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# **CODE OF CONDUCT ON THE PREVENTION OF CORRUPTION AND RELATED OFFENCES**

TRIANGLE'S COMPLIANCE



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## **1. INTRODUCTION**

Triangle's – Cycling Equipments S.A. ("**Triangle's**") conducts all of its activities in accordance with high standards of integrity and professional ethics..

With regard to the prevention of corruption and related offenses, Triangle's adopts and implements a compliance program aimed at preventing, detecting, and sanctioning acts of Corruption and Related Offenses carried out against or through Triangle's, as provided for in Decree-Law No. 109-E/2021 of 9 December ("**RGPC**") and in Guide No. 1/2023 issued by MENAC on the Instruments of the RGPC.

This program includes, namely, the following instruments: (i) the Corruption and Related Offenses Risk Prevention Plan, (ii) this Code of Conduct on the Prevention of Corruption and Related Offenses ("**RGPC Code of Conduct**" or "**Code**"), (iii) a training program, and (iv) Triangle's Whistleblowing Channel and respective Policy (jointly referred to as the "**Compliance Program**").

## **2. PURPOSE**

This Code establishes the set of principles, values, and rules of conduct regarding professional ethics and the prevention of Corruption and Related Offenses, as provided for in the RGPC, and shall be read as a complement to Triangle's Code of Conduct and in conjunction with its other procedures, codes, and policies.

## **3. SCOPE OF APPLICATION**

This Code applies to all Employees and Members of the Corporate Bodies of Triangle's (jointly referred to as "**Employees**").

## **4. COMPLIANCE OFFICER**

Triangle's appoints a Compliance Officer, who ensures and oversees the implementation of the Compliance Program ("**Compliance Officer**" or "**CO**"). The Compliance Officer is a member of senior management or an equivalent position and performs their duties in relation to Triangle's with independence and decision-making autonomy.

## **5. TRIANGLE'S VALUES**

The values that govern the conduct of Triangle's and its respective Employees are as follows:

### **Safety of All and for All**

We collectively commit to a safe environment, both physically and psychologically, for every member of our team, our clients, and the wider community. This principle underscores the importance of a culture of prevention, in which each individual is responsible not only for their own safety but also for the safety of others. We invest in continuous training, strict compliance with safety and sustainability standards, and the promotion of responsible practices that ensure collective well-being. We strive for a working environment where safety is a priority and where every action reflects a commitment to protection and to the quality of life of all.



### **Daring to Grow**

We face the new with confidence, energy, and a spirit for overcoming challenges. We grow because we dare, and we dare because we know where we want to go. We will be pioneers many times, supported by our ability to adapt and thrive in dynamic environments..

### **Excellence in Motion**

Excellence in detail, closeness, and respect are what sets us apart and sustains us. We serve with attitude, dedication, and pride in what we deliver: to our clients, to our teams, and to the community. As leaders, as colleagues, and as people.

### **Together We Are Energy**

We are stronger when we move forward together, as a team. The connection between us generates the energy that drives us, sustains us, and inspires us to transform challenges into achievements with lasting impact.

### **Integrity and Transparency**

We are whole, inside and out. We strive to do what is right, even when it is difficult, even when we do not gain from it. We act with awareness, respecting everyone we interact with: with honesty, with respect, and with courage.

## **6. PRINCIPLES OF CONDUCT**

Without prejudice to the other rules and principles set out in the Code of Conduct and in Triangle's Internal Regulations, the Company carries out all of its activities, namely, in accordance with the following principles:

- acting with integrity, honesty, transparency, courtesy, politeness, loyalty, and cooperation;
- complying with national and international laws and regulations related to the fight against corruption;
- acting with impartiality and independence;
- reporting potential conflicts of interest and refraining from decisions that may compromise Triangle's impartiality or independence;
- promoting Triangle's good reputation;
- complying with national and international environmental and competition rules;
- protecting Triangle's intellectual property;
- maintaining confidentiality regarding information obtained in the performance of duties;
- keeping records.

## **7. RULES OF CONDUCT**

Triangle's complies with the rules of conduct established in its internal codes and policies, as well as with those corresponding to best practices, particularly with regard to the following:

### **7.1. Triangle's Relations with Its Employees**

Triangle's values the human dimension of its Employees, seeking to provide an environment of

closeness, transparency, and support in its relationships with them and among them.

## **7.2. Relations with Clients, Partners, or Third Parties**

Triangle's Employees must act professionally, with integrity, honesty, and transparency in their relations with third parties and observe appropriate standards of courtesy and conduct.

## **7.3. Multiple Roles and Conflicts of Interest**

As detailed in the Code of Conduct, Triangle's promotes impartiality and independence in relations among its Employees and with any third parties, and all Employees must avoid actions or relationships that constitute or may constitute a conflict of interest.

The identification of roles performed by members of Triangle's management and executive bodies is carried out through the completion of the Multiple Roles Declaration set out in **Annex II**. All Triangle's Employees must complete and sign the Conflict of Interest Declaration set out in **Annex III**.

If Employees believe that a Conflict of Interest situation may exist or have doubts regarding their impartiality, they must inform their respective direct supervisors, in writing, of the conflict of interest in which they are or may be involved, prior to undertaking any operation.

## **7.4. Prevention of Corruption and Related Offences**

Triangle's prohibits and does not tolerate the practice of acts of corruption or any related offenses. All Triangle's Employees must comply with and ensure compliance with the applicable rules regarding the prevention of Corruption and Related Offenses.

In the course of Triangle's activities, there may be interactions with public officials, administrative staff, government agents, and other public bodies. Such interactions must be conducted with the utmost integrity, transparency, and compliance with all applicable legal rules and deontological duties, as well as with the provisions of this Code.

**Annex IV** to this Code (which forms an integral part thereof) sets out examples of prohibited conduct.

With regard to **gifts, hospitality, or other benefits**, it is, among other things, strictly prohibited:

- receive or offer any gifts, hospitality, or other benefits that are clearly inappropriate, particularly those of manifestly high value (above €300);
- receive or offer any gifts, hospitality, or other benefits, regardless of their value, as consideration for preferential treatment of any third party, to influence an action or decision, or which, in any way and regardless of their intrinsic value, are objectively likely to affect the full exercise of functions, including duties of impartiality, transparency, and integrity inherent to the proper performance of functions within an organization or entity;
- receive or offer, under any circumstances and regardless of value, money, cheques, or other assets subject to legal restrictions;
- obtain any benefit or advantage for the company, the employee, or third parties through unethical practices or practices contrary to the duties of the position, namely through acts of corruption, undue receipt of advantages, or influence peddling



The offering or acceptance of any benefit may only occur **when it is socially appropriate and in accordance with accepted customs**, i.e., when the benefit is offered as a sign of courtesy and good practice, in line with local customs, and insofar as such benefit is related to the activity and has neither the intent nor the potential to affect, at present or in the future, the duties of impartiality, transparency, and integrity inherent to the performance of functions.

