations, in coordination with the relevant departments and Business Units;
- Promote and coordinate the implementation, maintenance and monitoring of the Compliance Programme;

- Provide guidance and methodological support to the other stakeholders involved in Compliance Management, including Compliance Representatives and Business Unit Managers;
- Establish a framework for cooperation and coordination among the various stakeholders involved;
- Monitor and report to Management on the implementation and operation of the Compliance Programme, including any incidents identified;
- Promote employee awareness and training;
- Promote the development, maintenance and implementation of guidelines and procedures;
- Monitor the performance of internal and external audits relating to ethics and integrity matters;
- Promote the implementation of an information and documentation management system for the Compliance Programme;
- Monitor the operation of Compliance mechanisms, namely the third-party Integrity Due Diligence process and the process for assessing risks of corruption and related offences.

Ao Responsável pelo Cumprimento do Normativo (Direção de Serviços Corporativos) cabe garantir e controlar a aplicação do programa de Cumprimento do Normativo relativo ao RGPC.

The Compliance Officer (Corporate Services Direction) is responsible for ensuring and overseeing the implementation of the Compliance Programme established under the GRPC.

The Direction responsible for Compliance, together with the Compliance Officer, is supported by external legal counsel in monitoring relevant legislative developments, providing legal advice on their interpretation, and assessing their impact on the Company's activities, while informing and assisting the affected departments and management functions.

5. CRIMINAL PROVISIONS CONCERNING CORRUPTION AND RELATED OFFENCES

For the purposes of compliance with the General Anti-Corruption Framework (RGPC), the criminal sanctions associated with acts of corruption and related offences are those provided for by law.

6. METHODOLOGY

For the elaboration of this Plan, the Recommendations of the Corruption Prevention Council and the General Corruption Prevention Regime, approved by Decree-Law 109-E/2021 on December 9, were considered.

The risks were classified on a scale based on the probability of occurrence and the severity/impact of their consequences.

Probability of occurrence:

LOW: Probability of occurrence, but with a chance to prevent the event with existing control measures;

MODERATE: Probability of occurrence, but with chances to prevent the event through additional decisions and actions;

HIGH: Strong probability of occurrence and limited chances to prevent the event even with essential additional decisions and actions.

Predicted Impact:

LOW: Affects the optimization of performance or operational activities, requiring a review of procedures or schedules;

MODERATE: Moderate impact on institutional image or on performance and operational activities, requiring process or resource reorganization;

HIGH: Damage to institutional image and reputation, or significant impact on strategy, performance, and operational activities

The intersection of the probability and impact variables results in the following risk matrix, which is applied to each of the potential risks identified for the organization.

Risk matrix - Risk level				
Probability		Impact		
		Low	Moderate	High
		L	M	A
Low	L	LL	LM	LH
Moderate	M	ML	MM	MH
High	H	AL	HM	HH

For each potential risk, preventive measures have been identified with the aim to:

AVOID the risk by eliminating its cause;

PREVENT the risk by seeking to minimize the probability of the risk or its negative impact;

ACCEPT the risk and its effects;

TRANSFER the risk to third parties.

Although different formulations may be used, preventive/mitigation measures generally correspond to the following means of defense and control:

- Monitoring the Code of Conduct and respective operational norms;
- Preparation and decision-making based on a mixed structure, combining hierarchical validations with the incorporation of experts and stakeholders in risk management;

c) Application, in process validation, of the principle of segregation of duties among various participants and hierarchical levels;

d) Implementation of general controls for information systems and application controls;

e) Existence or need for the development of procedures or manuals of best practices.

7. TYPES OF CORRUPTION RISKS AND RELATED OFFENSES

The classification of corruption risks and related offenses is as follows:

1. Corruption
1. A) Active corruption, exercised over:
1.A.1) Exterior
1.A.2) Employees
1. B) Passive Corruption
1.B.1) Selection of technical subcontractors
1.B.2) Selection of Suppliers
1.B.3) Legal Proceedings
1.B.4) Granting of Supports
1.B.5) Contractual management of suppliers and subcontractors
1.B.6) Illegal receipts
1.B.8) Issuance of technical notes or appraisals
2. Conflicts of interest
2. A) Selection of Suppliers
2.A.1) Technical subcontractors
2.A.2) Suppliers of non-technical goods and services
2. B) Contracts Award
2. C) Recruitment and Performance Evaluation
3. Information manipulation
3. A) Income and expenses improperly accounted for and declared
3. B) Assets and liabilities incorrectly assessed and reflected in the balance sheet
3. C) Dissemination of distorted economic and financial information
3. D) Concealment/covering up of income and expenses.
4. Misappropriation of assets
4. A) Misappropriation of funds
4. B) Improper use of company assets
4. C) Bank transfers
4. D) Use of Checks
4. E) Theft of intellectual property
4. F) Theft of confidential information

Note: Adapted from *Association of Certified Fraud Examiners*.



