

Corruption Prevention Plan

Compliance

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1 Framework and Scope

This document, hereinafter referred to as the Corruption Risk Prevention Plan (PPR), aims to operationalize the legal requirement arising from Decree-Law No. 109-E/2021 of December 9, which creates the National Anti-Corruption Mechanism (MENAC) and approves the General Regime for the Prevention of Corruption (RGPC).

Corruption is a criminal offence under Portuguese Criminal Law (art. 372 to 374-A), and the criminal framework is applicable according to the active or passive nature of the underlying conduct. In addition to Corruption, criminal legislation also provides for other crimes harmful to the proper functioning of institutions and the market, according to Annex I to this PPR, which lists the crimes and the respective penal framework.

The RGPC is applicable to legal persons with head office in Portugal that employ 50 or more workers and to branches in national territory of legal persons with head office abroad that employ 50 or more workers. With this scope of application as a reference, they were identified as entities covered by the aforementioned Regime.

To this end, Whitestar undertakes to adopt and implement a regulatory compliance program that includes, at least, a plan for the prevention of risks of corruption and related infractions, a code of conduct, a training program and a whistleblowing channel, in order to prevent, detect and sanction acts of corruption and related infractions, carried out against or through the entity.

Based on the commitment of the Arrow Global Group (the Group) to ethics and integrity in all business and partnerships it carries out, Whitestar, in particular, and the Group, in general, has been defining and implementing mechanisms in this area, through a Specific Compliance Program (anti-corruption standards, Management process and monitoring of conflicts of interest, annual and mandatory training in financial crime and conflict of interest, etc.). This Program reinforces the general principles of action and duties of companies, their employees and business partners, with regard to unlawful acts, corrupt practices or related infractions, provided for and defined in the Code of Ethics and Conduct.

In short, this Whitestar Plan for the Prevention of Risks of Corruption and Related Infractions responds to the obligations provided for in the General Regime for the Prevention of Corruption, also reflecting the work developed within the scope of the Regulatory Compliance Program (Risk, Compliance and Audit), already implemented.

2 Whitestar's characterization

Whitestar is part of a Multinational Group in strong growth and is currently the market leader in its sector, in Portugal, in the management and recovery of credit and real estate portfolios, combining

experience with the offer of an integrated and complete asset management service for investors and originators.

2.1 Compromise

Whitestar, in alignment with the Group, undertakes to carry out its activity in strict compliance with the laws and regulations in force, along with the promotion of a culture of responsibility, guided by the highest standards of ethics and integrity. The appetite for the risk of non-compliance with the legislation is zero, and any conduct that, whether by action or omission, constitutes a violation of the aforementioned internal, legal and/or regulatory rules is not tolerated. In fulfilling this same purpose, the availability of collaboration with the authorities is guaranteed, with a view to eradicating such behavior.

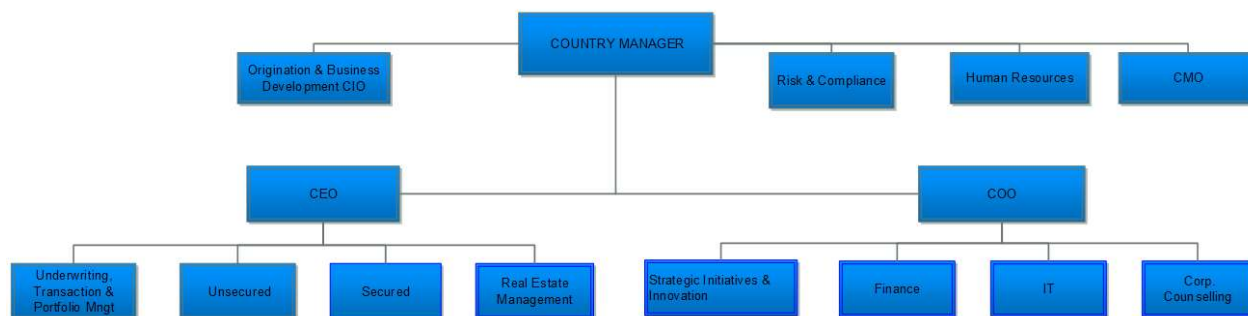
In this sequence, procedures are implemented to prevent and mitigate the risk of criminal practices occurring in our activity, such as acts that constitute or are likely to constitute acts of corruption, malfeasance, money laundering, or insider trading. At the same time, Whitestar also adopts additional procedures that prove necessary and opportune to detect any occurrences of this type and to report them to the competent authorities. In this regard, it also undertakes to periodically review and adapt its internal procedures and mechanisms, immediately, whenever they prove to be inadequate, safeguarding their alignment with legal requirements and best market practices.

From an external point of view, Whitestar only enters into legal transactions with third parties, partners and clients that comply with the legislation of their respective countries, good international practices, adopt their own procedures in accordance with the internal policies and standards of Whitestar and the Group and that are committed to complying with social responsibility practices in their production chain. For the foregoing, it is totally forbidden to practice any acts that, by framing or creating the appearance of illegality or criminality, translate into legal and regulatory non-compliance, integrity standards, or others to which Whitestar is bound.

2.2 Organizational Structure: Roles and Responsibilities

The responsibilities associated with the Compliance Program and consequently with the Corruption Risk Prevention Plan are based, first and foremost, on the commitment of the management bodies.

With a view to the development, implementation and continuous improvement, the Executive Committee approves and supports the implementation of the PPR, ensuring the integration of corruption prevention requirements into business processes, and promoting awareness of integrity issues.



Whitestar Org Chart

The operationalization of the Plan for the Prevention of Risks of Corruption and Related Infractions is also based on a definition of responsibilities, the same that results from the governance model adopted for the purposes of the Regulatory Compliance Program, that is, aligned with the concept of the system of three lines of defense internal to the organization.

2.2.1 1st Line of Defense

The 1st line of defense (Business) has, among others, the responsibility for the daily and proactive management of the risks of corruption and related infractions, in line with the established regulations.

The Senior Management of each Business or Support Unit and all the Employees who are part of them are identified as the main responsible.

