
RISKS OF CORRUPTION AND RELATED OFFENCES PREVENTION PLAN

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Prepared by | Compliance Office



TABOADELLA
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I. BACKGROUND

The phenomenon of corruption is present in all societies and spans various historical moments, affecting social development and economic growth, and leading to the discrediting of institutions and reputational crises.

The Risks of Corruption and Related Offences Prevention Plan, hereinafter referred to as "**RPP**", is a regulatory compliance activity plan aimed at preventing illegal acts or practices related to corruption and other offences referred to as "related offences", as described in detail in point III below.

The RPP has been adopted as part of the so-called National Anti-Corruption Strategy 2020/2024, which requires the private sector to be more committed to preventing, detecting and combating corruption, imposing stringent behavioural standards on management, workers and service providers.

In this regard, the approval, publication and enactment of Decree-Law no. 109-E/2021, of 9 December, established the General Regime for the Prevention of Corruption ("GRPC"), which enshrined this commitment by mandating the adoption of an RPP and a set of prevention measures by entities with 50 or more employees, through the adoption and implementation of regulatory compliance programmes.

Under Article 7 of the GRPC, RPPs must encompass job functions and organisational units, in terms of identifying risks of corruption and related offences, when individuals with less integrity competency are known to be exposed to such risks.

Following the identification of risks, the aim is to describe preventive and corrective measures to reduce the likelihood of occurrence and the impact of the risks and situations identified. These measures must be realistic, unequivocal and feasible so that possible occurrences are less likely, in particular if circumstances dictate that people with a low integrity profile may be involved in such duties.

This RPP is consistently adopted and implemented across all business activities conducted by Quinta Nova de Nossa Senhora do Carmo, S.A., "**Quinta Nova**" and Taboadella, S.A., "**Taboadella**", which, being companies in a group relationship due to the full control exercised by Amorim Investimentos e Participações, S.G.P.S., S.A., have shared services.

Quinta Nova and Taboadella are committed to ensuring, through appropriate regulatory compliance programmes, all the necessary conditions for compliance with the rules on the

prevention of risks inherent in corruption and related offences, adopting a principle of zero tolerance with regard to any conduct that gives rise to them, even potentially.

The Penal Code now also provides for the possibility of special mitigation with respect to penalties applied to legal persons, if they have adopted and implemented regulatory compliance programmes that promote the prevention of such a crime or similar crimes, prior to any crime actually being committed.

To this end, Quinta Nova and Taboadella adopt this RPP, in compliance with the provisions of the GRPC, in addition to having (i) a Code of Ethics; (ii) an internal training plan on this topic; (iii) a whistleblowing channel and (iv) a regulatory compliance officer.



II. ORGANIZATION AND OPERATION OF QUINTA NOVA DE NOSSA SENHORA DO CARMO AND TABOADELLA.

Quinta Nova is a company located in the Douro region, known for its long tradition of producing high-quality wines. With historical roots stretching back over 250 years, it is among the oldest wine estates in the region.

Quinta Nova's core business is viticulture and oenology, with a strong focus on the production of Port and DOC Douro wines. The winery combines traditional cultivation and winemaking methods with modern technology to guarantee the quality and consistency of the wine.

In addition to wine production, Quinta Nova offers wine tourism experiences, including guided tours, tastings and accommodation, taking advantage of the Douro region's natural beauty and cultural heritage.

For its part, Taboadella is another notable Portuguese wine company, located in the Dão region, one of the country's most prestigious wine regions. With a history that also stretches back centuries, Taboadella is renowned for its dedication to producing fine wines that express the unique identity of the Dão. The company owns a vast area of vineyards where indigenous grape varieties are grown, serving as the basis for the creation of its distinctive wines.

Both Quinta Nova and Taboadella are examples of Portugal's winemaking tradition and commitment to excellence in wine production, contributing significantly to the prestige of Portuguese wines on the international stage.

With regard to its structure, Annex I includes the current organisation chart with the main organisational units and divisions of Quinta Nova and Taboadella.

III. RISKS OF CORRUPTION AND RELATED OFFENCES

a. Crimes of corruption and related offences

According to the GRPC, corruption and related offences are defined as the following crimes: active corruption, passive corruption, receiving and offering an undue advantage, embezzlement, graft, extortion, abuse of power, administrative misconduct, influence peddling, money laundering, fraud in obtaining a subsidy, grant or credit and misappropriation of the same.

