

Code of Conduct on the Prevention of Corruption and Related Offences

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1. INTRODUCTION

Semapa is committed to high standards of ethics and integrity.

For the prevention of corruption and related offences, Semapa adopts and implements a regulatory compliance programme aimed at preventing, detecting and sanctioning acts of Corruption and Related Offences, as provided for in Decree-Law no. 109-E/2021, of 9 December ("**RGPC**") and Guide no. 1/2023, issued by MENAC on the Instruments of the RGPC.

The programme includes the following instruments: (i) Plan for the Prevention of Risks of Corruption and Related Offences, (ii) the present Code of Conduct for the Prevention of Corruption and Related Offences ("**RGPC Code of Conduct**" or "**Code**"), (iii) a training programme, and (iv) the Whistleblowing Channel and the respective Regulations for Reporting Irregularities (jointly the "**Regulatory Compliance Programme**").

2. OBJECT AND SCOPE OF APPLICATION

This Code sets out the principles, values and rules of conduct in terms of professional ethics and the prevention of corruption and related offences, as provided in the General Regime for the Prevention of Corruption in attachment to the RGPC, and is established in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, namely the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the eight core ILO Conventions and the International Charter of Human Rights.

The RGPC Code of Conduct must be read as a complement to the Code of Ethics and Conduct and other policies and procedures in force at Semapa.

The present Code is applicable to all Semapa managers and employees (hereinafter jointly referred to as "**Employees**").

3. REGULATORY COMPLIANCE OFFICER

Semapa appoints, as a member of senior management or equivalent, a person responsible for regulatory compliance, who guarantees and monitors the implementation of the regulatory compliance programme ("**Regulatory Compliance Officer**" or "**RCO**").

The RCO performs its duties independently and with decision-making autonomy. If you have questions about this Code, please contact the RCO.

4. SEMAPA VALUES

Semapa and its Employees guide their actions and performance by the following values: (i) Integrity; (ii) Ethics; (iii) Honesty.

5. PRINCIPLES

Semapa conducts its business in accordance with the following principles:

- Strict compliance with applicable laws and regulations;
- Prohibition and zero-tolerance of acts of corruption and related offences;
- Simplicity, proximity and discretion;
- Social and environmental awareness;
- Proactivity;
- Striving for continuous improvement, based on innovation and entrepreneurship;
- Diligence, integrity and loyalty.

6. RULES

Semapa is guided by the rules of conduct established in its internal codes and policies, namely the Code of Ethics and Conduct, alongside best practices, in particular with regard to the following:

Relations with its Employees

Semapa's Employees are bound by a duty of loyalty to the company, co-workers and their hierarchical superiors, and shall act at all times with honesty, integrity and due regard to the company's interests and objectives.

Semapa complies with the applicable labour rules and seeks to ensure fair and non-discriminatory treatment, namely on the basis of descent, gender, race, language, place of origin, religion, political beliefs or ideology, education, economic situation or social status

Relations with Third Parties

Semapa only carries out its business with third parties which share its commitment to high ethical standards and act responsibly and ethically.

Accumulation of Functions and Conflict of Interest

Semapa assesses the duties performed by directors and managers, for the purposes of managing the accumulation of duties.

Semapa employees are required to obtain prior authorisation from their superiors for any form of collaboration with competing entities or entities with interests that could conflict with those of the company.

The Employees of Semapa must act in the best interests of the Company and refrain from prioritising their own motivations and own interests or those of third parties to the detriment of Semapa's interests.

A Conflict of Interest arises whenever an Employee is in a position that may compromise its independence and influence its judgement with interests that are different to those of the Company, either financial or not, of their own or of third parties.

According to the rules laid down in the Regulation on Conflicts of Interest and Transactions with Related Parties and in the Code of Ethics and Conduct, mentioned above, whenever a (real or potential) situation of Conflict of Interest is deemed to exist, Semapa Employees must report it to their hierarchical superior and to the Regulatory Compliance Officer, before any decision is made.

Prevention of Corruption and Related Offences

All Semapa Employees must comply with and enforce compliance with the applicable national and international rules on the prevention of corruption and related offences.

In the course of their business, Semapa may engage with public officials and organisations, being such interaction conducted with total honesty, transparency and compliance with all applicable legal rules and ethical duties.

