

CORRUPTION RISK PREVENTION PLAN AND RELATED OFFENSES

I. FRAMEWORK AND EXPLANATORY STATEMENT

Decree-Law No. 109-E/2021 of 12/9/2021, an integral part of the National Anti-Corruption Strategy 2020-2024, created the National Anti-Corruption Mechanism (aka, MENAC) and approved the General Corruption Prevention Regime (aka, RGPC).

In addition to defining what is meant by corruption and related offenses - “crimes of corruption, undue receipt and offer of advantage, embezzlement, economic participation in business, concussion, abuse of power, malfeasance, influence peddling, money laundering or fraud in obtaining or diversion of subsidy, subsidy or credit”, under the terms of article 3 of the General Regime for the Prevention of Corruption (RGPC), annexed to Decree-Law no. 109-E/2021 – the aforementioned diploma provides that the prevention plan contains (i) the “identification, analysis and classification of risks and situations that may expose the entity to acts of corruption and related infractions” and “preventive and corrective measures that reduce the probability of occurrence and the impact of risks and situations identified” (article 6, no. 1).

In compliance with the aforementioned diploma, as well as the various recommendations issued by the GAFI/FATF and EU Directives, guiding its activity by high standards of professional responsibility and ethics, governed by the principles of integrity, transparency, honesty, loyalty, rigor and in good faith, IBERSOL SGPS, S.A. (hereinafter referred to as “IBERSOL” for short), has prepared this Plan for the Prevention of Risks of Corruption and Related Offenses (hereinafter referred to as PPR), which covers its entire organization and activity and its primary objectives:

- a) The identification, analysis and classification of risks and situations that may expose IBERSOL to acts of corruption and related infractions, considering the sector of activity and geographies in which it operates; It is
- b) The adoption of preventive and corrective measures that reduce the probability of occurrence and the impact of identified risks and situations.

The fulfillment of the desiderata included in the same diploma involves, for the obliged entities, the implementation of a Regulatory Compliance Program that is composed, at least, of:

- Corruption and Related Offenses Prevention Plan (PPR);
- Code of Conduct
- Training Program
- Reporting Channel

The Corruption Prevention and Money Laundering and Terrorist Financing Policy (BCFT Policy) is one of the fundamental parts in the global control of the Ibersol Group's activity, calling for standards and an ethical component in the activity carried out, constituting essential factors for safeguarding autonomy, integrity, sustainability, transparency, reputation and trust of the various stakeholders in each Business Unit (hereinafter referred to as BU) of the Ibersol Group.

The Policy thus defined is directly applicable to members of the management and supervisory bodies and to all employees of the Ibersol Group, and may also be extended to all employees of entities providing services external to the same Group.

The definition of this Policy, comprising a non-exhaustive set of principles, procedures and controls common to the various BUs of the Ibersol Group to prevent the risks of corruption, money laundering and terrorist financing, does not inhibit, but is rather compatible with, the additional procedures that each Business Unit understands to specifically establish the most appropriate treatment of its specific risk factors.

As a holding company, IBERSOL is specifically responsible for:

- 1 - Understand market dynamics and develop an independent and comprehensive long-term vision in each sector;
- 2 - Ensure that companies develop strategies and/or business plans that translate into above-average returns in terms of sustainability and business models prepared for the future;
- 3 - Evaluate significant capital reallocations and investments in new business areas;

- 4 - Ensure the balance of invested capital, exposure and debt for the desired risk and return levels;
- 5 - Ensure that businesses act in accordance with IBERSOL's values and high ethical standards;
- 6 - Ensure that Group companies invest in the development of human capital and excellent managers;
- 7 - Manage the top talent of the IBERSOL group, promote internal mobility, ensure the appropriate skillset and diversity in all senior leadership teams;
- 8 - Ensure transparent communication and attraction of the best investors; It is
- 9 - Support the IBERSOL group coordination platforms in key areas.

The provisions of this Policy do not prevail or replace, of course, what may be determined by national legislation applicable to the control of the same risk factors.

However, all exceptions arising from the application of what has just been said will have to be explained to the Person Responsible for Regulatory Compliance (hereinafter referred to as RCN), duly justified, identifying the differences in question and their respective consequences.

