

ANTI-CORRUPTION POLICY

(Regime Geral de Prevenção da Corrupção | Foreign Corruption Practices Act)

Introduction/Overview

This Policy sets down a collection of rules and principles for preventing corruption within Worthington Enterprises, Inc., as a business group. It further establishes the rules and principles specifically applicable to Amtrol-Alfa, Metalomecânica, S.A., a company based in Portugal (Worthington Enterprises, Inc. will be referred to as the “Organization,” and Amtrol-Alfa, Metalomecânica, S.A. will be referred to as “Amtrol-Alfa”). This Policy includes legal requirements from two sources: the USA Foreign Corrupt Practices Act (FCPA), whose rules also apply to the business operations of the entire group across its various jurisdictions, and the General Scheme for the Prevention of Corruption (RGPC), enacted by Decree-Law 109-E/2021, of 9 December 2021 (“RGPC”), which is specific to Portugal and applies only to Amtrol-Alfa’s operations.

The goal is to provide and enforce a single document that makes it easy for all employees to reference the obligations focused on preventing, detecting, and sanctioning acts of corruption and related offenses involving Worthington Enterprises, Inc., its subsidiaries, and specifically Amtrol-Alfa.

In terms of structure, this Policy’s first chapter contains the Code of Conduct for preventing corruption and related offenses, drafted in line with the RGPC. It then outlines the FCPA’s legal requirements. You should note that the requirements under each legal framework are different, so it is important to read this document carefully.

1. RGPC Code of Conduct

Overview

As previously stated, this chapter includes the Code of Conduct on the prevention of corruption and related offenses, in accordance with the General Scheme for the Prevention of Corruption under Decree-Law 109-E/2021, of 9 December 2021. This Code of Conduct should be read alongside the other provisions of this Policy and the Code of Conduct of Worthington Enterprises, Inc., which also applies to Amtrol-Alfa's operations.

This Code of Conduct is an integral part of the Compliance Program on the fight against corruption and related offenses, as outlined in the RGPC. It applies exclusively in Portugal and, therefore, only to the activities and operations of Amtrol-Alfa.

The purpose of this Code of Conduct is therefore to set down a collection of principles, values, and rules of conduct for all Amtrol-Alfa officers and employees regarding professional ethics, as provided for in the RGPC.

Values and General Principles

Amtrol-Alfa operates under high standards of professional ethics, consistently upholding values such as integrity, dignity, respect, transparency, honesty, accuracy, and good faith. All employees are expected to uphold these values in their interactions with one another, as well as with business partners, customers, suppliers, and other entities.

The principles of conduct set out in the group's Code of Conduct should also be taken into account, notably:

- Ethical standards that comply with laws, regulations, recommendations,

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statutory provisions, and internal rules and policies relevant to each employee's position and responsibilities;

- Promotion of equal opportunities and prohibition of discrimination, ensuring transparent engagement, transfer, promotion, compensation, and disciplinary decisions;
- Promotion of safety and general well-being of all employees, notably by ensuring adequate working conditions, with operational safety devices;
- Promotion of an “Open Door” policy in order to ensure a permanent open line of communication with employees;
- Promotion of security of information and information systems;
- Promotion of strict record-keeping policies for commercial and financial transactions;
- Prevention of conflicts of interest or improper conduct by employees, especially those arising from personal or family relationships, financial matters, or any other external influences or interests unrelated to Amtrol-Alfa's business goals.;
- Promotion of fair competition policies, as well as cooperation and professionalism in relations with competitors, partners, customers, suppliers and other entities;
- Promotion of training policies for its employees to prevent potential breaches of internal rules;
- A zero-tolerance policy regarding failure to comply with the company's internal rules and policies.

Rules of Conduct

The rules of conduct are established in Worthington Enterprises, Inc.'s Code of Conduct, which applies to Amtrol-Alfa's operations. The rules below specifically apply to the following relations and interactions:

(a) Amtrol-Alfa's relations with its Employees

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Amtrol-Alfa strictly abides by the applicable labour rules, particularly on:

- equal opportunities and non-discrimination at work;
- prohibition of all forms of harassment;
- health and safety at work; and
- prevention of violence in the workplace

(b) Relations between Employees

All Amtrol-Alfa employees must:

- treat others with dignity and respect;
- work as a team;
- promote continued quality and improvement; and
- adhere to rules of courtesy and proper treatment.

(c) Relations with Third Parties

All employees must uphold ethical standards of behaviour when dealing with third parties, namely competitors, business partners, customers, suppliers, and other entities.

Employees must perform and enforce all contractual obligations and follow good customs and sound commercial and ethical practices in their dealings with business partners.

They must further abide by market rules and refrain from endorsing or taking part in any kind of business that breaches or threatens to breach basic ethical, deontological or competition rules.

(d) Conflicts of Interest

Business decisions must be transparent and objective, align with Amtrol-Alfa's purposes, and strictly comply with applicable legal rules, detailed in the group's Code of Conduct.

All Amtrol-Alfa employees must follow internal rules to mitigate and prevent conflicts of interest. They should always avoid acting based on personal

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motivations or external influences and must not prioritize their own interests or the interests of others over those of Amtrol-Alfa.

Lastly, employees must avoid engaging in behaviour that might seem improper or inconsistent with Amtrol-Alfa's values and principles of conduct.

(e) Gifts and other Gratuities

Gifts, meals, entertainment and other types of gratuity exchanged between Employees and customers and/or suppliers must be transparent, modest, and their value must be appropriate and consistent with the employee's position or the importance of the customer or supplier for Amtrol-Alfa.

At no time and under no circumstance may gifts or gratuities be exchanged with public officials or employees of a public entity.

Any gifts and gratuities received and/or given must always be reported to the relevant supervisors, who in turn must consult Amtrol-Alfa's management.

(f) Prevention of Corruption and Related Offenses

All employees must comply with the applicable national and international rules on the fight against Corruption and Related Offenses, and must pay special attention to the conducts prohibited under the group's Code of Conduct and this Policy.

In the course of Amtrol-Alfa's business, employees may interact with public officials, administrative officials, government agents and other public bodies, and such interactions must be guided by the utmost integrity, transparency and compliance with all applicable legal rules and ethical duties.

