



United Nations
Global Compact

We thank you for your time spent taking this survey.
Your response has been recorded.

CEO Statement of Continued Support

To our stakeholders,

I am pleased to confirm that APDL – Administracao dos portos do Douro, Leixoes e Viana do Castelo SA reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

In this annual Communication on Progress, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,

C1. Please complete the following information:

CEO/Highest-level
executive name:

Mr. Joao Neves

CEO/Highest-level
executive full title:

President of the Board of Directors

Company name:

APDL – Administração dos Portos do Douro, Leixões e Viana do
Castelo, S.A

C2. Please confirm:

☐ I am the CEO or highest-level executive.

☒ **I have received permission to sign on behalf of the CEO or highest-level executive.**

C2.1. If applicable, form completed on behalf of the CEO or
highest-level executive by:

Luís Monteiro

R1. How will you complete the CoP reporting requirement?

(Select one)

- ☒ **Complete the digital questionnaire with the option to also add a sustainability report *(Recommended)***
- ☐ Only upload a sustainability report

R2. What is the time period covered by your Communication on Progress? (MM/YYYY – MM/YYYY)

Please share the date range of the reporting period used for the Communication on Progress option you select.[i](#)

01/2025 – 12/2025

R3. (Optional) Please clarify the scope of reporting covered by your Communication on Progress. For example, please describe the operational scope of your CoP, (e.g., corporate office, investments, subsidiaries) as needed.[i](#)

Corporate office

Success Stories & Future Priorities

S1. (Optional) Within the reporting period, is there an initiative(s), project(s), and/or policy(ies) of which the company is particularly proud? Please focus on examples that demonstrate not only positive societal or environmental impact but also measurable value for the company.

Disclaimer: These initiatives are self-reported and have not been independently verified by the UN Global Compact. By

responding to this question, you consent to being contacted by the UN Global Compact regarding these initiatives for potential inclusion as examples in UN Global Compact resources.

This stand-out effort relates to:

(Select all that apply) 

- ☐ Governance
- ☐ Human Rights
- ☐ Labour
- ☒ **Environment**
- ☐ Anti-Corruption

S1A. Please provide a link and/or provide additional information:

APDL achieved environmental certification under the international standard ISO 14001:2015, covering all its business units and operations.

(https://www.apdl.pt/media/satp0we2/apdl_c_port_um_25_scanned.pdf)

(Optional) Please upload an outcome-focused document:

Drop files or click here to upload

S2. Which of the five issue areas does the company plan to prioritize in the next two years?

(Select all that apply) [i](#)

- ☐ Governance
- ☐ Human Rights
- ☐ Labour
- ☒ **Environment**
- ☐ Anti-Corruption
- ☐ None

S2A. (Optional) Please provide additional information:

APDL is implementing the Port of Leixões Energy Transition Plan with a view to decarbonizing the port by 2035. Several investments will be made in the coming years to achieve this goal. Currently, APDL is updating the Port of Leixões Energy Transition Plan and is also developing Energy Transition Plans for the Port of Viana do Castelo and for the Douro Inland Waterway, reinforcing its commitment to decarbonization and sustainable development across all its areas of operation.

[Click for additional guidance](#)

G1. Does the board/highest governance body or most senior executive of the company:

(Select all that apply) i

- ☒ **Issue an annual statement about the relevance of sustainable development to the company**
- ☒ **Issue an annual statement that addresses impacts on both people and the environment**
- ☒ **Issue an annual statement highlighting a zero tolerance for corruption**
- ☐ Sign off on organizational sustainability targets
- ☒ **Supervise Environmental, Social, and Governance reporting**
- ☒ **Regularly review potential risks related to the business model**
- ☐ None of the above

G1A. (Optional) Please provide additional information:

APDL has a "Risk Management Plan, including the Risks of Corruption and related infractions", and carries out an annual Risk Assessment
(<https://www.apdl.pt/empresa/gestao-de-riscos-sistemas-de-gestao-e-certificacoes/>)

G2. Does the company have a code of conduct in place regarding each of the following sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on our employees	Yes, focused on our employees and suppliers	Yes, focused on our employees and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	☐	☐	☐	☒	☐
Labour Rights/Decent Work	☐	☐	☐	☒	☐
Environment	☐	☐	☐	☒	☐
Anti-Corruption	☐	☐	☐	☒	☐

G2A. (Optional) Please provide additional information:

Code of Ethics and Conduct (https://www.apdl.pt/media/ko0nr51m/codigo-%C3%A9tica-e-conduta_apdl_v3.pdf)

G3. Has the company appointed an individual or group responsible for each of the following sustainability topics?

(Select one answer option per line) 

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights	☐	☐	☒	☐	☐
Labour Rights/Decent Work	☐	☐	☒	☐	☐
Environment	☐	☐	☒	☐	☐
Anti-Corruption	☐	☐	☐	☐	☒

G3A. (Optional) Please provide additional information:

Code of Ethics and Conduct (www.apdl.pt/media/ko0nr5lm/codigo-%C3%A9tica-e-conduta_apdl_v3.pdf)

G3.1. If yes, does the company also have formal governance structures (e.g., committees or governance bodies) in place to provide strategic oversight and support for these sustainability topics?

(Select one answer option per line) **i**

	No formal structure	Yes, with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, involves one or more members of senior management)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of company)
Human Rights	☐	☐	☐	☐	☒
Labour Rights / Decent Work	☐	☐	☐	☐	☒
Environment	☐	☐	☐	☒	☐
Anti-Corruption	☐	☐	☐	☐	☒

G3.1A (Optional) Please provide additional information:

G4. Does the company have a process to identify, assess and mitigate risks related to the following sustainability topics?

(Select one answer option per line) **i**

	No, this is not a current priority	No, but we plan to within the next two years	Yes, conducted by a designated individual or group	Yes, engaging employees across the company	Yes, engaging employees and business partners	Yes, engaging employees, business partners and external stakeholders
Human rights risks	☐	☐	☐	☒	☐	☐
Labour rights risks	☐	☐	☐	☒	☐	☐
Environmental risks	☐	☐	☐	☒	☐	☐
Corruption risks	☐	☐	☐	☒	☐	☐

G4A. (Optional) Please provide additional information:

APDL has a Risk Committee that meets periodically. A Risk Assessment is conducted annually, involving all of the company's business units.

