ANNEX II

MID-TERM EVALUATION REPORT

PURSUANT TO THE PROVISIONS OF ARTICLE 6, PARAGRAPH 4, POINT A), OF DECREE-LAW NO. 109-E/2021, OF 9 DECEMBER

1.	**Company**
Beyond Gravity Portugal UNIPESSOAL LDA, Rue Dr. Eduardo Neves 9, 1050-077 Lisboa, Portugal	
2.	**Period under evaluation**
January – October 2026	
3.	**Brief description of the identified high or maximum risk situations that motivate the mid-term evaluation**
There are no high or maximum risk situations identified. This risk classification conclusion is distinct from the implementation status of the preventive and corrective measures described in section 4, several of which remain partially implemented or not yet implemented.	
4.	**Description of preventive and corrective measures and their degree of implementation**
• Establishment of the **Regulatory Compliance Programme** and this Risk Prevention Plan, in compliance with the legal requirements arising from the RGPC: Is established and will be monitored, to take action where needed. • Amendment of the **Code of Conduct** to bring it into line with the RGPC: Will be implemented with the next amendment of the Code of Conduct. • Establishment of the **Anti-Corruption Policy**, and rules governing the offering and acceptance of gifts, hospitality and contributions, as well as the inclusion of anti-corruption clauses in contracts entered into with suppliers and subcontractors: Implemented. New training is planned as next step. • Creation of the **Supplier Pre-Qualification Policy**: Partially implemented, needs to be aligned with global Policy and process. • Creation of the **Conflict of Interest Policy**, bringing the group's international rules into line with national legislation: Partially implemented, needs to be aligned with global Policy. • Adaptation of the **Training Rules**, in compliance with the obligations set out in the RGPC and with a view to raising staff awareness regarding the prevention, detection and mitigation of acts of corruption and related offences: Partially implemented, local training obligations need to be aligned with global ones. • Amendment of the **Procurement Policy** to describe the processes implemented in greater detail: Not yet implemented. • Amendment of the **Whistleblowing Policy** to comply with the RGDPI: Implemented. Additional local Policy next to global Policy. • Conducting an **awareness-raising programme** for departments with the highest exposure to risk: Not yet implemented.	
5.	**Forecast of the full implementation of preventive and corrective measures**
The goal is to implement the missing preventetive and corrective measures in 2027. Implementation of certain topics needs to be aligned with the global organization and processes. The Amendment of the **Code of Conduct** will be addressed when the Code of Conduct will be amended for the next time. Until then, the missing gaps to the Portuguese legislation are made available in a seperate document.	
6.	**Date of preparation of the Report**
29. October 2026	

7.	**Signature of the General Responsible for the Implementation, Control and Review of the PPR**
	