Prohibited conducts

To ensure a proper understanding of the matter at hand, note some examples of prohibited conducts:

(a) When dealing with public entities:

- Promising or offering, directly or through a third party, any type of remuneration, goods, favour or service, irrespective of its economic value, to a public authority or a public official, or to any third party on their instruction or with their knowledge, with the explicit or implicit objective that any public authority or public official makes a decision, or expedites a decision, for the benefit of Amtrol-Alfa or any of its stakeholders or that they unreasonably omit or delay an act inherent to their position, for the benefit of Amtrol-Alfa or any of its stakeholders;
- Promising or offering, directly or through a third party, any type of remuneration, goods, favour or service, irrespective of its economic value, to a public authority or public official, or to any third party on their instruction or with their knowledge, which constitutes, directly or indirectly, a reward for a previous decision of any public authority or public official for the benefit of Amtrol-Alfa or any of its stakeholders;
- Promising or offering to a public authority or public official, directly or to any third party on their instruction or with their knowledge, any type of remuneration, goods, favour or service, irrespective of its economic value, on condition that any other person, individual, public authority or public official influences another authority or public official, to obtain a decision inuring to the benefit of Amtrol-Alfa or any of its stakeholders;
- Promising or offering, directly or through a third party, any type of remuneration, goods, favour or service to any authority or public official, whose economic value, exclusivity or other similar circumstance, does not fall within common social practices and courtesy;
- Irrespective of their economic value, any cash deliveries, cash deliveries by other means of payment, payments or gifts of meals, trips, hotel stays,

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shows or other entertainment, as well as any benefit, whether or not pecuniary, to any authority or public official by virtue of their office, as well as any promise thereof are prohibited;

- Exerting any kind of influence over a public authority or public official, directly or through third parties engaged or approached for that purpose;
- Using any relationship of affinity with a specific public authority or public official to secure any benefit for Amtrol-Alfa or its stakeholders.

(b) When dealing with private entities:

- Promising or offering, directly or through a third party, any type of remuneration, goods, favour or service to a director, officer or employee of any private entity, or to any third party with their knowledge, in return for the performance of an act or omission that favours Amtrol-Alfa or its stakeholders and that contravenes their duties;
- Requesting or accepting from any private entity, notably Amtrol-Alfa's suppliers and customers, any undue benefit for themselves or a third party, in return for acting or omitting an action, in breach of their duties as an Amtrol-Alfa employee.

Breach

Considering that the dissemination of this Code of Conduct, knowledge of and compliance with its rules are mandatory, failure to do so may result in serious consequences for Amtrol-Alfa and constitute a disciplinary offense for employees, punishable pursuant to the law and regulations.

A report must be prepared for each breach of the rules set out in this Code of Conduct, stating:

- the breached provisions;
- the applicable penalty;
- the measures adopted or to be adopted following the breach.

With respect to disciplinary penalties and depending on the seriousness of

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the offense and the offender's fault for breach of the provisions of this Code, the following penalties may be assessed:

- unrecorded reprimand;
- recorded reprimand;
- pecuniary penalty;
- loss of holiday days;
- suspension from work with loss of pay and seniority;
- dismissal without severance pay.

As for the applicable criminal penalties, depending on the seriousness of the offense and the offender's fault, the criminal penalties set out in Annex 1 to this Policy and forming an integral part of this Code may apply to acts of Corruption and Related Offenses.

Whistleblowing Channel

As part of the Whistleblowing Channel in place at the Organization, available at Amtrol-Alfa's website (amtrol-alfa.com), employees can report acts of Corruption and Related Offences, as well as any breaches of the rules set out in this Policy..

Training

Amtrol-Alfa ensures that an internal training program is provided to all Employees and Officers, in order for them to know and understand this Code of Conduct and, in particular, the policies and procedures in place for the prevention of corruption and related offences, pursuant to the law.

2.FCPA

Overview

The FCPA prohibits bribing “foreign officials”, and requires US companies to maintain internal accounting controls and to keep books and records that accurately record all transactions.

Any Employee or agent of the Organization whose duties involve international business activities is required to read and comply with the Organization's FCPA Policy and all procedures implementing it.

The FCPA prohibits U.S. citizens and companies from bribing foreign officials, as well as their directors, officers, employees, agents and shareholders acting on their behalf, and any foreign companies and individuals operating in the United States. The FCPA further applies to foreign subsidiaries of U.S.-listed companies. Although this prohibition may appear simple and familiar in a domestic context, this act impacts day-to-day business relations with foreign governments and state-owned enterprises, as well as their employees, in the countries where the Organization operates.

The FCPA requires keeping accurate and complete books and records and having adequate internal accounting controls in place for expenses abroad. All Employees are expected to behave legally and ethically when conducting business on behalf of the Organization. The use of the Organization's funds or assets for illegal, inappropriate or unethical purposes is strictly prohibited. Inappropriate gifts, payments or offers of value to foreign employees can compromise the growth and reputation of the Organization, and will not be tolerated.

This chapter of the Policy extends to both the domestic and foreign operations of the Organization, including operations conducted by any department, subsidiary, agent, consultant, or other representatives. It further extends to all of the Organization's subsidiaries and majority-owned affiliates, including joint

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ventures. The Organization will notify this chapter of the Policy to its minority-owned affiliates.

This chapter of the Policy further extends to all financial registration activities and is part of the obligations to which the Organization is already subject under state and federal securities laws, such as the United States Securities Exchange Act of 1934.

Scope

All employees of the Organization or of any of its subsidiaries, whether located in U.S. territories or abroad, are responsible for complying with the FCPA and for carrying out enforcement procedures to ensure such compliance. All directors and supervisors must monitor compliance with the provisions of this Policy chapter and ensure compliance with the organization's moral, ethical and professional standards.

Any action in breach of the FCPA or of any of the Organization's moral, ethical and professional standards is prohibited. Any Employee who becomes aware of what they believe to be a breach of the FCPA should notify their supervisor, or report the matter under the “open door” policy, the ethics hotline, the Organization's legal department, or through the Whistleblowing Channel (amtrol-alfa.com). Please refer to the last page of this policy for contact details. Any supervisor or director who receives any such report must immediately notify the Legal Department.

Record-keeping/ Accounting provisions:

FCPA record-keeping provisions require companies as the Organization to keep accurate accounting records with the sufficient level of detail so as to clearly record all transactions and disposals of the Organization's assets. The FCPA prohibits the misrepresentation or omission of any transaction in the

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Organization's accounting and financial records, as well as any failure to maintain adequate accounting controls that result in such misrepresentation or omission. Keeping detailed and accurate descriptions of all payments and expenses is crucial for this component of the FCPA.

Consequently, the Organization's Employees must abide by the Organization's standards, principles, laws and procedures applicable to financial and accounting reporting. More specifically, Employees must prepare the reports and records requested by the management services in a timely and complete fashion. Prior to paying or authorizing payment to a foreign official, the Organization's Employees or Intermediaries must ensure that the purpose of all payments is appropriate and that payments (in their entirety) and their purpose are fully and accurately reflected in the Organization's records. Unrecorded or undeclared transactions or operations are not allowed. No false or artificial entries may be made in the Organization's records for any reason whatsoever. Lastly, no personal funds, or non-corporate funds may be used to carry out what would otherwise be prohibited under the Organization's policy.