8. IDENTIFICATION OF CORRUPTION RISKS AND RELATED OFFENSES AND THEIR PREVENTIVE MEASURES

Risk Identification	Risk grading	Function or Activity	Prevention Measures
1. Corruption			
1. A) Active Corruption, exercised over:			
1.A.1) Exterior	HH	Relationship with external entities	1. As per the provisions of COBA's Code of Conduct and Ethics (CCE), its employees are required to adhere to the highest ethical and moral standards, committing to act honestly, transparently, and responsibly, as well as to comply with the Group's directives. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE. 3. As part of the audit of the accounts conducted by the auditor, a detailed independent analysis is performed on all account transactions and their respective documentation and justifications. 4. As stipulated in its Statutes, COBA's mode of commitment is done by two Members of the Board of Directors, namely for the purpose of making payments. 5. The company's working capital is all recorded in the company's treasury, solely constituted for operational needs and duly approved by the Chief Financial Officer. These funds, involving relatively small amounts (e.g., employees relocated to construction sites), require legally valid supporting documentation and justifications approved by the hierarchy.
1.A.2) Employees	LL	Corporate Services Direction and Treasury	1. In accordance with COBA's Code of Conduct and Ethics (CCE), its employees are expected to adhere to the highest ethical and moral standards, committing to act honestly, transparently, and responsibly, as well as to comply with the directives of the Group. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE. 3. As part of the audit of the accounts conducted by the auditor, a detailed independent analysis is performed to all employee's remunerations. 4. The remunerations are processed by the Human Resources Section, they comply with the established levels for each employee, they are entered for payment by the Treasury Section, and the payment is authorized by two members of the Board of Directors (BoD). 5. Remunerations, including bonuses and fringe benefits, are exclusively defined by the BoD and are properly recorded in the minutes of BoD meetings.

Risk Identification	Risk grading	Function or Activity	Prevention Measures
1. B) Passive Corruption			
1.B.1) Selection of technical subcontractors	MM	Technical Departments' Directors and General Production Direction	1. Hiring technical subcontractors to support COBA in the development of its contracts is subject to authorization from the Project Manager and the Technical Department's Director, with all hirings being communicated to the General Production Direction. 2. Typically, when preparing the proposal, quotes are requested from different companies to have a reference price. 3. Hiring of subcontractors not foreseen in the proposal and for which there is no budget proposal is subject to a cost-benefit evaluation and justification of necessity by the Project Manager. 4. In recurring areas, the COBA Group has a set of regular and stable subcontractors, with prices defined globally rather than on a case-by-case basis. 5. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
1.B.2) Selection of Suppliers	ML	The Property and Supplies Section	1. The selection and hiring of suppliers are subject to approval from the Board of Directors, and the decision is made during a Board meeting unless the value of the goods or services is immaterial. 2. Typically, for supplier selection, quotes are requested from different companies to have a reference price. 3. The COBA Group has a set of regular and stable subcontracted suppliers in recurring areas. 4. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
1.B.3) Legal Proceedings	LM	Human Resources and Legal Support	1. The strategy to be followed by the company in each of the legal proceedings is previously defined by the Board of Directors. 2. Any judicial and extrajudicial settlements require prior approval from the Board of Directors and are recorded in the minutes of the Board of Directors' meeting. 3. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
1.B.4) Granting of Supports	LL	Corporate Services Direction	1. The granting of support, donations, or subsidies is previously approved by the Board of Directors. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
1.B.5) Contractual management of suppliers and subcontractors	LM	Corporate Services Direction, Technical Departments' Directors and Project Manager	1. The terms and conditions of the services to be provided by the supplier or technical subcontractor are previously established in a contract. 2. Any changes to it must be properly justified by the unit benefiting from the service provided. 3. Suppliers undergo an annual evaluation of the service provided. 4. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.