The Prevention of Corruption and Related Offences in **Annex II** to this Code sets out the type of behaviour that is prohibited.

Concerning **gifts, hospitality or other benefits**, it is **absolutely prohibited, among other things, to:**

(i) Receive or offer gifts, hospitality or other benefits that are not symbolic and are clearly inappropriate, especially those of a manifestly high value (above €150);

(ii) Accept or offer gifts, hospitality or other benefits, regardless of their value, in return for preferential treatment from any third party, in order to influence an action or decision, or which, in any way, and regardless of their intrinsic value, are objectively likely to condition the full exercise of the function, including the duties of impartiality, transparency and integrity, which are proper and inherent to the exercise of functions with integrity in an organisation or entity;

(iii) Offer or accept, in any circumstances whatsoever and irrespective of value, cash, cheques and other goods that are subject to legal restrictions;

(iv) Obtain any benefit or advantage for the company, for the Employee or for third parties, through unethical behaviour or conduct contrary to the duties of the position, in particular through corruption practices, improper receipt of an advantage or influence peddling;

(v) Promise or offer, directly or through a third party, any type of remuneration, good, favour or service, regardless of its economic value, to a public authority or official, or to any third party indicated by them or with their knowledge, with the explicit or implicit intention of having any public authority or official take a decision for the benefit of Semapa or any of its stakeholders or to unjustifiably omit or delay an act inherent to their position, for the benefit of Semapa or any of its stakeholders;

(vi) Promise or offer, either directly or through a third party, any type of remuneration, good, favour or service to any authority or public official, which, taking into account its economic value, uniqueness or similar circumstance, falls outside common social practices and courtesy;

(vii) Promise or offer, directly or through a third party, any type of remuneration, good, favour or service to a director, manager 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 Semapa or its stakeholders and that is contrary to their duties;

(viii) Make contributions to political parties.

Any benefit may only be offered and received **when socially acceptable and in accordance with customs**, i.e., when the benefit in question is offered as a sign of courtesy and good practice, in accordance with local customs, and to the extent that this benefit is related to the activity and is not intended or likely to affect, at the moment or in the future, the duties of impartiality, transparency and integrity associated with the exercise of functions.

Use of Electronic Resources

Semapa's Employees adopt cybersecurity practices to protect the confidentiality and integrity of data, and use emerging technologies, such as artificial intelligence, in an ethical and responsible manner.

At Semapa, practices of accessing, processing and sharing data are guided by clear rules, and backups are made on a regular basis, ensuring that all systems, software and plug-ins are updated with the latest security patches.

In carrying out their duties, Semapa's Employees undertake to comply strictly with the principles of personal data protection laid down in the applicable legislation and regulations.

All communications sent or received through Semapa email accounts are property of Semapa, except when expressly identified as personal.

Semapa Employees shall: (i) use the equipment and software provided by the Company exclusively in a professional context, unless otherwise specified; (ii) not disclose access credentials to professional accounts; (iii) use strong and unique passwords, which are renewed periodically; (iv) use multi-factor authentication; and (v) not provide information to third parties without authorisation to do so.

Conditions for using work tools

Semapa Employees shall use the tools provided to carry out their duties with care and responsibly.

All resources and assets made available by Semapa are its property and may not be used for personal benefit or private use, with the exception of the computer and mobile phone.

Semapa in society and the promotion of outstanding organisational conduct

In addition to all of the above, one of Semapa's priorities is to foster development and quality of life of the population.

Semapa is further committed to sustainable development and reducing its ecological footprint, guiding its actions by a strong sense of responsibility.

Environmental protection and sustainable development are essential pillars in the decisions made and the behaviour of all Employees of Semapa.

7. COMPLIANCE

This RGPC Code of Conduct must be read carefully by those to whom it is addressed, and all Employees shall take good note and comply with the rules herein.

Under no circumstances can ignorance of the rules set out in this RGPC Code of Conduct be invoked to justify failure to comply with them.

Failure to comply with the rules set forth in this RGPC Code of Conduct can have serious consequences for Semapa and may constitute a disciplinary offence and/or a breach of contract, which will be punished under the terms of the law and regulations.

The measures to be adopted may involve changes in procedures, training needs, in addition to disciplinary sanctions that are appropriate and proportionate to the offence committed, or civil and/or criminal liability of each Employee or, from a contractual or legal source, towards Semapa or third parties.