Anti-corruption Provisions

Pursuant to the FCPA, the Organization prohibits its Employees and Intermediaries, or those of its subsidiaries, from offering or paying bribes or otherwise making an offer for corruption purposes, as well as paying or offering to pay cash or anything of value to a foreign official (as in the FCPA) for the purpose of:

- Influencing any act or decision of such a foreign official in their official capacity.
- Causing the foreign official to act or omit an act in breach of their official duties.
- Prompting the foreign official to use his influence with a foreign government, or a department or any instrumentality thereof, to affect or

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influence a government act or decision

- Securing improper advantages to obtain or retain business for the Organization.

Additionally, in the specific context of the FCPA, payments for unlawful purposes may be made “unknowingly” or through Intermediaries who, in turn, would make payments to foreign officials. In this context, the term “knowingly” is given a very broad interpretation. An individual is deemed to know that a conduct is prohibited if that individual:

(a) is aware that the Intermediary is engaging in such conduct, that such circumstance exists, or that such result is substantially certain to occur;

Or

(b) has a firm belief that such circumstance exists or that such result is substantially certain to occur.

A person is also considered to know of a certain circumstance if they are aware of a high probability of the existence of such circumstance, unless the person actually believes that such circumstance does not exist. The Organization can therefore be held liable if the actions of its Employees or agents evidence a conscious disregard or wilful ignorance of circumstances, which they should have reported to the Organization as being highly likely to be unlawful. The Organization cannot overlook suspicious activities of its agents, representatives or foreign partners, in an attempt to avoid becoming aware of prohibited activities.

A “Foreign Official” is defined in the FCPA as any officer or employee of a foreign government or of any department, agency or instrumentality of a foreign government. The term “Government” includes agencies, bodies, subdivisions or other instrumentalities of:

(a) any form of national, state or local government;

(b) hospitals or other healthcare units owned or operated by a public entity;

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(c) regulatory authorities, or businesses, companies, organizations or organizations under government control;

and

(d) public international organizations such as the World Bank, the International Finance Corporation, the International Monetary Fund, the Inter-American Development Bank or the African Union.

In addition, any individual performing official duties for any government agency, department or instrumentality, or for a public international organization is a “Foreign Official”. For example, an entity engaged to review bids on behalf of a foreign government agency would be a “Foreign Official.”

The United States Department of Justice has declared that the individuals below should also be considered “Foreign Officials”:

- Officers and employees of foreign state-owned enterprises;
- Unpaid honorary officers if they can influence the award of business.
- Members of royal families who have interests, as owners or managers, in industries or companies owned or controlled by foreign governments.

The FCPA further prohibits bribing foreign political parties and their leaders, as well as candidates for political office abroad.

The term “anything of value” means that not only cash bribes are prohibited, but also bribes involving other things of value such as:

- Shares on the stock exchange;
- Entertainment;
- Gifts;
- Discounts on products and services that are not available to the general public.
- Job offers;
- Debt assumption or relief;

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- Payment of travel or other expenses;
- Personal favours; and
- Other goods or services.

Required Due Diligence

To ensure compliance with the FCPA, the Organization must deal carefully with sales agents, distributors, partners and other Intermediaries. Foreign business partners, agents or consultants from a different culture pose a significant risk, particularly in countries where the practice of unlawful payments may be widespread. The Organization must remain vigilant for “red flags” that could point toward a potential breach of the FCPA by a third party.

Examples of some “red flags” are:

- ✓ Which is the country at issue? The Organization cannot overlook the historical context, and must take special care in a legal system with a history of, or that is known for breaching the FCPA.
- ✓ The third party is known for making improper payments.
- ✓ The agent's fees or commissions are above the standard rate. Has the Organization been required to issue an invoice that is substantially higher than the actual sale value of the goods or services provided?
- ✓ Does the agent refuse to make any statement regarding their conduct (such as whether they are aware of the FCPA and have not acted to breach the FCPA)?

In other countries or cultures, you may come across a request from a foreign official or intermediary for something you believe might be a bribe. If you receive such a request, you should contact the legal department immediately.

Admissible Payments

Under certain circumstances, specific payments may be made to Foreign Officials. The FCPA considered “Facilitation Payments”, “promotional or marketing payments” or other “certain lawful payments” admissible. However, these types of payments can only be made when it is clear that they fall within such exceptions and when approved by the Legal Department, which must analyze whether the payment is also permitted under existing legal regulations in other jurisdictions, especially the RGPC [Portuguese General Anti-Corruption Regime].

“Facilitation Payments” will only be approved upon verifying that the payment meets the criteria listed above and the applicable law. In any case, an effort should be made to eliminate or minimize such payments.

“Promotional or marketing payments” may be made under certain circumstances, such as certain reasonable expenses (e.g., incurred in promotional presentations of the Organization to Foreign Officials). However, lavish travel, entertainment and/or accommodation expenses might not be paid or reimbursed. Prior approval in accordance with the Organization's Policy is required to pay or reimburse any such expenses.

A number of “certain lawful payments” to Foreign Officials, which are lawful under the laws and regulations of the foreign Official's home country, may be permitted under the FCPA. However, note that most countries have laws prohibiting the payment of bribes to public officials. No payment shall be made by any of the Organization's Employees or Intermediaries on the basis of the above-mentioned local legislation without the prior approval of the legal department in accordance with the Organization's Policy.

Penalti

The sanctions for breaches of the FCPA are severe and potentially devastating for the Organization and the individuals involved.

Companies can be fined millions of dollars or even banned from engaging in certain types of business.

Individuals can be fined up to hundreds of millions of dollars per breach or a prison sentence of up to five years. Fines imposed on individuals cannot be reimbursed by the Organization.

Compliance with the FCPA Policy

All Employees and Intermediaries of the Organization whose duties may cause them to be involved in, or exposed to any of the areas covered by the FCPA must familiarize themselves and comply with the provisions of this chapter of the Policy.

Every staff member of the Organization whose duties may cause them to be involved in, or exposed to any of the areas covered by the FCPA is responsible for ensuring strict compliance with the provisions of this chapter of the Policy. Any Staff Member or Intermediary who breaches the provisions of this chapter of the Policy will be subject to disciplinary measures, which may result in their dismissal.

Any Staff Member who suspects or is aware of any breach of the provisions of this chapter of the Policy must report it to their supervisor, who in turn must immediately inform the legal department. Alternatively, the Staff Member can use the Organization's helplines (described below), and report directly to the legal department or make use of the Organization's "open door" policy.

3. General Provisions

Contacts

For any queries regarding the provisions of the second chapter of the Policy concerning the FCPA, interactions with foreign officials, or payment practices, please contact the legal department using the contact details below.