G5. Does the company have a due diligence process through which it identifies, prevents, mitigates and accounts for actual and potential negative impacts on sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human rights risks	☐	☐	☐	☐	☒
Labour rights risks	☐	☐	☐	☐	☒
Environmental risks	☐	☐	☐	☐	☒
Corruption risks	☐	☐	☐	☐	☒

G5A. (Optional) Please provide additional information:

The risk assessment is carried out annually. APDL has a Risk Management Committee. The Regulation for the Risk Management Committee of APDL, S.A. can be consulted at <https://www.apdl.pt/empresa/gestao-de-riscos-sistemas-de-gestao-e-certificacoes>. APDL has Concerns and Grievance Mechanisms

G5.1. During the due diligence process, has the company identified those suppliers and/or other business relationships where the risk of adverse impacts on human rights, labour, environment and/or anti-corruption may be particularly severe?

(Select one answer option per line) i

	Yes	No
Human rights risks	☒	☐
Labour rights risks	☒	☐
Environmental risks	☒	☐
Corruption risks	☒	☐

G5.1A. (Optional) Please provide additional information:

G6. Does the company have a process(es) through which members of the company's workforce can raise concerns about the company's conduct on sustainability topics?

(Select one answer option per line) i

	No, this is not a current priority	No, but we plan to within the next two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, we have a formal process
Human Rights	☐	☐	☐	☒
Labour Rights / Decent Work	☐	☐	☐	☒
Environment	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☒

G6A. (Optional) Please provide additional information:

APDL has an Irregularity/Infraction Reporting Channel – Complaint, that allows three ways of presenting the communication of irregularity – complaint: web platform (verbal or written communication); closed letter, addressed to the APDL Ethics and Conduct Committee; in person. (https://www.apdl.pt/empresa/etica_empresarial/). The implementation of this Channel aims to allow the participation/reporting of intentional and/or negligent acts or omissions by any person who, directly or indirectly, has a relationship with APDL, namely, members of the corporate bodies, employees, service providers, suppliers, customers, auditors, competitors, among others, referring to facts that generate a violation of legal and regulatory provisions, as well as the rules, principles and values established in Concerns and Grievance Mechanisms the APDL Code of Ethics and Conduct; and also the infractions provided for in Law No. 93/2021, of December 20. This Channel was created in compliance with the provisions of article 8 of Decree-Law no. 109-E/2021, of December 9, as well as Law no. 93/2021, of December 20, allowing anonymous reception, or with identification, therefore APDL guarantees the whistleblower the same level of protection in any of the reported areas, namely ensuring non-retaliation against him/her

G6.1. Please provide additional detail regarding the process(es) the company has through which members of the company’s workforce can raise concerns about the company’s conduct.

(Select one answer option per line) i

Yes

No

Is the process communicated to all employees/workers in local languages?

☒☐

Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?

☒☐

Is the process confidential (e.g., whistleblowing process)?

☒☐

Are there processes in place to ensure the protection of whistleblowers? (e.g., against retaliation)

☒☐

Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)?

☒☐

Other (Please provide additional information)

☐☒

G6.1A. (Optional) Please provide additional information:

APDL has a Whistleblower Reporting Channel
(<https://whistleblowersoftware.com/secure/apdl>)

G7. How does the company track the effectiveness of its actions to manage its potential and actual impacts on the following sustainability topics?

(Select all that apply for each line) 

	No actions are systematically tracked	Gathers and assesses feedback from relevant stakeholders	Sets and regularly tracks goals and targets/KPIs	Conducts monitoring and evaluation (e.g. through internal and/or external auditing, impact assessments, grievance mechanisms, and benchmarking)	Incorporates lessons learned into operational policies and procedures
Human Rights	☐	☐	☐	☒	☐
Labour Rights/Decent Work	☐	☐	☐	☒	☐
Environment	☐	☒	☒	☒	☒
Anti-Corruption	☐	☐	☐	☒	☒

G7A. (Optional) Please provide additional information:

In 2025, APDL obtained environmental certification, issued by TÜV AUSTRIA in accordance with the international standard ISO 14001:2015, covering all of its business units
(https://www.apdl.pt/media/py0dspal/apdl_c_eng_01_um_25_scanned.pdf).

G8. Is executive pay linked to performance on one or more of the following sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	☒	☐	☐
Labour Rights / Decent Work	☒	☐	☐
Environment	☒	☐	☐
Anti-Corruption	☒	☐	☐

G8A. (Optional) Please provide additional information:

G9. Please provide details regarding the company's board/highest governance body.ⁱ

(Please enter only whole numbers rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros. For the categories 'Male, Female, Other', 'Under 30 years old, 30–50 years old, Above 50 years old', and 'Executive directors or equivalent, Non-executive directors or equivalent, and Independent non-executive directors or equivalent', please enter whole numbers only from 0 to 100). The values within these categories must total 100% in order to proceed.)

If your organization does not have board directors, select the options which best represent the members of your equivalent governing body with respect to their involvement in the day-to-day management of your organization.

	Known	Number (Please input a whole number)	Not applicable
Total number of board members (#)	☒	3	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Male (%)	☒	67	☐
Female (%)	☒	33	☐
Other (%)	☐		☒

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Under 30 years old (%)	☒	0	☐
30-50 years old (%)	☒	0	☐
Above 50 years old (%)	☒	100	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
From minority or vulnerable groups (%)	☐		☒

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Executive directors or equivalent (%)	☒	100	☐
Non-executive directors or equivalent (%)	☐		☒
Independent non-executive directors or equivalent (%)	☐		☒

G9A. (Optional) Please provide additional information:

G10. Within the reporting period, what was the percentage of women in managerial positions?

(If 'Known' is selected, include the value. Please enter only whole numbers from 0 to 100, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros)[i](#)

	Known	Percentage of women (%) (Please input a whole number e.g., 50% = 50)	Unknown
Managerial positions	☒	45	☐

G10A. (Optional) Please provide additional information:

The percentage presented refers to the proportion of women on the Board of Directors.

G11. What is the gender representation of the company's C-suite or equivalent executive leadership positions?

