

Risk Prevention Plan for Corruption and Related Offenses (PPR)

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I. Introduction

Following the approval of the National Anti-Corruption Strategy 2020–2024, Decree-Law No. 109-E/2021 was published in the Official Gazette on December 9, 2021, creating the National Anti-Corruption Mechanism (MENAC) and approving the General Regime for the Prevention of Corruption (RGPC).

The RGPC requires entities with 50 or more employees to adopt and implement a compliance program that includes: i) a risk prevention plan for corruption and related offenses (PPR); ii) a code of conduct; iii) an internal training program; and iv) an internal whistleblowing channel.

In this context, OutSystems – Software Em Rede S.A. (“OutSystems”) has prepared this PPR, which will be continuously monitored and periodically reviewed.

The PPR identifies, analyses, and classifies, for each area, the potential risks of corruption or related offenses associated with OutSystems’ activities, and systematizes the existing preventive measures for these risks, as well as the corrective measures, that reduce the likelihood of occurrence and the impact of the identified risks and situations.

II. OutSystems and Compliance Framework

OutSystems is a global leader in the software business sector transforming how companies innovate through software, empowering IT leaders with a better way to build the software that matters most. The OutSystems platform helps companies develop, deploy, and maintain mission-critical applications by unifying and automating the entire software lifecycle. Our mission is to help every company innovate through the power of software. Today, we are proud to be recognized as a leader in the low-code platform space and to be leading a creative revolution in global software development.

OutSystems believes in acting ethically and with integrity in our business conduct. We do not tolerate bribery, kickbacks, or corruption of any kind or violations of any laws wherever we do business.

OutSystems Anti-Corruption Compliance framework is designed with preventative and detective control mechanisms, including: relevant policies, training, available communication and reporting channels, fostering a speak up culture, anti-retaliation policies, and fair internal investigation processes.

We represent the main operational company of the Group, and our holding company is OutSystems Holdings S.A. The OutSystems Group has over 1700 employees worldwide. The working language spoken in Outsystems is English, with all policies also in English.

OutSystems has the following areas of activity:

- Sales, and Customer Office
- Marketing
- Product & Technology
- People
- Legal, including Security
- Finance

III. Risk Prevention Plan for Corruption and Related Offenses

A. Concept of corruption and of related offenses

Under the RGPC, corruption and related offences and crimes are the following: active corruption, passive corruption, improper receipt and offer of advantage, embezzlement, economic participation in business, extortion, abuse of power, malfeasance, influence peddling, money laundering, fraud in obtaining and diverting subsidies, grants, or credit.

However, since OutSystems is a private entity, and its employees do not have the status of public officials for the purposes of the Portuguese Penal Code, only the crimes identified in the table (see Appendix A) below could lead to its liability.

B. Methodology and definition of Risk Levels

The definition of risk levels, for the purposes of this PPR, considers the probability of occurrence of risk-related situations and the potential impact of any resulting violations (or the severity of the consequences.)

Regarding the indicator of the probability of risk occurrence, which is mainly associated with the existence of preventive measures and their historical effectiveness, it will be assessed according to a three-level scale:

- Low: risk prevention is adequately ensured by previously adopted preventive/corrective measures.
- Medium: adequate risk prevention may require and justify additional preventive measures beyond those already in place.
- High: adequate risk prevention requires additional corrective measures beyond those already in place.

In turn, the indicator of the potential impact of the risk occurrence, which is associated with the possible effects resulting from the realization of the acts intended to be prevented, is also assessed according to a three-level scale:

- Low: results in a decrease in the efficiency of the associated procedure, requiring a review of the procedure itself; internal impact only.
- Medium: results in a decrease in both efficiency and effectiveness of the associated procedure, requiring a review of the procedure and its objectives; internal impact only.
- High: results in a decrease in efficiency and effectiveness of the associated procedure and may attract public attention; internal and external impact.

The combination of these two variables results in the following risk level matrix:

Risks Levels		Probability of Occurrence (PO)		
		LOW	MEDIUM	HIGH
Potential Impact (PI)	LOW	Minimal	Low	Moderate
	MEDIUM	Low	Moderate	High
	HIGH	Moderate	High	Maximum

C. Control Mechanisms

For risks related to corruption and related offenses, OutSystems implemented, namely, the following sets of measures and controls to reduce the probability of occurrence, reduce the degree of impact and mitigate its exposure to potential risks.