Worthington Enterprises, Inc. 200 Old Wilson Bridge Road Columbus, Ohio
43085 Attention: Timothy J. Doney Phone: 614.840-3698

E-mail:timothy.doney@wthg.com

Internationally (add the relevant international dialing codes):

<i>AUSTRIA</i>	0800-200-288	877-263-9893
<i>CHINA-NORTH</i>	108-888	877-263-9893
<i>CHINA-SOUTH</i>	108-11	877-263-9893
<i>CZECH REPUBLIC</i>	00-800-222-55288	877-263-9893
<i>FRANCE</i>	0800-99-0111 or 0805-701-288	877-263-9893
<i>PORTUGAL</i>	800-800-128	877-263-9893

On the other hand, compliance with the legal obligations arising specifically from the RGPC is the responsibility of the Compliance Officer.

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If you become aware of or suspect that there has been a breach of this Policy, related company policies and/or procedures or any applicable legal provision, you must immediately report that breach to your supervisor or to one of the Compliance Officers identified above.

If you believe that the person to whom you have reported the suspected breach has not taken appropriate action, you should escalate the matter to the Chairman of the Board of Directors.

If you would prefer to speak to someone confidentially or anonymously, Amtrol-Alfa provides to its employees a 24-hour hotline through which they can report confidentially, as mentioned in the subchapter “Whistleblowing Channel” of the RGPC Code of Conduct.

You may also approach a member of the Board of Directors.

Review

This Policy will be reviewed every 3 years or whenever there is an amendment to Amtrol-Alfa's duties or organizational or corporate structure that so warrants.

Publication and Accessibility

This Policy and any amendments thereto shall be disseminated to all Employees via the Amtrol-Alfa intranet and website (amtrol-alfa.com), within 10 days of its implementation and respective amendments.

ANTI-CORRUPTION POLICY**Annex I**

Sanctions for corruption crimes and related offenses (cf. article 3 of the RGPC)

Penal Code

Legal Grounds	Legal Definition and Punitive Framework	Examples
<p><i>Passive corruption</i> (article 373)</p>	<p>1 – A public official who, directly or through a third party, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage, or its promise, for the performance of any act or omission contrary to the duties of the office, even if committed before such request or acceptance, shall be punished with imprisonment from one to eight years.</p> <p>2 - If the act or omission is not contrary to the duties of the office and the advantage is not due, the agent shall be punished with imprisonment from one to five years.</p>	<p>When a public official requests or receives an advantage, or its promise, in exchange for making a decision or omitting an act within the scope of his functions.</p>
<p><i>Active corruption</i> (article 374)</p>	<p>1 – Any person who, directly or through a third party, with their consent or ratification, gives or promises to a public official, or to a third party on their instructions or with their knowledge, a pecuniary or non-pecuniary advantage for the purpose indicated in paragraph 1 of article 373, shall be punished with imprisonment from one to five years.</p> <p>2 - If the purpose is as indicated in paragraph 2 of article 373, the agent shall be punished with imprisonment up to three years or with a fine up to 360 days.</p> <p>3 - Attempt is punishable.</p>	<p>When someone gives or promises a public official an advantage in exchange for making a decision or omitting an act within the scope of their functions.</p>
<p><i>Undue receipt and offer of advantage</i> (article 372)</p>	<p>1 – A public official who, in the discharge of his duties or because of them, directly or through a third party, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage that is not due, shall be punished with imprisonment up to five years or with a fine up to 600 days.</p> <p>2 – Any person who, directly or through a third party, with their consent or ratification, gives or promises to a public official, or to a third party on their instructions or with their knowledge, a pecuniary or non-pecuniary advantage that is not due, in the discharge of their duties or because of them, shall be punished with imprisonment up to three years or with a fine up to 360 days.</p> <p>3 - Socially adequate and customary conduct is excluded from the previous paragraphs.</p>	<p>When a public official, in in the discharge of his duties or because of them, requests or receives from another person, directly or indirectly, an advantage that is not due.</p> <p>When someone gives or promises a public official, in the discharge of their duties, an advantage that is not due.</p>

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<p><i>Embezzlement</i> (article 375)</p>	<p>1 - A public official who unlawfully appropriates, for his own benefit or that of another person, money or any movable or immovable thing or animal, public or private, that has been given to him, is in his possession or is accessible to him by reason of his duties, shall be punished with imprisonment from one to eight years, if a more severe penalty is not applicable by another legal provision.</p> <p>2 - If the values or objects referred to in the previous paragraph are of minor value, under the terms of subparagraph c) of article 202, the agent shall be punished with imprisonment up to three years or with a fine.</p> <p>3 - If the public official lends, pledges, or in any way encumbers the values or objects referred to in paragraph 1, they shall be punished with imprisonment up to three years or with a fine, if a more severe penalty is not applicable by another legal provision.</p>	<p>When a public official appropriates assets or values belonging to the organization where he performs his functions.</p>
<p><i>Misappropriation</i> (article 376)</p>	<p>1 - A public official who uses or allows another person to use, for purposes other than those intended, any immovable property, vehicles, other movable things, or animals of significant value, whether public or private, that has been given to him, is in his possession or is accessible to him by reason of his duties, shall be punished with imprisonment up to one year or with a fine up to 120 days.</p> <p>2 - If the public official, without special reasons of public interest underpinning it, uses public money for public purpose other than that to which it is legally allocated, shall be punished with imprisonment up to one year or with a fine up to 120 days.</p>	<p>When a public official uses for his benefit, or authorizes others to use, assets, equipment, or values, material or financial, belonging to the public organization where he performs his functions or that are under his custody.</p>
<p><i>Economic involvement in business</i> (article 377)</p>	<p>1 - A public official who, with the intention of securing, for himself or for a third party, an unlawful economic gain, damages in a legal transaction the property interests which, in whole or in part, he is tasked with administering, supervising, upholding, or carrying out by virtue of his position, shall be punished with imprisonment up to five years.</p> <p>2 - A public official who, in any way, receives, for himself or for a third party, a pecuniary advantage as a result of a civil-legal act concerning interests of which he had, by virtue of his duties, at the time of the act, total or partial control, administration, or supervision, even if without harming them, shall be punished with imprisonment up to six months or with a fine up to 60 days.</p> <p>3 - The penalty provided in the previous paragraph is also applicable to the public official who receives, for himself or for a third party, in any way, a material advantage by effect of</p>	<p>When a public official, in the discharge of his duties, makes decisions that benefit a particular interest, his own or that of a third party, harming the interest or causing damage to the organization or public entity for which he works.</p>