2.2.2 2nd Line of Defense

The 2nd line of defense (Risk & Compliance) has, in general terms, the responsibility to ensure that the business is supported in identifying, analyzing, assessing, mitigating and monitoring risk, as well as to challenge and question potential risks that may emerge.

The main person responsible is Whitestar's Risk and Compliance Officer, who is also responsible for the role of Regulatory Compliance Officer.

To support and implement this Plan, implementation managers are designated for each Business Unit.

2.2.3 3rd Line of Defense

The 3rd line of defense (Internal Audit) has the responsibility to conduct independent audits.

3 Plan for the Prevention of Risks of Corruption and Related Offences

3.1 Methodology

3.1.1 Risk identification and analysis

The construction of this Plan for the Prevention of Risks of Corruption and Related Infractions began with an exhaustive survey of the risks associated with each organic unit and follows the following methodology:

- Identification of the risks and risk factors associated with each of the areas of activity in the area of corruption and related offences (risk factors are defined, which correspond to the conditions or circumstances that enhance the implementation of the unlawful acts)
- Assessment of risks according to a risk scale according to the probability of occurrence and the degree of foreseeable impact, and subsequent attribution of a global risk level (inherent risk), according to the current Risk Matrix (results from the work of analysis of the organization's context, within which the internal and external factors that are relevant to its purpose and that may affect the ability to achieve the objectives of the Compliance Program, also based on best practices and national and international recommendations);
- Identification and implementation of preventive measures/controls to avoid or minimize the probability of occurrence and the degree of impact of risks (residual risk assessment); and
- Monitoring and control of risks, implementing corrective measures, when necessary.

The risk factors associated with Whitestar's main activities identified under this plan were the following:

- Acceptance and attribution of offers – Risk of improper acceptance/attribution of offers;
- Access to funds – Risk of embezzlement;
- Access to equipment, transportation, facilities, materials, etc. – Risk of using Whitestar's property for its own benefit;
- Contracting of third parties/Suppliers (conflicts of interest) – Risk of personal advantages and favoring third parties;
- Access to commercially sensitive/privileged or confidential information – Risk of disclosure of confidential information;
- Recruitment/Favoring of employees (conflicts of interest) – Risk of misuse of the position and favoring employees and third parties for their own benefit.

Note: The Code of Ethics and Conduct, as well as the Conflict of Interest Policy and the Declaration of Conflict of Interest procedure, available for consultation on the Governance platform, are applicable to all employees and provide that no responsibilities are assigned to employees in a situation of conflict of interest.

3.1.2 Control Mechanisms

The control mechanisms include:

- Design and implementation of internal standards, i.e. integrity and anti-corruption guidelines, operational processes, controls and necessary resources;
- Monitoring and measurement of indicators (e.g. declaration of interests, declaration of gifts and hospitality).

For all the risks of corruption and related infractions identified in the Plan, measures have been implemented that reduce the probability of occurrence and the degree of impact. These measures distinguish between global controls (code, standards, policies, training and other cross-cutting mechanisms) and operational controls (processes and procedures directed to each business area).

Following the identification and implementation of preventive measures, the level of residual risk is assessed, i.e. the risk after the controls have been implemented.

3.1.3 Risk assessment results

The assessment of the identified risks, according to the information available in Annex III to this document, results:

- The various risks distributed by the business areas result from the sum of concrete and transversal risks (*per* business area) analysed in terms of their probability of occurrence (PO), degree of impact (GI), level of residual risk (RR).

3.2 Plan Monitoring

- Documentation, periodic review of controls, implementation and recording of evidence of their execution;
- Monitoring the development of the Programme and reporting on the implementation and development of the respective initiatives;
- Consolidation and internal reporting of information on the progress of the implementation of the Programme, including:
 - analysis of relevant risks;
 - implementation of controls;
 - situations of non-conformity that occurred;
 - audits of the Programme by the Directorate of Internal Audit;
 - the degree of implementation of identified improvement opportunities.
- Periodic evaluation of the existence and implementation of opportunities for improvement.

The systematic monitoring of the measures implemented, through constant monitoring and supervision of the activities and procedures developed at Whitestar, allows risks to be identified and assessed and preventive measures to be implemented in a timely manner.

4 Additional information

In addition, the execution of the PPR is subject to control, carried out under the following terms:

- Preparation, in October, of a mid-term evaluation report in the identified situations of high or maximum risk;
- Preparation, in April of the year following the year in which the implementation relates, of an annual evaluation report, containing in particular the quantification of the degree of implementation of the preventive and corrective measures identified, as well as the forecast of their full implementation.

5 Plan Review

The PPR is reviewed every three years or whenever there is a change in the attributions or in the organic or corporate structure of the entity that justifies the revision of any of its elements.

The Risk and Compliance Department is responsible for reviewing the Plan, whenever necessary, integrating the contributions of the other areas responsible for the implementation of the measures included.

The Executive Committee is responsible for approving the Plan for the Prevention of Risks of Corruption and Related Infractions.

6 Publicity

The PPR and the mid-term and annual evaluation reports are publicized to all Whitestar employees, through the intranet and on its official website, within 10 days from their implementation and respective review or preparation.

7 Whistleblowing

Corruption is a public crime, so the authorities are obliged to investigate from the moment there is a complaint. As such, it is essential that employees keep in mind that they have a legal duty to report situations of corruption.

The practice of corruption or related infractions may result in the application of criminal sanctions, including, but not limited to, those presented in Annex I.