II – THE IBERSOL GROUP

1. The Ibersol Group

- Ibersol, SGPS S.A.
- Ibersol -Restauração S.A.
- Iberusa - Hotelaria e Restauração S.A.
- Ibersande Restauração S.A.
- Iberaki, Restauração, S.A.
- Ibersol Madeira e Açores, Restauração S.A.
- Firmoven, Restauração S.A.
- Ibergourmet - Produtos Alimentares, S.A.
- Restmon (Portugal) – Gestão e Exploração de Franquias, Lda
- IBR Imobiliária, S.A.
- Anatir, SGPS S.A.
- José Silva Carvalho - Catering, S.A.
- Maestro - Serviços e Gestão Hoteleira S.A.
- SEC - Eventos e Catering, S.A.
- Sugestões e Opções - Actividades Turísticas, S.A.
- Iberusa, Purchasing Center for ACE Restoration
- Food Orchestrator, S.A.

and also the companies in which, at any given time, Ibersol SGPS, SA. holds, directly or indirectly, a stake equal to or greater than 50% of the share capital or in which it exercises control.

2. The responsibilities of the Ibersol Group

a) The Principles

Firstly, the unequivocal affirmation of the exercise of its activity with respect for the laws, regulations and standards in force in each relevant geography, complemented by an action that, at each moment and in each circumstance, values the transparency, integrity and ethics of procedures adopted.

This also results in the mandatory nature of universal respect for the Policy defined here regarding the prevention of the risks of corruption, money laundering and terrorist financing, with non-compliance with any of the inherent standards or procedures being tolerated or minimally accepted.

As a holding company, IBERSOL ensures that the fundamental values of corporate governance - centered on sustainability and a total commitment to transparency - are present throughout the portfolio, through flexible mechanisms that allow for quick decision-making and effective supervision, namely, in terms of risk monitoring. Therefore, these values apply to all BUs of the Ibersol Group and, therefore, to all its members and employees, also extending to its service providers, especially when they may act on its behalf.

The achievement of the aforementioned values involves (i) definition and implementation of standards and procedures adjusted to the reality in question and monitoring of the respective risk factors, if necessary, including the specificities recommended by each relevant geography, (ii) implementation of essential controls to the permanent verification of its application, (iii) establishment of procedures that allow effective communication to the corresponding judicial entities of detected facts or actions classified as doubtful or less appropriate and (iv) permanent monitoring of the reasonableness of the solutions in force, with adjustment thereof to the achievement of the values intended to be achieved, whenever this proves necessary.

b) Prevention of Corruption, Money Laundering and Terrorist Financing

Members of the corporate bodies of any BU of the Ibersol Group, all employees thereof, as well as all employees who may act on behalf of any BU of the Ibersol Group, must fully and extensively know all the rules of the Policy in question here, allowing thus ensure that:

- (i) respect the rules in question;
- (ii) respect national legislation that conditions activity in each relevant geography;
- (iii) do not adopt improper or illegal practices;
- (iv) will not involve the Ibersol Group in illicit actions;
- (v) will not favor third parties.

On the other hand, the BUs of the Ibersol Group must only enter into legal transactions with entities that unequivocally comply with the national legislation in question and the good practices in force there, as well as which can present a conduct that coincides in all respects with the practices in force in the Group. Ibersol, ensuring in particular respect for practices that ensure social responsibility in its production chain.

Namely and mainly, but not exhaustively, practices that may involve, or may be assimilated to situations of:

- corruption;
- Bribery;
- money laundering and terrorist financing;
- embezzlement or economic participation in business;
- abuse of privileged information.

The BU of the Ibersol Group and its employees are completely and unequivocally prohibited from taking any action that could constitute the attribution of illicit advantages, as well as requesting or accepting, for themselves or third parties, material or non-material advantages or bribes in return for the practice of any act or its omission.

Additionally, the Ibersol Group BUs may only enter into legal transactions with entities that carry out legal activities and that manipulate resources with an undeniable legal source.

In fact, no legal transactions will be carried out, even if occasional, when identification elements or other elements considered equally indispensable are not obtained to assess the identity, control structure and respective beneficial owners of the counterparty entities in question.

The materialization of these values and practices will involve the definition and implementation, in each BU, of Standards and Procedures inherent to the prevention of the risks of Money Laundering and Terrorist Financing.

III – Corruption Risk Prevention Plan and Related Offenses

1- Scope

The crime of corruption, in its various dimensions, is duly defined in the Portuguese Penal Code, as summarized in Annex I to this PPR.

The RGPC is applicable to legal entities that, having their headquarters in Portugal, employ 50 or more workers, as well as to branches in the national territory of legal entities with headquarters abroad that employ 50 or more workers.

All companies that make up the IBERSOL Group are considered covered by the relevant Regime here.

To comply with the provisions of the aforementioned Regime and for the entities indicated above, the areas of activity that, typically, may carry a greater risk of committing acts of corruption and related offenses were identified, as set out in Annex II.

2- Mission, Functions, Competencies and Duties

First and foremost, the Corruption and Related Offenses Risk Prevention Plan is supported by the commitment of the Ibersol Group's management bodies, which unequivocally assume an attitude of actively promoting a culture of compliance and fight against corruption and related infractions.