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<p><i>Extortion</i> (article 379)</p>	<p>collection, revenue, liquidation, or payment that, by reason of his functions, he is totally or partially responsible for ordering or making, even if there is no harm to the Public Treasury or the interests entrusted to him.</p> <p>1 - A public official who, in the discharge of his duties or <i>de facto</i> powers derived therefrom, directly or through a third party, with their consent or ratification, receives, for himself, for the State, or for a third party, by misleading or taking advantage of the victim's misconception, a pecuniary advantage that is not due, or exceeds the amount due, notably a contribution, fee, charge, fine, or penalty, shall be punished with imprisonment up to two years or with a fine up to 240 days, if a more severe penalty is not applicable by another legal provision.</p> <p>2 - If the act is carried out by the use of violence or threat of serious harm, the agent shall be punished with imprisonment from one to eight years, if a more severe penalty is not applicable by another legal provision.</p>	<p>When a public official, in discharge of his duties, appropriates a value or asset that is not due, as a result of a circumstantial error or one that has been deliberately induced by him.</p>
<p><i>Denial of justice and misfeasance</i> (article 369)</p>	<p>1 - A public official who, in the context of a procedural investigation, judicial proceeding, administrative offense proceeding, or disciplinary proceeding, knowingly and against the law, promotes or fails to promote, conducts, decides or fails to decide, or performs an act in the exercise of powers arising from the office he holds, shall be punished with imprisonment up to two years or with a fine up to 120 days.</p> <p>2 - If the act is carried out with the intention of harming or benefiting someone, the public official shall be punished with imprisonment up to five years.</p> <p>3 - If, in the case of paragraph 2, it results in the deprivation of a person's liberty, the agent shall be punished with imprisonment from one to eight years.</p> <p>4 - The penalty provided in the previous paragraph also applies to the public official who, being competent to do so, orders or executes a measure depriving liberty illegally, or omits to order or execute it according to the law.</p> <p>5 - In the case referred to in the previous paragraph, if the act is committed with gross negligence, the agent shall be punished with imprisonment up to two years or with a fine.</p>	<p>When a public official, in the context of a proceeding, performs or omits an act consciously and unlawfully in the discharge of the powers of his office.</p>
<p><i>Abuse of power</i> (article 382)</p>	<p>A public official who, aside the cases provided for in the previous articles, abuses their powers or breaches the duties inherent to his functions, with the intention of securing, for himself or for a third party, an illegitimate benefit or causing harm to another person, shall be punished with imprisonment up to three years or with a fine, if a more severe penalty is not applicable by another</p>	<p>When a public official takes advantage of his functional powers to obtain an illegitimate benefit or to cause harm to another person.</p>

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<p><i>Influence peddling</i> (article 335)</p>	<p>legal provision.</p> <p>1 – Any person who, directly or through a third party, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or its promise, in order to abuse their real or supposed influence with any public entity, national or foreign, shall be punished:</p> <p>a) With imprisonment from one to five years, if a more severe penalty is not applicable by another legal provision, if the purpose is to obtain any favorable unlawful decision;</p> <p>b) With imprisonment up to three years or with a fine, if a more severe penalty is not applicable by another legal provision, if the purpose is to obtain any favorable lawful decision.</p> <p>2 – Any person who, directly or through a third party, with their consent or ratification, gives or promises a pecuniary or non-pecuniary advantage to the persons referred to in the previous paragraph:</p> <p>a) For the purposes provided in subparagraph a), shall be punished with imprisonment up to three years or with a fine;</p> <p>b) For the purposes provided in subparagraph b), shall be punished with imprisonment up to two years or with a fine up to 240 days.</p>	<p>When someone requests or receives an advantage in exchange for abusing their influence with a public entity or service, aiming to obtain a favorable decision, lawful or unlawful.</p> <p>When someone gives or promises an advantage for another person to abuse their influence with a public entity or service, aiming to obtain a favorable decision, lawful or unlawful.</p>
<p><i>Money laundering</i> (article 368-A)</p>	<p>(...) 3 – Any person who converts, transfers, assists, or facilitates any operation of conversion or transfer of advantages, obtained by themselves or by a third party, directly or indirectly, with the aim of concealing their illicit origin, or to prevent the perpetrator or participant in such offenses from being criminally prosecuted or facing criminal action, shall be punished with imprisonment up to twelve years.</p> <p>4 - The same penalty applies to whoever conceals or disguises the true nature, origin, location, disposition, movement, or ownership of the advantages, or the rights related to them.</p> <p>5 - The same penalty also applies to whoever, not being the author of the illicit typical act from which the advantages originate, acquires, holds, or uses them, with knowledge, at the time of acquisition or at the initial moment of holding or using, of that quality. (...)</p>	<p>When someone acts to conceal the illicit origin of assets and patrimonial, financial, or material values.</p>
<p><i>Concept of public official</i> (article 386)</p>	<p>a) The civil public employee and the military;</p> <p>b) Whoever holds a public office by virtue of a special bond;</p> <p>c) Whoever, even provisionally or temporarily, for remuneration or gratuitously, voluntarily or obligatorily, has been called to perform or participate in the performance of an activity included in the administrative or judicial public function;</p>	

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d) The judges of the Constitutional Court, the judges of the Court of Auditors, the judicial magistrates, the Public Prosecutors, the Attorney General, the Ombudsman, the members of the Superior Council of the Judiciary, the members of the Superior Council of Administrative and Fiscal Courts, and the members of the Superior Council of the Public Prosecutor's Office;

e) The arbitrator, the juror, the expert, the technician who assists the court in judicial inspection, the translator, the interpreter, and the mediator;

f) The notary;

g) Whoever, even provisionally or temporarily, for remuneration or gratuitously, voluntarily or obligatorily, performs or participates in the performance of an administrative public function or exercises authority functions in a legal person of public utility, including private institutions of social solidarity;

h) Whoever performs or participates in the performance of public functions in a public association.

2 - Public officials are equated with members of management or administration bodies or supervisory bodies and employees of public companies, nationalized companies, companies with public capital or with majority public capital participation, and also companies that are concessionaires of public services, with the exception that in the case of companies with equal or minority public capital participation, the holders of management or administration bodies designated by the State or another public entity are equated with public officials.

3 - For the purposes of articles 335 and 372 to 374, the following are also equated with public officials:

a) Magistrates, officials, agents, and equivalents of public international law organizations, regardless of nationality and residence;

b) National officials of other States;

c) All those who perform functions identical to those described in paragraph 1 within any public international law organization of which Portugal is a member;

d) Magistrates and officials of international courts, provided that Portugal has declared acceptance of the jurisdiction of those courts;

e) All those who perform functions within the scope of extrajudicial conflict resolution procedures, regardless of nationality and residence;

f) National jurors and arbitrators of other States.