8. DISCIPLINARY AND CRIMINAL SANCTIONS

The disciplinary and criminal sanctions provided for in Annexes III and IV to this Code may be enforced according to the gravity of the offence and the culpability of the offender for non-compliance with the provisions of this Code.

Failure of Partners and other Third Parties to comply with the rules laid down in this Code can provide sufficient grounds for applying a penalty and/or suspending the commercial engagement.

9. PROCEDURE IN THE EVENT OF AN INFRINGEMENT

The enforcement of the rules in this Code is continuously monitored by the Regulatory Compliance Officer.

A report must be drawn up every time this Code is infringed.

10. WHISTLEBLOWING CHANNEL

Semapa has a Whistleblowing Channel (Irregularities Reporting Channel) and monitors reports of acts of corruption and related offences, under the terms of the legislation transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of

persons who report breaches of Union law, in accordance with the Regulations for Reporting Irregularities.

11. DISSEMINATION, IMPLEMENTATION AND MONITORING

The RGPC Code of Conduct and its revisions are circulated to all Employees and interested parties through the Intranet and the Internet within 10 days of their implementation.

Semapa ensures that the RGPC Code of Conduct is incorporated into its corporate culture, namely by providing an internal training programme for all employees and managers, so that they know and understand the policies and procedures for the prevention of corruption and related offences that have been implemented, in accordance with the law.

The Board of Directors shall authorise the necessary actions for the adoption of this RGPC Code of Conduct, namely by establishing due diligence procedures for the implementation of preventive and corrective measures and compliance evaluation procedures - aimed at identifying the key impacts and potential risks of its activity in this regard - and take the necessary actions and ensure the disclosure, in a transparent manner, of relevant information on combating corruption in its annual report.

12. REVISIONS

The Code shall be reviewed every three years or whenever a change occurs in the duties or organic or corporate structure that justifies its revision.

Revisions and/or possible changes will be notified via the Intranet and Internet within 10 days of the revision and/or change.

13. GENERAL PROVISIONS

This Code shall enter into force on the date of its adoption by the Board of Directors of Semapa.

Any changes to the Code must be approved by the Board.

ANNEX I

Definitions

RGPC Code of Conduct: this Code, which must be read in conjunction with Semapa's Code of Ethics and Conduct and is an integral part of the Regulatory Compliance Programme.

Employees: managers and workers of Semapa.

Conflict of Interest: whenever an Employee is in a position that may compromise its independence and influence its judgement with interests that are different to those of the Company, either financial or not, of their own or of third parties.

Corruption and Related Offences: the offences listed in Annex IV of the RGPC Code of Conduct, namely the crimes of corruption, undue receipt and offer of advantage, embezzlement, economic involvement in business, extortion, abuse of power, misfeasance, influence peddling, money laundering or fraud in obtaining or misappropriating a subsidy, grant or credit.

Rules for the Prevention of Corruption and Related Offences: the set of provisions contained in the RGPC Code of Conduct, the Code of Ethics and Conduct, Semapa's internal policies and procedures or other legal or corporate rules concerning Corruption and Related Offences.

RGPC: the General Regime for the Prevention of Corruption, established in the annex to Decree-Law 109-E/2021 of 9 December.

Partners: representatives, external auditors, customers, suppliers and other persons who provide services to Semapa in any capacity, on a permanent or occasional basis.

ANNEX II

Examples of prohibited conduct

In relations with authorities or public officials:

- Promising or offering, directly or through a third party, any type of remuneration, good, favour or service, regardless of its economic value, to a public authority or official, or to any third party indicated by them or with their knowledge, with the explicit or implicit goal of having any public authority or official take a decision for the benefit of Semapa or any of its stakeholders or to unjustifiably omit or delay an action inherent to their position, for the benefit of Semapa or any of its stakeholders;
- Promising or offering, directly or through a third party, any type of remuneration, good, favour or service, regardless of its economic value, to a public authority or official, or to any third party indicated by them or with their knowledge, which constitutes, directly or indirectly, a reward for a decision previously taken by any public authority or official for the benefit of Semapa or any of its stakeholders.
- Promising or offering to a public authority or official, or to any third party indicated by them or with their knowledge, any type of remuneration, good, favour or service, regardless of its economic value, on condition that any other person, private individual, public authority or official influences another authority or official to obtain a decision for the benefit of Semapa or any of its stakeholders.
- Promising or offering, either directly or through a third party, any type of remuneration, good, favour or service to any authority or public official, which taking account of its economic value, uniqueness or other similar circumstance does not fall under common rules of social practices and courtesy.
- Irrespective of its economic value, cash payments or payments made by other means, payments or offers of meals, trips, hotel stays, shows or other leisure events, and the granting of any benefit, other than cash, to any authority or public official on account of their position, are prohibited, as is the promise of the aforementioned offers or gifts, except in exceptional cases where this is expressly permitted by local legislation and is deemed appropriate.
- Exercising any sort of influence on a public authority or official, directly or through third parties engaged or contacted for this purpose.
- Using any close relationship with a specific authority or public official to obtain any benefit for Semapa or its stakeholders.

In relations with private organisations:

- Promising or offering, directly or through a third party, any type of remuneration, good, 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 Semapa or its stakeholders and is contrary to their duties.
- Requesting or accepting from any private entity, namely Semapa's suppliers and customers, any undue benefit for themselves or for a third party, in exchange for an act or omission that is contrary to their duties as an employee of Semapa.

ANNEX III

Disciplinary duties and sanctions

Legal framework	Duties	Conduct
<i>Labour Code</i>	Duties of the employee	
<i>Article 128</i>	Duties of the employee	<p>1. Notwithstanding other obligations, the employee shall:</p> <ul style="list-style-type: none"> a) Respect and treat the employer, the hierarchical superiors, the work associates and the people who relate to the company, with urbanity and probity; b) Attend the service with assiduity and punctuality; c) Do the work with zeal and diligence; d) Participate diligently in professional training provided by the employer; e) Comply with the orders and instructions of the employer regarding the execution or discipline of work, as well as occupational safety and health, which are not contrary to their rights or guarantees; f) Maintain loyalty to the employer, in particular by not negotiating on their own or in competition with them, nor divulging information concerning their organisation, production methods or business; g) Ensure the conservation and good use of work-related assets entrusted to him by the employer; h) Promote or to execute the acts tending to the improvement of the productivity of the company; i) Cooperate for the improvement of occupational safety and health, in particular through the representatives of employees elected for that purpose; j) Comply with occupational safety and health requirements that are derived from a law or collective labour regulation instrument.

2 - The duty of obedience respects both the orders or instructions of the employer and the hierarchical superior of the worker, within the powers attributed by him.

Note: Other particular or ethical duties established for specific sectors or activities may/must be added to the violation of the duties set out in Article 128 of the Labour Code (Law 7/2009 of 12 February, as amended).

Labour Code	Disciplinary sanctions	
Article 328	Disciplinary sanctions	<p>1 - In the exercise of disciplinary power, the employer may apply the following sanctions:</p> <ul style="list-style-type: none">a) Reprimand;b) Recorded rebuke;c) Penalty payment;d) Loss of holidays days;e) Suspension of work with loss of remuneration and seniority;f) Dismissal without compensation or compensation. <p>2 - The instrument of collective labour regulation may provide for other disciplinary sanctions, as long as they do not affect the rights and guarantees of the worker.</p> <p>3 - The application of sanctions must comply with the following limits:</p> <ul style="list-style-type: none">a) The financial penalties imposed on a worker for offenses committed on the same day may not exceed one third of the daily remuneration and, in each calendar year, the remuneration corresponding to 30 days;b) The loss of days of leave cannot jeopardize the enjoyment of 20 working days;c) The suspension of work may not exceed 30 days for each offense and, in each calendar year, the total of 90 days. <p>4 - Where justified by the special working conditions, the limits established in subparagraphs a) and c) of the preceding paragraph may be raised up to double by collective bargaining instrument.</p> <p>5 - The sanction may be exacerbated by its disclosure within the company.</p> <p>6 - Violation of the provisions of paragraphs 3 or 4 represents a serious administrative offense.</p>

Annex IV

Crimes of corruption and related offenses (article 3 of the RGPC)

Penal Code

Legal Grounds	Legal Definition and Punitive Framework	Examples
<i>Passive corruption (article 373)</i>	<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>	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.
<i>Active corruption (article 374)</i>	<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>	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.
<i>Undue receipt and offer of advantage</i>	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,	When a public official, in the discharge of his duties or because of them, requests or receives from

<i>(article 372)</i>	<p>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>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>
<p><i>Embezzlement</i> <i>(article 375)</i></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</p>	<p>When a public official appropriates assets or values belonging to the organization where he performs his functions.</p>

	a more severe penalty is not applicable by another legal provision.	
<i>Misappropriation (article 376)</i>	<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>	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.
<i>Economic involvement in business (article 377)</i>	<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>	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.