If, in a professional context, an Employee receives a gift, hospitality, or other benefit, they must complete the form set out in **Annex V** and send it to the Compliance Officer.

#### **7.5. Use of Electronic Resources and Protection of Confidential Information**

Triangle's Employees must maintain confidentiality regarding facts relating to the company of which they have become or may become aware.

The use of email and the internet, as well as all information contained in the various information systems (e.g., computers, mobile phones, etc.), is exclusively for Triangle's business purposes. The installation of software not authorized by the IT Department is prohibited.

Access credentials to information systems are individual and non-transferable and must be changed as frequently as necessary..

#### **7.6. Conditions for the Use of Work Tools**

Triangle's Employees must exercise due care in the use of all work tools or company assets. Employees must ensure the proper preservation and use of assets, tools, machinery, equipment, and facilities related to their activity.

The resources and work tools provided by Triangle's are its property and may not be used for personal benefit or by third parties, unless expressly provided otherwise.

#### **7.7. Triangle's in Society and the Promotion of a Distinguished Organizational Culture**

In addition to all the above, based on the values and principles of conduct that guide its activity, Triangle's recognizes sustainability as an essential pillar of its decisions and behaviors, committing to ensuring that its activities are carried out in a balanced and environmentally responsible manner, within a framework of continuous improvement of civil society.

### **8. NON-COMPLIANCE**

This RGPC Code of Conduct must be carefully read by its addressees, and knowledge of and compliance with the rules set forth herein are mandatory for all Employees.

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

Failure to comply with the rules contained in this Code of Conduct may entail serious consequences for Triangle's and may constitute a disciplinary offense and/or a contractual breach, which Triangle's will not fail to sanction, in accordance with applicable legal and regulatory provisions.

The measures to be adopted may include changes to procedures, training requirements, and may also give rise to disciplinary sanctions that are appropriate and proportionate to the offense

committed, as well as civil and/or criminal liability of each Employee, arising from contractual or legal sources, towards Triangle's or third parties.

## **9. DISCIPLINARY AND CRIMINAL SANCTIONS**

Depending on the seriousness of the offense and the offender's degree of fault in failing to comply with the provisions of this Code, the disciplinary and criminal sanctions set out in **Annexes VI and VII** to this RGPC Code of Conduct may be applied.

In the case of Partners and other third parties, failure to comply with the rules set forth in this Code may constitute grounds for the application of penalties and/or for the discontinuation of the business relationship.

## **10. PROCEDURE IN THE EVENT OF AN INFRINGEMENT**

The application of the rules defined in this RGPC Code of Conduct is permanently monitored and supervised by the Compliance Officer.

For each infringement of this RGPC Code of Conduct, a report must be prepared in accordance with the terms defined in the form set out in **Annex VIII**.

## **11. PROCEDURE FOR THE ANALYSIS OF WHISTLEBLOWING**

Triangle's has a whistleblowing channel and processes reports of acts of corruption and related offenses in accordance with 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.

The receipt and follow-up of reports shall comply with the applicable reporting procedure established in the Regulation on the Communication of Irregularities.

## **12. DISCLOSURE, RESPONSABILITIES AND TRAINING**

The RGPC Code of Conduct is disclosed to all Triangle's Employees and stakeholders through the Intranet and the website <https://triangles.eu/>, within 10 days from its implementation.

Triangle's ensures the implementation of an internal training program provided to all Employees, with the aim of ensuring that they are aware of and understand the policies and procedures implemented regarding the prevention of corruption and related offenses, in accordance with legally established requirements.

## **13. REVIEW**

The RGPC Code of Conduct shall be reviewed every 3 years or whenever a change occurs in the duties, organizational structure, or corporate structure that justifies its revision.

Revisions and/or any changes made shall be communicated through the Intranet and the website <https://triangles.eu/>, within 10 days from the review and/or amendment.

## **14. FINAL PROVISIONS**

This Code shall enter into force on the date of its approval by Triangle's management body.

Any amendment to this Code must be approved by the management body.

## ANNEX I

For the purposes of this Code, the following terms and expressions shall have the meanings set out below, when capitalized, whether used in the singular or the plural:

1. **RGPC Code of Conduct:** this Code, which forms an integral part of the Compliance Program provided for in the RGPC.
2. **Employees:** all members of the corporate bodies, employees, directors, and other collaborators, insofar as they may be held accountable for their actions.
3. **Conflict of Interest:** any situation in which an employee's private interest interferes, or appears to interfere, in any way, with the interests of the company as a whole; or where an employee, or close family members or friends, receive an improper personal benefit as a result of the position held by that employee within the company.
4. **Corruption and Related Offences:** the offenses listed in Annex VII to the RGPC Code of Conduct, namely the crimes of corruption, undue receipt and offering of advantages, embezzlement, economic participation in business, extortion, abuse of power, misconduct in office, influence peddling, money laundering, or fraud in obtaining or misappropriation of a subsidy, grant, or credit, as provided for in the Criminal Code, approved as an annex to Decree-Law No. 48/95 of 15 March, as amended, in Law No. 34/87 of 16 July, as amended, in the Military Justice Code, approved as an annex to Law No. 100/2003 of 15 November, in Law No. 50/2007 of 31 August, as amended, in Law No. 20/2008 of 21 April, as amended, and in Decree-Law No. 28/84 of 20 January, as amended.
5. **Rules on the Prevention of Corruption and Related Offences:** the set of provisions contained in the RGPC Code of Conduct, the Code of Conduct, Triangle's internal policies and procedures, or other legal or corporate rules related to Corruption and Related Offences.
6. **Partners:** agents, external auditors, clients, suppliers, and other persons who provide services to Triangle's, in any capacity, on a permanent or occasional basis.