Law No. 34/87, of July 16 (Crimes of Responsibility of Political Office Holders)

Legal Grounds	Legal Definition and Punitive Framework	Examples
<p><i>Passive corruption</i></p> <p>(article 17)</p>	<p>1 - A political office holder who, in the discharge of his duties or because of them, directly or through a third party, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage, or its promise, for the performance of any act or omission contrary to the duties of the office, even if prior to such request or acceptance, shall be punished with imprisonment from two to eight</p>	<p>When a political office holder requests or receives an advantage, or its promise, in exchange for making a decision or omitting an act within the scope of their functions.</p>

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	<p>years.</p> <p>2 - If the act or omission is not contrary to the duties of the office and the advantage is not due, the political office holder shall be punished with imprisonment from two to five years.</p>	
<p><i>Active corruption</i></p> <p><i>(article 18)</i></p>	<p>1 – Any person who, directly or through a third party, with their consent or ratification, gives or promises to a political office holder, or to a third party on their instructions or with their knowledge, a pecuniary or non-pecuniary advantage for the purpose indicated in paragraph 1 of article 17, shall be punished with imprisonment from two to five years.</p> <p>2 - If the purpose is as indicated in paragraph 2 of article 17, the agent shall be punished with imprisonment up to five years.</p> <p>3 - The political office holder who, in the discharge of his duties or because of them, directly or through a third party, with his consent or ratification, gives or promises to a public official, a high public office holder, or another political office holder, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage that is not due, for the purposes indicated in article 17, shall be punished with the penalties provided in the same article.</p>	<p>When someone gives or promises a political office holder an advantage in exchange for making a decision or omitting an act within the scope of their functions.</p> <p>When the political office holder gives or promises a public official, a high public office holder, or another political office holder an advantage, or its promise, to make a decision or omit an act within the scope of his functions.</p>
<p><i>Unlawful receipt and offer of advantage</i></p> <p><i>(article 16)</i></p>	<p>1 - A political office holder who, in the discharge of his duties or because of them, directly or through a third party, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage that is not due, shall be punished with imprisonment from one to five years.</p> <p>2 – Any person who, directly or through a third party, with their consent or ratification, gives or promises to a political office holder, or to a third party on their instructions or with their knowledge, a pecuniary or non-pecuniary advantage that is not due, in the discharge of their duties or because of them, shall be punished with imprisonment up to five years or with a fine up to 600 days.</p> <p>3 - The political office holder who, directly or through a third party, with his consent or ratification, gives or promises to another political office holder, a high public office holder, or a public official, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage, or its promise, that is not due, in the discharge of his duties or because of them, shall be punished with the penalties provided in the previous paragraph.</p> <p>4 - Socially adequate and customary conduct is excluded from the previous paragraphs.</p>	<p>When a political office holder, in the discharge of his duties or because of them, requests or receives from another person, directly or indirectly, an advantage that is not due.</p> <p>When someone gives or promises a political office holder, in the discharge of their duties or because of them, an advantage that is not due.</p> <p>When the political office holder gives or promises another political office holder, a high public office holder, or a public official, in the discharge of his duties or because of them, an advantage that is not due.</p>
<p><i>Embezzlement</i></p>	<p>1 - A political office holder who, in the discharge of his functions, unlawfully appropriates, for his own</p>	<p>When the political office holder appropriates assets or values</p>

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<i>(article 20)</i>	<p>benefit or that of another person, money or any movable or immovable thing, public or private, that has been given to him, is in his possession, or is accessible to him by reason of his duties, shall be punished with imprisonment from three to eight years and a fine up to 150 days, if a more severe penalty is not applicable by another legal provision.</p> <p>2 - If the offender lends, pledges, or in any way encumbers any objects referred to in the previous paragraph, with the knowledge that they harm or may harm the State or its owner, they shall be punished with imprisonment from one to four years and a fine up to 80 days.</p>	<p>belonging to the entity or organization where he performs his functions.</p>
<i>Misappropriation (article 21)</i>	<p>1 - A political office holder who uses or allows another person to use, for purposes other than those intended, any immovable property, vehicles, or other movable property of significant value, public or private, that have been given to him, are in his possession, or are accessible to him by reason of his duties, is punished with imprisonment up to two years or with a fine up to 240 days.</p> <p>2 - A political office holder who allocates public money for a public use different from that to which it is legally assigned is punished with imprisonment up to two years or with a fine up to 240 days.</p>	<p>When a political office holder uses for his own benefit, or authorizes others to use, assets, equipment, or values belonging to the entity or organization where he performs duties, or that are under his custody.</p>
<i>Embezzlement of public funds by error of a third party (article 22)</i>	<p>A political office holder who, in the discharge of his duties, but taking advantage of someone else's error, receives, for himself or for a third party, fees, charges, or other amounts that are not due, or exceed those due, will be punished with imprisonment up to three years or a fine up to 150 days.</p>	<p>When a political office holder, in the discharge of his duties, appropriates a value or asset that is not due, as a result of a circumstantial error or one that he has deliberately induced.</p>
<i>Economic involvement in business (article 23)</i>	<p>1 - A political office holder who, with the intention of securing, for himself or for a third party, an unlawful economic gain, damages in a legal transaction the property interests which, in whole or in part, he is tasked with for administering, supervising, upholding, or carrying out, is punished with imprisonment up to 5 years.</p> <p>2 - A political office holder who, in any way, receives a pecuniary advantage as a result of a civil-legal act related concerning interests of which he had, by virtue of his duties, at the time of the act, total or partial control, administration, or supervision, even if without harming them, is punished with imprisonment up to 6 months or with a fine up to 150 days.</p> <p>3 - The penalty provided in the previous paragraph is also applicable to a political office holder who receives, in any way, an economic advantage by effect of collection, assessment, liquidation, or payment of which, by virtue of his duties, he is totally or partially responsible for ordering or making, even if there is no economic damage to</p>	<p>When a political office holder, in the discharge of his duties, makes decisions that benefit a particular interest, of his own or of a third party, harming the interest or causing damage to the public entity or organization for which he works.</p>

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<i>Abuse of powers</i> (article 26)	<p>the Public Treasury or the interests thus affected.</p> <p>1 - A political office holder who abuses the powers or breaches the duties inherent to his position, with the intention of securing, for himself or for a third party, an illegitimate benefit or causing harm to another person, will be punished with imprisonment from six months to three years or a fine of 50 to 100 days, if a more severe penalty is not applicable by another legal provision.</p> <p>2 - The penalties provided in the previous paragraph also apply to a political office holder who fraudulently grants concessions or enters into contracts for the benefit of a third party or to the detriment of the State.</p>	When a political office holder takes advantage of his functional powers to obtain an illegitimate benefit or to cause harm to another person.
<i>Misfeasance</i> (article 11)	A political office holder who knowingly conducts or adjudicates against the law a case in which he intervenes in the discharge of his duties, with the intention of thereby harming or benefiting someone, will be punished with imprisonment from two to eight years.	When a political office holder makes functional decisions within the scope of a process that deliberately benefit or harm someone.
Political offices (article 3)	<ul style="list-style-type: none"> - The President of the Republic; - The President of the Assembly of the Republic; - The Member of the Assembly of the Republic; - The Member of the Government; - The Member of the European Parliament; - The Representative of the Republic in the autonomous regions; - The Member of the self-governing body of an autonomous region; - The Member of the representative body of a local authority; - The holders of political offices of public international law organizations, as well as the holders of political offices of other States, regardless of nationality and residence, when the offense has been committed, in whole or in part, in Portuguese territory. 	