8 Attachments

8.1 Appendix I – Penal Framework

Crime	Description	Penal framework
Active corruption	Who, by himself or through an intermediary, with his consent or ratification, gives or promises to any employee, or to a third party by indication or with knowledge of the former, patrimonial or non-patrimonial advantage for the practice of any act or omission contrary to the duties of the position.	Prison sentence of 1 to 5 years (limit can be aggravated)
Passive corruption	Who, by himself, or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, patrimonial or non-patrimonial advantage, or his promise, for the practice of any act or omission contrary to the duties of the office, even if prior to that request or acceptance.	Prison sentence of 1 to 8 years
Embezzlement	Anyone who illegitimately appropriates, for his own benefit or that of another person, money or any movable or immovable thing, which has been delivered to him, is in his possession or is accessible to him by reason of his functions.	Prison sentence of 1 to 8 years
Embezzlement of use	Anyone who makes use of or allows another person to make use, for purposes other than those for which they are intended, immovable property, vehicles, or other movable things of appreciable value, which are delivered to him, are in his possession or are accessible to him by reason of his functions.	Imprisonment of up to 1 year or a fine of up to 120 days
Abuse of Power	Anyone who abuses powers or violates duties inherent to their functions, with the intention of obtaining, for themselves or for a third party, an illegitimate benefit or causing damage to another person.	Imprisonment of up to 3 or a fine
Money Laundering	Anyone who converts, transfers, assists or facilitates any operation of conversion or transfer of advantages, obtained by himself or by a third party, directly or indirectly, with the purpose of concealing its illicit origin, or to prevent the perpetrator or participant of such offenses from being criminally prosecuted or subjected to a criminal reaction.	Prison sentence of up to 12 years (limit can be increased)
Undue receipt of advantage	The Employee who, in the exercise of his duties or because of them, by himself, or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, a patrimonial or non-patrimonial advantage, which is not due to him.	Imprisonment for up to 5 years or a fine of up to 600 days

Economic participation in business	The Employee who, with the intention of obtaining, for himself or for a third party, illicit economic participation, harms in a legal transaction the patrimonial interests that, in whole or in part, he is responsible for, due to his function, to administer, supervise, defend or carry out.	Prison sentence of up to 5 years
Concussion	The Employee who, in the exercise of his functions or de facto powers arising therefrom, by himself or through an intermediary person with his consent or ratification, receives, for himself or for a third party, by inducing error or taking advantage of the victim's error, a patrimonial advantage that is not due to him, or is greater than that due, namely (but not exhaustively) contribution, fee or emolument.	Imprisonment of up to 2 years or a fine of up to 240 days and, if committed by means of violence, imprisonment of 1 to 8 years
Influence peddling	The Collaborator who, by himself or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, patrimonial or non-patrimonial advantage, or his promise, to abuse his influence, real or supposed, with any public entity.	Prison sentence of 1 to 5 years
Fraud	The Collaborator who, with the intention of obtaining illegitimate enrichment for himself or for a third party, through error or deception about facts that he or she has cunningly caused, determines another person to perform acts that cause him/her, or another person, patrimonial damage.	Imprisonment for up to 3 years or a fine

8.2 Appendix II – Risk Matrix

		1 – Remote	2 – Unlikely	3 – Possible	4 – Likely	5 – Almost Certain
LIKELIHOOD		<ul style="list-style-type: none"> Risk event could occur in more than 3 years Associated risk event has occurred in the past 5 years 	<ul style="list-style-type: none"> Risk event could occur in 3 years Associated risk event has occurred in the past 3 years 	<ul style="list-style-type: none"> Risk event could occur in 3 years Associated risk event has occurred in the past 2 years 	<ul style="list-style-type: none"> Risk event could occur in 1 year Associated risk event has occurred in the past 1 year 	<ul style="list-style-type: none"> Risk event could occur in 6 months Associated risk event has occurred in the past 6 months
IMPACT	Financial ¹	Up to and including €25k	>€25k - €100k	>€100k - €1m	>€1m - €5m	>€5m
	Business Disruption (IT/Infrastructure/process/staff)	Negligible disruption to business activities	Temporary disruption to non-critical business activities	Extended disruption to non-critical business activities	Temporary disruption to critical business	Extended disruption to critical business activities
	Regulatory	No breach	<ul style="list-style-type: none"> Regulatory breach which does not require notification No further regulatory scrutiny No risk of regulatory fine Licence / Authorisation to operate is not at risk 	<ul style="list-style-type: none"> Regulatory breach which requires notification Temporary regulatory scrutiny Potential for regulatory fine Potential threat to Licence / Authorisation to operate 	<ul style="list-style-type: none"> Regulatory breach which requires notification Significant and/or prolonged regulatory scrutiny and continuous monitoring Certain regulatory fine Potential threat to Licence / Authorisation to operate 	<ul style="list-style-type: none"> Regulatory breach which requires notification Severe regulatory scrutiny and possible censure Certain regulatory fine Licence / Authorisation to operate is suspended or terminated
	Customer / Relationship ²	Customer: <ul style="list-style-type: none"> <1% of portfolio's total customer base and/or No/negligible customer detriment and no remediation Relationship: <ul style="list-style-type: none"> No/minimal impact on Third Party relationships 	Customer: <ul style="list-style-type: none"> <5% of portfolio's total customer base and/or Low customer detriment with minor levels of remediation Relationship: <ul style="list-style-type: none"> Minor impact on non-critical third-party relationships, but no ongoing damage to relationships 	Customer: <ul style="list-style-type: none"> <15% of portfolio's total customer base and/or Low customer detriment with extensive remediations, or material customer detriment with minor levels of remediation Relationship: <ul style="list-style-type: none"> Significant impact on non-critical third-party relationships, or moderate impact on critical third-party relationships. 	Customer: <ul style="list-style-type: none"> <25% of portfolio's total customer base and/or Material customer detriment with significant levels of remediation Relationship: <ul style="list-style-type: none"> Significant number of relationships adversely impacted with the loss of smaller clients 	Customer: <ul style="list-style-type: none"> >=25% of portfolio's total customer base and/or Material customer detriment with extensive and complex levels of remediation Relationship: <ul style="list-style-type: none"> Irreparable relationship damage with the loss of key clients
	Reputation	No public or media attention	Indirect negative media attention, additional media scrutiny on our industry	Negative local media attention impacting the regional brand	Negative national media attention impacting the regional brand	Negative national and/or international media attention impacting the regional brand and the global brand

IMPACT	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
		1	2	3	4	5
LIKELIHOOD						

Risk RAYG	Response Required
Satisfactory	No further action required.
Adequate	No further action required but this risk should be monitored.
Uncomfortable	Consideration should be given to what existing controls could be improved or additional controls could be put in place to mitigate this risk and prevent it from becoming 'unacceptable'. These should be managed as part of BAU activities.
Unacceptable	Urgent intervention is required to reduce the exposure of this risk in the short-term. These risks should be actively being managed down by Senior Management / Execs.