This PPR was promoted by the Board of Directors of Ibersol SGPS, SA, committing it equally to its implementation in the Ibersol Group, as well as to the search for its continuous improvement over time.

In possession of this Plan, which embodies the set of principles relating to the Policy for the Prevention of Corruption and Money Laundering and Financing of Terrorism (BCFT Policy), the management bodies of the entities forming part of the Ibersol Group must promote its respective implementation, incorporating, if applicable, the specificities determined by the relevant entity or by the legislation specific to the geography in question.

It is important, for a complete understanding of the context of application of the Corruption Risk Prevention Plan and Related Infractions, to remember that it is part of, naturally with evident protagonism, the aforementioned culture of compliance and which the Ibersol Group assumes as its own, the which involves the existence of the four usual lines of defense, such as:

- First line of defense, incorporated into the daily management of the Business and in compliance with the rules and procedures in force at the Group, being the responsibility of the Group's Top Management and the universality of its employees;

- Second line of defense, which will be decisively reinforced with the designation of the Person Responsible for Regulatory Compliance with the Policy for the Prevention of Corruption and Money Laundering and Financing of Terrorism, aiming to:

- (i) ensure, at the first line of defense, the identification, assessment, evaluation and monitoring of risk, permanently questioning potential risks emerging from the activity carried out;

- (ii) guidance and control of the activity of local members responsible for the Policy, taking care of the implementation of approved procedures and the respective existing guidelines, looking for incidents and applying the most appropriate corrective measures.

- Third line of defense, constituted by the External Audit which, using independent audits, must cover the assessment of the universality of existing procedures and controls in each period of 3 years (period considered usual and equally applicable to the Ibersol Group), but with annual assessment of the points considered most important or urgent.

In addition, there are duties that each BU must assume in relation to the main MLFT risk factors that affect its activity and commercial relations.

The duties that are understood to be generically assigned to each BU will be:

- Duty of Research and Normal Diligence;
- Examination Duty;
- Duty to Abstain or Reject;
- Duty of Communication;
- Duty of Secrecy;
- Duty to Keep Records.

The designation of each of the aforementioned duties is symptomatic of the objective pursued, however, it is important to observe the following in particular:

- The Duty of Research and Normal Diligence is particularly important whenever commercial relationships are initiated, namely occasional ones and in periodic reviews of the relationship.
- The Duty of Examination must be carried out whenever any sign is detected that may refer to BCFT risks, namely, funds with an unclear origin;
- The Duty to Abstain or Reject allows BUs to refrain from, or even reject, any operation or the maintenance of a business relationship when, after the Duty of Examination, they conclude that there are suspicions of MLFT risks;
- The Duty of Communication is exercised by the UN, both in relation to entities legally defined to monitor BCFT situations, and in relation to the RCN;
- The Duty of Secrecy implies that all information resulting from the MLFT risk prevention activity is not disclosed or shared outside the scope of the Duty of Communication;
- The Duty to Keep Records implies keeping relevant records for the period established in the legislation of each geography involved.

3- Methodology in risk assessment

3.1. – Selection of relevant risks and respective assessment

The preparation of this PPR follows a standard methodology, including:

- (i) Selection of relevant risks regarding the issue of corruption and related offenses;
- (ii) Hierarchy of selected risks (low, medium and high), taking into account both the probability of occurrence and the expected impact (economic, operational and reputational), with attribution of a composite or aggregate risk level;
- (iii) Identification and definition of preventive and control measures inherent to the identified risks, aiming at their natural minimization; It is
- (iv) Permanent monitoring of the risks incurred, implementing the respective corrective measures, whenever necessary.

Taking into account what was stated here, the following were defined and listed:

- Areas of Activity within which a risk of corruption may occur – Annex II
- Legally foreseen crimes of corruption and related offenses that may lead to the criminal liability of legal entities in the private sector (article 11 of the Penal Code) – Annex III
- Application Controls associated with the mitigation of each risk factor – Annex IV.

3.2 - Control

The applicable control mechanisms include:

- Procedures and standards that translate the guidelines and policies underlying the Policy for the Prevention of Corruption and Money Laundering and Terrorism Financing, identifying the respective impact on operational processes, as well as quantifying the necessary resources;
- Permanent monitoring of the Corruption and Related Offenses Risk Prevention Plan;
- Conservation of all relevant documentation and information to improve the Corruption Risk and Related Offenses Prevention Plan.

The preventive measures adopted to reduce risk incidences include what we could call broad, generic and transversal controls, such as:

- Code of Conduct and Policy for the Prevention of Corruption and Related Offenses
- Compliance standards applicable to the Ibersol Group
- Irregularity Communication Channel (Whistleblowing)

or, the application controls set out in Annex IV.