(Select all that apply for each line) 

	Women	Men	Other (e.g., non-binary)	Not applicable (e.g., the company does not have this position)	Choose not to disclose
Chief Executive Officer	☐	☐	☐	☒	☐
Chief Financial Officer	☒	☐	☐	☐	☐
Chief Procurement Officer	☐	☒	☐	☐	☐
Chief Technology Officer	☐	☒	☐	☐	☐
Chief Marketing Officer	☒	☐	☐	☐	☐
Chief Operations Officer	☐	☒	☐	☐	☐
Chief Sustainability Officer	☐	☒	☐	☐	☐
Chief Legal Officer/General Counsel	☒	☐	☐	☐	☐
Chief Human Resources Officer	☐	☒	☐	☐	☐
Chief Compliance Officer	☐	☐	☐	☒	☐
Other (Please provide additional information)	☒	☒	☐	☐	☐

G11A. Other (Please provide additional information):

Chief Construction and Equipment Officer – man Chief Studies and Projects Officer – women Chief Property and Heritage Officer – women

G11A. (Optional) Please provide additional information:

G12. Does the company consider sustainability in its financing and investment strategies?

(Select one that applies) **i**

- ☐ Yes, we consider sustainability in our financial planning and decision-making, **but not through a structured approach**
- ☐ Yes, we take a structured approach to considering sustainability **through a sustainability-informed investment or financing strategy, but this does not include specific targets tied to sustainability impact** (e.g., sustainability-linked bonds)
- ☒ **Yes, we take a structured approach to considering sustainability in financing and investment through SDG-aligned investment or SDG-linked financing strategies, including specific targets tied to sustainability impact (e.g., use-of-proceeds bonds)**
- ☐ No, but we plan to within the next two years
- ☐ No, this is not a current priority
- ☐ Choose not to disclose

G12A. (Optional) Please provide additional information:

2025 Annual Report and Accounts: <https://www.apdl.pt/empresa/relatorio-e-contas-anual/>

G13. Does the company produce sustainability reporting according to:

(Select all that apply) 

- ☐ National/local regulation on sustainability
- ☐ Security exchange regulations
- ☐ Corporate Sustainability Reporting Directive (CSRD) (formerly known as Non-Financial Reporting Directive of the European Union (NRFD))
- ☐ Voluntary Sustainability Reporting Standards for non-listed SMEs (VSME)
- ☒ **Global Reporting Initiative (GRI)**
- ☐ Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
- ☐ International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
- ☐ Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
- ☐ IFRS Sustainability Disclosure Standards (IFRS S1 and S2) (incorporating the Task Force on Climate-related Financial Disclosures (TCFD))
- ☐ Taskforce on Nature-related Financial Disclosures (TNFD)
- ☐ Taskforce on Inequality and Social-related Financial Disclosures (TISFD)
- ☐ CDP (formerly known as Carbon Disclosure Project)
- ☐ Science-Based Targets initiative (SBTi)
- ☐ Other voluntary frameworks (Please provide additional information)
- ☐ No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

G13A. (Optional) Please provide additional information:

G14. Is some or all of the information disclosed in this questionnaire assured by a third-party?

(Select one that applies) [i](#)

☐ Yes

☒ **No**

G14A. (Optional) Please provide additional information:

Human Rights and Labour

[Click for additional guidance](#)

NOTE: Regardless of whether the labour rights topics (freedom of association and the right to collective bargaining, child labour, forced labour, non-discrimination and equality, a safe and healthy working environment and wages) and the gender topic (gender equality and women's rights) are selected as material in questions HR/L1, all UN Global Compact participants must provide additional details on these topics in subsequent HR/L questions. For all other human rights and labour rights topics listed in question HR/L1, these topics will only be prompted in subsequent HR/L questions if they are selected as material in question HR/L1.1.

HR/LI. Which of the following has the company identified (by way of a formal or informal assessment) as material human rights and labour rights topics connected with its operations and/or value chain?

Note: It is important that participants assess the topics below, especially areas such as digital security, privacy, and data protection through a human rights and labour rights lens rather than an operational risk management lens.

(Select all that apply) 

☒ **Freedom of association and the right to collective bargaining**

☐ Child labour

☐ Forced labour

☒ **Non-discrimination and equality (in respect of employment and occupation)**

☒ **Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)**

☒ **Wages**

☒ **Working hours**

☒ **Mental health and employee wellbeing**

☒ **Gender equality and women's rights**

☐ Children's rights (beyond child labour)

☐ Rights of vulnerable groups (e.g., migrants, refugees, minority communities)

☐ Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)

☐ Just Transition (human rights impacts of climate action and economic transition on workers and communities)

☐ Land rights and rights of Indigenous Peoples

☐ Raw material sourcing (incl. traceability)

☒ **Digital security, privacy, and data protection**

☐ Freedom of expression and access to information

- ☐ Product and service end-user rights (incl. safety, accessibility, and potential misuse)
- ☐ Emerging technologies and responsible adoption of Artificial Intelligence (AI)
- ☐ Conflict-sensitive due diligence and/or use of security providers
- ☒ **Other human/labour rights topics identified as material**
- ☐ No informal or formal human/labour rights assessment conducted

HR/LIA. Please identify additional current material human rights topics either not on this list or that you believe represent evolving topics:

Mental health and employee wellbeing

HR/LIA. (Optional) Please provide additional information:

<https://www.apdl.pt/empresa/pessoas/politica-de-responsabilidade-social-corporativa/>; <https://www.apdl.pt/empresa/etica-empresarial/>;
https://www.apdl.pt/media/ko0nr51m/codigo-%C3%A9tica-econduta_apdl_v3.pdf;
Collective bargaining (Acordo coletivo de Trabalho publicado no Boletim do Trabalho e Emprego de 22/07/2024);
<https://diariodarepublica.pt/dr/detalhe/decreto-lei/421-1999-667363>;
<https://www.apdl.pt/empresa/pessoas/igualdade-de-genero/> The General Data Protection Regulation (GDPR); Regulation (EU) 2016/679 of the European Parliament and of the Council, dated 27 April 2016.

HR/L1.1. In addition to the required labour rights topics (freedom of association and the right to collective bargaining, child labour, forced labour, non-discrimination and equality, a safe and healthy working environment, and wages) and the gender topic (gender equality and women's rights), which human rights and labour rights topics does the company identify as most material to be reported on when answering questions HR/L2–HR/L5?