**ANNEX II**  
**Declaration of Multiple Roles**

I, \_\_\_\_\_, holder of Citizen Card no. \_\_\_\_\_, with professional address at \_\_\_\_\_, in the capacity of \_\_\_\_\_:

1. I, hereby, make the following declarations, under a commitment of honour:
  - I work exclusively with Triangle's and do not hold or perform any roles or functions in other companies, entities, associations, institutions, or any type of organization, whether public or private;
  - In addition to the functions I perform within Triangle's structure, I hereby declare, under a commitment of honor, that I perform the following functions:

Entities in which I perform functions	Description of the function performed (position	Observations

2. Should I, in the future, come to accumulate any additional function, I undertake to immediately notify Triangle's by means of written communication, within a maximum period of 5 days from becoming aware thereof.
3. The information provided in this Declaration is true and complete, and I assume full responsibility for its content.
4. I further declare that I undertake to update the information contained in this Declaration should any change in circumstances occur that so requires.
5. Additionally, I acknowledge that the personal data collected through this Declaration will be processed for the purpose of identifying and assessing risks with a view to the preparation and implementation of the Corruption and Related Offences Risk Preventions Plan.
6. For further information on the processing of my personal data and the exercise of my rights, I may consult Triangle's Data Protection Policy, which has been made available to me.

Date \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature \_\_\_\_\_

**ANNEX III**  
**Conflict of Interest Statement**

I, \_\_\_\_\_, holder of citizen card no. \_\_\_\_\_, with professional domicile in \_\_\_\_\_, as \_\_\_\_\_, hereby make the following declarations:

1. I declare that I have read and understood the provisions of Triangle's Code of Conduct, as well as the RGPC Code of Conduct, in particular those that establish the values and principles that should guide my actions and the importance of communicating the existence of any situations of actual or potential conflicts of interest.
2. For the purposes deemed appropriate, I hereby declare that:
  - To the best of my knowledge, I do not find myself, nor do I foresee finding myself, in a situation of conflict of interest, even if potential, likely to lead me to superimpose personal interests or those of third parties over the interests of Triangle's, in the exercise of my duties;
  - I am or anticipate finding myself in the following situation(s) of actual or potential conflict of interest:

Potential Conflict	Detail (indicate the nature of the role and the name of the entity)
Financial Interests (e.g., shareholdings in companies)	
Previous professional activities	
Current external activities, professional or associative	
Activities of the spouse/partner, professional or associative ascendants and descendants	
Other personal relationships	

3. I undertake to immediately notify Triangle's by written communication of any circumstance of which I may become aware that may place me in a situation of (potential) conflict of interest, within a maximum period of 5 days from the date of becoming aware.
4. I undertake to request an excuse or to declare my impediment and not to participate, by any means, neither directly nor indirectly, in the making of any decision or in the performance of any act or omission for which, directly or indirectly, I may be in a situation of conflict of interest and, in any case, that may benefit, harm or impact my personal interests or those of third parties close to me.

5. I declare, on my honour, that the information provided in this Statement is correct and complete and I assume full responsibility for its content.
6. I further declare that I undertake to update the information contained in this Statement, in the event of a change in circumstances that so determines.
7. In addition, I acknowledge that the personal data collected through this statement will be processed for the purpose of (i) identifying and classifying risks with a view to preparing and implementing the Plan for the prevention of risks of corruption and related infractions and respective preventive measures and (ii) definition of internal control procedures and mechanisms related to the identified risks, based on compliance with legal obligations to which Triangle's is subject.
8. For more information about the processing of my data and exercise of rights, I can consult Triangle's Data Protection Policy that was made available to me.

Date \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature \_\_\_\_\_

## ANNEX IV

### Examples of Prohibited Conduct

#### **In Relations with Authorities or Public Officials**

- Promising or offering, directly or through a third party, any type of remuneration, asset, favor, or service, regardless of its economic value, to an authority or public official, or to any third party designated by them or with their knowledge, with the explicit or implicit purpose of causing any authority or public official to make a decision for the benefit of Triangle's or any of its stakeholders, or to unjustifiably omit or delay an act inherent to their position, for the benefit of Triangle's or any of its stakeholders.
- Promising or offering, directly or through a third party, any type of remuneration, asset, favor, or service, regardless of its economic value, to an authority or public official, or to any third party designated by them or with their knowledge, which constitutes, directly or indirectly, a reward for a decision previously taken by an authority or public official for the benefit of Triangle's or its stakeholders.
- Promising or offering to an authority or public official, or to any third party designated by them or with their knowledge, any type of remuneration, asset, favor, or service, regardless of its economic value, on the condition that any other person, whether a private individual, authority, or public official, influences another authority or public official, for the purpose of obtaining a decision for the benefit of Triangle's or any of its stakeholders.
- Promising or offering, directly or through a third party, any type of remuneration, asset, favor, or service to any authority or public official which, having regard to its economic value, exclusivity, or other similar circumstance, does not fall within common social practices and standards of courtesy.
- Regardless of economic value, any provision of cash, monetary transfers through other means of payment, payments or offers of meals, travel, hotel accommodation, shows, or other leisure events, as well as the granting of any benefit, even if non-pecuniary, to any authority or public official by virtue of their position, is prohibited. The promise of such payments or benefits is likewise prohibited, except in exceptional cases where expressly permitted under local legislation and deemed appropriate.
- Using any relationship of affinity with a specific authority or public official in order to obtain any benefit for Triangle's or its stakeholders.
- Exercising any form of influence over an authority or public official, directly or through third parties hired or contacted for that purpose.

#### **In Relations with Private Entities**

- Promising or offering, directly or through a third party, any type of remuneration, asset, favor, or service to a director, officer, or employee of any private entity, or to any third party with their knowledge, as consideration for the performance of an act or omission that favors Triangle's or its stakeholders and is contrary to their duties.
- Requesting or accepting from any private entity, namely suppliers and clients of Triangle's, any undue benefit for oneself or for a third party, as consideration for taking an action or



refraining from taking an action that is contrary to one's duties as an employee of Triangle's.

**ANNEX V**  
**Declaration of Receipt of Gifts, Hospitality, or Other Benefits**

<b>Name</b>	
<b>Department</b>	
<b>Date of receipt of the offer</b>	
<b>Benefit received</b>	
<b>Offering party</b>	
<b>Brief and objective explanation of the context of the offer and its admissibility</b>	

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature: \_\_\_\_\_

**ANNEX VI**  
**Duties and Disciplinary Sanctions**

Legal Basis	Duties	Conduct
<b>Labour Code</b> Article 128	<b>Employee Duties</b> Employee Duties	1 – Without prejudice to other obligations, the employee shall: <ul style="list-style-type: none"> <li>a) Respect and treat the employer, hierarchical superiors, co-workers, and all persons who interact with the company with civility and integrity;</li> <li>b) Attend work with regularity and punctuality;</li> <li>c) Perform work with care and diligence;</li> <li>d) Participate diligently in professional training actions provided by the employer;</li> <li>e) Comply with the employer's orders and instructions regarding the performance or discipline of work, as well as occupational safety and health, provided that they are not contrary to the employee's rights or guarantees;</li> <li>f) Act loyally towards the employer, namely by not engaging, on their own account or on behalf of others, in activities competing with the employer, nor disclosing information relating to its organization, production methods, or business;</li> <li>g) Ensure the preservation and proper use of work-related assets entrusted to them by the employer;</li> <li>h) Promote or carry out actions aimed at improving the company's productivity;</li> <li>i) Cooperate in improving occupational safety and health, namely through elected employee representatives for that purpose;</li> <li>j) Comply with occupational safety and health requirements arising from law or collective labor regulation instruments..</li> </ul> 2 – The duty of obedience applies both to orders or instructions issued by the employer and by the employee's hierarchical superior, within the powers granted to them by the employer.

