

ANNEX
TO THE
REGULATORY COMPLIANCE AND RISK PREVENTION PLAN

SOGRAPE GROUP

Internal Training Plan

Prevention of Criminal Offences

Clause One

Aim and objectives

1. This training plan is compulsory for the members of the statutory bodies and all Employees of the Sogrape Group, which includes Sogrape SGPS, S.A., Grape Ideas - Turismo, Comércio e Serviços, S.A., Sogrape Distribuição, S.A. and Sogrape Vinhos, S.A., and includes the training components and frequency of the respective sessions, with a view to complying with the provisions of Decree-Law no. 109-E/2021, of 9 December.
2. Training in the prevention of criminal offences is fundamentally aimed at making everyone in the Group's professional structure aware of the risks to which the business is exposed, as well as giving an account of the appropriate behaviours for dealing with these risks, which are set out in the Code of Conduct, deepening them and giving them a practical form.

Clause Two

Frequency of compulsory training

1. Without prejudice to the obligation of express acceptance of the Regulatory Compliance and Risk Prevention Plan and the Code of Conduct on the part of the members of the statutory bodies of each of the Companies and also to all holders of employment contracts with any of the Companies or for the mere provision of services (hereinafter referred to as "Employees"), regardless of the legal title that legitimises their relationship with them, the specific duties they perform and the position they occupy in the respective hierarchy, such staff are given compulsory training in the prevention of criminal offences every year, in two-hour sessions, without prejudice to being given information on the Regulatory Compliance and Risk Prevention Compliance Plan and the Code of Conduct applicable to the Group when they join.
2. The training in question can take place in person or online.

Clause Three

Annual compulsory training: Organisation

1. Compulsory annual training in criminal risk prevention must be given in two-hour sessions, divided as follows:
 - a) Sessions aimed at members of the statutory bodies of each of the Companies and other employees with management and coordination functions;
 - b) Sessions for other Employees.

2. The training has a theoretical component and a practical component, under the terms set out in the following clause.
3. Failure to attend mandatory annual training is a disciplinary offence and, in any case, grounds for termination of employment with the Company.
4. Employees will be notified by the Human Resources Department of the session they must attend.

Clause Four

Training modules

1. The training to be given to members of the statutory bodies of each of the Companies, and other employees with management and coordination functions, will be organised according to the following modules:
 - a) Criminal risks in general and criminal risks in specific, taking into account the activity carried out by Companies;
 - b) The Regulatory Compliance and Risk Prevention Plan *and* the Code of Conduct;
 - c) Conflicts of interest;
 - d) Corruption (and related offences, including abuse of trust, infidelity and extortion) and business activity: specific risks;
 - e) With regard to the prevention of money laundering and terrorist financing, the rules for accepting customers and current cases will be covered, as will the preventive and reporting duties applicable under Law 83/2017 of 18 August;

- f) Processing of personal data, with regard to the prevention of corruption and related offences and the laundering and financing of terrorism;
 - g) Internal whistleblowing channel: what to report, when and to whom.
- 2. The training to be given to other employees will be organised according to the following modules:
 - a) The Regulatory Compliance and Risk Prevention Plan and the Code of Conduct;
 - b) Conflicts of interest;
 - c) Corruption (and related offences, including abuse of trust, infidelity and extortion) and the Company's activity: specific risks;
 - d) Processing of personal data, with regard to the prevention of corruption and related offences and the laundering and financing of terrorism;
 - e) Internal whistleblowing channel: what to report, when and to whom.

Clause Five

Training registration

1. Participation in the training courses regulated in this plan will be registered with the Human Resources Department.
2. These records must be kept for the duration of the professional relationship and, in the event of a legal dispute, until a final judgement is handed down.

Control:

Approved by the Board of Directors of Guesi - Comércio e Serviços, S.A. on 14
February 2024