Plan for the Prevention of Risks of Corruption and Related Offences

MEO Group

Index

1. Framework and scope

The Plan for the Prevention of Risks of Corruption and Related Offences (PPR) is provided for in article 6 of the General Regime for the Prevention of Corruption (RGPC), established by Decree-Law no. 109-E/2021 of 9 December, and one of its main objectives is the identification of risks of corruption and related offences and the implementation of preventive and corrective actions to mitigate them. The RGPC is applicable to legal persons with head offices in Portugal that employ 50 or more workers.

MEO Group companies (together referred to as MEO Group) carry out their activity based on a set of rules, principles and values that define the conduct of all their employees and the behaviour to be adopted in the relationship between MEO Group and any other entity and/or individual.

The MEO Group's positioning and behaviour is fully committed to its internal rules of conduct and transparency, expressed in its Anti-Corruption Policy, in the Code of Ethics and Conduct for employees and in the Code of Conduct for Third Parties, to the applicable anti-corruption legislation and also to the 10 principles of the United Nations Global Compact, which includes the principle of Anti-Corruption.

The PPR is based on the prevention of acts of misconduct such as bribery, corruption and related offences, and the MEO Group is firmly committed to being a responsible corporate entity in all aspects of its business, which is conducted in an honest, ethical and legal manner.

The PPR concerns the activities of the following legal entities of the MEO Group, covered by the RGPC:

- MEO - Serviços de Comunicações e Multimédia, S.A.
- Altice Labs, S.A.
- MEO - Associação de Cuidados de Saúde.

The corporate objects of these legal entities are presented below:

Corporate object MEO – Serviços de Comunicações e Multimédia S.A.

i) the design, construction, management and operation of electronic communications networks and infrastructures, the provision of electronic communications services, broadcast telecommunications signal transmission and dissemination services and television activity;

ii) the provision of services in the areas of information systems and technologies, information society, multimedia and communication, and their respective contents, including data processing and hosting activities, information domiciliation and related activities, the development and commercialisation of electronic communications products and equipment, information and communication technologies, as well as the performance of e-commerce activities, including auctions carried out by electronic means in real time and the provision of advertising services, as well as the provision of training and consultancy services in the areas that form part of its corporate purpose;

iii) the provision of business process outsourcing services, namely business advisory, consultancy, administration and business management, including accounting, financial, logistical, administrative and human resources services, training, safety, hygiene and health at work, the purchase, sale and administration of movable or immovable property as well as the promotion, investment and management of securities and real estate businesses, the preparation of projects and economic studies, the management of shareholdings, the management of call centres, market research, the exploitation of information and any other activities that are subsequent or related to the aforementioned activities;

iv) the commercialisation of well-being and customer care services, including the provision of various domestic care services, and cultural activities, including ticketing and the sale of experiences, virtual or otherwise, and travel;

v) the management of electric mobility network operations, comprising the management of energy and financial flows associated with electric mobility network operations, as well as the provision of services related or complementary to those activities;

vi) the commercialisation, through its network of shops, distance selling or via the internet, of products and services directly or indirectly related to the activities referred to in the preceding paragraphs, including, but not limited to, mobility equipment and accessories (electric or non-electric), household appliances and other equipment for domestic use, and gaming products, which may or may not be connectable, clothing and hygiene products, air fresheners and other non-perishable consumables, without food products predominating;

vii) to carry out any activities that are complementary, subsidiary or accessory to those referred to in the preceding paragraphs, either directly or by setting up or participating in companies;

viii) may, by resolution of the Board of Directors, acquire and dispose of holdings in companies with a corporate purpose other than that described in the preceding paragraphs, in companies governed by special laws, in companies with limited or unlimited liability, as well as enter into partnerships with other legal entities to form complementary groupings of companies, European economic interest groupings, new companies, consortia and joint ventures, as well as set up or take part in any other form of temporary or permanent partnership between companies and public or private law entities.