3.3. – Risk assessment results

The assessment of the most relevant risk factors is summarized in the Matrix contained in Annex V, and the most significant risk factors can be summarized as follows:

Risk Factor	Risk	Area of Activity
Negotiating/hiring private third parties (conflicts of interest)	Passive corruption (private sector)	Purchases (Raw Materials, Goods and Services and Capital Goods)
Access to commercially sensitive information / privileged or confidential information	Passive corruption (private sector)	Purchases (Raw Materials, Goods and Services and Capital Goods)
		Análise de Negócios e Parcerias
Involvement with third parties associated with situations of corruption	Passive corruption (private sector)	Purchases (Raw Materials, Goods and Services and Capital Goods)

Awarding gifts and invitations to events	Active corruption (Private sector)	Partnerships, donations and sponsorships
Relations with public officials and/or politically exposed persons	Active corruption (Private sector)	Business Analysis and Partnerships / Investments/M&A
		Partnerships, donations and sponsorships

3.4. Application and Monitoring

The IBERSOL Board of Directors appointed a Regulatory Compliance Officer (“RCN”) with a view to monitoring and controlling the execution of the Regulatory Compliance Program as well as its review, without prejudice to legal powers granted to other bodies or Employees of the Company. Updating activities, inherent and residual risks and respective control measures are the responsibility of the RCN.

The position of Responsible for Regulatory Compliance is held by a member of the Company's senior management, who reports to the Company's Executive Committee. Within the scope of its respective functions, the RCN has access to internal information and the necessary technical and human resources, having the authority to request information from the company's various departments, acting with decision-making independence and autonomy.

The RCN also provides all necessary clarifications on the application of the Anti-Corruption Policy and promotes regular internal audits to assess compliance with it.

The periodicity for monitoring the PPR is governed by the following deadlines:

- 1) Preparation, in October, of an interim assessment report on identified high or critical risk situations; It is

2) Preparation, in April of the year following implementation, of an annual assessment report, containing in particular the quantification of the degree of implementation of the identified preventive and corrective measures, as well as the forecast of their full implementation.

3) The PPR is reviewed every three years or whenever there is a change in IBERSOL's responsibilities or organic or corporate structure that justifies the review of risks and situations that may expose the entity to acts of corruption and related offenses or preventive and corrective measures that allow them to be mitigated.

3.5. Disclosure

The disclosure of the PPR, interim and annual evaluation reports is ensured to all Ibersol Group employees.

ANNEX I

Terminology and Definitions

- **BCFT** – Money Laundering and Terrorist Financing;
- **BEF** – Beneficial Owner, the person or natural persons who, ultimately, own or control the client, supplier or partner in the legal business in question, or the person or natural persons in whose name an operation or activity is carried out;
- **Money Laundering** – process by which perpetrators of criminal activities cover up, or attempt to cover up, the origin of goods and income (advantages) obtained illegally, transforming the liquidity resulting from these activities into legally reusable capital, disguising the origin or true owner of the funds, preventing the perpetrator or participant of these infractions from being criminally prosecuted. Participation, association, attempt, complicity, as well as the fact of facilitating the execution or advising the practice of criminal activities, jointly imply the crime of money laundering;
- **Employees and Members of Corporate Bodies** – all employees of the Ibersol Group, including corporate bodies of all Group entities;
- **Corruption and Related Offenses** – namely, crimes of corruption, receiving and offering an undue advantage, embezzlement, economic participation in business, concussion, abuse of power, malfeasance, influence peddling, money laundering or fraud in obtaining a subsidy, subsidy or credit , provided for in the Penal Code (annex to DL 48/95 of March 15, in its current wording), in Law 34/87 of July 16, in its current wording, in the Military Justice Code (Law No. 100/2003 of 15 November), in Law No. 50/2007 of 31 August, in its current wording, in Law No. 20/2008 of 21 April, in its current wording and in Decree-Law 28/84 of 20 January, in its current wording);
- **Customer, Provider and Partner Due Diligence** – due diligence procedure, understood as standard, to understand and evaluate the risks posed by a customer, supplier or partner, or by their respective transactions;
- **Top Management** – any management team or collaborator with sufficient knowledge of the BU's exposure to MLFT risk and with a sufficiently high hierarchical level to make

decisions that affect exposure to risk, not necessarily being a member of the Board of Directors;

□ **Integrity Due Diligence** – in-depth process of analysis, study and evaluation of information and documents from various sectors of a company, with the intention of eliminating or reducing the risks involved in an acquisition;

□ **Enhanced Due Diligence** – enhanced due diligence procedure in relation to a client, supplier or partner, generally adopted when a high BCFT risk factor is identified;