8.3 Appendix III – Identified Risks

Each of the Business Units has identified corruption risks, as well as the respective assessment, as can be seen from the attached table, which is hereby reproduced in full.

The responsibility for implementing each of the controls associated with the specific risk lies with the business areas, especially the respective Director.

8.3.1 Business Unit: Underwriting Transaction & Portfolio Management

8.3.1.1 Portfolio Management

Risk identification (specific)	Risk Scale – Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictabl e Impact	Risk Grading	Preventive measures
Lack of independence and neutrality in the analysis of proposals according to other interests	1	1	1	Decision Matrix; Internal procedures; Operational Training & Awareness; Financial Crime Training & Awareness
Use of inside and/or confidential information to obtain advantages for oneself and/or others	1	2	2	Internal procedures; Decision Matrix; Operational Training & Awareness; Financial Crime Training & Awareness
Granting of advantages through improper intervention in the conduct of processes in exchange for benefits	1	1	1	Internal procedures; Segregation of access and duties; Hierarchical superior control (target monitoring)
Omission/manipulation of information to influence decisions with the aim of obtaining personal or third-party benefits	1	2	2	Internal procedures; Segregation of access and duties; Higher-level control
Conditioning of the decision process, through omission/manipulation of information or postponement/delay in the availability of information for the benefit of oneself and/or third parties (ex:	1	2	2	Internal procedures (approval and discussion always made with the investor); Alerts for putback deadlines (by implementation; Control of the hierarchical superior;

putbacks management, the return of loans within the deadline)				Financial Crime Training & Awareness; Training & Awareness Data Protection and Information Security
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8.3.1.2 Valuations

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Risk of lack of neutrality in valuation process	2	1	2	Operational Training & Awareness; Financial Crime Training & Awareness; Segregation of access and duties; Hierarchical superior control (automatic alerts for review on the Reviews portal)
Favouring suppliers in exchange for benefits	2	1	2	Internal procedures; Operational Training & Awareness; Financial Crime Training & Awareness;
Omission/manipulation of information to condition decisions for the purpose of obtaining undue benefit for oneself, third parties, WS and/or related parties	1	1	1	Internal procedures; Operational Training & Awareness; Financial Crime Training & Awareness;
Conditioning of the decision process, through omission/manipulation of information or postponement/delay in the availability of information for the benefit of oneself and/or third parties	2	1	2	Internal procedures; Operational Training & Awareness; Financial Crime Training & Awareness;
Use of inside and/or confidential information to obtain advantages for oneself and/or others	1	2	2	Internal procedures; Operational Training & Awareness; Financial Crime Training & Awareness;

Failure, incompleteness, in maintain/updating DB for one's own benefit and/or third parties	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data Protection and Information Security
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8.3.1.3 Legal Due Diligence & Implementation

Risk identification (specific)	Risk Scale – Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Lack of independence and neutrality in DDs, boardings and investor intermediation	1	1	1	Internal procedures (External validation (SIS vs DT)); Control of hierarchical superior;
Attribution of advantages for undue intervention in the conduct of proceedings in exchange for benefits	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data Protection and Information Security
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data Protection and Information Security
Conditioning of the decision-making process, through omission/manipulation of information or postponement/slowness of analyses for one's own benefit and/or that of third parties	1	1	1	Internal procedures; Control of hierarchical superior
Use of privileged and/or confidential information to obtain advantages for oneself and/or others	1	2	2	Internal procedures; Segregation of access and duties Control of the hierarchical superior
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data

own benefit and/or that of third parties				Protection and Information Security
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8.3.1.4 Transaction Management

Risk identification (specific)	Risk Scale – Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Lack of independence and neutrality in the review of technical information that precedes credit assignment agreements	1	1	1	Internal procedures (external validation (VDA and investor; approval of documentation by the Investor) Segregation of access and duties;
Attribution of advantages for undue intervention in the conduct of proceedings in exchange for benefits	1	1	1	Internal procedures (external validation (VDA and investor; approval of documentation by the Investor) Segregation of access and duties;
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	1	1	Internal procedures (external validation (VDA and investor; approval of documentation by the Investor) Segregation of access and duties;
Conditioning of the decision-making process, through omission/manipulation of information or the postponement/slowness of analyses for one's own benefit and/or that of third parties.	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data Protection and Information Security
Use of privileged and/or confidential information to obtain advantages for oneself and/or others	1	1	1	Internal procedures; Segregation of access and duties; Control of the hierarchical superior
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data

own benefit and/or that of third parties				Protection and Information Security
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8.3.1.5 Modelling & Analytics

Risk identification (specific)	Risk Scale – Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Lack of independence and neutrality in the allocation of portfolio prices and in the implementation of <i>business plans</i>	1	1	1	Internal procedures (Roll ups and meetings; investor approval regarding pricing and BPs) Segregation of access and duties;
Attribution of advantages for undue intervention in the conduct of proceedings in exchange for benefits	1	1	1	Internal procedures (Roll ups and meetings; investor approval regarding pricing and BPs) Segregation of access and duties;
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	1	1	Internal procedures (Roll ups and meetings; investor approval regarding pricing and BPs) Segregation of access and duties;
Conditioning of the decision-making process, through omission/manipulation of information or postponement/slowness of analyses for one's own benefit and/or that of third parties	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data Protection and Information Security
Use of privileged and/or confidential information to obtain advantages for oneself and/or others	1	1	1	Internal procedures; Segregation of access and dutiesControl of the hierarchical superior
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their own benefit and/or that of third parties	1	1	1	Internal procedures; Financial Crime Training & Awareness; Training & Awareness Data Protection and Information Security

8.3.1.6 Data Reporting

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their own benefit and/or that of third parties	1	2	2	Internal procedures; Code of Conduct; Training and Awareness Financial Crime, COI, Data Protection and Information Security; COI Statement
Lack of independence and neutrality in the analysis of reports due to other interests	1	2	2	Internal procedures; Code of Conduct; Training and Awareness Financial Crime, COI, Data Protection and Information Security; COI Declaration; Contractual clauses (reports)
Use of privileged and/or confidential information about WS and other entities to obtain advantages for oneself and/or others	1	2	2	Internal procedures; Code of Conduct; Training and Awareness Financial Crime, COI, Data Protection and Information Security; DLP Coo Declaration

