



Annual Evaluation Report of the Corruption Risk Prevention Plan - **2025**



VAPESOL -Fábrica de Componentes para Calçado Lda



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I. Framework

Following the approval of the National Anti-Corruption Strategy 2020–2024, Decree-Law No. 109-E/2021 was published in the Official Gazette on 9 December 2021, establishing the National Anti-Corruption Mechanism (MENAC) and approving the General Regime for the Prevention of Corruption (RGPC).

With the aim of preventing, detecting, and sanctioning acts of corruption and related offences, the RGPC requires both public and private entities within its scope to adopt and implement a Compliance Programme, which must include, among other instruments, a Corruption and Related Offences Risk Prevention Plan (hereinafter “PPR”).

Vapesol has been ensuring the implementation, maintenance, and continuous improvement of its corruption prevention mechanisms through the application of its Corruption Risk Prevention Plan, aligned with the principles of legality, integrity, transparency, and good governance.

The implementation, monitoring, and oversight of the PPR during the year 2025 were the responsibility of the designated officer, in coordination with Vapesol’s management.

This Annual Evaluation Report, relating to the 2025 financial year, fulfils the obligation established under the RGPC regarding the monitoring of PPR execution. It presents an assessment of the degree of implementation of the identified preventive and corrective measures, as well as their respective state of progress, from a continuous improvement perspective.

II. Annual Evaluation

Based on the identification, assessment, and classification of the risk factors associated with the different activity areas covered by the PPR, it is concluded that approximately 95% of the identified risks fall within low or acceptable levels.

Considering the preventive and detective mechanisms currently implemented and in operation, no need was identified for the adoption of additional risk mitigation measures, with the controls provided for in the PPR remaining adequate.

Within the scope of the present annual evaluation, the identification and assessment of risk factors were reviewed, taking into account the evolution of the external context as well as the development of Vapesol's activity. This analysis did not result in any significant changes compared to the risk assessment previously included in the PPR.

Notwithstanding the absence of a need to implement new mitigation mechanisms, several initiatives were reinforced under a continuous improvement approach. Following the development and publication of the PPR, the following actions were implemented in particular:

- Internal awareness-raising and training sessions on ethics, integrity, and professional conduct;
- Periodic review of administrative and operational procedures;
- Strengthening of transparency practices and internal control mechanisms.

The execution of the plan proceeded regularly, without significant constraints, ensuring the full implementation of the measures provided for.

III. Conclusion

During the year 2025, no incidents were recorded, nor were any internal or external reports received, and no indications or practices suggestive of acts of corruption or related offences were identified. Vapesol maintained an active whistleblowing channel, in compliance with applicable legislation, ensuring confidentiality, the protection of whistleblowers, and the appropriate handling of communications. During the period under review, no reports were received through this channel. Based on the monitoring carried out and the mitigation measures implemented within the scope of the PPR, it is concluded that, in all material respects, the identified preventive and corrective measures are adequately implemented and prove to be effective. As a result, the residual risk assessment associated with the risk factors identified in the PPR remains valid and within acceptable levels, with no situations classified as high or very high risk. Vapesol's management reaffirms its commitment to the principles of legality, integrity, transparency, and zero tolerance towards corruption, promoting an organisational culture based on ethics and regulatory compliance.

IV. Final Provisions

The Corruption Risk Prevention Plan shall be subject to revision whenever deemed necessary, namely in the event of significant changes to the organisational structure, the activities carried out, or the applicable legal framework. This Annual Evaluation Report shall be disclosed to Vapesol employees by being posted on the company's information board within a maximum period of 10 days following its preparation, ensuring compliance with the principles of transparency and internal communication.

Compliance Officer:

Revinhade, 10 de abril de 2026