Corporate object Altice Labs, S.A.

i) Ensuring the MEO Group's innovation process, the development of products and services, the provision of services and systems integration in the area of information and communication technologies. Carrying out work in the field of Research and Development, Services and Systems, Demonstration and Dissemination of Technologies and Services, Technological Training and Provision of Integration, Engineering and Consultancy Services in Information, Communication and Electronic Technologies;

ii) It may also carry out any other activities that are complementary, subsidiary or accessory to those referred to in the preceding paragraphs, either directly or by setting up or participating in companies;

iii) It may, by resolution of the Board of Directors, acquire and dispose of holdings in companies with the same or different corporate purpose as described in the preceding paragraphs, in companies governed by special laws, in companies with limited or unlimited liability, as well as associate with other legal entities to form complementary groupings of companies, European economic interest groupings, new companies, consortia and associations in participation, as well as set up or participate in any other form of association, temporary or permanent, between companies and or entities governed by public or private law.

Corporate object MEO – Associação de Cuidados de Saúde

Promotion and protection of health, namely through the direct or indirect provision of preventive, curative and rehabilitative medical care.

In addition to these entities, Portugal Telecom Data Center, S.A. also covered by the Plan for the Prevention of Corruption Risks and Related Offences, and by the risks specifically provided for herein, since **MEO - Serviços de Comunicações e Multimédia S.A.** is its only client and other companies belonging to the Group are its only service providers.

The corporate object of this legal entity is presented below.

Corporate object Portugal Telecom Data Center, S.A.

Provision of services and supply of products in the area of information systems and technologies, including data processing activities, information domiciliation and related activities, as well as the operation and maintenance of data centres and associated telecommunications infrastructures.

2. MEO Group’s organisational structure

MEO Group’s management model based on its organisational and functional structure, consisting of the Chairman of the Board of Directors, the Chief Executive Officer and the Executive Committee.
Executive Committee is made up of the following members: Chief Executive Officer, Chief Financial Officer, Chief Human Resources Officer, Chief Legal Officer, Chief Technology Officer, Chief Operations Officer, Chief Sales Officer/B2B and Chief Sales Officer/B2C.

MEO Group’s current organisational structure is as follows:

2.1 Chief Executive Officer (CEO)

The portfolio under the CEO’s direct responsibility includes, in addition to the CEO’s Office, Altice Labs, responsible for the MEO Group’s development and innovation, the Artificial Intelligence Centre, MEO Energia, the Brand and Communications department, the Portuguese Communications Foundation, Communications department, Customer Ombudsman department, Projects, Audit and Sustainability department as well as the Transformation Office.

2.2 Chief Financial Officer (CFO)

The CFO’s portfolio, responsible for the MEO Group’s financial management, includes not only the Finance department, but also the Purchasing and Supply Chain, Asset Management, Planning and Control and Business Assurance departments.

2.3 Chief Human Resources Officer (CHRO)

The CHRO department, which is responsible for the strategic management of the MEO Group’s human resources and talent, is in charge of the People and Organisation department, MEO - Associação de Cuidados de Saúde and the MEO Foundation.

2.4 Chief Legal Officer (CLO)

The CLO department, responsible for managing legal and regulatory issues, includes, in addition to the Regulation, Competition and Legal department, the Compliance and Data Privacy department and the General Secretariat Office.

2.5 Chief Technology Officer (CTO)

The CTO, responsible for the strategic management of networks and technology, is in charge of Network Engineering and Operations, Information Technology, Digital Transformation and Cybersecurity & Privacy.

2.6 Chief Operations Officer (COO)

The COO’s department, responsible for the strategic management and efficiency of commercial operations, includes the departments of Operations and Customer Services, Logistics, Wholesale and Technical Network Services.

2.7 Chief Sales Officer/B2B (CSO/B2B)

The CSO/B2B department, which is responsible for defining and managing the commercial strategy for the B2B (Business to Business)

The CSO/B2B department, which is responsible for defining and managing the commercial strategy for the B2B (Business to Business) segment, includes the B2B Segment Management, Product and Pre-Sales, SME and SoHo Sales, Geographical Corporate Customers, Top Corporate Customers, Services and Business Operations divisions, as well as the Madeira and Azores Commercial divisions.