Considering the business activity engaged in by Quinta Nova and Taboadella, they are more likely to be liable for the crimes identified in the table below:

Legal type	Description of penalties	Legislation
ACTIVE CORRUPTION	<p>Whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises to give to an official, or to a third party by indication or with his/her knowledge, a monetary or non-monetary advantage for the performance of an act or omission in the exercise of his/her duties, even if the action or omission does not imply a violation of the duties of office.</p> <p>Punishable by <u>imprisonment for up to 5 years or a fine of up to 360 days' basic wage (€1,800 - €180,000)</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to <u>pay a fine of up to 600 days at the official rate, totalling between €60,000 and €6,000,000</u>.</p>	Penal Code Article 374

<p>UNDUE OFFER OF ADVANTAGE</p>	<p>Whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises to give to an official, or to a third party by indication or with his/her knowledge, a monetary or non-monetary advantage which is not due to him/her for the performance of his/her duties, or because of them.</p> <p>Punishable by <u>imprisonment for up to 3 years or a fine of up to 360 days (€1.800 - €180.000)</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to <u>pay a fine of up to 360 days, totalling between €36.000 and €3.600.000</u></p>	<p>Penal Code Article 372</p>
<p>ACTIVE CORRUPTION DAMAGING INTERNATIONAL TRADE</p>	<p>Whoever by him/herself or with his/her consent or ratification, through an intermediary, gives or promises to a national, foreign or international official, or to a national or foreign political officeholder, or to a third party with their knowledge, a material or non-material advantage that is not due to them, in order to obtain or retain a business deal, a contract or another undue advantage in international trade.</p> <p>Punishable by <u>imprisonment from 1 to 8 years</u>, in the case of natural persons.</p> <p>A legal person may be sentenced <u>to pay a fine of up to 960 days, between €96.000 and €9.600.000.</u></p>	<p>Law no. 20/2008 of 21 April (Criminal liability for crimes of corruption in international trade and private activity)</p>
<p>PASSIVE CORRUPTION IN THE</p>	<p>Whoever [private sector employee], by him/herself or with his/her consent or ratification, through an intermediary, requests or accepts for him/herself or a third party, without being owed such, a monetary or non-monetary advantage, or the promise thereof, for an act or omission that constitutes an infringement of his/her functional duties.</p> <p>Punishable by <u>imprisonment for up to 8 years or a fine of up to 600 days (€3.000 - €300.000)</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to pay a <u>fine of up to 960 days, between €96.000 and €9.600.000.</u></p>	<p>Law no. 20/2008 of 21 April (Criminal liability for crimes of corruption in international trade and private activity) Article 8</p>
<p>ACTIVE CORRUPTION IN THE PRIVATE</p>	<p>Whoever by him/herself or with his/her consent or ratification, through an intermediary, gives or promises to a worker in the private sector, or to a third party with his/her knowledge, a monetary or non-monetary advantage, which is not due, for the performance of an act or omission which constitutes an infringement of his/her functional duties.</p> <p>Punishable by <u>imprisonment for up to 5 years or a fine of up to 600 days (€3.000 - €300.000)</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to pay a <u>fine of up to 600 days, between €60.000 and €6.000.000.</u></p>	<p>Law no. 20/2008 of 21 April (Criminal liability for crimes of corruption in international trade and private activity) Art. 9</p>
<p>INFLUENCE PEDDLING</p>	<p>Whoever, by him/herself or through an intermediary, with his/her consent or ratification, requests or accepts, for him/herself or for a third party, a monetary or non-monetary advantage, or the promise thereof, in order to abuse their real or supposed influence over any public entity; or whoever, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises a monetary or non-monetary advantage to the above-mentioned persons.</p> <p>Punishable by <u>imprisonment for up to 5 years or a fine of up to 240 days (€1.200 - €120.000)</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to pay a <u>fine of up to 600 days, between €60.000 and €6.000.000.</u></p>	<p>Penal Code Article 335</p>