(Select all that apply, maximum six) i

☐ Working hours

☒ **Mental health and employee wellbeing**

☐ Children's rights (beyond child labour)

☐ Rights of vulnerable groups (e.g., migrants, refugees, minority communities)

☐ Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)

☐ Just Transition (human rights impacts of climate action and economic transition on workers and communities)

☐ Land rights and rights of Indigenous Peoples

☐ Raw material sourcing (incl. traceability)

☒ **Digital security, privacy, and data protection**

☐ Freedom of expression and access to information

☐ Product and service end-user rights (incl. safety, accessibility, and potential misuse)

☐ Emerging technologies and responsible adoption of Artificial Intelligence (AI)

☐ Conflict-sensitive due diligence and/or use of security providers

☐ None

HR/LI.1A. (Optional) Please provide additional information:

<https://www.apdl.pt/empresa/pessoas/politica-de-responsabilidade-social-corporativa/>; The General Data Protection Regulation (GDPR); Regulation (EU) 2016/679 of the European Parliament and of the Council, dated 27 April 2016.

HR/L2. Does the company have a policy commitment in relation to the following human rights & labour rights topics?

(Select one answer option per line, if 'Yes', include the value) 

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)
Freedom of association and the right to collective bargaining	☒	☐	☐	☐
Child labour	☒	☐	☐	☐
Forced labour	☒	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☒	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☒	☐
Wages	☐	☐	☒	☐
Gender equality and women's rights	☐	☐	☒	☐
Mental health and employee wellbeing	☐	☐	☒	☐
Digital security, privacy, and data protection	☐	☐	☒	☐

Please input the year the relevant human rights and labour rights policy was last reviewed (YYYY)

Freedom of association and the right to collective bargaining

Child labour

Forced labour

Non-discrimination and equality (in respect of employment and occupation)

Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)

Wages

Gender equality and women's rights

Mental health and employee wellbeing

Digital security, privacy, and data protection

HR/L2A. (Optional) Please provide additional information:

The documents referred to in the table above can be consulted at: – Corporate Social Responsibility Policy (<https://www.apdl.pt/empresa/pessoas/politica-de-responsabilidade-social-corporativa/>); Equality Plan (<https://www.apdl.pt/media/hyxnephs/plano-igualdade-2026.pdf>); Order No. 1103-B/2025 (Summary: Guidelines on the remuneration policy to be adopted by the State-owned enterprise sector in 2025.) Business Ethics (<https://www.apdl.pt/empresa/etica-empresarial/>); Privacy Policy (<https://www.apdl.pt/media/dellzykc/pol%C3%ADtica-de-privacidade.pdf>); Personal Data Processing Code of Conduct (https://www.apdl.pt/media/tg3lm2kl/c%C3%B3digo-de-conduta-para-o-tratamento-de-dados-pessoais_v2.pdf); Data Protection (<https://www.apdl.pt/empresa/privacidade/protecao-de-dados/>); <https://diariodarepublica.pt/dr/detalhe/decreto-lei/421-1999-667363>. APDL complies with national legislation that does not allow forced labor and child labor.

HR/L2A. (Optional) Please upload supporting documentation if applicable (1/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

HR/L2A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

HR/L2.1. For each human rights & labour rights policy commitment, is it:

(Select all that apply for each line) i

	Aligned with international human rights/labour standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's suppliers
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☒	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☒	☐	☐
Wages	☐	☐	☒	☐	☐
Gender equality and women's rights	☐	☐	☒	☐	☐
Mental health and employee wellbeing	☐	☐	☒	☐	☐
Digital security, privacy, and data protection	☐	☐	☒	☐	☐

	Applied to the other stakeholders within the company's value chain (consumers, communities, other business relationships)	Developed involving human rights/labour expertise from inside and/or outside the company	Other (Please provide additional information)
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☐
Wages	☐	☐	☐
Gender equality and women's rights	☐	☐	☐
Mental health and employee wellbeing	☐	☐	☐
Digital security, privacy, and data protection	☐	☐	☐

HR/L2.1A. (Optional) Please provide additional information:

HR/L2.3. Does the company's policy on wages include:

(Select all that apply) 

Note: The International Labour Organization (ILO) defines living wage as “the wage level that is necessary to afford a decent standard of living for workers and their families, taking into account the country circumstances and calculated for the work performed during the normal hours of work.” Compliance with minimum wage laws alone does not constitute a living wage commitment unless explicitly aligned with recognised living wage benchmarks.

☒ **A commitment to equal pay for work of equal value**

- ☐ A commitment to paying living wages to the company's own employees
- ☐ A commitment to advancing the payment of living wages across the company's supply chain
- ☐ A commitment to measuring and monitoring progress toward paying living wages (e.g., through living wage gap analyses)
- ☐ Time-bound, measurable targets to advance the payment of living wages
- ☐ We do have a policy on wages, but it does not include any of these details (Please provide additional information)

HR/L2.3A. (Optional) Please provide additional information:

Law No. 421/99 of 21 October; Ordinance No. 1098/99 of 21 December; Collective Labour Agreement (Labour and Employment Bulletin No. 44 of 29/11/2024; No. 47 of 22/12/2024; No. 2 of 15/01/2025; No. 10 of 15/03/2025; No. 11 of 2025); Order No. 1103-B/2025 (Summary: Guidelines on the remuneration policy to be adopted by the State-owned enterprise sector in 2025); Collective Bargaining Agreement (Collective Labour Agreement published in the Labour and Employment Bulletin on 22/07/2024).

HR/L3. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following human rights & labour rights topics?

(Select all that apply for each line) 

	No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent/mitigate the risks/ impacts in question	To agree on a way to prevent/mitigate the risks/ impacts in question
Freedom of association and the right to collective bargaining	☒	☐	☐	☐
Child labour	☒	☐	☐	☐
Forced labour	☒	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☐	☐
Wages	☐	☐	☐	☐
Gender equality and women's rights	☐	☐	☐	☐
Mental health and employee wellbeing	☐	☐	☐	☐
Digital security, privacy, and data protection	☐	☐	☐	☒

	To assess progress in preventing /mitigating the risks/impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question
· Freedom of association and the right to collective bargaining	☐	☐
· Child labour	☐	☐
· Forced labour	☐	☐
· Non-discrimination and equality (in respect of employment and occupation)	☒	☐
· Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☒	☐
· Wages	☒	☐
· Gender equality and women's rights	☒	☐
· Mental health and employee wellbeing	☐	☒
· Digital security, privacy, and data protection	☐	☐

HR/L3A. (Optional) Please provide additional information:

Plan for gender equality; <https://www.apdl.pt/empresa/pessoas/igualdade-degenero/> Among other measures, APDL has privacy and data protection agreements with our suppliers/service providers and partners. For services and activities supporting logistics and port operations, customers and concession areas at the Port of Leixões, APDL is certified by the ISO 28000 standard – Supply Chain Security (<https://www.apdl.pt/empresa/gestao-de-riscos-sistemas-de-gestao-ecertificacoes/>).