**Nota:** To the breach of the duties provided for in Article 128 of the Labour Code (Law No. 7/2009 of 12 February, as amended), any other special or deontological/ethical duties established for specific sectors or activities may and/or should be added.

**Labour Code**
**Disciplinary  
Sanctions for  
Breach of Duties**
*Article 328*

 Disciplinary  
Sanctions

1 – In the exercise of disciplinary power, the employer may apply the following sanctions:

- a) Reprimand;
- b) Recorded reprimand;
- c) Financial penalty;
- d) Loss of vacations days;
- e) Suspension from work with loss of remuneration and seniority;
- f) Dismissal without compensation or severance.

2 – The collective labour regulation instrument may provide for other disciplinary sanctions, provided that they do not prejudice the employee's rights and guarantees..

3 – The application of sanctions must comply with the following limits:

- a) Financial penalties imposed on an employee 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 vacation days may not compromise the enjoyment of 20 working days;
- c) Suspension from work may not exceed 30 days per offense and, in each calendar year, a total of 90 days..

4 – Whenever justified by special working conditions, the limits set out in paragraphs (a) and (c) of the previous number may be increased up to double by a collective labour regulation instrument.

5 – The sanction may be aggravated by its disclosure within the company..

6 – Failure to comply with the provisions of paragraphs 3 or 4 constitutes a serious administrative offence.

## ANNEX VII

### Sanctions Associated with Crimes of Corruption and Related Offences

(cf. Article 3 of the RGPC)

#### *Criminal Code*

<b>Legal Provision</b>	<b>Legal Definition and Penalty</b>	<b>Illustrative Examples</b>
<i>Passive Corruption (article 373)</i>	<p>1 - A public official who, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, 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 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 offender 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 taking a decision or omitting an act within the scope of their duties.
<i>Active Corruption (article 374)</i>	<p>1 - Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises to give a public official, or to a third party designated by or with the knowledge of such official, a pecuniary or non-pecuniary advantage for the purposes referred to in paragraph 1 of Article 373, shall be punished with imprisonment from one to five years.</p> <p>2 - If the purpose is that referred to in paragraph 2 of Article 373, the offender shall be punished with imprisonment of up to three years or a fine of up to 360 days.</p> <p>3 - Attempt is punishable.</p>	When someone gives or promises a public official an advantage in exchange for a decision or omission by that official within the scope of their duties.
<i>Undue Receipt and Offering of Advantage (article 372)</i>	<p>1 - A public official who, in the exercise of their functions or by reason thereof, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage that is not due, shall be punished with imprisonment of up to five years or a fine of up to 600 days.</p> <p>2 - Anyone who gives or promises to give such an advantage to a public official, or to a third party designated by or with the knowledge of such official, shall be punished with imprisonment of up to three years or a fine of up to 360 days.</p> <p>3 - Socially appropriate conduct in accordance with customary practices is excluded.</p>	<p>When a public official requests or receives an undue advantage in the exercise of their functions.</p> <p>When someone gives or promises an undue advantage to a public official.</p>
<i>Embezzlement (article 375)</i>	<p>1 - A public official who unlawfully appropriates, for their own benefit or that of another person, money or any movable or immovable property or animals, whether public or private, which have been entrusted to them, are in their possession, or are accessible to them by reason of their duties, shall be punished with imprisonment from 1 to 8 years, unless a more severe penalty applies under another legal provision.</p> <p>2 - If the values or objects involved are of small value, within the meaning of Article 202(c), the offender shall be punished with imprisonment of up to 3 years or a fine.</p>	When a public official appropriates assets or financial resources belonging to the organisation where they perform their duties.

	<p>3 - If the public official lends, pledges, or in any way encumbers the assets referred to in paragraph 1, they shall be punished with imprisonment of up to 3 years or a fine, unless a more severe penalty applies.</p>	
<p><i>Embezzlement of Use (article 376)</i></p>	<p>1 - A public official who uses, or allows another person to use, for purposes other than those intended, immovable property, vehicles, other movable property or animals of significant value, whether public or private, which have been entrusted to them, are in their possession, or are accessible to them by reason of their duties, shall be punished with imprisonment of up to 1 year or a fine of up to 120 days.</p> <p>2 - If a public official, without justifiable reasons of public interest, uses public funds for a purpose other than that for which they are legally intended, they are punishable by imprisonment for up to one year or a fine of up to 120 days.</p>	<p>When a public official uses for their own benefit, or authorizes third parties to do so, assets, equipment, or valuables, whether material or financial, belonging to the public organization where they perform their duties or that are under their custody.</p>
<p><i>Economic Participation in Business (article 377)</i></p>	<p>1 - A public official who, with the intent of obtaining unlawful economic participation for themselves or for a third party, causes harm to the patrimonial interests that they are responsible for administering, supervising, defending or carrying out by virtue of their duties, shall be punished with imprisonment of up to 5 years</p> <p>2 - A public official who receives, for themselves or for a third party, any patrimonial advantage resulting from a civil legal act related to interests over which they had, by virtue of their duties at the time of the act, total or partial powers of disposal, administration or supervision, even if no damage occurs, shall be punished with imprisonment of up to 6 months or a fine of up to 60 days.</p> <p>3 - The penalty stipulated in the first paragraph also applies to any public servant who receives, for themselves or for a third party, in any form, a financial advantage as a result of collection, assessment, settlement, or payment that, by virtue of their duties, they are totally or partially responsible for ordering or making, provided that no harm is done to the Public Treasury or to the interests entrusted to them..</p>	<p>When a public servant, in the exercise of their duties, makes decisions that benefit a particular interest, whether their own or that of a third party, harming the interests of or causing damage to the public organization or entity.</p>
<p><i>Exortion by a Public Official (Concussion) (article 379)</i></p>	<p>1 - A public official who, in the exercise of their duties or of powers arising therefrom, directly or through an intermediary with their consent or ratification, receives, for themselves, for the State or for a third party, by inducing error or taking advantage of an error of the victim, a patrimonial advantage that is not due or that exceeds what is due – namely a contribution, fee, emolument, fine or administrative penalty – shall be punished with imprisonment of up to 2 years or a fine of up to 240 days, unless a more severe penalty applies under another legal provision.</p> <p>2 - If the act is committed by means of violence or threat of serious harm, the offender shall be punished with imprisonment from 1 to 8 years, unless a more severe penalty applies.</p>	<p>When a public official, in the exercise of their duties, appropriates money or assets that are not due, as a result of a circumstantial error or an error deliberately induced by the official.</p>
<p><i>Denial of Justice and Misconduct (Prevarication) (article 369)</i></p>	<p>1 - A public official who, in the context of investigative proceedings, judicial proceedings, administrative offence proceedings or disciplinary proceedings, knowingly and unlawfully initiates or fails to initiate, conducts or fails to conduct, decides or fails to decide, or performs an act in the exercise of powers arising from their position, shall be punished with imprisonment of up to 2 years or a fine of up to 120 days.</p> <p>2 - If the act is committed with the intent to harm or benefit someone, the penalty shall be imprisonment of up to 5 years.</p>	<p>When a public official, within the scope of a legal or administrative process, knowingly performs or omits an act contrary to the law in the exercise of their official powers.</p>