<p>MONEY LAUNDERING</p>	<p>Whoever converts, transfers, aids or facilitates any conversion or transfer operation of advantages obtained, for him/herself or a third party, directly or indirectly, for the purpose of concealing their illegal origin or avoiding prosecution for the crime(s) committed.</p> <p>Punishable by <u>imprisonment of up to 16 years</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to pay a <u>fine of up to 1920 days, between €192,000 and €19,200,000</u>.</p>	<p>Penal Code Article 368-A</p>
<p>FRAUD IN OBTAINING A SUBSIDY OR GRANT</p>	<p>Whoever by him/herself or with his/her consent or ratification, through an intermediary, gives or promises to a national, foreign or international official, or to a national or foreign political officeholder, or to a third party with their knowledge, a material or non-material advantage that is not due to them, in order to obtain or retain a business deal, a contract or another undue advantage in international trade.</p> <p>Punishable by <u>imprisonment from 1 to 8 years</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to <u>pay a fine of up to 960 days, between €96,000 and €9,600,000</u>.</p>	<p>Decree-Law no. 28/84 of 20 January (Anti-economic offences and offences against public health) Article 36</p>
<p>FRAUD IN OBTAINING CREDIT</p>	<p>Whoever, when presenting a proposal for granting, maintaining or modifying the conditions of a credit intended for an establishment or company:</p> <p>a) Provides inaccurate or incomplete written information intended to enhance the application or which may impact on the decision to be taken regarding the application;</p> <p>b) Uses inaccurate or incomplete documents relating to the economic situation, namely balance sheets, profit and loss accounts, general descriptions of assets or expert opinions;</p> <p>c) Conceals downturns in the economic situation discovered subsequent to submission of the credit application and which may impact on the decision to be taken regarding the application.</p> <p>Punishable by <u>imprisonment for up to 5 years or a fine of up to 200 days (€1,000 - €100,000)</u>, in the case of natural persons.</p> <p>A legal person may be sentenced to <u>pay a fine of up to 600 days, between €60,000 and €6,000,000, or even the penalty of winding up the company</u>.</p>	<p>Decree-Law no. 28/84 of 20 January (Anti-economic offences and offences against)</p>
<p>MISAPPROPRIATION OF A SUBSIDY, GRANT OR SUBSIDISED CREDIT</p>	<p>Whoever uses benefits obtained as a grant, subsidy or subsidised credit for purposes other than those for which they are legally intended or those provided for in the credit line as established by the legally competent entity.</p> <p>Punishable by <u>imprisonment for up to 6 years or a fine of up to 200 days (€1,000 - €100,000)</u>.</p> <p>A legal person may be sentenced to pay a <u>fine of up to 720 days, between €72,000 and €7,200,000, or even the penalty of winding up the company</u>.</p>	<p>Decree-Law no. 28/84 of 20 January (Anti-economic offences and offences against public health) Article 37</p>

b. Definition of risk levels

The definition of the degrees of risk, for the purposes of the present RPP, is based on two variables: (i) the probability of occurrence of situations entailing risk and (ii) the foreseeable impact of the infringements that the same may give rise to (or the seriousness of the consequences).

The indicator probability of occurrence of the risk, which is mainly associated with the existence of preventive measures and the history of their effectiveness, will be measured according to the following scale:

- **Low:** adequate risk prevention with the preventive/corrective measures previously adopted;
- **Medium:** adequate risk prevention may rely on additional preventive measures to those already in place;
- **High:** adequate risk prevention relies on additional corrective measures to those already in place.

It should be noted that this is a theoretical exercise in risk probability and not in risk reality.

In turn, the foreseeable impact of the occurrence of the risk indicator, which is associated with the possible effects resulting from commission of the acts intended to be prevented, is also assessed according to a three-point scale:

- **Low:** reduced efficiency of the associated procedure, requiring a review of the procedure itself; internal impact;
- **Medium:** reduced efficiency and effectiveness of the associated procedure, requiring a review of the procedure and its related objectives; internal impact.
- **High:** reduced efficiency and effectiveness of the associated procedure, which could be divulged in the media; internal and external impact.

It is also worth noting that this is a theoretical exercise examining impact probability and not actual impact.