□ **Entity** – any natural or legal person, representing customers, suppliers and partners;

□ **Risk factors** – are the variables or circumstances that, alone or together, can increase or decrease the BCFT risk measured in business relationships or in an occasional transaction;

□ **Terrorist Financing** – a collective term for various acts whose ultimate purpose is to provide the material resources to make terrorist activities possible. Unlike the prevention of money laundering, controls are not so much imposed in relation to the origin of the money, but more in relation to its destination and intended purposes;

□ **Ibersol Group or Group** – includes Ibersol, SGPS, S.A. and all legal entities in which Ibersol, SGPS; SA, directly or indirectly, holds more than 50% of the capital or voting rights, or has the power to appoint more than half of the management or supervisory bodies or is included in the Group's consolidation perimeter;

□ **Significant Influence** – power to participate in deciding the financial and operational policies of the Entity in question or its economic activity;

□ **High risk jurisdictions** – means countries that, based on an assessment of established risk factors, present a higher MLFT risk.

□ **KYC** – Know Your Customer, is a structured repository of information about the customer, individual or Entity;

□ **KYS** – Know Your Supplier, is a structured repository of information about the supplier, individual or Entity;

□ **KYP** – Know Your Partner, is a structured repository of information about the business partner, individual or Entity;

- **Origin of Funds** – means the origin of the funds involved in business relationships or occasional transactions, including both the activity that generated the funds and the means used to transfer them;
- **High-risk third countries** – non-European Union (EU) countries or jurisdictions identified by the European Commission as having national MLFT regimes that present strategic deficiencies that constitute a significant threat to the EU financial system;
- **Partners** – people, agents, external auditors, suppliers and all those who provide services to the Ibersol Group, in any capacity, permanently or occasionally;
- **PEP – Politically Exposed Person** – an individual who is or has been entrusted with a prominent public position;
- **Persons recognized as closely associated** – i) natural person who has a legal entity or an agreement without legal personality; ii) natural person who owns the share capital or voting rights of a legal person, or the assets of an agreement without legal personality, with the client as the beneficial owner; iii) natural person with business, commercial or professional relationships;
- **BCFT Policy** – Corruption Prevention and Money Laundering and Terrorist Financing Policy;
- **Business Relationships** – any relationship established for business, professional or commercial purposes, which, at the time of establishment, is or is expected to be lasting, stable and maintained over time, regardless of the number of individual transactions carried out;
- **Responsible for Regulatory Compliance** – person responsible, within the Ibersol Group, for controlling compliance with the Policy on Corruption and MLFT, as well as for the policies and procedures that ensure the adequacy of this control;
- **RGPC** – General Corruption Prevention Regime established as an annex to Decree-Law No. 109-E/2021 of December 9;
- **Occasional transactions** – means a transaction that is carried out outside the scope of an already established business relationship, with an expected punctuality;
- **Business Unit** – includes all legal entities that are part of the Ibersol Group in Portugal or other countries, the brands operated by the Group and the functional departments.

ANEXO II

Areas of Activity in which the risk of corruption may occur

Areas of Activity	Ibersol Group entities covered
Purchasing Raw Materials	Across Group companies
Purchases of Goods and Services	Across Group companies
Investment Goods Purchases	Across Group companies
Purchases of Advertising Space	Holding
Acquisition of Real Estate Assets	Holding
Use of property	Holding
Partnerships	Holding
Sponsorship	Holding
Donations	Holding
Treasury Management	Across Group companies
Financial management, including CI's	Holding
Human Resources Management	Across Group companies
Accounting and tax reporting	Holding
Investments, including financial	Holding
Mergers and Acquisitions	Holding
Investor Relations	Holding
Legal Department	Holding
Regulatory bodies	Holding

ANNEX III

Legally established crimes of corruption and related offences that may lead to criminal liability for legal persons in the private sector

(Article 11 of the Penal Code)

Applicable offences	Risk/Diploma	Legal Framework
Corruption and related offences in the public sector	Active corruption (p. and p. in Art. 374 of the Penal Code)	<p>‘1 - Whoever, by himself or through an intermediary, with his consent or ratification, gives or promises to an official, or to a third party on his recommendation or with his knowledge, a pecuniary or non-pecuniary advantage for the purpose indicated in article 373(1), shall be punished with imprisonment of one to five years.</p> <p>2 - If the purpose is indicated in article 373(2), the perpetrator shall be punished with imprisonment of up to three years or a fine of up to 360 days.</p> <p>3 - Attempt is punishable.’</p>
	Influence peddling (p. and p. in art. 335 of the Criminal Code)	<p>‘1 - Whoever, by himself or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, in order to abuse his influence, real or supposed, with any public entity, shall be punished: a) imprisonment for a term of 1 to 5 years, if a more serious penalty does not apply by virtue of another legal provision, if the purpose is to obtain a favourable unlawful decision; b) imprisonment for a term of up to 3 years or a fine, if a more serious penalty does not apply by virtue of another legal provision, if the purpose is to obtain a favourable lawful decision.</p>