2.8 Chief Sales Officer/B2C (CSO/B2C)

The CSO/B2C and CMO department, responsible for defining and managing the commercial strategy for the B2C (Business to Consumer) segment, includes the B2C Segment Management, Consumer Commercial, B2C Products and Services, SAPO Products and Solutions, Digital and Customer Experience as well as Commercial Support department.

3. Risks of corruption and related offences and preventive measures

3.1 Risk assessment methodology

MEO Group follows the recommendations of ISO 31000 (Risk Management - Guidelines) and ENISA (Risk Management Process), which specify requirements for establishing, maintaining and continuously improving risk management, and has formally defined a methodology for identifying and assessing its risks.

In accordance with the defined methodology, the risk identification and assessment exercise is carried out annually, involving the various areas of the MEO Group. Thus, the process begins with the identification of risks by management, followed by their assessment according to their impact and probability.

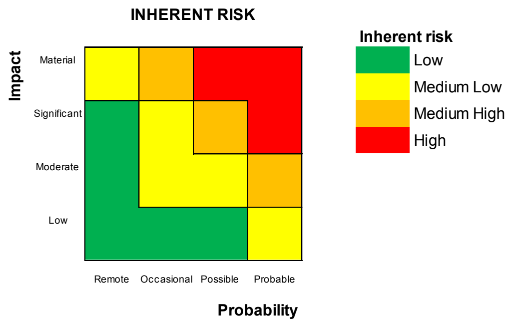
The impact is assessed according to 4 levels:

Impact	
Material	Negative impact on QoS in more than 5% of the customer base, or With non-compliance with laws, regulations or standards that will result in fines or other serious consequences, or With adverse publicity with a negative impact on the brand's reputation at national and international level, or Financial impact of more than 25 million euros, or Interference in normal operations with impact on multiple critical processes or services
Significant	Negative impact on QoS for more than 1% and less than or equal to 5% of the customer base, or With legal, regulatory or normative non-compliance that may result in fines or other serious consequences, or With adverse publicity with a negative impact on the brand's reputation for a specific audience at a national level, or Financial impact of between 15 and 25 million euros, or Interference in normal operations with an impact on a single critical service
Moderate	Negative impact on QoS of more than 0.1% and less than or equal to 1% of the customer base, or With legal, regulatory or normative non-compliance that is easy to resolve, or With adverse publicity that impacts the brand's reputation only for a specific audience, or Financial impact of between 3 and 15 million euros, or Interference with normal operations with an impact on processes but not on critical services
Low	Negative impact on QoS for less than 0.1% of the customer base, or Without legal, regulatory or normative non-compliance, or No adverse publicity with a significant impact on reputation, or Financial impact of less than 3 million euros, or Reduced interference in normal operations with no impact on critical processes or services

Probability is also assessed according to 4 levels:

PROBABILITY	
Remote	Probability of occurrence less than 10%
Occasional	Probability of occurrence between 10% and 30%
Possible	Likelihood of occurring between 30% and 50%
Probable	Probability of occurrence greater than 50%

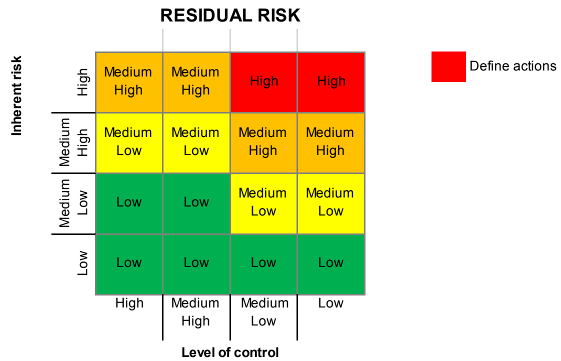
The result of the combination of impact and probability produces the inherent risk:



In a second phase, the inherent risk is combined with the existing level of control, which is assessed according to the following scale:

NÍVEL DE CONTROLO	
High	With all possible control measures in place.
Medium-high	With control measures in place.
Medium-low	With the minimum control measures in place.
Low	No control measures in place.

The result of combining the inherent risk with the level of control produces the residual risk, identifying the situations in which there is a need implement actions to deal with it, according to the following figure:



Actions should therefore be defined to treat the residual risks located in the red quadrant, classified as "High", in order to reduce the level of threat to a level considered acceptable by the MEO Group.