The combination of these two variables results in the following matrix of risk degrees:

Risk degrees		Probability of occurrence		
		Low	Medium	High
FORESEEABLE IMPACT (FI)	Low	Light Green	Green	Yellow
	Medium	Green	Yellow	Red
	High	Yellow	Red	Dark Red

c. Risk matrix for corruption and related offences

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.								
SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
Production (Viticulture and Oenology)	Purchase of raw materials, phytopharmaceuticals and fertilisers	<ul style="list-style-type: none"> > Purchases not resulting from real needs and/or in non-market conditions 		<ul style="list-style-type: none"> > Corruption¹ 	Medium	Medium	Moderate	<p style="text-align: center;">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Code of Conduct for Suppliers > Internal Whistleblowing Channel > Internal Purchasing Procedure > Purchasing and Payment Flowchart > Procedures for preventing conflicts of interest > Payment Approval Matrix > Segregation of duties and the "four eyes" rule > Documentary archive <p style="text-align: center;">Corrective measures</p> <ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication dissemination of the above policies > Internal training
	Purchase of oenological products (yeasts, enzymes and stabilisers)	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of influencing purchasing decisions > Use and/or disclosure of privileged information for personal benefit or that of third parties > Undue favouritism towards third parties > Accepting favours in exchange for advantages and/or benefits > Conflicts of interest 						
	Purchase of dry products (barrels, corks and bottles)	<ul style="list-style-type: none"> > Purchases not resulting from real needs and/or in non-market conditions > Omission and/or manipulation of information with the aim of influencing purchasing decisions > Undue favouritism towards third parties > Accepting favours in exchange for advantages and/or benefits > Conflicts of interest 	<ul style="list-style-type: none"> > Related-Party Transactions 	<ul style="list-style-type: none"> > Corruption 	Low	Medium	Weak	<p style="text-align: center;">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Code of Conduct for Suppliers > Internal Whistleblowing Channel > Internal Purchasing Procedure > Purchasing and Payment Flowchart > Procedures for preventing conflicts of interest > Payment Approval Matrix > Segregation of duties and the "four eyes" rule > Documentary archive

¹ The reference to "corruption" can include (i) active corruption, (ii) active corruption in the private sector and (iii) passive corruption in the private sector.

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
								<p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication/dissemination of the above policies > Internal training
	Purchase of conservation and maintenance services	<ul style="list-style-type: none"> > Purchases not resulting from real needs and/or in non-market conditions > Conflicts of interest 	> Subcontracts	> Corruption	Low	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Suppliers' Code of Conduct > Internal Whistleblowing Channel > Procedures for preventing conflicts of interest > Internal Purchasing Procedure > Purchasing and Payment Flowchart > Payment Approval Matrix > Segregation of duties and the "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication dissemination of the above policies > Internal training
Assets	Projects and investments	<ul style="list-style-type: none"> > Purchases not resulting from real needs and/or in non-market conditions > Undue favouritism towards third parties > Offering or accepting favours in exchange for advantages and/or benefits > Use and/or disclosure of privileged information for personal benefit or that of third parties 	> Subcontracts	<ul style="list-style-type: none"> > Corruption > Offering undue advantages > Influence peddling 	Medium	Medium	Moderate	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Suppliers' Code of Conduct > Internal Whistleblowing Channel > Procedures for preventing conflicts of interest > Internal Purchasing Procedure > Purchasing and Payment Flowchart > Payment Approval Matrix > Segregation of duties and the "four eyes" rule > Documentary archive <p align="center">Corrective measures</p>

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
		<ul style="list-style-type: none"> > Confidentiality breaches > Conflicts of interest 						<ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication dissemination of the above policies > Internal training
	Inventory and management of real estate assets, as well as contracts relating to them (e.g. leases)	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Improper payments 		<ul style="list-style-type: none"> > Corruption > Money Laundering 	Low	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Policy for the Prevention of Money Laundering and Terrorist Financing > Internal Whistleblowing Channel <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Effective communication dissemination of the above policies > Internal training
Supply chain	Inventory management	<ul style="list-style-type: none"> > Falsification of records and/or manipulation of information > Undue favouritism towards third parties 	> Subcontracts	<ul style="list-style-type: none"> > Corruption 	Medium	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Suppliers' Code of Conduct > Stock and inventory procedure > Segregation of duties and the "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Automated procedures > Internal training > Effective communication/dissemination of the above policies
	Logistics Subcontracting transport services	<ul style="list-style-type: none"> > Falsification of records and/or manipulation of information > Undue favouritism towards third parties > Improper payments 	> Subcontracts	<ul style="list-style-type: none"> > Corruption > Offering undue advantage 	Low	Medium	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p>