<p><i>Abuse of Power (article 382)</i></p>	<p>3 - If, in the case referred to in paragraph 2, the act results in deprivation of liberty, the penalty shall be imprisonment from 1 to 8 years.</p> <p>4 - The same penalty applies to a public official who, being competent to do so, orders or executes a deprivation of liberty unlawfully, or fails to order or execute it in accordance with the law.</p> <p>5 - If the conduct referred to in the previous paragraph is committed with gross negligence, the penalty shall be imprisonment of up to 2 years or a fine.</p>	<p>When a public official uses their official powers to obtain an unlawful benefit or to cause harm to another person.</p>
<p><i>Trading in Influence (article 335)</i></p>	<p>1 - Any person who, directly or through an intermediary with their consent or ratification, requests or accepts, for themselves or for a third party, a patrimonial or non-patrimonial advantage, or its promise, in order to abuse their real or supposed influence over any public authority, national or foreign, shall be punished:</p> <p>a) With imprisonment from 1 to 5 years, if the purpose is to obtain an unlawful favourable decision;</p> <p>b) With imprisonment of up to 3 years or a fine, if the purpose is to obtain a lawful favourable decision.</p> <p>2 - Any person who gives or promises a patrimonial or non-patrimonial advantage for the purposes referred to above shall be punished:</p> <p>a) For the purposes set out in subparagraph a), it is punishable by imprisonment for up to 3 years or a fine;</p> <p>b) For the purposes set out in subparagraph b), it is punishable by imprisonment for up to 2 years or a fine of up to 240 days.</p>	<p>When someone requests or receives an advantage in exchange for abusing their influence over a public authority to obtain a favourable lawful or unlawful decision.</p> <p>When someone gives or promises an advantage so that another person abuses their influence over a public authority to obtain a favourable lawful or unlawful decision.</p>
<p><i>Money Laundering (article 368-A)</i></p>	<p>(...) 3 - Any person who converts, transfers, assists or facilitates any operation of conversion or transfer of advantages obtained, directly or indirectly, by themselves or by a third party, with the purpose of concealing their illicit origin or of preventing the author or participant of such offences from being criminally prosecuted or subjected to a criminal sanction, shall be punished with imprisonment of up to 12 years.</p> <p>4 - The same penalty applies to anyone who conceals or disguises the true nature, origin, location, disposition, movement or ownership of such advantages, or the rights relating thereto.</p> <p>5 - The same penalty also applies to anyone who, not being the author of the underlying criminal offence, acquires, possesses or uses such advantages, with knowledge of their illicit origin at the time of acquisition or at the initial moment of possession or use. (...)</p>	<p>When someone acts to conceal or disguise the illicit origin of assets, money or other patrimonial, financial or material goods.</p>
<p><i>Concept of Public Official (article 386)</i></p>	<p>1 – For the purposes of criminal law, a public official includes:</p> <p>a) Civil and military public employees;</p> <p>b) Persons performing public office by virtue of a special legal bond;</p>	

- c) Persons who, even temporarily or provisionally, whether remunerated or unpaid, voluntarily or compulsorily, are called upon to perform or participate in activities within the administrative or judicial public function;
  - d) Judges of the Constitutional Court, judges of the Court of Auditors, judicial magistrates, public prosecutors, the Prosecutor-General of the Republic, the Ombudsman, and members of the High Councils of the Judiciary, of the Administrative and Tax Courts, and of the Public Prosecution Service;
  - e) Arbitrators, jurors, experts, technicians assisting courts in judicial inspections, translators, interpreters and mediators;
  - f) Notaries;
  - g) Persons who, even temporarily or provisionally, whether remunerated or unpaid, voluntarily or compulsorily, perform or participate in administrative public functions or exercise authority in legal persons of public utility, including private institutions of social solidarity;
  - h) Persons who perform or participate in public functions within public associations.
- 2 - Members of management or supervisory bodies and employees of public enterprises, nationalised companies, companies with public capital or majority public shareholding, as well as concessionaires of public services, are equated to public officials. In companies with equal or minority public participation, only members of management or supervisory bodies appointed by the State or another public entity are equated to public officials.
- 3 - For the purposes of Articles 335 and 372 to 374, public officials also include
- a) Magistrates, officials, agents and equivalents of international public law organisations, regardless of nationality or residence;
  - b) National officials of other States;
  - c) Persons performing functions equivalent to those described in paragraph 1 within international public organisations of which Portugal is a member;
  - d) Magistrates and officials of international courts, provided Portugal has declared acceptance of their jurisdiction;
  - e) Persons involved in alternative dispute resolution procedures, regardless of nationality or residence;
  - f) Jurors and arbitrators of other States.