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 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.

*Extortion
(article 379)*

1 - A public official who, in the discharge of his duties or *de facto* 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.

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.

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.

*Denial of justice
and misfeasance
(article 369)*

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

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.

holds, shall be punished with imprisonment up to two years or with a fine up to 120 days.

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.

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.

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.

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.

*Abuse of power
(article 382)*

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 legal provision.

When a public official takes advantage of his functional powers to obtain an illegitimate benefit or to cause harm to another person.

*Influence
peddling
(article 335)*

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

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.

influence with any public entity, national or foreign, shall be punished:

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;

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.

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:

a) For the purposes provided in subparagraph a), shall be punished with imprisonment up to three years or with a fine;

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.

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.

*Money
laundering
(article 368-A)*

(...) 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.

4 - The same penalty applies to whoever conceals or disguises the true nature, origin,

When someone acts to conceal the illicit origin of assets and patrimonial, financial, or material values.

location, disposition, movement, or ownership of the advantages, or the rights related to them.

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. (...)

**Concept of
public official
(article 386)**

- a) The civil public employee and the military;
- b) Whoever holds a public office by virtue of a special bond;
- 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;
- 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
<i>Passive corruption (article 17)</i>	<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 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>	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.
<i>Active corruption (article 18)</i>	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	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>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 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 (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</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</p>

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.

4 - Socially adequate and customary conduct is excluded from the previous paragraphs.

*Embezzlement
(article 20)*

1 - A political office holder who, in the discharge of his functions, unlawfully appropriates, for his own 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.

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.

When the political office holder appropriates assets or values belonging to the entity or organization where he performs his functions.

*Misappropriation
(article 21)*

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.

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.

	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.	
<i>Embezzlement of public funds by error of a third party (article 22)</i>	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.	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.
<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</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.

	ordering or making, even if there is no economic damage to the Public Treasury or the interests thus affected.	
<i>Abuse of powers (article 26)</i>	<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 (article 11)</i>	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.
<i>Political offices (article 3)</i>	<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 (article 36)</i>	<p>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.</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>	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.
<i>Active corruption (article 37)</i>	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.	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.

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.

Law No. 14/2024, of January 19 (Legal Regime of Sports Integrity and Combating Unsportsmanlike Behavior)

Legal Provision	Legal Definition and Punitive Framework	Examples
<i>Passive corruption (article 14)</i>	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.	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.
<i>Active corruption (article 15)</i>	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.	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.
<i>Influence peddling (article 16)</i>	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 is not applicable by another legal provision.	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>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 (article 17)</i></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>	

- 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;
- 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;
- 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;
- 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;
- 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;
- 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 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	When someone gives or promises an advantage to an official of an international entity or organization to obtain or retain a business,

	<p>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.</p>	<p>contract, or other undue advantage in international trade.</p>
<p><i>Passive corruption in the private sector (article 8)</i></p>	<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>	<p>When a private sector worker requests or accepts an undue advantage or its promise to violate their functional duties.</p>
<p><i>Active corruption in the private sector (article 9)</i></p>	<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>When someone gives or promises an undue advantage to a private sector worker to violate their functional duties.</p>

3 - Attempt is punishable.

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
<i>Fraud in obtaining subsidy or grant (article 36)</i>	<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>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>

b) Commits the offense with abuse of their functions or powers;

c) Obtains assistance from a public office holder who abuses his position or powers.

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.

7 - The agent shall be exempt from penalty if:

a) They spontaneously prevent the granting of 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.

*Fraud in
obtaining credit
(article 38)*

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;

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.

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.

5 - The sentence shall be published.

*Misappropriation
of subsidy, grant,
or subsidized
credit
(article 37)*

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.

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.

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

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.