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
		<ul style="list-style-type: none"> > Purchases not resulting from real needs and/or in non-market conditions > Conflicts of interest 						<ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication dissemination of the above policies > Internal training
	Customs clearance processes	<ul style="list-style-type: none"> > Improper payments > Offering or accepting favours in exchange for advantages and/or benefits 	<ul style="list-style-type: none"> > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage 	Low	High	Moderate	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Inclusion of anti-corruption clauses in contracts > Effective communication/dissemination of the above policies > Internal training
Financial	Budget and projection of financial statements	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions 		<ul style="list-style-type: none"> > Corruption > Money Laundering 	Low	Medium	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Policy for the Prevention of Money Laundering and Terrorist Financing > Segregation of functions and "four eyes" rule
	Access to funds/movement of bank accounts Cash payments	<ul style="list-style-type: none"> > Improper payments > Falsification of records or manipulation of information > Offering or accepting favours in exchange for advantages and/or benefits > Conflicts of interest 		<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling > Money Laundering 	Medium	Medium	Moderate	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Policy for the Prevention of Money Laundering and Terrorist Financing > Purchase and Payment Flowchart > Payment Approval Matrix > Segregation of functions and "four eyes" rule > Documentary archive

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
								Corrective measures
								> Internal training
	Applications for grants and public funds Management of funds and grants	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Undue favouritism towards third parties > Offering or accepting favours in exchange for advantages and/or benefits > Violation of competition rules > Conflicts of interest > Confidentiality breaches 	> Interaction with public entities	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling > Fraud in obtaining a subsidy or grant > Misappropriation of a subsidy, grant or subsidised credit > Money Laundering 	Medium	Medium	Moderate	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Procedures for preventing conflicts of interest > Policy for the Prevention of Money Laundering and Terrorist Financing > Purchase and Payment Flowchart > Payment Approval Matrix > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Internal training
	Submission of credit applications Credit line management	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Falsification of records or manipulation of information 		<ul style="list-style-type: none"> > Corruption > Fraud in obtaining credit > Misappropriation of a subsidy, grant or subsidised credit > Money Laundering 	Low	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Policy for the Prevention of Money Laundering and Terrorist Financing > Segregation of functions and "four eyes" rule
	Payments to third parties and employees	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Improper payments > Undue favouritism towards third parties > Offering or accepting favours in exchange for advantages and/or benefits 		<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling > Money Laundering 	Low	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Policy for the Prevention of Money Laundering and Terrorist Financing > Credit Control and Collection Procedures > Purchasing and Payment Flowchart > Payment Approval Matrix > Automated procedures > Segregation of functions and "four eyes" rule > Documentary archive

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
								Corrective measures > Internal training
	Salary processing for middle and senior management (including variable remuneration)	> Omission and/or manipulation of information with the aim of steering decisions > Improper payments > Undue favouritism of third parties > Offering or accepting favours in exchange for advantages and/or benefits		> Corruption > Offering undue advantage > Influence peddling > Money Laundering	Low	Low	Weak	Preventive Measures > Code of Professional Conduct > Internal Whistleblowing Channel > Policy for the Prevention of Money Laundering and Terrorist Financing > Credit Control and Collections Procedure > Automated procedures > Segregation of functions and "four eyes" rule > Documentary archive
Quality	Purchase of specialised goods and services (laboratory analyses and others)	> Purchases not resulting from real needs and/or in non-market conditions > Omission and/or manipulation of information with the aim of influencing purchasing decisions > Undue favouritism towards third parties > Accepting favours in exchange for advantages and/or benefits > Conflicts of interest	> Subcontracts	> Corruption > Offering undue advantage > Influence peddling	Low	Medium	Moderate	Preventive Measures > Code of Professional Conduct > Internal Whistleblowing Channel > Procedures for preventing conflicts of interest > Purchase and Payment Flowchart > Payment Approval Matrix > Automated procedures > Segregation of functions and "four eyes" rule > Documentary archive Corrective measures > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication dissemination of the above policies > Internal training
	Subject to inspections and audits	> Omission and/or manipulation of information with the aim of steering decisions > Falsification of records or manipulation of information	> Interaction with public entities	> Corruption > Offering undue advantage > Influence peddling	Low	Low	Weak	Preventive Measures > Code of Professional Conduct > Internal Whistleblowing Channel > Segregation of functions and "four eyes" rule > Documentary archive