- i. OutSystems Code of Business Conduct and Ethics and annual training
- ii. Specific policies and training related to corruption and related infractions
- iii. Supplier Code of Conduct for vendors
- iv. OutSystems Business Partner Compliance Guide, a code of conduct for our partners
- v. Contractual terms and representations specifically addressing anti-corruption compliance
- vi. Training plan in different Compliance subjects and in some cases to targeted audiences
- vii. Whistleblower and Complaint Policy
- viii. OutSystems Speak Up Helpline (reporting channel), available 24/7 to employees and third parties to report concerns or seek guidance, supported by a strict non-retaliation policy for good-faith reporting.

We make every effort to instill a culture of accountability and transparency to ensure ethical decision-making is practiced throughout the business. We uphold a strong commitment to integrity and ethical behavior through our Code of Business Conduct and Ethics (“Code of Conduct”), which all employees are required to acknowledge and uphold. The OutSystems Code of Conduct outlines the Company’s principles and sets the expectations for business conduct in dealings with each other, our customers, communities and business partners.

OutSystems has policies, including those regarding avoiding conflicts of interest in the performance of duties, gifts & entertainment, adhering to anti-bribery and financial integrity standards, protection of company assets, and complying with all applicable laws.

OutSystems implements appropriate compliance policies and procedures and provides regular communication and reporting to our Board of Directors. This ensures accountability and fosters a culture of trust and responsibility across the organization.

Additionally, the management of the business is responsible for identifying and ensuring the assessment and mitigation of risks in its area of responsibility.

The Legal department is responsible for the Anti-Corruption Compliance Program, identifying compliance-related risks and defining risk-based mitigation measures. The Compliance Officer is responsible for the execution, control and review of the PRR, providing guidance and working with the business areas to ensure that relevant compliance controls are implemented.

Compliance with the Anti-Corruption Compliance policy and all anti-bribery and corruption laws and regulations is mandatory. Violation of the Code of Conduct or this policy will subject an employee to sanctions up to and including termination of employment, in addition to any civil, administrative or criminal liability that might be imposed by any court or regulatory agency.

D. Revision and Disclosure of PPR

OutSystems will continue its commitment to the prevention and mitigation of corruption risks and related offenses in its business. This document, approved by the Board of Directors, will be reviewed at least once every three years or whenever a risk reassessment is deemed necessary, particularly in cases of changes in responsibilities, organizational structure, or corporate framework.

Regarding the PPR, OutSystems shall prepare as applicable:

- In October, an interim report on identified situations of high or maximum risk of corruption or related offenses (which is not applicable at this time.).
- In April of the year following the execution period, an annual assessment report, which includes the quantification of the degree of implementation of the identified preventive and corrective measures, as well as a forecast for their full implementation.

OutSystems ensures that the PPR is made available to its employees via the intranet and on its official internet page within 10 days of their implementation.

E. Risk Assessment

Areas	Activities	Risk Situation	PO	PI	Risk Level	Preventive/Corrective Measures
Management	Performance of Management Functions	Undue favoring of a third party Offering or accepting favors in exchange for granting advantages and/or benefits Use and/or disclosure of privileged information for personal or third-party benefit	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training
	Access and movement of bank accounts	Improper payments Offering or accepting favors in exchange for granting advantages and/or benefits Undue favoring of a third party	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Anti-Money Laundering Compliance policy - Whistleblower and Complaint Policy - Segregation of duties and account access restriction policies and controls - Training

Marketing	Promotional Activity	Offering or accepting favors in exchange for granting advantages and/or benefits	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy -Expense approval system and controls -Gifts and Entertainment policy - Whistleblower and Complaint Policy -Training
	Organization and Participation in Events	Offering or accepting favors in exchange for granting advantages and/or benefits Use and/or disclosure of privileged information for personal or third-party benefit	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Expense approval systems and controls -Gifts and Entertainment policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy -Training
Sales and Customer Office	Establishment of business relationships with clients	Offering or accepting favors in exchange for granting advantages and/or benefits Omission and/or manipulation of information to influence decision-making Violation of competition rules	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy -Gifts and Entertainment policy - Anti-Money Laundering Compliance policy - Implementation of sanctions