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

<b>Legal Provision</b>	<b>Legal Definition and Penalty</b>	<b>Illustrative Examples</b>
<i>Passive Corruption</i> (article 17)	<p>1 - A holder of political office who, in the exercise of their functions or by reason thereof, directly or through an intermediary with their consent or ratification, requests or accepts, for themselves or for a third party, a patrimonial or non-patrimonial advantage, or its promise, in exchange for performing or omitting any act contrary to the duties of the office, even if prior to such request or acceptance, shall be punished with imprisonment from 2 to 8 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 holder of political office shall be punished with imprisonment from 2 to 5 years.</p>	When a holder of political office requests or receives an advantage, or its promise, in exchange for making a decision or omitting an act within the scope of their official functions.
<i>Active Corruption</i> (article 18)	<p>1 - Any person who, directly or through an intermediary with their consent or ratification, gives or promises to a holder of political office, or to a third party at their indication or with their knowledge, a patrimonial or non-patrimonial advantage for the purposes referred to in Article 17(1), shall be punished with imprisonment from 2 to 5 years.</p> <p>2 - If the purpose is that referred to in Article 17(2), the offender shall be punished with imprisonment of up to 5 years.</p> <p>3 - A holder of political office who, in the exercise of their functions or by reason thereof, directly or through an intermediary with their consent or ratification, gives or promises to a public official, a holder of high public office or another holder of political office, or to a third party with their knowledge, a patrimonial or non-patrimonial advantage that</p>	<p>When someone gives or promises a holder of political office an advantage in exchange for making a decision or omitting an act within the scope of their functions.</p> <p>When a holder of political office gives or promises an advantage to a public official, a holder of high public office or another holder of political office in order to influence a decision or omission within the scope of their functions.</p>

	is not due, for the purposes referred to in Article 17, shall be punished with the penalties provided for in that article.	
<i>Undue Receipt and Offering of Advantage (article 16)</i>	<p>1 - A holder of political office who, in the exercise of their functions or by reason thereof, directly or through an intermediary with their consent or ratification, requests or accepts, for themselves or for a third party, a patrimonial or non-patrimonial advantage that is not due, shall be punished with imprisonment from 1 to 5 years.</p> <p>2 - ny person who, directly or through an intermediary with their consent or ratification, gives or promises to a holder of political office, or to a third party at their indication or with their knowledge, a patrimonial or non-patrimonial advantage that is not due, in the exercise of their functions or by reason thereof, shall be punished with imprisonment of up to 5 years or a fine of up to 600 days.</p> <p>3 - A holder of political office who, directly or through an intermediary with their consent or ratification, gives or promises to another holder of political office, to a holder of high public office or to a public official, or to a third party with their knowledge, a patrimonial or non-patrimonial advantage, or its promise, that is not due, in the exercise of their functions or by reason thereof, shall be punished with the penalties provided for in the previous paragraph.</p> <p>4 - Conduct that is socially appropriate and consistent with customs and practices is excluded from the scope of the previous paragraphs.</p>	<p>When a holder of political office, in the exercise of their functions or by reason thereof, requests or receives an undue advantage.</p> <p>When someone gives or promises a holder of political office, in the exercise of their duties or because of them, an advantage that is not due to them.</p> <p>When a holder of political office gives or promises an undue advantage to another holder of political office, a holder of high public office or a public official</p>
<i>Embezzlement (Peculato) (article 20)</i>	<p>1 - A holder of political office who, in the exercise of their functions, unlawfully appropriates, for their own benefit or that of another person, money or any movable or immovable property, public or private, that has been entrusted to them, is in their possession or is accessible to them by reason of their functions, shall be punished with imprisonment from 3 to 8 years and a fine of up to 150 days, unless a more severe penalty applies.</p> <p>2 - If the offender lends, pledges or in any way encumbers the assets referred to in the previous paragraph, with awareness of causing or being able to cause harm to the State or to the lawful owner, they shall be punished with imprisonment from 1 to 4 years and a fine of up to 80 day.</p>	When a holder of political office appropriates assets or funds belonging to the entity or organisation in which they perform their functions.
<i>Embezzlement of Use (article 21)</i>	<p>1 - A holder of political office who uses or allows another person to use, for purposes other than those for which they are intended, immovable property, vehicles or other movable property of significant value, public or private, that has been entrusted to them, is in their possession or is accessible to them by reason of their functions, shall be punished with imprisonment of up to 2 years or a fine of up to 240 days.</p> <p>2 - A holder of political office who allocates public funds to a public use different from that to which they are legally assigned shall be punished with imprisonment of up to 2 years or a fine of up to 240 days.</p>	When a holder of political office uses, or authorises third parties to use, assets, equipment or funds belonging to the entity or organisation in which they perform their functions or that are under their responsibility.
<i>Embezzlement Due to Another's Error (article 22)</i>	A holder of political office who, in the exercise of their functions, but taking advantage of another person's error, receives, for themselves or for a third party, fees, emoluments or other amounts that are not due or that exceed what is due, shall be punished with imprisonment of up to 3 years or a fine of up to 150 days.	When a holder of political office appropriates a value or asset that is not due, as a result of a circumstantial error or an error deliberately induced.

*Economic Participation in Business (article 23)*

1 - A holder of political office who, with the intent of obtaining an unlawful economic participation for themselves or for a third party, causes damage in a legal transaction to the patrimonial interests that, in whole or in part, they are responsible for administering, supervising, defending or conducting by reason of their functions, shall be punished with imprisonment of up to 5 years.

When a holder of political office takes decisions that benefit a specific private interest, their own or that of a third party, causing damage or loss to the public entity or organisation for which they work.

2 - A holder of political office who, in any manner, receives a patrimonial advantage resulting from a civil-law act relating to interests over which, by reason of their functions, they had, at the time of the act, total or partial power of disposition, administration or supervision, even if no damage occurs, shall be punished with imprisonment of up to 6 months or a fine of up to 150 days.

3 - The penalty provided for in the previous paragraph also applies where the holder of political office receives an economic advantage resulting from collection, recovery, liquidation or payment operations which, by reason of their functions, they are wholly or partially responsible for ordering or executing, even if no economic damage occurs to the State Treasury or the relevant interests.

*Abuse of Powers (article 26)*

1 - holder of political office who abuses their powers or violates duties inherent to their functions, with the intent of obtaining an unlawful benefit for themselves or for a third party, or of causing harm to another person, shall be punished with imprisonment from 6 months to 3 years or a fine of 50 to 100 days, unless a more severe penalty applies.

When a holder of political office uses their official powers to obtain an unlawful benefit or to cause harm to another person.

2 - The same penalties apply to a holder of political office who fraudulently grants concessions or enters into contracts for the benefit of third parties or to the detriment of the State.

*Prevarication (article 11)*

A holder of political office who knowingly conducts or decides, contrary to the law, a process in which they intervene in the exercise of their functions, with the intent of thereby harming or benefiting someone, shall be punished with imprisonment from 2 to 8 years.

When a holder of political office deliberately adopts functional decisions within a process that benefit or harm someone.