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
		<ul style="list-style-type: none"> > Accepting favours in exchange for advantages and/or benefits 						<p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Internal training
	Licensing	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Falsification of records or manipulation of information > Accepting favours in exchange for advantages and/or benefits 	<ul style="list-style-type: none"> > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	Low	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Internal training
Institutional	Awarding of donations and/or sponsorships	<ul style="list-style-type: none"> > Undue favouritism towards third parties > Offering or accepting favours in exchange for advantages and/or benefits > Falsification of records or manipulation of information > Conflicts of interest 	<ul style="list-style-type: none"> > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	Low	Medium	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Suppliers' Code of Conduct > Internal Whistleblowing Channel > Internal Purchasing Procedure > Purchase and Payment Flowchart > Procedures for preventing conflicts of interest > Payment Approval Matrix > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication dissemination of the above policies > Internal training

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
	Relations with stakeholders and investors	<ul style="list-style-type: none"> > Use and/or disclosure of privileged information for personal benefit or that of third parties > Conflicts of interest 	<ul style="list-style-type: none"> > Related Party Transactions > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	Low	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Procedures for preventing conflicts of interest
Marketing and advertising/promotional activity	Sales	<ul style="list-style-type: none"> > Offering or accepting favours in exchange for advantages and/or benefits > Violation of competition rules 	<ul style="list-style-type: none"> > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Money Laundering 	Medium	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Policy for the Prevention of Money Laundering and Terrorist Financing > Sales process > Credit Control and Collections Procedure > Retention Procedure > Automated procedures > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > List of internationally sanctioned countries > Internal training
	Offering of samples	<ul style="list-style-type: none"> > Offering or accepting favours in exchange for advantages and/or benefits > Omission and/or manipulation of information with the aim of steering decisions 	<ul style="list-style-type: none"> > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	Medium	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Sales Process > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Internal training

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
	Invitations and promotional offers	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Offering or accepting favours in exchange for advantages and/or benefits > Falsification of records or manipulation of information 	<ul style="list-style-type: none"> > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	Medium	Medium	Moderate	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Procedure for Commercial Offers and Investments > Gift offer/acceptance registration form > Request for Exceptional Approval of the Gift Offer/Acceptance > Purchasing and Payment Flowchart > Procedures for preventing conflicts of interest > Payment Approval Matrix > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Effective communication/dissemination of the above policies > Internal training
People	Recruitment of employees (senior managers)	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Lack of impartiality and fairness in the selection criteria > Undue favouritism towards third parties > Offering or accepting favours in exchange for advantages and/or benefits > Conflicts of interest 		<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	Low	Medium	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Statement of Acceptance and Commitment > Internal Whistleblowing Channel > Procedures for preventing conflicts of interest > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Internal training
	Recruitment of employees (middle managers and others)	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions 	<ul style="list-style-type: none"> > Subcontracts 	<ul style="list-style-type: none"> > Corruption 	Medium	Medium	Moderate	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
	Recruitment of seasonal workers	<ul style="list-style-type: none"> > Lack of impartiality and fairness in the selection criteria > Undue favouritism towards third parties > Offering or accepting favours in exchange for advantages and/or benefits > Situations of conflict of interests 		<ul style="list-style-type: none"> > Offering undue advantage > Influence peddling 				<ul style="list-style-type: none"> > Statement of Acceptance and Commitment of interest > Suppliers' Code of Conduct > Documentary checklists > Prior verification of compliance with legal obligations > Internal Whistleblowing Channel > Procedures for preventing conflicts of interest > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Internal training
Wine tourism	Acquisition of specialised goods and services (Hotel and restaurant)	<ul style="list-style-type: none"> > Purchases not resulting from real needs and/or in non-market conditions > Omission and/or manipulation of information with the aim of influencing purchasing decisions > Undue favouritism towards third parties > Accepting favours in exchange for advantages and/or benefits > Conflicts of interest 		<ul style="list-style-type: none"> > Corruption 	Medium	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Suppliers' Code of Conduct > Internal Whistleblowing Channel > Internal Purchasing Procedure > Purchasing and Payment Flowchart > Procedures for preventing conflicts of interest > Payment Approval Matrix > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication dissemination of the above policies > Internal training
	Promotion and organisation of events	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions 	<ul style="list-style-type: none"> > Subcontracts > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	Low	Low	Weak	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Suppliers' Code of Conduct > Internal Whistleblowing Channel > Internal Purchasing Procedure