						<p>screening and escalation procedures</p> <ul style="list-style-type: none"> - Regular monitoring of the country risk where doing or allowing business is permitted, which includes consideration of corruption risk - Contractual terms and representations specifically addressing anti-corruption compliance - Whistleblower and Complaint Policy - Training, including targeted Anti-Corruption training for the sales teams
	Establishment of business relationships with partners, resellers, and distributors	<p>Offering or accepting favors in exchange for granting advantages and/or benefits</p> <p>Omission and/or manipulation of information to influence decision-making</p>	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Gifts and Entertainment policy - Whistleblower and Complaint Policy - Contractual terms and representations specifically addressing anti-corruption compliance - Business Partner Compliance Guide, a code of conduct for partners - Training

	Pricing	Breaches of confidentiality/business secrets Offering or accepting favors in exchange for granting advantages and/or benefits Granting excessive/unjustified discounts to customers and/or whose reasonableness is ambiguous, which could result directly as benefit to the organization Violation of competition rules	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training - Documented and approved pricing according to relevant procedure - Exception process and controls for approval of any non-standard discount
	Customer Support	Use and/or disclosure of privileged information for personal or third-party benefit Breach of confidentiality Failure to report with the intent to conceal certain irregularities	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training
	Renewals	Offering or accepting favors in exchange for granting advantages and/or benefits Use and/or disclosure of privileged information for personal or third-party benefit Breach of confidentiality	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Contract management platform - Whistleblower and Complaint Policy

		Omission and/or manipulation of information to influence decision-making				-Training
Product & Technology	Breach of confidentiality	Breaches of business secrets Use and/or disclosure of privileged information for personal or third-party benefit Offering or accepting favors in exchange for granting advantages and/or benefits	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy -Training - Non-Disclosure Agreements and relevant contractual terms and representations - Confidentiality & Protection of Assets Policy - Contractual IP protections in employees' agreements
People	Recruitment and Talent Selection	Omission and/or manipulation of information to influence decisions Lack of impartiality and fairness in selection criteria Undue favoritism of candidates Offering or accepting favors in exchange for advantages and/or benefits	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy -Training - Documented approval processes - Sanctions screening performed prior to offer and as part of new hire process

	Assignment of donations/ sponsorships	<p>Undue favoritism of a third party</p> <p>Offering or accepting favors in exchange for the granting of advantages and/or benefits</p> <p>Allocation of donations and/or sponsorships, with the purpose of obtaining undue commercial advantage from or exerting undue influence over the beneficiary entity</p> <p>Lack of independence and impartiality in the allocation of donations and/or sponsorships arising from the existence of conflicts of interests (family, politicians, commercials or personal) to third parties (public and/or private)</p>	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Anti-Money Laundering Compliance policy - Training - Documented expense approval processes
	Management and treatment of complaints	<p>Absence of reporting with the intent to conceal certain irregularities.</p> <p>Lack of impartiality and objectivity in the preparation and/or analysis to benefit or harm third parties.</p> <p>Omission and/or manipulation of information with the aim of influencing decisions.</p> <p>Use and/or disclosure of</p>	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Existence of robust mechanisms for reporting irregularities that promote the independent handling of complaints - Training

		<p>privileged information for personal or third-party benefit.</p> <p>Offering or accepting favors in exchange for granting advantages and/or benefits.</p>				
	Management of benefits, compensation, and incentives	<p>Omission and/or manipulation of information with the aim of influencing decisions</p> <p>Lack of impartiality and objectivity</p> <p>Undue favoring of a third party</p> <p>Offering or accepting favors in exchange for the granting of advantages and/or benefits</p>	Low	Low	Minimum	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Anti-Money Laundering Compliance policy - Training
Legal	Provision of legal assistance	<p>Omission and/or manipulation of information with the aim of influencing decisions</p> <p>Offering or accepting favors in exchange for granting advantages and/or benefits</p> <p>Use and/or disclosure of privileged information for personal or third-party benefit</p> <p>Breaches of confidentiality or professional secrecy</p>	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training
	Preparation and formalization of contracts with	Offering or accepting favors in exchange for granting	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy

	customers/suppliers and payment terms	<p>advantages and/or benefits</p> <p>Use and/or disclosure of privileged information for personal or third-party benefit</p> <p>Drafting and formalization of contracts with ambiguous conditions to the level of the payment terms and/or with a broad/ambiguous/little making it difficult to interpret/check/ monitor the services and the control of the payments</p>				<ul style="list-style-type: none"> - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training - Anti-Money Laundering Compliance policy - Use of standard Master Subscription Agreements - Application of standard OutSystems Vendor Agreement - Contract management platform
	Intervention in negotiations	<p>Offering or accepting favors in exchange for granting advantages and/or benefits</p> <p>Use and/or disclosure of privileged information for personal or third-party benefit</p> <p>Omission and/or manipulation of information with the aim of influencing decisions</p>	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training - Contract management platform
	Management and treatment of complaints	<p>Absence of reporting with the intent to conceal certain irregularities.</p> <p>Lack of impartiality and objectivity in the preparation and/or analysis to benefit or</p>	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy

		<p>harm third parties.</p> <p>Omission and/or manipulation of information with the aim of influencing decisions.</p> <p>Use and/or disclosure of privileged information for personal or third-party benefit.</p> <p>Offering or accepting favors in exchange for granting advantages and/or benefits.</p>				<ul style="list-style-type: none"> - Multiple mechanisms for reporting irregularities that promote the independent handling of complaints - Training
	Intervention in supplier selection	<p>Omission and/or manipulation of information to influence decisions.</p> <p>Lack of impartiality and fairness in selection criteria.</p> <p>Undue favoritism or disadvantaging of suppliers.</p> <p>Offering or accepting favors in exchange for advantages and/or benefits.</p>	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training - Approval policies and procedures documented in system workflow - Supplier Code of Conduct - Third party due diligence processes - Documented sanctions screening and escalation procedures - Monitoring third-party risk and definition of measures

Finance	Access and movement of bank accounts	Improper payments Offering or accepting favors in exchange for granting advantages and/or benefits Undue favoring of a third party	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Anti-Money Laundering Compliance policy - Whistleblower and Complaint Policy - Segregation and strict access controls - Training
	Government grants	Offering or accepting favors in exchange for granting advantages and/or benefits Use and/or disclosure of privileged information for personal or third-party benefit Omission and/or manipulation of information with the aim of influencing decisions Use of inaccurate or incomplete information to receive the grant Use of the benefits obtained as a grant for purposes other than those legally intended	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy and related Gifts & Entertainment Policy - Training - Documented expense approval processes - Whistleblower and Complaint Policy - Segregation of duties
	Accounting and Financial Reporting	Absence of reporting with the intent to conceal certain irregularities	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance

		<p>Lack of impartiality and objectivity in the preparation and/or analysis to benefit or harm third parties</p> <p>Omission and/or manipulation of information with the aim of influencing decisions</p> <p>Use and/or disclosure of privileged information for personal or third-party benefit</p> <p>Offering or accepting favors in exchange for granting advantages and/or benefits</p>				<p>policy</p> <ul style="list-style-type: none"> - Whistleblower and Complaint Policy - Training - Regular external audits and periodic internal certifications processes
	Review of employees' expenses	<p>Improper payments</p> <p>Undue favoritism towards third parties</p> <p>Offering or accepting favors in exchange for granting advantages and/or benefits</p>	Low	Medium	Low	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Anti-Money Laundering Compliance policy - Finance Policy - Documented expense management system and approval process - Whistleblower and Complaint Policy - Training
	Payroll	<p>Improper payments</p> <p>Undue favoritism towards an employee</p>	Low	Low	Minimum	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance

		Offering or accepting favors in exchange for granting advantages and/or benefits				policy – Anti-Money Laundering Compliance policy – Whistleblower and Complaint Policy – Training
	Procurement	Acquisitions that do not stem from real needs and/or under conditions outside the market Omission and/or manipulation of information with the aim of influencing acquisition decisions Undue favoritism of a third party Offering or accepting favors in exchange for the granting of advantages and/or benefits Use and/or disclosure of privileged information for personal or third-party benefit	Low	High	Moderate	– Code of Conduct – Conflict of Interest policy – Anti-Corruption Compliance policy – Whistleblower and Complaint Policy – Training – Supplier procurement procedure – Finance Policy – Anti-Money Laundering Compliance policy – Supplier Code of Conduct – Implementation of sanctions screening and escalation procedures – Mandatory use of purchase orders and supplier registration system – Automated payment processing system , including segregated duties for expenditures and processing payments – Contractual terms and representations specifically

						addressing anti-corruption compliance - Periodic financial control certifications and audits
	Investor Relations	Omission and/or manipulation of information with the intent to influence decisions. Use and/or disclosure of privileged information for personal or third-party benefit. Offering or accepting favors in exchange for the granting of advantages and/or benefits	Low	Medium	Low	- Code of Conduct - Conflict of Interest policy and related Gifts & Entertainment Policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training
	Financial planning and performance analysis	Omission and/or manipulation of information with the intent to influence decisions Use and/or disclosure of privileged information for personal or third-party benefit. Offering or accepting favors in exchange for the granting of advantages and/or benefits	Low	Medium	Low	- Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training