8.3.2 Unsecured Loans

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Intentional omission of relevant information	1	2	2	Control of hierarchical superior; Internal procedures Training & Awareness Financial Crime, COI, Data Protection and Information Security Segregation of duties and access (portfolio rotation); Customer Satisfaction Survey;

Manipulation of data/information with a view to favoring debtor customers (own benefit and/or detriment of the organization)	1	2	2	Control of hierarchical superior; Internal procedures; Training & Awareness Financial Crime, COI; COI Declaration; Code of Conduct; Customer Satisfaction Survey;
Misappropriation of customer/third party amounts	1	2	2	Code of Conduct Training & Awareness Financial Crime and COI; COI Declaration; Management Information; Control of hierarchical superior; Customer Satisfaction Survey;
Bribery and/or gratuities for non-continuation or delay in the judicial process and/or debt collection	1	2	2	Code of Conduct; Training & Awareness Financial Crime and COI; COI Statement and Gifts and Hospitality; Control of hierarchical superior; Customer Satisfaction Survey;

8.3.3 Secured Loans

Risk identification (specific)	Risk Scale – Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Manipulation of data/information with a view to favoring debtor customers (own benefit and/or detriment of the organization)	1	2	2	Control of hierarchical superior; Internal procedures Training & Awareness Financial Crime, COI, Data Protection and Information Security Segregation of duties and access (portfolio rotation); Customer Satisfaction Survey;
Misappropriation of customer/third party amounts	1	1	1	Control of hierarchical superior; Internal procedures; Training & Awareness Financial

				Crime, COI; COI Declaration; Code of Conduct; Customer Satisfaction Survey;
Intentional omission of relevant information	1	2	2	Code of Conduct Training & Awareness Financial Crime and COI; COI Declaration; Management Information; Control of hierarchical superior; Customer Satisfaction Survey;
Bribery and/or gratuities for non-continuation or delay in the judicial process and/or debt collection	1	2	2	Code of Conduct; Training & Awareness Financial Crime and COI; COI Statement and Gifts and Hospitality; Control of hierarchical superior; Customer Satisfaction Survey;

8.3.4 Real Estate Management

Sub-areas	Risk identification (specific)	Risk Scale – Residual			Risk Prevention and Treatment Measures
		Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
REM/RES	Absence of exemption in the analysis of RE proposals	1	2	2	Internal payment control process Hierarchical control and segregation of information and access KYC to partners COI and P&H statement, Financial Crime and COI Statement
REM/RES	Failures in the KYC process for one's own benefit or that of a third party	1	2	2	Internal payment control process Hierarchical control and segregation of information and access KYC to partners COI and P&H statement, Financial Crime and COI Statement

REM	Absence of exemption in the analysis of real estate partners with a view to obtaining an undue gain	2	1	2	Internal payment control process Hierarchical control and segregation of information and access KYC to partners COI and P&H statement, Training, Financial Crime and COI
Transversal to the RE area	Conflict of interest (favoring one of the parties involved in the business)	2	1	2	Internal payment control process Hierarchical control and segregation of information and access KYC to partners COI and P&H statement, Financial Crime and COI Statement
REM/RED/REMarktable	Illegal gratuities (payment in the form of thanks for benefits in relation to third parties)	2	1	2	Internal payment control process Hierarchical control and segregation of information and access KYC to partners COI and P&H statement, Financial Crime and COI Statement
REM/RED/REMarktable	Bribery (payment for someone to deviate from their professional duties)	2	1	2	Internal payment control process Hierarchical control and segregation of information and access KYC to partners COI and P&H statement, Financial Crime and COI Statement

8.3.5 Business Solutions

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their own	1	2	2	The workflow of the process and/or shared management allows the identification of inconsistencies.

benefit and/or that of third parties				
Intentional omission of relevant information	1	2	2	The workflow of the process and/or shared management allows the identification of inconsistencies.
Manipulation of data/information with a view to favoring debtor customers (own benefit and/or detriment of the organization)	1	2	2	The workflow of the process and/or shared management allows the identification of inconsistencies.
Misappropriation of customer/third party amounts	1	2	2	The workflow of the process and/or shared management allows the identification of inconsistencies.
Bribery and/or gratuities for non-continuation or delay in the judicial process and/or debt collection	1	3	3	The workflow of the process and/or shared management allows the identification of inconsistencies. Annual and mandatory training in Financial Crime.
Attribution of advantages to third parties in the conduct of administrative procedures in exchange for benefits	1	1	1	It requires the definition of internal control, however, in the case of supplier management there is always intervention/approval by Procurement and/or Excom. Annual and mandatory Financial Crime training
Failures in compliance with the budgeting process and specific projects, as well as the approval of expenses not foreseen in the budget	1	2	2	Project budgets are reviewed with the Sponsor All projects are approved at an Executive Committee meeting All expenses are validated and approved by different managers Segregation of duties

Conditioning of the decision-making process, through omission/manipulation of information or postponement/delay in making information available for one's own benefit and/or that of third parties.	1	2	2	Code of Ethics and Conduct Internal Standards and Awareness (confidentiality and information security)
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	2	2	Code of Ethics and Conduct Internal Standards and Awareness (confidentiality and information security)

8.3.6 Finance

8.3.6.1 Regulated Accounting

Risk identification (specific)	Risk Scale - Residual (after controls have been implemented)			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Manipulation of payment activity for one's own benefit or that of third parties	1	2	2	Segregation of duties; Control of hierarchical superior; Internal procedures; Regulatory Q&A; Code of Conduct; Training & Awareness COI Declaration
Manipulating the auditors' selection activity	1	1	1	Internal procedures (requests for quotation are made to 2 entities in order to have a comparison of value and service); Code of Conduct; Training & Awareness COI Declaration
Manipulation of accounting data in order to distort values	1	1	1	Segregation of duties; Control of hierarchical superior; Internal procedures; Code of Conduct; Training, COI