Law No. 100/2003, of November 15 (Military Justice Code)

Legal Grounds	Legal Definition and Punitive Framework	Examples
<i>Passive corruption</i> (article 36)	1 – Any person who, as a member or in the service of the Armed Forces or other military forces, directly or through a third party, with their consent or ratification, requests or accepts, for themselves or for a third party, without being due, a pecuniary or non-pecuniary advantage or its promise, as a counterpart to an act or omission contrary to the duties of the office and resulting in a danger to national security, is punished with imprisonment from 2 to 10 years.	When a military person requests or receives an advantage, or its promise, in exchange for making a decision or omitting an act within the scope of his duties, which unduly benefits the person who offered or promised the advantage.

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<p><i>Active corruption (article 37)</i></p>	<p>2 - If the agent, before the act, voluntarily repudiates the offer or promise he had agreed upon or returns the advantage or, in the case of a fungible thing, its value, he is exempt from punishment.</p> <p>3 - Civilians who are employees of the Armed Forces or other military forces, within the meaning of article 386 of the Penal Code, and the persons referred to in article 4, are considered to be in the service of the Armed Forces or other military forces.</p> <p>1 – Any person who, directly or through a third party, with their consent or ratification, gives or promises to any member or person at the service of the Armed Forces or other military forces, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage that is not due, with the purpose indicated in the previous article and resulting in a danger to national security, is punished with imprisonment from 1 to 6 years.</p> <p>2 - If the perpetrator of the crimes referred to in the preceding paragraph is an officer of a higher rank than the member of the military whom he seeks to corrupt or performs command or leadership duties over him, the minimum limit of the applicable penalty is doubled.</p> <p>When someone gives or promises a military person an advantage, or its promise, in exchange for making a decision or omitting an act within the scope of their functions, which unduly benefits the person who offered or promised the advantage.</p>
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Law No. 14/2024, of January 19 (Legal Regime of Sports Integrity and Combating Unsportsmanlike Behavior)

Legal Provision	Legal Definition and Punitive Framework	Examples
<p><i>Passive corruption (article 14)</i></p>	<p>A sports agent who, directly or through a third party, with his consent or ratification, requests or accepts, for himself or for a third party, without being due, a pecuniary or non-pecuniary advantage, or its promise, for any act or omission intended to alter or falsify the result of a sports competition, even if prior to such request or acceptance, is punished with imprisonment from 1 to 8 years.</p>	<p>When a sports agent requests or receives an advantage, or its promise, for an act or omission intended to alter or falsify the result of a sports competition.</p>
<p><i>Active corruption (article 15)</i></p>	<p>Any person who, directly or through a third party, with their consent or ratification, gives or promises to a sports agent, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage that is not due, with the purpose indicated in the previous article, is punished with imprisonment from 1 to 5 years.</p>	<p>When someone gives or promises a sports agent an advantage, or its promise, for an act or omission intended to alter or falsify the result of a sports competition.</p>
<p><i>Influence peddling (article 16)</i></p>	<p>1 – Any person who, directly or through a third party, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or its promise, to abuse their real or supposed influence with any sports agent, with the aim of obtaining any decision intended to alter or falsify the result of a sports competition, is punished with imprisonment from 1 to 5 years, if a more severe penalty</p>	<p>When someone requests or receives an advantage in exchange for abusing their influence with a sports agent, with the aim of obtaining any decision intended to alter or falsify the result of a sports competition.</p>

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	<p>is not applicable by another legal provision.</p> <p>2 – Any person who, directly or through a third party, with their consent or ratification, gives or promises to another person a pecuniary or non-pecuniary advantage, for the purpose referred to in the previous paragraph, is punished with imprisonment up to 3 years or with a fine, if a more severe penalty is not applicable by another legal provision.</p> <p>3 - Attempt is punishable.</p>	<p>When someone gives or promises another person an advantage to abuse their influence with a sports agent, with the aim of obtaining a decision intended to alter or falsify the result of a sports competition.</p>
<p><i>Unlawful receipt and offer of advantage</i> (article 17)</p>	<p>1 - A sports agent who, in the discharge of his duties or because of them, directly or through a third party, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage that is not due, is punished with imprisonment up to 5 years or with a fine up to 600 days.</p> <p>2 – Any person who, directly or through a third party, with their consent or ratification, gives or promises to a sports agent, or to a third party on their instructions or with their knowledge, a pecuniary or non-pecuniary advantage that is not due, in the discharge of their duties or because of them, is punished with imprisonment up to 3 years or with a fine up to 360 days.</p> <p>3 - Socially adequate conduct and in accordance with customs and traditions are excluded from the previous paragraphs.</p>	<p>When a sports agent requests or accepts from another person, directly or indirectly, an advantage that is not due, in the discharge of his duties or because of them.</p> <p>When someone gives or promises a sports agent, directly or indirectly, an advantage that is not due, in the discharge of their duties or because of them.</p>
<p>Definitions (article 2)</p>	<p>a) "Sports agent" means the individuals or legal persons referred to in the following subparagraphs, as well as those who, even provisionally or temporarily, for remuneration or free of charge, voluntarily or obligatorily, individually or as part of a group, participate in a sports competition or sports event;</p> <p>b) "Sports referee or judge" means anyone who, in any capacity, principal or auxiliary, assesses, judges, decides, observes, or evaluates the application of the technical and disciplinary rules of the sports modality;</p> <p>c) "Sports competition" means the regulated sports activity, organized and exercised under the aegis of sports federations or professional leagues, associations, and groups of clubs affiliated with them or international bodies of which those legal persons are part;</p> <p>d) "Sports manager" means the holder of the body or representative of the sports legal person, anyone who has authority to exercise control over the activity, and the sports director or equivalent;</p> <p>e) "Sports entrepreneur" means the individual or legal person who, being duly accredited, exercises the activity of representation or intermediation, occasional or permanent, in the conclusion of sports contracts;</p> <p>f) "Sports event" means an organized meeting that includes a series of individual and/or collective competitions held under the aegis of the same sports entity;</p> <p>g) "Incidents" means all actions or events of any event, test, or sports competition, susceptible to sports betting, online or territorial, namely regarding the winner, the result, the number of goals or points, the number of cards, the number of corners, and the number of free kicks, both final and partial;</p> <p>h) "Sports legal persons" means sports clubs, sports companies, sports federations, professional leagues, associations, and groups of clubs affiliated with them, as well as legal persons, civil societies, or associations representing any of the categories of sports agents referred to in</p>	

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subparagraphs b), d), e), and i);

i) "Sports technician" means the coach, technical advisor, physical trainer, doctor, masseur, their assistants, and anyone who, in any capacity, guides sports practitioners in the performance of their activity;

j) "Manipulation of sports competitions" means an agreement, act, or intentional omission, aimed at an irregular alteration of the result or course of a sports competition, to eliminate, in whole or in part, the unpredictable nature of the said sports competition, with a view to obtaining undue advantages for themselves or others