Across all areas	Participation in Public Tenders	Offering or accepting favors in exchange for granting advantages and/or benefits Use and/or disclosure of privileged information for personal or third-party benefit Omission and/or manipulation of information with the intent to influence decisions	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy and related Gifts & Entertainment Policy. - Public tenders strictly conducted through existing platforms -Expense approval systems and controls. - Whistleblower and Complaint Policy
	Prevention and management of conflict of interest situations	Improper favoring of a third party Offering or accepting favors in exchange for granting advantages and/or benefits Use and/or disclosure of privileged information for personal or third-party benefit Breach of confidentiality	Medium	Medium	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy and related Gifts & Entertainment Policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training - Review implementation of conflict of interest disclosure forms or certifications
	Offering gifts and courtesies	Offering courtesies in exchange for the granting of advantages and/or benefits Undue favoritism towards a third party	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Gifts & Entertainment Policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy

						<ul style="list-style-type: none"> - Training - Expense approval systems and controls - Review and implementation of gift log
	Receiving gifts and courtesies	Acceptance of courtesies in exchange for the granting of advantages and/or benefits	Low	High	Moderate	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Gifts & Entertainment Policy - Anti-Corruption Compliance policy - Whistleblower and Complaint Policy - Training - Review implementation of gift log
	Approval of employees' expenses	Improper payments Undue favoritism towards third parties Offering or accepting favors in exchange for granting advantages and/or benefits	Low	Low	Minimum	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy - Finance Policy - Expense approval systems and controls - Whistleblower and Complaint Policy - Training
	Approval of variable compensation	Omission and/or manipulation of information with the aim of influencing decisions Improper payments	Low	Low	Minimum	<ul style="list-style-type: none"> - Code of Conduct - Conflict of Interest policy - Anti-Corruption Compliance policy

		<p>Undue favoritism of third parties</p> <p>Offering or accepting favors in exchange for the granting of advantages and/or benefits</p> <p>Lack of impartiality and objectivity</p>				<ul style="list-style-type: none"> - Whistleblower and Complaint Policy - Anti-Money Laundering Compliance policy -Training
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APPENDIX A

Corruption and related offenses for which OutSystems may be held criminally liable:

Legal Type	Description/Penalties
Active Corruption Article 374 of the Penal Code	<p>Whoever, by themselves or through another person, with their consent or ratification, gives or promises to an official, or to a third party by indication or with the knowledge of the official, a material or non-material advantage, for the practice of an act or omission in the exercise of their functions, even if the action or omission does not imply a violation of the duties of the position.</p> <p>Punishable by imprisonment for up to 5 years or a fine of up to 360 days (€1,800 – €180,000), for individuals.</p> <p>The legal entity can be sentenced to a fine of up to 600 days, between €60,000 and €6,000,000.</p>
Active Corruption with Detriment to International Trade Article 7 of Law No. 20/2008, of April 21	<p>Whoever, by themselves or, with their consent or ratification, through another person, gives or promises to an official, national, foreign or of an international organization, or to a holder of a political office, national or foreign, or to a third party with the knowledge of those, a material or non-material advantage, which is not due, to obtain or maintain a business, a contract or another undue advantage in international trade.</p> <p>Punishable by imprisonment from 1 to 8 years, for individuals.</p>