				Awareness COI Declaration
Manipulation of data for third parties in order to distort information	1	1	1	Segregation of duties (the person who approves the payment and accounts is not the one who makes the payment); Code of Conduct; Training, COI Awareness COI Declaration
Misuse of company funds	1	1	1	Segregation of duties (the person who approves the payment and accounts is not the one who makes the payment); Code of Conduct; COI Training and Awareness COI Statement
Expense claim fraud	1	2	2	DAF verification (payment only with original expenses); Hierarchical superior control; Code of Conduct; Training, COI Awareness COI Declaration
Bribery (payment for someone to deviate from their professional duties)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement
Conflict of interest (favoring one of the parties involved in the business activity)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement

8.3.6.2 Commercial Accounting

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures

Manipulation of payment activity for one's own benefit or that of third parties	1	2	2	Segregation of duties; Control of hierarchical superior; Internal procedures; Regulatory Q&A; Code of Conduct; COI Training and Awareness COI Statement
Manipulating the auditors' selection activity	1	1	1	Internal procedures (requests for quotation are made to 2 entities in order to have a comparison of value and service); Code of Conduct; Training and Awareness COI Declaration
Manipulation of accounting data in order to distort values	1	1	1	Segregation of duties; Control of hierarchical superior; Internal procedures; Code of Conduct; Training and Awareness COI Declaration
Manipulation of data for third parties in order to distort information	1	1	1	Segregation of duties (the person who approves the payment and accounts is not the one who makes the payment); Code of Conduct; Training, COI Awareness COI Declaration
Expense claim fraud	1	2	2	DAF verification (payment only with original expenses); Hierarchical superior control; Code of Conduct; COI Awareness Training COI Declaration
Misuse of company funds	1	1	1	Segregation of duties (the person who approves the payment and accounts is not the

				one who makes the payment); Code of Conduct; COI Training and Awareness COI Statement
Bribery (payment for someone to deviate from their professional duties)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement
Conflict of interest (favoring one of the parties involved in the business activity)	1	2	2	Code of Conduct; COI Training and Awareness; COI Statement

8.3.6.3 Planning & Treasury

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Manipulating the auditors' selection activity	1	2	2	Internal procedures (requests for quotation are made to 2 entities in order to have a comparison of value and service); Code of Conduct; Training & Awareness COI Declaration
Expense claim fraud	1	2	2	DAF verification (payment only with original expenses); Hierarchical superior control; Code of Conduct; COI Awareness Training COI Declaration
Misuse of company funds	1	1	1	Segregation of duties (the person who approves the payment and accounts is not the one who makes the payment); Code of Conduct; Training, COI Awareness COI Declaration

Lack of powers to authorise payments	1	1	1	Segregation of duties (the person who approves the payment and accounts is not the one who makes the payment); Code of Conduct; Training & Awareness COI Declaration
Economic extortion (pressuring someone to act in a certain way)	1	2	2	Code of Conduct; Training & Awareness COI Declaration
Bribery (payment for someone to deviate from their professional duties)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement
Conflict of interest (favoring one of the parties involved in the business)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement

8.3.6.4 Administrative

8.3.6.4.1 Facilities, Fleet & Office Management

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Manipulation of payment activity for one's own benefit or that of third parties	1	2	2	Segregation of duties; Control of hierarchical superior; Internal procedures; Regulatory Q&A; Code of Conduct; Training & Awareness COI COI Statement
Intentional omission of relevant information	1	2	2	The workflow of the process and/or shared management allows the identification of inconsistencies.
Lack of powers to authorise payments	1	1	1	"Segregation of duties (who approves the payment and accounts

				is not the one who makes the payment); Code of Conduct; Training & Awareness COI COI Declaration"
Conflict of interest (favoring one of the parties involved in the business)	1	2	2	"Code of Conduct; Training & Awareness COI; COI Declaration"
Bribery (payment for someone to deviate from their professional duties)	1	3	3	The workflow of the process and/or shared management allows the identification of inconsistencies. Annual and mandatory training in Financial Crime. Code of conduct.
Attribution of advantages to third parties in the conduct of administrative procedures in exchange for benefits	1	1	1	It requires the definition of internal control, however, in the case of supplier management there is always intervention/approval by Procurement and/or Excom. Annual and mandatory Financial Crime training
Failures in compliance with the budgeting process and specific projects, as well as the approval of expenses not foreseen in the budget	1	2	2	Project budgets are reviewed with the Sponsor All projects are approved at an Executive Committee meeting All expenses are validated and approved by different managers Segregation of duties
Conditioning of the decision-making process, through omission/manipulation of information or postponement/delay in making information available for one's own	1	2	2	Code of Ethics and Conduct Internal Standards and Awareness (confidentiality and information security)

benefit and/or that of third parties.				
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	2	2	Code of Ethics and Conduct Internal Standards and Awareness (confidentiality and information security)

8.3.6.4.2 Procurement

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Economic extortion (pressuring someone to act in a certain way)	1	2	2	Code of Conduct; Training & Awareness COI Declaration
Bribery (payment for someone to deviate from their professional duties)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement
Conflict of interest (favoring one of the parties involved in the business)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement

8.3.6.5 Tax

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Manipulation of payment activity for one's own benefit or that of third parties	1	2	2	Segregation of duties; Control of hierarchical superior; Internal procedures; Regulatory Q&A; Code of Conduct; Training & Awareness COI Declaration

Expense claim fraud	1	2	2	DAF verification (payment only with original expenses); Hierarchical superior control; Code of Conduct; Awareness COI Training COI Declaration
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	2	2	Code of Ethics and Conduct Internal Standards and Awareness (confidentiality and information security)
Bribery (payment for someone to deviate from their professional duties)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement
Conflict of interest (favoring one of the parties involved in the business activity)	1	2	2	Code of Conduct; Training & Awareness COI; COI Statement
Misuse of company funds	1	1	1	Segregation of duties (the person who approves the payment and accounts is not the one who makes the payment); Code of Conduct; Awareness COI Training COI Declaration
Economic extortion (pressuring someone to act in a certain way)	1	2	2	Code of Conduct; Training & Awareness COI Declaration