HR/L4. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select all that apply for each line) 

	No action within reporting period	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue
Freedom of association and the right to collective bargaining	☐	☐	☐	☐	☐
Child labour	☒	☐	☐	☐	☐
Forced labour	☒	☐	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☒	☐	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☒	☐	☐	☐
Wages	☐	☐	☐	☐	☐
Gender equality and women's rights	☐	☐	☐	☐	☐
Mental health and employee wellbeing	☐	☐	☐	☐	☐
Digital security, privacy, and data protection	☐	☐	☐	☒	☐

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	☒	☐
Child labour	☐	☐
Forced labour	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐
Wages	☒	☐
Gender equality and women's rights	☒	☐
Mental health and employee wellbeing	☒	☐
Digital security, privacy, and data protection	☐	☐

HR/L4A. (Optional) Please provide additional information:

Corporate Social Responsibility Policy (<https://www.apdl.pt/media/1kxبتqsl/politica-de-responsabilidade-social-corporativa.pdf>) Protocol with CITE – Commission for Equality in Labour and Employment; Order No. 1103-B/2025 (Summary: Guidelines on the remuneration policy to be adopted by the State-owned enterprise sector in 2025); Collective Bargaining Agreement (Collective Labour Agreement published in the Labour and Employment Bulletin on 22 July 2024); Business Ethics (<https://www.apdl.pt/empresa/etica-empresarial/>). Plan for gender equality; <https://www.apdl.pt/empresa/pessoas/igualdade-degenero/>; Regarding digital security and privacy, regular technical audits are conducted by external and independent entities on our IT tools/platforms. Audits are also conducted to determine whether regulations (e.g., legislation, internal regulations, etc.) are being followed. For services and activities supporting logistics and port operations, customers and concession areas at the Port of Leixões, APDL is certified by the ISO 28000 standard – Supply Chain Security.

HR/L4.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select one answer per line) 

	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	☐	☒	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☒	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☒	☐	☐
Wages	☐	☐	☐	☐	☒
Gender equality and women's rights	☐	☐	☒	☐	☐
Mental health and employee wellbeing	☐	☐	☒	☐	☐
Digital security, privacy, and data protection	☐	☐	☐	☒	☐

HR/L4.1A. Other (Please provide additional information):

Plan for gender equality (<https://www.apdl.pt/media/hyxnephs/plano-igualdade-2026.pdf>); Corporate Risk Management, including the risks of corruption and related violations (<https://www.apdl.pt/empresa/gestao-de-riscos-sistemas-de-gestao-ecertificacoes/>); Order No. 1103-B/2025 (Summary: Guidelines on the remuneration policy to be adopted by the State-owned enterprise sector in 2025); Business Ethics (<https://www.apdl.pt/empresa/etica-empresarial/>); Corporate Social Responsibility Policy (<https://www.apdl.pt/empresa/pessoas/politica-de-responsabilidade-social-corporativa/>).

HR/L4.1A. (Optional) Please provide additional information:

HR/L4.1.1. (Optional) For relevant human rights & labourrights topics for which the company sets timebound goals/targets, what targets has the company set? i

Non-discrimination and equality (in respect of employment and occupation)

Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)

Gender equality and women's rights

100% of achivement of the plan

Mental health and employee wellbeing

100% of achivement of the plan

Digital security, privacy, and data protection

HR/L4.1.1A. (Optional) Please provide additional information:

Plan for gender equality (<https://www.apdl.pt/media/hyxnephs/plano-igualdade-2026.pdf>); Internal plan of Social Responsibility 100% of achivement of the plan.

HR/L5. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following human rights & labour rights topic(s) ?

(Select one answer per line) **i**

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Freedom of association and the right to collective bargaining	☒	☐	☐	☐
Child labour	☒	☐	☐	☐
Forced labour	☒	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☒	☐	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☒	☐	☐	☐
Wages	☒	☐	☐	☐
Gender equality and women's rights	☒	☐	☐	☐
Mental health and employee wellbeing	☒	☐	☐	☐

No adverse
impact
identified or
caused

Yes, adverse
impact(s)
identified, but no
remedy
provided/enabled

Yes, adverse
impact(s)
identified, and
remedy
provided/enabled

Choose not to
disclose

Digital security,
privacy, and data
protection

☐☐☒☐

HR/L5A. (Optional) Please provide additional information:

HR/L6. What was the average gender pay gap (comparing jobs of equal value) during the reporting period?i

(Please enter only whole numbers, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, spaces, or leading zeros)

Guidance for Gender Pay Gap: Companies should calculate the gender pay gap by subtracting the average hourly earnings of male employees by the average gross hourly earnings of female employees, dividing the resulting figure by average gross hourly earnings of male employees. Earnings should be based on jobs of equal value. The result should then be multiplied by 100 to reveal the percentage wage gap between female and male employees. Please refer to the CoP guidebook for additional information on the gender pay gap formula.

Average Gender Pay Gap (%) - (Please input answer as a whole number e.g., 95% = 95)



Unknown



Choose to not disclose

9

HR/L6A. (Optional) Please provide additional information:

2024 Pay Gap Report (https://www.apdl.pt/media/1zcj4q5b/relatorio-diferencial-genero-2024_v1.pdf)

HR/L7. Within the reporting period, what was the rate of recordable work-related accidents for employees? i

Guidance for work-related accidents rate: companies should calculate the work-related accidents rate by dividing the total number of work-related accidents in the reporting year by the total number of hours worked by all employees during the same period. The result should then be multiplied by 200,000. Please refer to the CoP guidebook for additional information on the work-related accidents rate formula.

Rate of work-related accidents (Please input a number rounded to two decimal places, e.g., 1.55)



☐ Unknown

C

☐ Choose to not disclose

0.02

HR/L7A. (Optional) Please provide additional information:

2025 Annual Report (<https://www.apdl.pt/empresa/relatorio-e-contas-anual/>)

HR/L8. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the human rights and labour principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.ⁱ

Environment

[Click for additional guidance](#)

E1. Does the company have a policy commitment in relation to the following environmental topics?