	<p>The legal entity can be sentenced to a fine of up to 960 days, between €96,000 and €9,600,000.</p>
<p>Passive Corruption in the Private Sector</p> <p>Article 8 of Law No. 20/2008, of April 21</p>	<p>Whoever [private sector worker], by themselves or, with their consent or ratification, through another person, solicits or accepts, for themselves or for a third party, without being due, a material or non-material advantage, or its promise, for any act or omission that constitutes a violation of their functional duties.</p> <p>Punishable by imprisonment for up to 8 years or a fine of up to 600 days (€3,000 – €300,000), for individuals.</p> <p>The legal entity can be sentenced to a fine of up to 960 days, between €96,000 and €9,600,000.</p>
<p>Active Corruption in the Private Sector</p> <p>Article 9 of Law No. 20/2008, of April 21</p>	<p>Whoever, by themselves or, with their consent or ratification, through another person, gives or promises to a private sector worker, or to a third party with the knowledge of that worker, a material or non-material advantage, which is not due, for the practice of an act or omission that constitutes a violation of their functional duties.</p> <p>Punishable by imprisonment for up to 5 years or a fine of up to 600 days (€3,000 – €300,000), for individuals.</p> <p>The legal entity can be sentenced to a fine of up to 600 days, between €60,000 and €6,000,000.</p>
<p>Undue Offering of Advantage</p>	<p>Whoever, by themselves or through another person, with their consent or ratification, gives or promises to an official, or to a third party by indication or</p>

<p>Article 372 of the Penal Code</p>	<p>knowledge of that official, a material or non-material advantage, which is not due, in the exercise of their functions or because of them.</p> <p>Punishable by imprisonment for up to 3 years or a fine of up to 360 days (€1,800 – €180,000), for individuals.</p> <p>The legal entity can be sentenced to a fine of up to 360 days, between €36,000 and €3,600,000.</p>
<p>Influence Peddling Article 335 of the Penal Code</p>	<p>Whoever, by themselves or through another person, with their consent or ratification, solicits or accepts, for themselves or for a third party, a material or non-material advantage, or its promise, to abuse their real or supposed influence with any public entity; or whoever, by themselves or through another person, with their consent or ratification, gives or promises a material or non-material advantage to the aforementioned persons.</p> <p>Punishable by imprisonment for up to 5 years or a fine of up to 240 days (€1,200 – €120,000) for individuals.</p> <p>The legal entity can be fined up to 600 days, between €60,000 and €6,000,000.</p>
<p>Money Laundering Article 368-A of the Penal Code</p>	<p>Whoever 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 avoiding criminal prosecution for the crime(s) committed.</p>

	<p>Punishable by imprisonment for up to 16 years in the case of individuals.</p> <p>The legal entity can be fined up to 1920 days, between €192,000 and €19,200,000.</p>
<p>Fraud in Obtaining a Subsidy or Grant</p> <p>Article 36 of Decree-Law No. 28/84, of January 20</p>	<p>Whoever obtains a subsidy or grant:</p> <ul style="list-style-type: none"> a) By providing the competent authorities or entities with inaccurate or incomplete information about themselves or third parties and related to important facts for the granting of the subsidy or grant; b) By omitting information about important facts for its granting; c) By using a document justifying the right to the subsidy or grant or important facts for its granting, obtained through inaccurate or incomplete information. <p>Punishable by imprisonment from 1 to 8 years in the case of individuals.</p> <p>The legal entity can be fined up to 960 days, between €96,000 and €9,600,000 or even face dissolution.</p>
<p>Fraud in Obtaining a Credit</p> <p>Article 38 of Decree-Law No. 28/84, of January 20</p>	<p>Whoever, when presenting a proposal for the granting, maintenance, or modification of the conditions of a credit intended for an establishment or a company:</p> <ul style="list-style-type: none"> a) Provides written information that is inaccurate or incomplete to accredit it or important for the decision on the request; b) Uses documents related to the economic situation that are inaccurate

	<p>or incomplete, namely balance sheets, profit and loss accounts, general descriptions of assets, or appraisals;</p> <p>c) Conceals the deteriorations of the economic situation that have occurred since the credit request and that are important for the decision on the request.</p> <p>Punishable by imprisonment for up to 5 years or a fine of up to 200 days (€1,000 – €100,000) for individuals.</p> <p>The legal entity can be fined up to 600 days, between €60,000 and €6,000,000, or even face dissolution.</p>
<p>Misappropriation of Subsidy, Grant, or Subsidized Credit</p> <p>Article 37 of Decree-Law No. 28/84, of January 20</p>	<p>Whoever uses benefits obtained as a subsidy, grant, or subsidized credit for purposes other than those legally intended or as provided in the credit line determined by the legally competent entity.</p> <p>Punishable by imprisonment for up to 6 years or a fine of up to 200 days (€1,000 – €100,000) for individuals.</p> <p>The legal entity can be fined up to 720 days, between €72,000 and €7,200,000 or even face dissolution.</p>