8.3.7 Corporate Counselling

Risk identification (specific)	Risk Scale - Residual	Risk Prevention and Treatment Measures
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	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Illegal gratuities (payment in the form of thanks for benefits in relation to third parties)	1	1	1	Code of Conduct Financial Crime & COID Awareness Training & Awareness COI Declaration Management Information Superior's Control
Bribery (payment for someone to deviate from their professional duties)	2	1	2	Code of Conduct Financial Crime & COID Awareness Training & Awareness COI Declaration Management Information Superior's Control
Use of privileged and/or confidential information to obtain advantages for oneself and/or others	1	2	2	Code of Conduct Financial Crime & COID Awareness Training & Awareness COI Declaration Management Information Superior's Control
Preparation of preliminary and definitive opinions in order to favor third parties.	1	1	1	Code of Conduct Financial Crime & Awareness & COI Declaration COI and P&V Declaration Information

8.3.8 IT

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Misappropriation and evasion of the company's physical	1	3	3	Internal procedures; Registration of assets in the Jira system; Control of hierarchical

assets (hardware and software)				superior; Regular asset checking
Misuse (damaging company assets, on purpose, with the intention of causing losses)	1	2	2	Internal procedures; Registration of assets in the Jira system; Control of hierarchical superior; Regular asset checking
Conditioning of the decision-making process, through omission/manipulation of information or postponement/delay in making information available for one's own benefit and/or that of third parties.	1	2	2	Control of hierarchical superior; Internal procedures
Use of privileged and/or confidential information to obtain advantages for oneself and/or others	1	2	2	Control of hierarchical superior; Internal procedures; Training and Awareness COI, Data Protection and Information Security
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their own benefit and/or that of third parties	1	2	2	Control of hierarchical superior; Internal procedures; Training and Awareness COI, Data Protection and Information Security

8.3.9 Transfer. & Innovation

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Failures to comply with the budgeting process and specific projects, as well as the approval of expenses not foreseen in the budget	1	2	2	Project budgets are reviewed with the Sponsor All projects are approved at an Executive Committee meeting

				All expenses are validated and approved by different responsible parties Segregation of duties
Acceptance of benefits in exchange for the granting of advantages and/or favors in the conduct of internal decision-making processes	1	2	2	Code of Conduct Annual and mandatory training in Financial Crime and COI Declaration Management Information
Conflict of interest (favoring one of the parties involved in the business)	2	1	2	Hierarchical Superior's Control Code of Conduct Annual and mandatory training in Financial Crime and COI Declaration, Procurement Policy and KYS Process
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	2	2	Code of Ethics and Conduct Internal Standards and Awareness (confidentiality and information security)

8.3.10 Internal Audit

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Lack of independence and neutrality in analyses and recommendations in light of other own interests and those of third parties	1	2	2	COI Statement Financial Crime and COI QA Formation by the Head of Internal Audit Group Code of Ethics and Conduct Internal Procedure Independent Reporting Line
Tampering or non-application of assessment tools	1	2	2	COI Statement Financial Crime and COI QA Formation by the Head of Internal Audit Group Code of Ethics and Conduct

				Internal Procedure Independent Reporting Line
Giving undue and/or biased opinions, given conflicts of interest, related to multiple relationships	1	2	2	COI Statement Financial Crime and COI QA Statement by the Head of Internal Audit Group Code of Ethics and Conduct Internal Procedure Independent Reporting Line
Incorrect, biased analysis, and that does not contemplate the legal and technical framework	1	2	2	COI Statement Financial Crime Training and COI QA conducted by the Head of Internal Audit Group Code of Ethics and Conduct Internal Procedure Independent Reporting Line
Use of privileged and/or confidential information about WS/other entities and/or employees (breach of confidentiality) to obtain advantages for oneself and/or others	1	2	2	COI Statement Financial Crime and COI QA Statement by the Head of Internal Audit Group Code of Ethics and Conduct Internal Procedure Independent Reporting Line
Conditioning of the decision-making process, through omission/manipulation of information or postponement/slowness of analyses for one's own benefit and/or that of third parties	1	2	2	COI Statement Financial Crime and COI QA Statement by the Head of Internal Audit Group Code of Ethics and Conduct Internal Procedure Independent Reporting Line

8.3.11 Human Resources

Risk identification (specific)	Risk Scale - inherent (after checks)			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures

Favoring the processing of salaries with the attribution of inadequate, undue or inappropriate remuneration or compensation	1	1	1	Internal procedures Control of a hierarchical superior Approval workflow Internal rules Audits
Exclusion or privilege in the selection process of suppliers (trainers, consultants, recruiters)	1	1	1	Internal procedures Control of hierarchical superiors Audits Training Financial Crime and COI
Lack of independence and neutrality in the analysis of applications to recruitment processes according to other interests	1	1	1	Internal procedures Control of hierarchical superiors COI Declaration Financial Crime and COI Formation
Unlawful favoring of candidates in recruitment, selection and integration processes, abuse of power and influence peddling	1	1	1	Internal procedures Control of hierarchical superiors COI Declaration Financial Crime and COI Formation
Lack of independence and neutrality in the analysis of complaints, complaints, requests for information	1	1	1	Internal procedures Control of a superior Audit Declaration COI, Information Financial Crime and COI
Use of privileged and/or confidential information about employees (breach of confidentiality) to obtain advantages for oneself and/or others	1	1	1	Internal Procedures Audits COI Declaration Financial Crime and COI Statement

8.3.12 Risk & Compliance

8.3.12.1 Risk & BCM

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Lack of independence and neutrality in the analysis of risks and incidents, as well as their evaluation favoring entities in exchange for	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H and COI; COI and P&H statements; segregation of

benefits, according to other interests				duties and access; Hierarchical superior control
Attribution of advantages to entities subject to investigation processes for intervention in the conduct of processes in exchange for benefits	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H and COI; COI and P&H statements; segregation of duties and access; Hierarchical superior control
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their own benefit and/or that of third parties	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H and COI; COI and P&H statements; segregation of duties and access; Hierarchical superior control
Failure to report incidents to the RC due to other interests	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H and COI; COI and P&H statements; segregation of duties and access; Hierarchical superior control
Use of privileged and/or confidential information about WS to obtain advantages for oneself and/or others	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H and COI; COI and P&H statements; segregation of duties and access; Hierarchical superior control
Omission/manipulation of information to condition decisions with the aim of obtaining one's own benefit or that of third parties	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H and COI; COI and P&H statements; segregation of duties and access; Hierarchical superior control