Risk Identification	Risk grading	Function or Activity	Prevention Measures
1.B.6) Illegal receipts	LL	The entire company	1. As outlined in the CCEP, each Group employee should exhibit a behavior of loyalty towards it and the affiliated company, striving to safeguard its credibility and good image in all situations and promoting and ensuring its prestige. Offers, payments, or other benefits that may be interpreted as expectations of favoring relationships with the company should not be accepted or made. 2. Any gifts received from third parties that exceed mere courtesy or a commercially negligible value, never exceeding 1/4 of the national minimum wage, should be declined and reported to the immediate supervisor, who should inform the Corporate Services Direction for evaluation. 3. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
1.B.7) Issuance of technical notes or appraisals	MM	Production services	1. The issuance of opinions or technical notes is subject to an internal review and approval process. 2. As outlined in the CCE, remunerations aimed at obtaining opinions or any form of professional advice that could be condemned due to lack of independence, objectivity, or integrity should not be accepted. 3. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
2. Conflicts of interest			
2. A) Selection of Suppliers			
2.A.1) Technical subcontractors	MM	Technical Departments' Directors and General Production Direction	1. The hiring of technical subcontractors to support COBA in the development of its contracts is subject to approval from the Project Manager and the Service Director, with all hirings being communicated to the General Production Directorate. 2. Typically, when preparing the proposal, quotes are requested from different companies to have a reference price. 3. The hiring of subcontractors not foreseen in the proposal and for which there is no budget proposal is subject to a cost-benefit evaluation and justification of necessity by the Project Manager. 4. The COBA Group has a set of regular and stable subcontractors in recurring areas, with prices generally defined on a case-by-case basis, and in some situations, there are pre-defined unit rates. 5. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
2.A.2) Suppliers of non-technical goods and services	ML	Property and Supplies section	1. The selection and hiring of suppliers are subject to approval from the Board of Directors, and the decision is made during a Board meeting unless the value of the goods or service is immaterial. 2. Typically, for supplier selection, quotes are requested from different companies to have a reference price. 3. The COBA Group has a set of regular and stable subcontracted suppliers in recurring areas. 4. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.

Risk Identification	Risk grading	Function or Activity	Prevention Measures
2. B) Contracts Award	MM	Production services	1. COBA adopts a project, client, and partner selection process to avoid any conflicts of interest in the contract development and to prevent the existence of a privileged relationship with a client. The company maintains a conservative policy in this regard, with the primary objective of being an independent engineering consulting firm in the market. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
2. C) Recruitment and Performance Evaluation	LL	Human Capital Section and Areas responsible for hiring	1. The selection and hiring of employees are carried out simultaneously by the contracting departments and the Human Capital Section. The selection and definition of hiring conditions are proposed to the Board of Directors after the interview process is completed. 2. The final hiring decision rests with the Board of Directors, and the hiring conditions are approved and recorded during a Board of Directors meeting. 3. Performance evaluation and corresponding bonuses are based on the Performance Management System defined and approved by the Board of Directors. Any abnormal situation, whether positive or negative, is duly monitored by the Human Capital Section and the Board of Directors. 4. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
3. Information manipulation			
3. A) Income and expenses improperly accounted for and declared	LL	Financial Direction	1. COBA's accounts are reviewed by an auditor who audits them independently. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
3. B) Assets and liabilities incorrectly assessed and reflected in the balance sheet	LL	Financial Direction	1. COBA's accounts are reviewed by an auditor who audits them independently. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
3. C) Dissemination of distorted economic and financial information	LL	Financial Direction	1. COBA's accounts are reviewed by an auditor who audits them independently. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
3. D) Concealment/covering up of income and expenses.	LL	Financial Direction	1. COBA's accounts are reviewed by an auditor who audits them independently. 2. As part of the audit of the accounts conducted by the auditor, a detailed independent analysis is performed on all account transactions and their respective documentation and justifications. 3. As stipulated in its Statutes, COBA's mode of commitment is done by two Members of the Board of Directors, namely for the purpose of making payments. 4. The company's working capital is all recorded in the company's treasury, solely constituted for operational needs and duly approved by the Chief Financial Officer. These funds, involving relatively small amounts (e.g., employees relocated to construction sites), require legally valid supporting documentation and justifications approved by the hierarchy. 6. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.