Law No. 20/2008, of April 21 (Penal Regime for Corruption in International Trade and the Private Sector)

Legal Provision	Legal Definition and Punitive Framework	Examples
<i>Active corruption harming international trade (article 7)</i>	Any person who, directly or through a third party, with their consent or ratification, gives or promises to a national, foreign, or international organization official, or to a national or foreign political office-holder, or to a third party with their knowledge, an undue pecuniary or non-pecuniary advantage in secure to obtain or retain a business, contract, or other undue advantage in international trade, shall be punished with imprisonment from one to eight years.	When someone gives or promises an advantage to an official of an international entity or organization to obtain or retain a business, contract, or other undue advantage in international trade.
<i>Passive corruption in the private sector (article 8)</i>	<p>1 - A private sector employee who, directly or through a third party, with his consent or ratification, requests or accepts, for himself or for a third party, an undue pecuniary or non-pecuniary advantage, or its promise, for any act or omission that constitutes a violation of their functional duties, shall be punished with imprisonment up to five years or with a fine up to 600 days.</p> <p>2 - If the act or omission mentioned in the previous paragraph is likely to cause a distortion of competition or patrimonial damage to third parties, the agent shall be punished with imprisonment from one to eight years.</p>	When a private sector worker requests or accepts an undue advantage or its promise to violate their functional duties.
<i>Active corruption in the private sector (article 9)</i>	<p>1 - Any person who, directly or through a third party, with their consent or ratification, gives or promises to any person referred to in the preceding article, or to a third party with that person's knowledge, an undue pecuniary or non-pecuniary advantage, in order to fulfil the purpose provided for therein, shall be punished with imprisonment up to three years or with a fine.</p> <p>2 - If the conduct provided for in the preceding paragraph is intended or likely to cause a distortion of competition or pecuniary damage to third parties' assets, the agent shall be punished with imprisonment up to five years or with a fine up to 600 days.</p> <p>3 - Attempt is punishable.</p>	When someone gives or promises an undue advantage to a private sector worker to violate their functional duties.

ANTI-CORRUPTION POLICY**Decree-Law No. 28/84, of January 20 (Regime on Economic Offenses and Offenses Against Public Health)**

Legal Provision	Legal Definition and Punitive Framework	Examples
<p><i>Fraud in obtaining subsidy or grant</i></p> <p>(article 36)</p>	<p>1 – Any person who obtains a subsidy or grant:</p> <p>a) By providing the relevant authorities or bodies with inaccurate or incomplete information concerning themselves or third parties and concerning facts which are relevant for the award of the subsidy or grant;</p> <p>b) By omitting, in breach of the legal framework of the grant or subsidy, information on facts that are important for its award;</p> <p>c) By using a supporting document underpinning the entitlement to the grant or subsidy or facts relevant to their award, obtained by providing inaccurate or incomplete information</p> <p>shall be punished with imprisonment from 1 to 5 years and a fine from 50 to 150 days</p> <p>2 - In particularly serious cases, the penalty shall be imprisonment from 2 to 8 years.</p> <p>3 - If the acts mentioned in this article are committed in the name and interest of a legal person or company, exclusively or predominantly constituted for their practice, the court, in addition to the pecuniary penalty, shall order its dissolution.</p> <p>4 - The sentence shall be published.</p> <p>5 - For the purposes of paragraph 2, particularly serious cases are considered those in which the agent:</p> <p>a) Obtains for himself or for a third party a grant or subsidy of a considerably large amount or uses false documents;</p> <p>b) Commits the offense with abuse of their functions or powers;</p> <p>c) Obtains assistance from a public office holder who abuses his position or powers.</p> <p>6 - Whoever commits the acts described in subparagraph a) and b) of paragraph 1 with negligence shall be punished with imprisonment up to 2 years or a fine up to 100 days.</p> <p>7 - The agent shall be exempt from penalty if:</p> <p>a) They spontaneously prevent the granting of</p>	<p>Whoever obtains a subsidy or grant by presenting inaccurate or incorrect elements regarding important facts for the decision to grant that subsidy or grant.</p>

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Fraud in obtaining credit
(article 38)

the subsidy or grant;

b) In the case of not being granted without their contribution, they have spontaneously and seriously endeavored to prevent its granting.

8 - Important facts for the granting of a subsidy or grant are considered:

a) Declared important by the law or entity granting the subsidy or grant;

b) On which the authorization, granting, reimbursement, renewal, or maintenance of a subsidy, grant, or resulting advantage legally depends.

1 – Any person who, when presenting a proposal for the granting, maintenance, or modification of the conditions of a credit intended for an establishment or company:

a) Provides inaccurate or incomplete written information intended to accredit them or important for the decision on the request;

b) Uses documents related to the economic situation that are inaccurate or incomplete, namely balance sheets, profit and loss accounts, general descriptions of assets, or appraisals;

c) Conceals the deteriorations of the economic situation that have occurred since the situation described at the time of the credit request and that are important for the decision on the request;

shall be punished with imprisonment up to 3 years and a fine up to 150 days.

2 - If the agent, acting in the manner described in the previous paragraph, obtains credit of a considerably high value, the penalty may be increased to 5 years of imprisonment and up to 200 days of fine.

3 - In the case of the previous paragraph, if the crime has been committed in the name and interest of a legal person or company, the court may order their dissolution.

4 - The agent shall be exempt from penalty:

a) If they spontaneously prevent the creditor from delivering the intended provision;

b) If, in the case of the provision not being delivered without their contribution, they have seriously and spontaneously endeavored to prevent the delivery.

Whoever presents, in a proposal for the granting, maintenance, or modification of the conditions of a credit, false or incorrect elements, aiming to obtain that credit unduly.

ANTI-CORRUPTION POLICY

*Misappropriation
subsidy, grant,
subsidized credit*

*of
or*

(article 37)

5 - The sentence shall be published.

1 – Any person who uses benefits obtained as a subsidy or grant for purposes other than those to which they are legally intended shall be punished with imprisonment up to 2 years or a fine not less than 100 days.

Whoever diverts or gives a different direction to a subsidy, grant, or subsidized credit that has been legally assigned to them.

2 - The same penalty shall be applied to whoever uses a benefit obtained as a subsidized credit for a purpose other than that provided in the credit line determined by the legally competent entity.

3 - The penalty shall be imprisonment from 6 months to 6 years and a fine up to 200 days when the values or damages caused are considerably high.

4 - If the acts mentioned in this article are committed repeatedly in the name and interest of a legal person or company and the damage has not been spontaneously repaired, the court shall order their dissolution.

5 - The sentence shall be published.

March 27, 2025