(Select one answer per line, if 'Yes', include the value)i

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (
Climate change	☐	☐	☒	☐	2025
Water	☐	☐	☒	☐	2025
Oceans	☐	☐	☒	☐	2025
Nature and biodiversity	☐	☐	☒	☐	2025
Air pollution	☐	☐	☒	☐	2025
Waste management	☐	☐	☒	☐	2025
Circularity	☐	☐	☒	☐	2025
Energy & resource use	☐	☐	☒	☐	2025
Other environmental topic(s) (Please provide additional information)	☒	☐	☐	☐	

EIA. (Optional) Please provide additional information:

In 2025, APDL revised its Sustainability Policy, which is available at
<https://www.apdl.pt/media/x0yfr354/politica-de-sustentabilidade-2025.pdf>

EIA. (Optional) Please upload supporting documentation if applicable (1/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

EIA. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

E1.1. For each environmental policy commitment, is it:

(Select all that apply for each line) 

	Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's suppliers
Climate change	☒	☒	☒	☐	☐
Water	☒	☒	☒	☐	☐
Oceans	☒	☒	☒	☐	☐
Nature and biodiversity	☒	☒	☒	☐	☐
Air pollution	☒	☒	☒	☐	☐
Waste management	☒	☒	☒	☐	☐
Circularity	☒	☒	☒	☐	☐
Energy & resource use	☒	☒	☒	☐	☐

	Applied to the other stakeholders within the company's value chain (consumers, communities, other business relationships)	Developed involving environmental expertise from inside and/or outside the company	Other (Please provide additional information)
Climate change	☒	☒	☐
Water	☒	☐	☐
Oceans	☒	☐	☐
Nature and biodiversity	☒	☐	☐
Air pollution	☒	☒	☐
Waste management	☒	☐	☐
Circularity	☒	☐	☐
Energy & resource use	☒	☒	☐

E1.1A. (Optional) Please provide additional information:

One of the objectives of APDL's Sustainability Policy is to create value and engage business partners in its sustainability commitments. Additionally, APDL has established several policies, plans and instruments to support its sustainability commitments, including: - Roadmap for the Energy Transition towards Carbon Neutrality, with a commitment to achieving carbon neutrality at the Port of Leixões by 2035 (available at <https://www.apdl.pt/sustentabilidade/>); - Waste Reception and Management Plans for Ship-Generated Waste for each port (available at <https://www.apdl.pt>); - Maritime Safety Standards for the ports of Leixões and Viana do Castelo (available at <https://www.apdl.pt>); - the Regulations for the Operation and Use of the Douro Waterway (<https://douro.apdl.pt/regulamentos-e-tarifarios/regulamentos/regulamento-de-exploracao-e-utilizacao-da-vnd/>); - the Letter of Principles for Concessionaires of the Port of Leixões (<https://www.apdl.pt/media/0drjp443/carta-principios-concessionarios.pdf>); - Supplier Code of Conduct (<https://www.apdl.pt/media/555hkbld/codigo-fornecedores.pdf>); and - Water Quality Control Plan (<https://www.apdl.pt/empresa/seguranca-e-saude-no-trabalho/controlo-de-qualidade-e-consumo-da-agua/>). Through these policies and management instruments, APDL promotes responsible business practices, environmental protection, maritime safety, sustainable resource management and engagement with suppliers and concessionaires.

E2. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following environmental topics?

(Select all that apply for each line) **i**

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Climate change	☐	☐	☐	☒
Water	☐	☐	☒	☐
Oceans	☐	☒	☒	☒
Nature and biodiversity	☒	☐	☐	☐
Air pollution	☐	☐	☒	☒
Waste management	☐	☐	☒	☒
Circularity	☒	☐	☐	☐
Energy & resource use	☐	☐	☒	☒
Other environmental topic(s)	☐	☐	☒	☐

	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
· Climate change	☐	☐	☐
· Water	☐	☐	☐
· Oceans	☐	☐	☐
· Nature and biodiversity	☐	☐	☐
· Air pollution	☐	☐	☐
· Waste management	☐	☐	☐
· Circularity	☐	☐	☐
· Energy & resource use	☐	☒	☐
· Other environmental topic(s)	☐	☐	☐

E2A. Other environmental topic(s) (Please provide additional information):

Several stakeholders were also consulted as part of the preparation of the Management and Operation Plan for the Douro River Waterway.

E2A. (Optional) Please provide additional information:

In 2025, APDL, with the support of external experts, developed the Port of Leixões Strategic Plan 2025–2035. During this process, stakeholders were actively involved, including concessionaires, port operators, the Municipality, the Port Community, and other institutional partners. Their contributions were taken into consideration in defining the port's strategic priorities, particularly in areas such as competitiveness, logistics efficiency, port-city integration, sustainable development, energy transition, digitalization, and territorial integration.

E3. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select all that apply) 

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue
Climate change	☐	☐	☐	☒	☐
Water	☐	☐	☐	☒	☐
Oceans	☐	☐	☐	☒	☒
Nature and biodiversity	☐	☐	☐	☒	☐
Air pollution	☐	☐	☐	☒	☐
Waste management	☐	☐	☒	☒	☐
Circularity	☒	☐	☐	☐	☐
Energy & resource use	☐	☐	☒	☒	☐
Other environmental topic(s)	☒	☐	☐	☐	☐

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Climate change	☐	☐
Water	☐	☐
Oceans	☒	☐
Nature and biodiversity	☐	☐
Air pollution	☐	☐
Waste management	☐	☐
Circularity	☐	☐
Energy & resource use	☐	☐
Other environmental topic(s)	☐	☐

E3A. (Optional) Please provide additional information:

In 2025, APDL achieved ISO 14001:2015 environmental certification across all its business units
(https://www.apdl.pt/media/satp0we2/apdl_c_port_um_25_scanned.pdf).

E3.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select one answer option per line) 

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Climate change	☐	☐	☐	☒	☐
Water	☐	☐	☐	☒	☐
Oceans	☐	☐	☐	☒	☐
Nature and biodiversity	☐	☒	☐	☐	☐
Air pollution	☐	☐	☐	☒	☐
Waste management	☐	☒	☐	☐	☐
Energy & resource use	☐	☐	☐	☒	☐

E3.1A. (Optional) Please provide additional information:

APDL monitors the quantity of water consumed, the quality of drinking water and the quality of surface water. Although a target for 2025 with regard to waste has not been established, joint work was carried out with some stakeholders and service providers that allowed the recycling rate of non-hazardous waste to be increased.