Risk Identification	Risk grading	Function or Activity	Prevention Measures
4. Misappropriation of assets			
4. A) Misappropriation of funds	LL	Financial Direction	1. COBA's accounts are reviewed by an auditor who audits them independently. 2. As part of the audit of the accounts conducted by the auditor, a detailed independent analysis is performed on all account transactions and their respective documentation and justifications. 3. As stipulated in its Statutes, COBA's mode of commitment is done by two Members of the Board of Directors, namely for the purpose of making payments. 4. The company's working capital is all recorded in the company's treasury, solely constituted for operational needs and duly approved by the Chief Financial Officer. These funds, involving relatively small amounts (e.g., employees relocated to construction sites), require legally valid supporting documentation and justifications approved by the hierarchy. 6. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
4. B) Improper use of company assets	LL	Technical Support Unit, Property and Supplies and Human Resources Sections	1. The provision of work tools to employees, including laptops, vehicles, etc., follows a procedure that involves defining usage rules. Requests for additional material resources, especially vehicles for transportation, require authorization from the hierarchy. A clear and transparent process is established for their use, along with the need to ensure that the vehicle is returned in proper condition. A photographic record of the vehicle is requested as part of this process. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE.
4. C) Bank Transfers	LL	Financial Direction	1. As per the provisions of COBA's Code of Conduct and Ethics (CCE), its employees are required to adhere to the highest ethical and moral standards, committing to act honestly, transparently, and responsibly, as well as to comply with the Group's directives. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE. 3. As part of the audit of the accounts conducted by the auditor, a detailed independent analysis is performed on all account transactions and their respective documentation and justifications. 4. As stipulated in its Statutes, COBA's mode of commitment is done by two Members of the Board of Directors, namely for the purpose of making payments.
4. D) Use of Checks	LL	Financial Direction	1. As per the provisions of COBA's Code of Conduct and Ethics (CCE), its employees are required to adhere to the highest ethical and moral standards, committing to act honestly, transparently, and responsibly, as well as to comply with the Group's directives. 2. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE. 3. As part of the audit of the accounts conducted by the auditor, a detailed independent analysis is performed on all account transactions and their respective documentation and justifications. 4. As stipulated in its Statutes, COBA's mode of commitment is done by two Members of the Board of Directors, namely for the purpose of making payments.

Risk Identification	Risk grading	Function or Activity	Prevention Measures
4. E) Theft of intellectual property	LM	The entire company	1. As per the provisions of COBA's Code of Conduct and Ethics (CCE), its employees are required to adhere to the highest ethical and moral standards, committing to act honestly, transparently, and responsibly, as well as to comply with the Group's directives. 2. As provided for in the COBA Code of Conduct and Ethics (CCE), no employee shall be permitted to appropriate the work of another individual and present it as their own for personal benefit without the knowledge of the original author. All information and data circulated, researched, produced or maintained within the scope of projects, and stored on servers or equipment owned by the COBA Group, shall remain the exclusive property of the COBA Group, irrespective of the employee who may have created or developed them. 3. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE. 4 The company has a process for managing information, software, and projects that ensures differentiated treatment for reserved and/or confidential elements.
4. F) Theft of confidential information	LM	The entire company	1. As per the provisions of COBA's Code of Conduct and Ethics (CCE), its employees are required to adhere to the highest ethical and moral standards, committing to act honestly, transparently, and responsibly, as well as to comply with the Group's directives. 2. The categories of data subject to confidentiality are identified in the CCE, and this duty of confidentiality shall continue to apply and must be respected even after an employee has left the COBA Group. 3. As outlined in the CCE, all employees are obligated to report any situations they find anomalous. The designated reporting channel is specified in section 2.2 of the CCE. 4. The company has a process for managing information, software, and projects that ensures differentiated treatment for reserved and/or confidential elements.

9. PLAN MONITORING

The Corporate Services Direction conducts periodic monitoring of the Plan, preparing an annual report for this purpose. The annual monitoring of the Plan should be based on the analysis of responses from the involved Directions, through forms and specific actions developed by the Corporate Services Direction. The monitoring process must ensure that appropriate control mechanisms are implemented for the company's activities and that procedures are understood and followed at all organizational levels.

In addition to the periodicity of the aforementioned reviews and updates, the responsible Directors must inform the Corporate Services Direction whenever high or new risks arise that need prevention.

The Corporate Services Direction informs the Executive Committee and the Management of the Group's companies about the results of the monitoring conducted.

In addition, the implementation of the PPRCRO is subject to monitoring and control, and a periodic assessment report shall be prepared detailing the progress of the identified preventive and corrective measures, as well as the results of the monitoring of their effective implementation.

10. PLAN'S REVISION

The PPRCRO shall be reviewed whenever changes occur in the Company's responsibilities, organisational structure or corporate structure that warrant the revision of any of its elements, and whenever new risks are identified or the need arises to reassess existing risks or their significance, based on the results of the periodic implementation report or other monitoring mechanisms established for that purpose.

11. FINAL PROVISIONS

The PPRCRO shall be made available both on the Group's collaborative platform and on its website from the date of its approval. It shall likewise be republished whenever it is revised.

We are what we do.



REVISION 1 - SEPTEMBER 2024