*Political Offices (article 3)*

For the purposes of this law, political offices include:

- The President of the Republic;
- The President of the Assembly of the Republic;
- Members of the Assembly of the Republic;
- Members of the Government;
- Members of the European Parliament;
- The Representative of the Republic in the Autonomous Regions;
- Members of the self-governing bodies of the Autonomous Regions;
- Members of the representative bodies of local authorities;
- Holders of political office in international public law organisations, as well as holders of political office of other States, regardless of nationality or residence, where the offence has been committed, in whole or in part, within Portuguese territory..

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

<b>Legal Provision</b>	<b>Legal Definition and Penalty</b>	<b>Illustrative Examples</b>
<i>Passive Corruption</i> (article 36)	<p>1 - Anyone who, as part of or in the service of the Armed Forces or other military forces, directly or through a third party with their consent or ratification, solicits or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage, or a promise thereof, without being entitled to it, as a consideration for an act or omission contrary to their duties and that results in a danger to national security, shall be punished with imprisonment from 2 to 10 years.</p> <p>2 - If the agent, before committing the act, voluntarily rejects the offered advantage or promise, or returns the advantage or, in the case of a fungible item, its value, they are exempt from punishment.</p> <p>3 - Civilians who are employees of the Armed Forces or other military forces, as defined in Article 386 of the Penal Code, and the persons referred to in Article 4, are considered to be in the service of these forces.</p>	When a military member solicits or receives an advantage, or a promise thereof, in exchange for taking a decision or omitting an act within the scope of their duties, which improperly benefits the person who offered or promised the advantage.
<i>Active Corruption</i> (article 37)	<p>1 - Anyone who, directly or through a third party with their consent or ratification, gives or promises to any person integrated into or in the service of the Armed Forces or other military forces, or to a third party with their knowledge, a patrimonial or non-patrimonial advantage that is not due, with the purpose described in the previous article and which results in a danger to national security, shall be punished with imprisonment from 1 to 6 years.</p> <p>2 - If the agent in the crimes referred to in the previous number is an officer of higher rank than the military member they attempt to corrupt or exercises command functions over, the minimum applicable sentence is doubled.</p>	When someone gives or promises a military member an advantage, or a promise thereof, in exchange for taking a decision or omitting an act within the scope of their duties, which improperly benefits the person who gave or promised the advantage.

**Law No. 14/2024, of January 19 (Legal Regime on Sports Integrity and Combating Unsporting Conduct)**

<b>Legal Provision</b>	<b>Legal Definition and Penalty</b>	<b>Illustrative Examples</b>
<i>Passive Corruption</i> (article 14)	A sports agent who, directly or through a third party with their consent or ratification, solicits or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage, or a promise thereof, without being entitled to it, as consideration for any act or omission intended to alter or falsify the result of a sports competition, even if prior to such solicitation or acceptance, shall be punished with imprisonment from 1 to 8 years.	When a sports agent solicits or receives an advantage, or a promise thereof, in exchange for taking an action or omitting an act intended to alter or falsify the result of a sports competition.
<i>Active Corruption</i> (article 15)	Anyone 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 patrimonial or non-patrimonial advantage that is not due, for the purpose described in the previous article, shall be punished with imprisonment from 1 to 5 years.	When someone gives or promises a sports agent an advantage, or a promise thereof, in exchange for taking an action or omitting an act intended to alter or falsify the result of a sports competition.
<i>Influence Peddling</i> (article 16)	1 - Anyone who, directly or through a third party with their consent or ratification, solicits or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage, or a promise thereof, to abuse their real or supposed influence over any sports agent, in order to obtain any decision intended to alter or falsify the result of a sports competition.	When someone solicits or receives an advantage in exchange for abusing their influence over a sports agent, in order to obtain a decision intended to alter or falsify the result of a sports competition.

competition, shall be punished with imprisonment from 1 to 5 years, unless a more severe penalty applies under other legal provisions.

2 - Anyone who, directly or through a third party with their consent or ratification, gives or promises another person an advantage for the purpose described in the previous number, shall be punished with imprisonment up to 3 years or with a fine, unless a more severe penalty applies under other legal provisions.

3 - Attempted acts are punishable.

When someone gives or promises another person an advantage to abuse their influence over a sports agent, in order to obtain a decision intended to alter or falsify the result of a sports competition.

*Improper Offering or Receiving of Advantages (article 17)*

1 - A sports agent who, in the exercise of their functions or because of them, directly or through a third party with their consent or ratification, solicits or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage that is not due, shall be punished with imprisonment up to 5 years or a fine up to 600 days.

2 - Anyone who, directly or through a third party with their consent or ratification, gives or promises a sports agent, or a third party by indication or knowledge of the agent, a patrimonial or non-patrimonial advantage that is not due, in the exercise of their functions or because of them, shall be punished with imprisonment up to 3 years or a fine up to 360 days.

3 - Socially appropriate behaviors and those in accordance with customs are excluded from the previous numbers.

When a sports agent solicits or accepts from another person, directly or indirectly, an advantage that is not due, in the exercise of their functions or because of them.

When someone gives or promises a sports agent, directly or indirectly, an advantage that is not due, in the exercise of their functions or because of them.

*Definitions (article 2)*

- a) Sports Agent – natural or legal persons participating in sports competitions or events, individually or as part of a group, voluntarily or obligatorily, paid or unpaid.
- b) Referee or Sports Judge – anyone who, in any capacity, assesses, judges, decides, observes, or evaluates the application of technical or disciplinary rules of the sport.
- c) Sports Competition – regulated sports activity organized under the authority of federations, professional leagues, associations, or international sports bodies.
- d) Sports Director – the head or representative of a sports organization with authority to oversee the activity, including the sports director or equivalent.
- e) Sports Agent/Representative – accredited natural or legal person representing athletes in sports contracts.
- f) Sports Event – organized event including multiple individual or team competitions under the same sports entity.
- g) Incidents – actions or events in any sports competition relevant to sports betting, such as winner, result, number of goals/points, cards, corners, or free kicks, final or partial.
- h) Sports Legal Persons – clubs, sports companies, federations, leagues, associations, or groups of clubs, as well as civil societies representing any of the sports agents mentioned.
- i) Sports Coach/Technical Staff – trainers, coaches, physical trainers, doctors, physiotherapists, assistants, and anyone guiding athletes in their activity.
- j) Manipulation of Sports Competitions – intentional agreement, act, or omission aimed at irregularly altering the outcome or course of a competition, removing its unpredictability, to obtain undue advantage for oneself or others.