		<p>2 - Whoever, by himself or through an intermediary, with their consent or ratification, gives or promises a pecuniary or non-pecuniary advantage to the persons referred to in the preceding paragraph for the purposes set out in point a) shall be punished with imprisonment of up to 3 years or with a fine.'</p>
	<p>Undue receipt of an advantage (p. and p. in art. 372 of the Code)</p>	<p>2 - Whoever, by himself or through an intermediary, with his consent or ratification, gives or promises an official, or to a third party on his instructions or knowledge, a advantage, whether pecuniary or non-pecuniary, which is not due to him, in the in the performance of his duties or because of them, shall be punished with imprisonment of up to three years or a fine of up to 360 days.</p>
<p>Bribery</p>	<p>Bribery (p. e p, in Art. 363 of the Penal Code)</p>	<p>'Anyone who persuades or attempts to persuade another person, through a gift or promise of a pecuniary or non-pecuniary advantage or non-pecuniary advantage, to commit the acts provided for in Articles 359 or 360 (Falsity of testimony or declaration and Falsity of testimony, expertise, interpretation or translation, respectively), without these having been committed, shall be shall be punished with imprisonment of up to 2 years or a fine of up to 240 days. up to 240 days.'</p>

Applicable offences	Risk/Diploma	Legal Framework
Illegal funding of political parties	Illegal funding of political parties (p. e p. in articles 8 and 29 of Law no. 19/2003, of 20 June June)	<p>Article 8 ‘1 - Political parties may not receive anonymous donations or anonymous donations or receive donations or loans of a pecuniary nature or in kind from national or foreign legal persons foreign legal persons, with the exception of the provisions of the following paragraph.’ Article 29 ‘4 - Legal persons who violate the provisions of chapter ii (Financing of political parties) shall be penalised with a minimum fine equivalent to twice the amount of the prohibited donation and a maximum fine of five times that amount.’</p>
Corruption and related offences in the private sector	Active corruption with trade international trade (e.g. in Art. 7 of Law no. 20/2008 of 21 April)	<p>‘Whoever, by himself or with his consent or ratification, through an intermediary, gives or promises to an official, national, foreign or of an international organisation, or to a national or foreign political office, national or foreign, or to a third party with their third party with their knowledge, a pecuniary or non-pecuniary advantage, which is not due to him, in order to obtain or retain business, a contract or other undue advantage in international trade international trade, shall be punished with imprisonment of one to eight years. eight years.’</p>
	Passive corruption (e.g. p. in Art. 8 of Law no. 20/2008 of 21 April)	<p>‘1 - A private sector worker who, by himself or, with his consent or ratification, through an intermediary, requests or accepts, for himself or for a third party, without being due, a pecuniary or non-pecuniary advantage, or the promise thereof, for any act or omission that constitutes a violation of his functional duties, shall be punished with imprisonment of up to five years or a fine of up to 600 days. 2 - If the act or omission provided for in the preceding paragraph is likely to cause a distortion of competition or damage to the property of third parties, the perpetrator shall be punished with imprisonment of one to eight years.’</p>

Active corruption (p.e.p. in art. 9 of Law no. 20/2008, of 21 April)

‘1 - Whoever, by himself or, with his consent or ratification, through an intermediary, gives or promises to a person referred to in the previous article, or to a third party with knowledge thereof, a pecuniary or non-pecuniary advantage which is not due to him, in order to pursue the purpose indicated therein, shall be punished with imprisonment of up to three years or a fine.
 2 - If the conduct provided for in the previous paragraph is intended to obtain or is likely to cause a distortion of competition or patrimonial damage to third parties, the perpetrator shall be punished with imprisonment of up to five years or a fine of up to 600 days.
 3 - Attempts shall be punishable.’

ANNEX IV

Application Controls associated with the mitigation of each risk factor

Risk Factors	Preventive and Corrective Measures
Relationships with public officials and/or politically exposed persons	<ul style="list-style-type: none"> - Ensuring compliance with the Procedure for Relations with Public Officials and Politically Exposed Persons, and for the Prevention and Management of Conflicts of Interest: - Reporting of all interactions with Public Officials and Politically Exposed Persons; - Annual signature by decision-makers and employees classified as Politically Exposed Persons of a Declaration of No Conflict of Interest; - Analysing the conflict of interest of Politically Exposed Persons (PEPs), close members or people closely associated with PEPs - Employees and candidates for employees.
Involvement with third parties associated with corruption situations / integrity risks	<ul style="list-style-type: none"> - Third parties with whom it is intended to establish a business relationship with an Ibersol Group entity (with the exceptions defined in the respective procedure) are subject to an Integrity Due Diligence process and the adequacy of the contractual piece to the recommendations issued in the DDI Opinion.