QUINTA NOVA DE NOSSA SENHORA DO CARMO, S.A., AND TABOADELLA, S.A.

SECTOR	ACTIVITIES	RISK SITUATIONS	RISK FACTORS	ASSOCIATED OFFENCES	PO	FI	DEGREE OF RISK	PREVENTIVE/CORRECTIVE MEASURES
		<ul style="list-style-type: none"> > Offering or accepting favours in exchange for advantages and/or benefits 						<ul style="list-style-type: none"> > Purchase and Payment Flowchart > Procedures for preventing conflicts of interest > Payment Approval Matrix > Segregation of functions and "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Supplier certification procedures > Inclusion of anti-corruption clauses in contracts > Effective communication/dissemination of the above policies > Internal training
All	Gift offers	<ul style="list-style-type: none"> > Omission and/or manipulation of information with the aim of steering decisions > Offering or accepting favours in exchange for advantages and/or benefits > Falsification of records or manipulation of information 	<ul style="list-style-type: none"> > Interaction with public entities 	<ul style="list-style-type: none"> > Corruption > Offering undue advantage > Influence peddling 	High	Medium	High	<p align="center">Preventive Measures</p> <ul style="list-style-type: none"> > Code of Professional Conduct > Internal Whistleblowing Channel > Procedure for Commercial Offers and Investments > Gift offer/acceptance registration form > Request for Exceptional Approval of the Gift > Offer/Acceptance
	Receipt of gifts	<ul style="list-style-type: none"> > Undue favouritism towards third parties > Offering or accepting favours in exchange for advantages and/or benefits > Use and/or disclosure of privileged information for personal benefit or that of third parties > Conflicts of interest 		<ul style="list-style-type: none"> > Corruption > Offering undue advantage 	Low	Medium	Weak	<ul style="list-style-type: none"> > Purchasing and Payment Flowchart > Procedures for preventing conflicts of interest > Payment Approval Matrix > Segregation of duties and the "four eyes" rule > Documentary archive <p align="center">Corrective measures</p> <ul style="list-style-type: none"> > Effective communication > dissemination of the above policies > Internal training

IV. IMPLEMENTATION, MONITORING AND REVIEW OF THE RPP

Quinta Nova and Taboadella maintain a system of internal control and monitoring with regard to business and operations, which must be adjusted to the specific risks of corruption and conflict of interest specific to the activities carried out.

The management bodies of Quinta Nova and Taboadella are responsible for implementing adequate procedures and control systems for monitoring compliance with this RPP, as well as any other supplementary rules approved and implemented to prevent corruption.

The Compliance Officer appointed by the Board of Directors of Quinta Nova and Taboadella is responsible for implementing, overseeing and reviewing the RPP.

In implementing their RPP, Quinta Nova and Taboadella draw up the following:

- i) In the month of October, an interim report of identified situations of high or maximum risk of corruption or related offences;
- ii) In April of the year following implementation, an annual evaluation report, quantifying the degree of implementation of the preventive and corrective measures identified, as well as forecasting when they will be fully implemented.

The RPP will be reviewed every three years or whenever a review of the risks is justified, namely by virtue of a change in the functions or in the organisational or corporate structure of Quinta Nova or Taboadella that may warrant a review of the risk matrix.