3.2. Identification of risks and preventive measures

The following pages present the identification, analysis and classification of the risks of corruption and related offences in the legal entities covered by this RFP, as well as the controls in place in relation to the residual risks identified and the preventive measures to be implemented in relation to the risks identified, with a view to dealing with them.

In many of the processes identified below, these risks and measures are allocated to MEO - Serviços de Comunicações e Multimédia, S.A., as the corporate processes are centralised there.

3.2.1. MEO – Serviços de Comunicações e Multimédia, S.A.

3.2.1.1. Purchasing

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
· Market research, evaluating and negotiating proposals · Place orders · Selecting, qualifying and evaluating suppliers · Managing contracts · Managing travel contracts · Ordering goods and services · Receiving and checking goods and services	Acquisition of goods and services not included in the planning for own benefit and/or that of third parties	O	M	Mb	Mb	· Purchasing Manual · Delegation of competences · Code of Ethics and Conduct · Code of Conduct for Third Parties · Anti-Corruption Policy · Third Party Evaluation Policy; · Third Party Assessment Procedure; · Internal Control Manual · Internal Audit · Segregation of processing and authorisation functions · Functional independence between the areas responsible for the main stages of the goods and services procurement process · Contract proposals subject to authorisation according to DC · Group policies and regulations · Training on the Code of Ethics and Conduct · Monitoring of interactions with suppliers to ensure that they follow bribery prevention and compliance rules in accordance with national legislation and internal standards. · Anti-corruption clauses in contracts with third parties
	Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits	Pv	S	A	Ma	
	Lack of impartiality in analysing supplier proposals	O	M	Mb	Mb	
	Restrictions in the decision-making process, through omission and misuse of information or delay in analyses and opinions, for their own benefit and/or that of third parties	Pv	S	A	Ma	
	Conflicts of interest that jeopardise the acquisition/contracting process	Pv	S	A	Ma	
	Favouring suppliers of goods and/or services to achieve their own benefits and/or those of third parties	Pv	S	A	Ma	
	Non-compliance with mandatory procedures and non-compliance with legal procurement principles	Pv	S	Ma	Ma	
	Purchase without prior assessment of the supplier's compliance	Ps	M	Ma	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.1.2. Accounts Receivable and Credits

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
· Billing for services · Processing customer credit notes · Process receipts · Managing customer orders · Credit and collection management	Granting benefits to own and/or someone else's participation in proceedings in the their competences in exchange for benefits	R	B	Mb	B	· Delegation of competences · Internal Control Manual · Code of Ethics and Conduct · Anti-Corruption Policy · Internal Audit · Bank reconciliations · Segregation of processing and authorisation functions · External audit of MEO Group's accounts with assessment of the level of internal control · Periodic analysis of accounts receivable and respective adjustments · All sales orders/invoices are only processed upon fulfilment of sales policies, namely approval levels and credit policies. · Group policies and regulations
	Restrictions in the decision-making process, through omission and misuse of information or delay in analyses and opinions, for their own benefit and/or that of third parties	R	M	Mb	B	
	Intentional omission or misrepresentation in the financial statements either of events, transactions or other information with an impact	R	M	Mb	B	
	Use of privileged and/or confidential information to gain advantages for oneself and/or third parties	R	M	Mb	B	
	Embezzlement	R	S	Mb	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.1.3. Tax and Legal Function

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
· Management of tax and legal disputes	Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits	R	M	Mb	B	· Delegation of competences · Internal Control Manual · Internal Audit · Segregation of processing and authorisation functions · Group policies and regulations · Ethics and Compliance Committee · Anti-Corruption Policy · Code of Ethics and Conduct · Code of Conduct for Third Parties · Third Party Valuation Policy · Party Valuation Procedure · Procedure for Granting and Receiving Gifts and Hospitality · Conflict of Interest Management Procedure · Training on the Code of Ethics and Conduct · Workshops on compliance issues · Internal audits of compliance with the Code of Ethics and Conduct · Internal audits of compliance with the Code of Conduct for Third Parties
	Restrictions in the decision-making process, through omission and misuse of information or delay in analyses and opinions, for their own benefit and/or that of third parties	R	M	Mb	B	
	Imprecision in the interpretation of norms that can lead to failures in their applicability	R	S	Mb	B	
	Employees are unaware of the Procedure for Granting and Receiving Gifts and Hospitality	O	M	Mb	Mb	
	Employees are unaware of the Conflict of Interest Procedure	O	M	Mb	Mb	
	Employees are unaware of the Third Party Assessment Procedure	O	M	Ma	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.1.4. Stock management