Awarding gifts and invitations to events	- The granting of gifts or invitations to events is subject to an approval process by Senior Management when certain reference limits are exceeded.
Acceptance of gifts and invitations to events	- Accepting gifts and invitations to events
Allocation of sponsorships and donations	- Risk analysis in terms of integrity, with an opinion assigning a final risk rating to the potential beneficiary of the donation or sponsorship. Subsequent inclusion / adaptation of specific clauses that mitigate the risk(s) identified, namely accountability, monitoring and compliance. - - Continuous monitoring of the effectiveness of donations and sponsorships, in order to check that the projects / actions carried out fulfil the objectives of the protocol / contract signed.
Access to funds	- Internal Control System for Financial Reporting, consisting of a consolidated matrix of risks and controls for the relevant processes and Business Units, detailing the risks that affect the preparation of financial information and the controls that mitigate them.

Risk Factors	Preventive and Corrective Measures
Engagement with countries in geographies	- Third parties with whom it is intended to establish a business relationship with an Ibersol Group entity (with the exceptions defined in the respective procedure) are subject to an Integrity Due Diligence process and the adequacy of the contractual piece to the recommendations issued in the DDI Opinion. - In accordance with internally defined rules, Ibersol Group companies must not relate to non-cooperative persons, entities or countries.
Business relations with natural/collective persons from countries with a high level of corruption	- Third parties with whom it is intended to establish a business relationship with an Ibersol Group entity (with the exceptions defined in the respective procedure), are subject to an Integrity Due Diligence process and the adequacy of the contractual part to the recommendations issued in the DDI Opinion.

<p>Negotiating/hiring private third parties (conflicts of interest)</p>	<ul style="list-style-type: none"> - Ensure compliance with the procedures in force: - Members of the management bodies of controlled companies/entities and all Employees must report to Senior Management any apparent, potential or actual Conflict of Interest situation in which they find themselves. - Annual signature by decision-makers and employees classified as Politically Exposed Persons of a Declaration of No Conflict of Interest prior to the opening of a contracting procedure; - Third parties with whom it is intended to establish a business relationship with an Ibersol Group entity (with the exceptions defined in the respective procedure) are subject to an Integrity Due Diligence process and the adequacy of the contractual piece to the recommendations issued in the DDI Opinion. - Set of control mechanisms implemented in the purchasing process. - Set of control mechanisms associated with the selection of lawyers.
<p>Access to commercially sensitive information / privileged or confidential information</p>	<p>Access to commercially sensitive information / privileged or confidential information</p>
<p>Favouring employees (conflicts of interest)</p>	<ul style="list-style-type: none"> - A set of control mechanisms associated with the recruitment and internal mobility process, namely various screening phases and interviews with different interlocutors.
<p>Intervention in legal proceedings</p>	<ul style="list-style-type: none"> - Levels of validation associated with the selection of lawyers/law firms, and the Integrity Due Diligence analysis procedure.

ANNEX V

Risk and Control Matrix

Areas of activity	Risk	Risk Factor	Inherent Risk Assessment		
			PO	DI	RL
Purchasing (Goods/Services)	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	L	HR	M
	Active corruption (private sector)	Negotiating/contracting with private third parties (conflicts of interest)	L	M	M
		Involvement with third parties associated with corruption/integrity situations	L	M	M
		Relationships with public officials and/or politically exposed persons	B	HR	M
	Passive corruption (private sector)	Negotiating/hiring private third parties (conflicts of interest)	M	HR	HR
		Access to commercially sensitive information / privileged or confidential information:	HR	M	HR
		Involvement with third parties associated with corruption/integrity situations	HR	M	HR

		Relations with public officials and/or politically exposed persons	M	HR	HR
	Illegal funding of political parties	Negotiating/hiring private third parties (conflicts of interest)	L	M	M
		Relations with public officials and/or politically exposed persons	L	M	M

Areas of activity	Risk	Risk Factor	Inherent Risk Assessment		
			PO	DI	RL
Purchasing Materials)	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	M	HR	HR
		Involvement with sanctioned countries	M	HR	HR
		Business relations with natural/collective persons from countries with a high level of corruption	M	HR	HR
		Negotiating/hiring private third parties (conflicts of interest)	M	HR	HR

