

LEGAL ALERT

GENERAL REGIME FOR THE PREVENTION OF CORRUPTION

OCTOBER INTERIM EVALUATION REPORT

During this month of October, in accordance with the rules imposed by [Decree-Law no. 109-E/2021, of December 9](#), which establishes the General Regime for the Prevention of Corruption (RGPC) and creates the National Anti-Corruption Mechanism, the entities covered by and obliged to adopt and implement the Plan for the Prevention of Risks of Corruption and Related Offenses (PPR) are **required to produce an interim evaluation report, which aims to monitor the implementation of said PPR** (according to Article 6(4)(a), of the RGPC).

We would therefore like to alert all the entities covered by the RGPC that the deadline for producing the aforementioned interim assessment report in the situations identified in the PPR as high or maximum risk is currently underway, as a consequence of the legally foreseen oversight mechanism. This report must include, among other information which may be relevant for the purposes of this interim assessment, the risks that have been classified in the PPR as high or maximum, the measures provided for in the PPR to prevent or correct these risks and the state of implementation of these measures.

Failure to produce this report, as well as failure to publicize it to employees and failure to communicate it to certain bodies, in the case of public entities, **constitutes an administrative offense**, under the terms of Article 20(3), (a), (c) and (d), of the RGPC. These offenses are punishable by a fine of EUR 1000 to EUR 25 000 in the case of a legal person or similar entity, and up to EUR 2500 in the case of natural persons.

It should be noted that the RGPC came into force in June 2022 – you may find out more about this regime in our previous [Legal Alert](#) of April 13, 2023 –, having a phased effect, with its **sanctioning regime having come into force on June 7, 2023**, with the exception of medium-sized companies in the private sector (companies between 50 and 249 employees), for which it will take effect from June 7, 2024 onwards.

[Morais Leitão's Compliance team](#) has been advising its clients on the implementation of the RGPC and, in general, on complying with legal obligations regarding the prevention of corruption. The team is at your disposal for any clarification on the preparation of the interim evaluation report by the entities covered by this regime, as well as any other issue related to the RGPC.

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