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
• Stock management • Inventory management	Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits	O	M	Mb	Mb	• Delegation of competences • Internal Control Manual • Code of Ethics and Conduct • Anti-Corruption Policy • Internal Audit • Segregation of processing and authorisation functions • Carrying out inventories • Group policies and regulations
	Use, appropriation or misappropriation of MEO Group resources for their own benefit or the benefit of others	O	M	Mb	Mb	

3.2.1.5. Fixed Assets

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
• Safeguarding assets • Updating the database	Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits	R	S	A	B	• Delegation of competences • Internal Control Manual • Group policies and regulations • Anti-Corruption Policy • Third Party Valuation Procedure • Property Management Manual • Internal Audit
	Illicit favouritism to achieve their own benefits and/or those of third parties in the assessment of requests, abuse of power and influence peddling	R	S	A	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.1.6. Human Resources

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
• Managing recruitment and selection • Welcoming candidates • Ensuring compliance with remuneration policies • Process salaries	Restrictions in the decision-making process, through omission and misuse of information or delay in analyses and opinions, for their own benefit and/or that of third parties	O	M	Mb	Mb	• Delegation of competences • Internal Control Manual • Code of Ethics and Conduct • Anti-Corruption Policy • Internal Audit • Segregation of processing and authorisation functions • Group policies and regulations • Conflict of Interest Management Procedure (for employees being recruited and working for the Group)
	Illicit favouritism to achieve their own benefits and/or those of third parties in the assessment of requests, abuse of power and influence peddling	R	Mt	Ma	B	
	Absence of identification of personal and family relationships of employees integrated in the organisation with people related to entities with a relationship with the MEO Group that could trigger situations of lack of independence or conflicts of interest	Ps	S	Ma	Mb	
	Undeclared conflicts of interest	R	Mt	Ma	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.1.7. Treasury Management

<table>
<tr><th colspan="7">MEO - Serviços de Comunicações e Multimédia, S.A.</th></tr>
<tr><th>Activity</th><th>Risk identification</th><th>Probability</th><th>Impact</th><th>Level of control</th><th>Residual Risk</th><th>Preventive measures</th></tr>
<tr><td rowspan="2">· Ensuring treasury management, verifying the legality and regularity of treasury operations
· Update payment methods
· Making requests to change the powers to operate bank accounts with the financial institution
· Carry out bank reconciliations</td><td>Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits</td><td>R</td><td>S</td><td>A</td><td>B</td><td rowspan="2">· Delegation of competences
· Internal Control Manual
· Code of Ethics and Conduct
· Anti-Corruption Policy
· Internal Audit
· Segregation of processing and authorisation functions
· Bank reconciliations
· Restricted access to bank accounts by authorised signatures or passwords
· Group policies and regulations</td></tr>
<tr><td>Embezzlement</td><td>R</td><td>S</td><td>A</td><td>B</td></tr>
</table>

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.1.8. Financial Reporting

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
· Closing accounts · Consolidation process · Preparation of financial statements	Lack of independence and neutrality in interventions for other interests	R	S	A	B	· Delegation of competences · Internal Control Manual · Accounting Policies Manual · Code of Ethics and Conduct · Anti-Corruption Policy · Internal Audit · Bank reconciliations · Segregation of processing and authorisation functions · Analysis of critical accounts and main variations · Validation of the consistency of the information in the financial statements · Group policies and regulations
	Illicit favouritism to achieve their own benefits and/or those of third parties in the assessment of requests, abuse of power and influence peddling	R	S	A	B	
	Manipulation, falsification (including vitiation) or alteration of accounting records or supporting documents from which the financial statements are prepared	R	S	A	B	
	Intentional omission or misrepresentation in the financial statements either of events, transactions or other information with an impact	R	S	A	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.1.9. Stock management