E3.1.1. (Optional) For relevant environmental topics for which the company sets timebound goals/targets, what targets has the company set?

(Please provide a description of targets, for example, what is the target, absolute vs. intensity, externally verified, on track, etc. Refer to the CoP Guidebook for target examples) 

Climate change

Decarbonization of the port of Leixões until 2035

Water

Regarding the quality of water for human consumption, legal compliance is assessed in terms of microbiological parameters

Oceans

Compliance with quality standards for bathing water and good chemical status of surface water at least 50% of the year.

Air pollution

Average annual concentration of NO₂ below 40 µg/m³ at the entry gate of trucks in the port of Leixões and average annual concentration of PM₁₀ below 40 µg/m³ in the port of Leixões.

Energy & resource use

- By the end of 2025, at least 70% of APDL's vehicle fleet is expected to be composed of electric or hybrid vehicles; - Deployment of solar energy solutions aimed at generating 6.05 GWh annually; - Provision of shore-side electricity to maritime tourism vessels operating on the Douro Waterway, with the aim of reducing the carbon footprint associated with the use of auxiliary engines while vessels are berthed.

E3.1.1A. (Optional) Please provide additional information:

E3.1.2. For each environmental topic in which the company sets timebound goals/targets, how is progress against goal/target tracked?

(Select all that apply for each line) 

	Progress is not tracked	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information)
Climate change	☐	☐	☒	☐	☐
Water	☐	☒	☐	☐	☐
Oceans	☐	☒	☒	☐	☐
Air pollution	☐	☒	☒	☒	☐
Energy & resource use	☐	☒	☒	☐	☐

E3.1.2A. (Optional) Please provide additional information:

E4. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following environmental topics?

(Select one answer option per line) i

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Climate change	☒	☐	☐	☐
Water	☒	☐	☐	☐
Oceans	☒	☐	☐	☐
Nature and biodiversity	☒	☐	☐	☐
Air pollution	☐	☐	☒	☐
Waste management	☒	☐	☐	☐
Circularity	☒	☐	☐	☐
Energy & resource use	☒	☐	☐	☐
Other environmental topic(s)	☒	☐	☐	☐

E4A. (Optional) Please provide additional information:

E5. Within the reporting period, did the company measure Scope 1 and/or Scope 2 global greenhouse gas (GHG) emissions?

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros)

	Known	Measured Total Emissions (tCO2e)	We did not measure our gross emissions (Please provide additional information)
Scope 1 emissions	☐		☒
Scope 2 (market-based) emissions	☐		☒
Scope 2 (location-based) emissions	☐		☒

E5A. We did not measure our gross emissions (Please provide additional information):

Given the extent of the company's value chain, the emissions has not yet been determined.

E5A. (Optional) Please provide additional information:

E6. Within the reporting period, did the company measure Scope 3 global greenhouse gas (GHG) emissions?

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros) ⓘ

			Measured total emissions (tCO2e)	Yes, partially measured	We did not measure Scope 3 emissions (Please provide additional information)
Scope 3 emissions	☐			☐	☒

E6A. We did not measure Scope 3 emissions (Please provide additional information):

Given the extent of the company's value chain, the Scope 3 GHG emissions has not yet been determined.

E6A. (Optional) Please provide additional information:

E7. Does the company have a target(s), validated by a third-party, relating to the reduction of greenhouse gas (GHG) emissions?

(Select all that apply for each line. If have target(s), include the baseline year)

	Short term (5-10 years)	Medium term (10-15 years)	Long term (20-30 years)	Baseline year (YYYY)	No targets set
Scope 1 targets validated by a third-party	☐	☐	☐	YYYY	☒
Scope 2 targets (market-based) validated by a third-party	☐	☐	☐	YYYY	☒
Scope 2 targets (location-based) validated by a third-party	☐	☐	☐	YYYY	☒
Scope 3 targets validated by a third-party	☐	☐	☐	YYYY	☒
All or some set targets not validated by a third-party	☐	☐	☐	YYYY	☒

E7A. (Optional) Please provide additional information:

E8. Does the company have a climate change adaptation plan?

(Select all that apply) **i**

- ☐ Yes, and it includes physical risk assessments
- ☐ Yes, and it includes transition risk assessments
- ☐ Yes, and it includes a physical climate risk scenario analysis
- ☐ Yes, and it includes actions to increase adaptation and resilience in the communities in which we operate
- ☐ No, but we plan to within the next two years
- ☒ **No (Please provide additional information)**

E8A. (Optional) Please provide additional information:

We don't have a plan but In the most recent projects that are subject to an Environmental Impact Study, their impact on Climate Change is studied and, whenever applicable, measures are identified/taken for adaptation and resilience to climate change.

E9. Has the company set targets to phase out fossil fuels?

(Select all that apply) 

- ☐ Yes, we have set targets to phase out fossil fuel-based materials
- ☒ **Yes, we have set targets for investment in non-fossil fuel emitting activities**
- ☒ **Yes, we have set targets for renewable energy procurement**
- ☐ Yes, we have set targets to end the exploration of fossil fuels, the expansion of existing fossil fuel reserves, the extraction of fossil fuels
- ☒ **Yes, we have set other targets to phase out fossil fuel usage**
- ☐ No, but we plan to within the next two years
- ☐ No

E9A. Yes, we have set other targets to phase out fossil fuel usage
(Please provide additional information):

APDL, as a socially and environmentally responsible company, commits to achieving carbon neutrality by 2035, adopting appropriate measures: - Onshore Power Supply (OPS); - Renewable Energy Sources; - Alternative Fuels; - Electrification of Port Activities; - Digitalization; - Air Quality; - Electric Grid.

E9A. (Optional) Please provide additional information:

E10. Does the company have a transition plan containing policies, actions, investments, accountability mechanisms, and targets to limit global warming?