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

Legal Provision	Legal Definition and Penalty	Illustrative Examples
<i>Active Corruption with Harm to International Trade (article 7)</i>	Anyone who, directly or through a third party with their consent or ratification, gives or promises to a national or foreign official, an official of an international organization, or a holder of a national or foreign political office, or to a third party with the knowledge of those persons, a patrimonial or non-patrimonial advantage that is not due, in order to obtain or retain a business, contract, or other undue advantage in international trade, shall be punished with imprisonment from 1 to 8 years.	When someone gives or promises an advantage to a public official of a national or international organization in order to obtain or retain a business, contract, or other undue advantage in international trade.

*Passive Corruption in the Private Sector (article 8)*

1 - A private sector worker who, directly or through a third party with their consent or ratification, solicits or accepts, for themselves or a third party, without being entitled to it, a patrimonial or non-patrimonial advantage, or a promise thereof, in exchange for any act or omission that constitutes a breach of their functional duties, shall be punished with imprisonment up to 5 years or a fine of up to 600 days.

2 - If the act or omission referred to in the previous number is likely to cause a distortion of competition or patrimonial harm to third parties, the agent shall be punished with imprisonment from 1 to 8 years.

When a private sector worker solicits or accepts an advantage or promise thereof to violate their professional duties.

*Active Corruption in the Private Sector (article 9)*

1 - Anyone who, directly or through a third party with their consent or ratification, gives or promises to the person referred to in the previous article, or to a third party with their knowledge, a patrimonial or non-patrimonial advantage that is not due, to pursue the purpose indicated therein, shall be punished with imprisonment up to 3 years or a fine.

2 - If the conduct referred to in the previous number aims to obtain, or is likely to cause, a distortion of competition or patrimonial harm to third parties, the agent shall be punished with imprisonment up to 5 years or a fine of up to 600 days.

3 - Attempt is punishable.

When someone gives or promises a private sector worker an advantage or promise thereof, which is not due, in order to violate their professional duties.

**Decree-Law No. 28/84, of January 20 (Regime on Anti-Economic Offences and Public Health)**

<b>Legal Provision</b>	<b>Legal Definition and Penalty</b>	<b>Illustrative Examples</b>
<p><i>Fraud in Obtaining Subsidy or Grant (article 36)</i></p>	<p>1 - Anyone who obtains a subsidy or grant by:</p> <p>a) Providing authorities or competent entities with inaccurate or incomplete information about themselves or others, regarding facts important for granting the subsidy or grant;</p> <p>b) Omitting, contrary to the legal regime of the grant or subsidy, information about facts important for its granting;</p> <p>c) Using a document justifying the right to the grant or subsidy, or important facts for its granting, obtained through inaccurate or incomplete information;</p> <p>shall be punished with imprisonment from 1 to 5 years and a fine of 50 to 150 days.</p> <p>2 - In particularly serious cases, the penalty is imprisonment from 2 to 8 years.</p> <p>3 - If the acts are committed in the name or interest of a legal entity or company established exclusively or predominantly for that purpose, the court shall order its dissolution in addition to pecuniary penalties.</p> <p>4 - The sentence shall be published.</p> <p>5 - For the purposes of paragraph 2, particularly serious cases include those where the agent:</p> <p>a) Obtains a subsidy or grant of considerable value or uses false documents;</p> <p>b) Commits the act with abuse of their functions or powers;</p> <p>c) Obtains aid from a public officer who abuses their functions or powers.</p>	<p>Anyone who obtains a subsidy or grant by providing inaccurate or incorrect information regarding facts important to the decision on granting that subsidy or grant.</p>

6 - Negligent acts under a) or b) are punishable with imprisonment up to 2 years or 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 case the subsidy or grant would not be granted without their involvement, they made serious and spontaneous efforts to prevent it.

8 - Facts considered important for granting a subsidy or grant include:

- a) Those declared important by law or granting entity;
- b) Facts on which legally depend authorization, granting, reimbursement, renewal, or maintenance of a subsidy, grant, or resulting advantage.

*Fraud in Obtaining Credit (article 38)*

1 - Anyone who, when submitting a proposal for granting, maintaining, or modifying credit conditions for an establishment or company:

- a) Provides inaccurate or incomplete written information intended to support the proposal or important for its evaluation;
- b) Uses documents regarding the economic situation that are inaccurate or incomplete, including balance sheets, profit and loss accounts, general asset descriptions, or appraisals;
- c) Conceals deterioration of the economic situation that occurred after the original submission and is important for the credit decision;

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

2 - If credit of considerably high value is obtained, the penalty may rise to imprisonment up to 5 years and fine up to 200 days.

3 - If committed in the name or interest of a legal entity or company, the court may order its dissolution.

4 - The agent shall be exempt from penalty if:

- a) They spontaneously prevent the creditor from delivering the requested amount;
- b) If the delivery would not occur without their involvement, they made serious and spontaneous prior efforts to prevent it.

5 - The sentence shall be published.

Anyone who presents false or incorrect information in a proposal for granting, maintaining, or modifying the terms of a loan, with the intention of improperly obtaining that loan.

*Misappropriation of Subsidy, Grant, or Concessional Credit (article 37)*

1 - Anyone who uses a subsidy or grant for purposes other than those legally intended shall be punished with imprisonment up to 2 years or a fine of at least 100 days.

2 - The same penalty applies to anyone who uses a concessional credit for purposes other than those legally determined by the competent entity.

3 - If the amounts or damages are considerably high, the penalty is imprisonment from 6 months to 6 years and fine up to 200 days.

4 - If the acts are repeatedly committed in the name or interest of a legal entity or company and damages have not been spontaneously repaired, the court shall order its dissolution.

5 - The sentence shall be published.

Anyone who diverts or misuses a subsidy, grant, or concessional credit legally allocated to them for purposes other than those intended.

## ANNEX VIII

### Report of Violations for Non-Compliance with the RGPC Code of Conduct

#### Artigo 7.º, n.º 3 do Decreto-Lei n.º 109-E/2021, de 9 de dezembro

On [●], it came to the attention of the undersigned, in their capacity as Compliance Officer, that a violation of the RGPC Code of Conduct, approved and implemented by Triangle's in compliance with the General Regime for the Prevention of Corruption ("RGPC"), established under Decree-Law No. 109-E/2021 of December 9, had been committed.

The offense in question occurred on [date/period] and consists of a breach of the provisions in point [●], subparagraph [●], of the Triangle's RGPC Code of Conduct, which refers to [●].

[The sanction applied to the offender was [●].]

The following measures [have/will be implemented] to prevent similar situations and to ensure the proper observance of the RGPC Code of Conduct:

[●];

[●].

Date: [●]

The Compliance Officer,

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