	Active corruption (private sector)	Relations with public officials and/or politically exposed persons	M	HR	HR
		Involvement with sanctioned countries:	M	HR	HR
		Business relations with natural/collective persons from countries with a high level of corruption	M	HR	HR
		Involvement with third parties associated with corruption/integrity situations	M	HR	HR
	Passive corruption (private sector)	Negotiating/hiring private third parties (conflicts of interest)	M	HR	HR
		Access to commercially sensitive information / privileged or information:	HR	HR	HR
		Involvement with third parties associated with corruption/integrity situations	M	HR	HR
		Involvement with sanctioned countries	M	HR	HR
		Business relations with natural/collective persons from countries with a high level of corruption	M	HR	HR
Treasury Management	Active corruption (public sector)	Access to funds	HR	HR	HR

	Active corruption (private sector)	Access to funds	HR	HR	HR
	Passive corruption (private sector)	Access to commercially sensitive information / privileged or confidential information	L	HR	M

Areas of activity	Risk	Risk Factor	Inherent Risk Assessment		
			PO	DI	RL
Business Analysis and Partnerships / Investments/M&A	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	M	HR	HR
		Involvement with sanctioned countries	M	HR	HR
		Business relations with natural/collective persons from countries with a high level of corruption	M	HR	HR
	Active corruption (private sector)	Negotiating/hiring private third parties (conflicts of interest)	M	HR	HR
		Relations with public officials and/or politically exposed persons	M	HR	HR
		Involvement with sanctioned countries	M	HR	HR
		Business relations with natural/collective persons from countries with a high level of corruption	M	HR	HR
		Involvement with third parties associated with corruption/integrity situations	M	HR	HR

		Negotiating/hiring private third parties (conflicts of interest)	M	HR	HR
		Access to commercially sensitive information / privileged or confidential information:	HR	HR	HR
	Corrupção passiva (setor privado)	Involvement with third parties associated with corruption/integrity situations	M	HR	HR
		Involvement with sanctioned countries	M	HR	HR
		Business relations with natural/collective persons from countries with a high level of corruption	M	HR	HR
Financial Reporting and Taxation	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	L	HR	M
	Corrupção passiva (setor privado)	Access to commercially sensitive information / privileged or confidential information	HR	HR	HR

Areas of activity	Risk	Risk Factor	Inherent Risk Assessment		
			PO	DI	RL
Finance Management	Passive corruption (private sector)	Access to commercially sensitive information / privileged or confidential information:	L	M	M
	Active corruption (private sector)	Negotiating/hiring private third parties (conflicts of interest)	L	HR	M
		Relations with public officials and/or politically exposed persons	L	HR	M
Investor Relations	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	L	HR	M
	Passive corruption (private sector))	Access to commercially sensitive information / privileged or confidential information	HR	M	HR
HR Management	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	L	HR	M
	Passive corruption (private sector))	Negotiating/hiring private third parties (conflicts of interest)	L	HR	M
		Relations with public officials and/or politically exposed persons	L	HR	M
		Favouring employees (conflicts of interest)	M	M	M

Partnerships, Donations and Sponsorships	Active corruption (public sector)	Sponsorship and donations	M	HR	HR
		Awarding gifts and issuing invitations to events	M	HR	HR
	Active corruption (private sector)	Sponsorship and donations	M	HR	HR
		Awarding gifts and issuing invitations to events	M	HR	HR
		Relations with public officials and/or politically exposed persons	M	HR	HR
		Involvement with third parties associated with corruption/integrity situations	M	HR	HR
	Passive corruption (private sector))	Accepting offers and invitations to events	M	M	M
		Involvement with third parties associated with corruption/integrity situations	M	HR	HR
	Illegal funding of political parties	Sponsorship and donations	L	M	M

Areas of activity	Risk	Risk Factor	Inherent Risk Assessment		
			PO	DI	RL
Legal	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	L	HR	M
	Bribery	Intervention in legal proceedings	M	M	M
	Active corruption (private sector)	Negotiating/hiring private third parties (conflicts of interest)	L	HR	M
	Passive corruption (private sector)	Negotiating/hiring private third parties (conflicts of interest)	L	HR	M
Regulation	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	M	HR	HR
Real estate asset management	Active corruption (public sector)	Relations with public officials and/or politically exposed persons	L	M	M
	Passive corruption (private sector)	Negotiating/contracting with private third parties	L	M	M
Management of corporate insurance programmes	Active corruption (private sector)	Negotiating/contracting with private third parties	M	M	M
	Passive corruption (private sector)	Negotiating/contracting with private third parties	M	M	M
		Access to commercial information	HR	M	HR

		sensitive/privileged confidential information	or			
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PO - Probability of Occurrence

L - Low Risk

DI - Degree of Impact

M - Medium Risk

RL - Risk Level

HR - High Risk