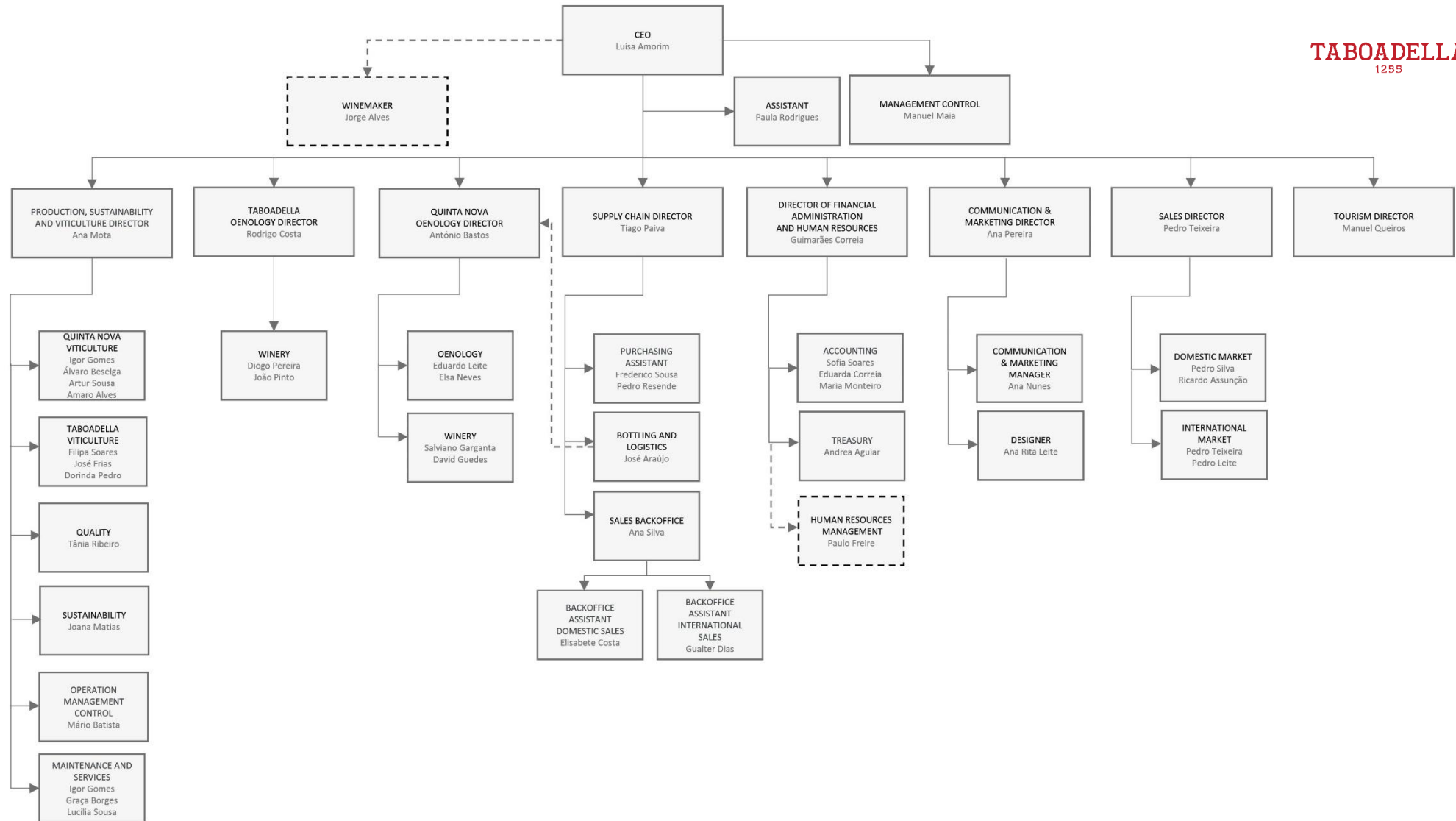
Quinta Nova and Taboadella ensure that the RPP and the above-mentioned reports are made public to its employees, through the intranet and its official web page, within 10 days of their implementation and any revisions or drafting.

Appendix I- ORGANISATION CHART OF QUINTA NOVA AND TABOADELLA



QUINTA NOVA
DE NOSSA SENHORA DO CARMO

TABOADELLA
1255





QUINTA NOVA
DE NOSSA SENHORA DO CARMO

TABOADELLA
1255