(Select all that apply) 

- ☐ Yes, it is aligned with science to limit global warming to 1.5°C
- ☐ Yes, it follows the mitigation hierarchy
- ☒ **Yes, it helps increase direct/indirect investment in renewable energy**
- ☒ **Yes, it transitions from fossil fuels to non-emitting energy sources such as renewables**
- ☐ Yes, it improves energy efficiency and substituting disposable materials for reusable materials
- ☐ Yes, it deploys GHG removal methods
- ☐ Yes, it describes the impacts on stakeholders, workers and the environment and the actions taken to manage them
- ☐ Yes, it describes how public policy activities, including lobbying activities, are consistent with the transition plan
- ☒ **Yes, it factors into the organization's financial planning**
- ☒ **Yes, it is embedded in the business strategy**
- ☒ **Yes, it is overseen by the highest governance body of the company**
- ☐ No transition plan (Please explain why it does not exist)

E10A. (Optional) Please provide additional information:

APDL has established an Energy Transition Roadmap for the Port of Leixões aimed at achieving Carbon Neutrality. This roadmap is currently under review and update.

E11. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

(Select all that apply) **i**

- ☐ Climate change
- ☐ Oceans
- ☒ **Energy & resource use**
- ☒ **Waste management**
- ☐ Water
- ☐ Nature and biodiversity
- ☐ Air pollution
- ☐ Circularity
- ☐ None of the topics have been identified as material by the company

E11A. (Optional) Please provide additional information:

E17. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the environment principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.

Anti-Corruption

[Click for additional guidance](#)

AC1. Does the company have an anti-corruption compliance programme?

(Select one that applies) [!\[\]\(78ffa80c852b6e8c49ef700c33cf24e1_img.jpg\)](#)

- ☐ No, this is not a current priority
- ☐ No, but we plan to within the next two years
- ☒ **Yes**

AC1A. (Optional) Please provide additional information:

APDL has a "Plan for the prevention and mitigation of management risks, including risks of corruption and related infractions", available at
<https://www.apdl.pt/empresa/gestao-de-riscos-sistemas-de-gestao-e-certificacoes>

AC1.1. Is the anti-corruption compliance programme:

(Select all that apply) 

☒ **Publicly available**

☒ **Approved at most senior level of the company**

☒ **Applied to the company's own operations**

☒ **Applied to the company's own suppliers**

☐ Applied to the other stakeholders within the company's value chain
(consumers, communities, other business relationships)

☐ Other (Please provide additional information)

AC1.1A. (Optional) Please provide additional information:

https://www.apdl.pt/media/ko0nr51m/codigo-%C3%A9tica-e-conduta_apdl_v3.pdf
<https://www.apdl.pt/empresa/gestao-de-riscos-sistemas-de-gestao-ecertificacoes/>

AC1.2. Does the company monitor its anti-corruption compliance programme?

(Select all that apply) 

- ☒ **Yes, through review on an adhoc basis**
- ☒ **Yes, through internal employee self-evaluations**
- ☐ Yes, through automated controls monitoring
- ☐ Yes, through external independent monitoring
- ☐ Yes, through other mechanisms (Please provide additional information)
- ☐ No, we do not monitor the anti-corruption compliance programme
(Please provide additional information)

AC1.2A. (Optional) Please provide additional information:

The programme is reviewed every year and has a public anual report available at <https://www.apdl.pt/empresa/gestao-de-riscos-sistemas-de-gestao-ecertificacoes/>

AC2. Does the company have policies and recommendations for employee procedures in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

(Select one that applies) i

- ☐ No, and we have no plans to develop any policy/recommendation
- ☐ No, but we plan to within the next two years
- ☒ **Yes, included within a broader policy or as a standalone policy**

AC2A. (Optional) Please provide additional information:

Recommendations on this matter can be found in the APDL "Code of Ethics and Conduct", available at https://www.apdl.pt/media/ko0nr51m/codigo-%C3%A9tica-e-conduta_apdl_v3.pdf

AC3. Does the company engage in collective action against corruption?

(Select one that applies) i

- ☐ No, this is not a current priority
- ☐ No, but we plan to in the next two years
- ☒ **Yes (Please provide additional information)**

AC3A. Yes (Please provide additional information):

In addition to the various organizational units of APDL being involved annually in the risk assessment, training actions are carried out to which all workers have access.

AC3A. (Optional) Please provide additional information:

AC4. Who receives training on anti-corruption and integrity?

(Select all that apply) i

- ☒ **All employees**
- ☐ Selected employees (Please provide additional information)
- ☐ Third-party suppliers, contractors and/or consultants
- ☐ No training provided

AC4A. (Optional) Please provide additional information:

AC4.1. How often is such training provided?

(Select one answer option per line) 

	One time only	Every two or more years	Every year	Unknown
All employees	☐	☐	☒	☐

AC4.1A. (Optional) Please provide additional information:

AC5. What mechanisms does the company have in place to detect incidents of corruption?

(Select all that apply) 

- ☒ **Internal reporting channels (e.g., confidential or anonymous speak-up mechanisms)**
- ☒ **Whistleblower protection**
- ☐ Internal audits, compliance reviews, or other forms of controls
- ☐ Third-party due diligence and ongoing monitoring
- ☐ External reporting channels (e.g., grievance or complaint mechanisms)
- ☐ External audits or independent reviews
- ☐ Other (Please provide additional information)
- ☐ No mechanisms in place to detect incidents of corruption

AC5A. (Optional) Please provide additional information:

AC5.1. Within the reporting period, what actions has the company taken to address suspected incidents of corruption?

(Select all that apply) **i**

- ☒ **Internal measures (e.g. internal investigation, review by board of directors, review by ethics committee)**
- ☐ External measures (e.g., audit, review, report to and collaborate with authorities)
- ☐ Other (Please provide additional information)
- ☐ No actions were taken to address suspected incidents of corruption
- ☐ No incidents of corruption suspected

AC5.1A. (Optional) Please provide additional information:

Within the scope of the CEC's activities, 9 reports were registered through the Whistleblowing Channel and, following analysis and the corresponding processing, were closed with no further action and archived. APDL has a Corporate Governance Dossier, which includes the Code of Ethics and Conduct, the Code of Conduct for the Processing of Personal Data, the Whistleblowing Regulation, and the Regulation of APDL's Ethics and Conduct Committee.

AC6. (Optional) Briefly describe additional relevant practical actions the company has taken within the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation.[i](#)

The APDL has internal regulations aimed at preventing the risk of corruption and related offenses, particularly the Code of Ethics and Conduct, the Corruption Prevention Plan and Related Offenses, the Regulations for Reporting Irregularities, the Regulations for the Operation of the Ethics and Conduct Committee, and the Irregularity Reporting Channel.

R5. (Optional) Please upload the sustainability report for your company

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R5.1. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R5.2. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

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