8.3.12.2 Compliance

Risk identification (specific)	Risk Scale - Residual	Risk Prevention and Treatment Measures
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	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Failure to adhere to the applicable legislation on Financial Crime (Corruption and related offences)	1	2	2	Code of Conduct; Internal procedures; Early Warning System; Training & Awareness Financial Crime, P&H and COI Monitorization and management of the Conflict of Interest, Gifts and Hospitality register, on a basis that is at least biannual; Management Information (RC; reporting at least biannual MLRO); Hierarchical superior control
Lack of independence and neutrality in the issuance of opinions/proposals/partners /suppliers/other counterparties according to other own interests and/or those of third parties	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H and COI; Monitoring and management of the Segregation of Duties register; Control of hierarchical superior;
Information regarding the investigation/analysis of suspected AML provided to third parties	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H, COI, Data Protection and Information Security; Management Information (RC; reporting at least biannual MLRO); Segregation of duties; Control of hierarchical superior;

Use of privileged and/or confidential information about WS, or its customers/partners, to obtain advantages for oneself and/or others	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H, COI, Data Protection and Information Security; Segregation of duties; Control of hierarchical superior;
Conditioning of the decision-making process, through omission/manipulation of information or postponement/slowness of analyses for one's own benefit and/or that of third parties	1	2	2	Code of Conduct; Internal procedures; Training & Awareness Financial Crime, P&H, COI, Data Protection and Information Security; Segregation of duties; Control of hierarchical superior;
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their own benefit and/or that of third parties	1	1	1	Code of Conduct; internal procedures; Training & Awareness Financial Crime, P&H, COI, Data Protection and Information Security; Management Information (RC; reporting at least biannual MLRO)
Conflict of Interest	1	2	2	Code of Conduct; internal procedures; Training & Awareness Financial Crime, P&H, COI, Data Protection and Information Security; Management Information (RC; reporting at least bi- annually MLRO)

8.3.12.3 Governance & Quality Assurance

Risk identification (specific)	Risk Scale – Residual	Risk Prevention and Treatment Measures
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	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Lack of independence and impartiality in the QA analysis of cases in the light of other interests	1	2	2	Internal procedures; Code of Conduct; Training and Awareness Financial Crime and COI; COI Declaration
Use of privileged and/or confidential information about WS to obtain advantages for oneself and/or for third parties	1	2	2	Internal procedures; Code of Conduct; Training and Awareness Financial Crime, COI, Data Protection and Information Security;
Conditioning of the decision-making process, through omission/manipulation of information or the postponement/slowness of analyses for one's own benefit and/or that of third parties	1	2	2	Internal procedures; Segregation of duties (hierarchical superior); Code of Conduct; Training and Awareness Financial Crime, COI, Data Protection and Information Security; COI Statement
Failure, incompleteness or untimeliness of the maintenance and updating of the databases for their own benefit and/or that of third parties	1	2	2	Internal procedures; Code of Conduct; Training and Awareness Financial Crime, COI, Data Protection and Information Security; COI Declaration; Contractual clauses (reports)

8.3.13 Board

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures

Risk in non-compliance and adherence to anti-corruption legislation p.e. Illegal gratuities (payment in the form of thanks for a benefit in relation to third parties; bribery payment for someone to deviate from their professional duties.	1	2	2	Adequacy of selection methods to the profile of the position (selection and recruitment) Corruption and related infractions risk management plan (PPR); Code of Ethics and Conduct Internal Procedures Financial Crime Training Internal Audit Decision Matrix Segregation of Duties
Failures in compliance with the budgeting process and specific projects, as well as the approval of expenses not foreseen in the budget	1	2	2	Adequacy of selection methods to the profile of the position (selection and recruitment) Corruption and related infractions risk management plan (PPR); Code of Ethics and Conduct Internal Procedures Financial Crime Training Internal Audit Decision Matrix Segregation of Duties
Use of privileged and/or confidential information about WS or other entities to obtain advantages for oneself and/or others	1	2	2	Adequacy of selection methods to the profile of the position (selection and recruitment) Corruption and related infractions risk management plan (PPR); Code of Ethics and Conduct Internal Procedures Financial Crime Training Internal Audit Decision Matrix Segregation of Duties
Lack of independence and neutrality in issuing opinions in the light of other interests	1	2	2	Adequacy of selection methods to the profile of the position (selection and recruitment) Corruption and related infractions risk management plan (PPR); Code of Ethics and Conduct Internal Procedures Financial Crime Training Internal Audit Decision Matrix Segregation of Duties

Conditioning of the decision-making process, through omission/manipulation of information or the postponement/slowness of analyses for one's own benefit and/or that of third parties, Fr. Signing of contracts with public and private entities	1	2	2	Adequacy of selection methods to the profile of the position (selection and recruitment) Corruption and related infractions risk management plan (PPR); Code of Ethics and Conduct Internal Procedures Financial Crime Training Internal Audit Decision Matrix Segregation of Duties
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8.3.14 Origination & Business Development CIO

Risk identification (specific)	Risk Scale - Residual			Risk Prevention and Treatment Measures
	Probability of occurrence	Predictable Impact	Risk Grading	Preventive measures
Existence of conflicts of interest that jeopardize the transparency of the acquisition/contracting process (relationship with investors and other stakeholders)	1	2	2	COI Declaration Financial Crime and COIS Training Job Addition Internal Procedures Decision Matrix
Conditioning of the decision-making process, through omission/manipulation of information or the postponement/slowness of analyses and opinions on investors, for one's own benefit and/or that of third parties	1	2	2	COI Declaration Financial Crime and COIS Training Job Addition Internal Procedures Decision Matrix
Absence of exemption in the analysis of Investors' proposals - Favoring suppliers of goods and/or services to obtain their own benefits and/or those of third parties	1	2	2	COI Declaration Financial Crime and COIS Training Job Addition Internal Procedures Decision Matrix