MEO - Serviços de Comunicações e Multimédia, S.A.						
Activity	Risk identification	Probability	Impact	Level of control	Residual Risk	Preventive measures
• Stock management • Inventory management	Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits	O	S	Ma	B	• Delegation of competences • Internal Control Manual • Code of Ethics and Conduct • Anti-Corruption Policy • Internal Audit • Segregation of processing and authorisation functions • Carrying out inventories • Group policies and regulations
	Use, appropriation or misappropriation of MEO Group resources for their own benefit or the benefit of others	R	Mt	Ma	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.2. Altice Labs, S.A.

3.2.2.1. Stock management

Altice Labs, S.A.						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
· Stock management · Inventory management	Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits	O	S	Ma	B	· Delegation of competences · Internal Control Manual · Code of Ethics and Conduct · Anti-Corruption Policy · Internal Audit · Segregation of processing and authorisation functions · Carrying out inventories · Group policies and regulations
	Use, appropriation or misappropriation of MEO Group resources for their own benefit or the benefit of others	R	Mt	Ma	B	

3.2.2.2. Strategic Partnership Management

Altice Labs, S.A.						
Atividade	**Identificação Risco**	Probabilidade	Impacto	Nível de controlo	Risco Residual	**Medidas preventivas**
· Establishing agreements with strategic partners to provide services to third parties	Establishing partnerships without prior assessment by parties	Ps	S	Ma	Mb	· Code of Ethics and Conduct · Code of Conduct for Third Parties · Anti-Corruption Policy · Internal Audit · Third Party Valuation Policy · Party Valuation Procedure · Approval of all partnerships by Executive Commitee · Conflict of Interest Management Procedure
	Parties favouring each other	Ps	S	Ma	Mb	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

3.2.3. MEO – Associação de Cuidados de Saúde

3.2.3.1. Stock management

MEO – Associação de Cuidados de Saúde						
Activity	**Risk identification**	Probability	Impact	Level of control	Residual Risk	**Preventive measures**
• Stock management • Inventory management	Granting advantages to oneself and/or others for participating in processes within the scope of one's competences in exchange for benefits	O	S	Ma	B	• Delegation of competences • Internal Control Manual • Code of Ethics and Conduct • Anti-Corruption Policy • Internal Audit • Segregation of processing and authorisation functions • Carrying out inventories • Group policies and regulations
	Use, appropriation or misappropriation of MEO Group resources for their own benefit or the benefit of others	R	Mt	Ma	B	

Caption

Probability:	Impact:	Control Level:	Residual risk:
Remote (R)	Low (B)	Low (B)	Low (B)
Possible (Ps)	Moderate (M)	Medium-low (Mb)	Medium-low (Mb)
Occasional (O)	Significant (S)	Medium-high (Ma)	Medium-high (Ma)
Probable (Pv)	Material (Mt)	High (A)	High (A)

4. Follow-up, monitoring and review of the PPR

In addition to the continuous monitoring of risks and preventive measures by the areas responsible for them, article 5 of the RGPC provides for the appointment of a Regulatory Compliance Officer, whose responsibility it is to guarantee and control the application of the regulatory compliance programme, including the PPR.

MEO Group's Regulatory Compliance Officer is appointed by the Executive Commitee ,to whom he reports directly, and can be contacted with any questions about the PPR at compliance@meo.pt

According to article 6 of the RGPC, the implementation of the PPR is subject to periodic formal control, carried out as follows:

In October - Mid-term evaluation report for the current year, for high and maximum level risks;

In April of the following year - Annual assessment report for the previous year for all risks, quantifying the degree of implementation of preventive and corrective measures and forecasting their full implementation.

It should also be mentioned that the PPR is reviewed whenever necessary, including whenever there is a change in the MEO Group's attributions or organisational or corporate structure, and at least every three years.

5. Approval and versioning

This document was approved by MEO Group's Executive Commitee on 10 November 2025, constituting version 4 of the PPR.

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