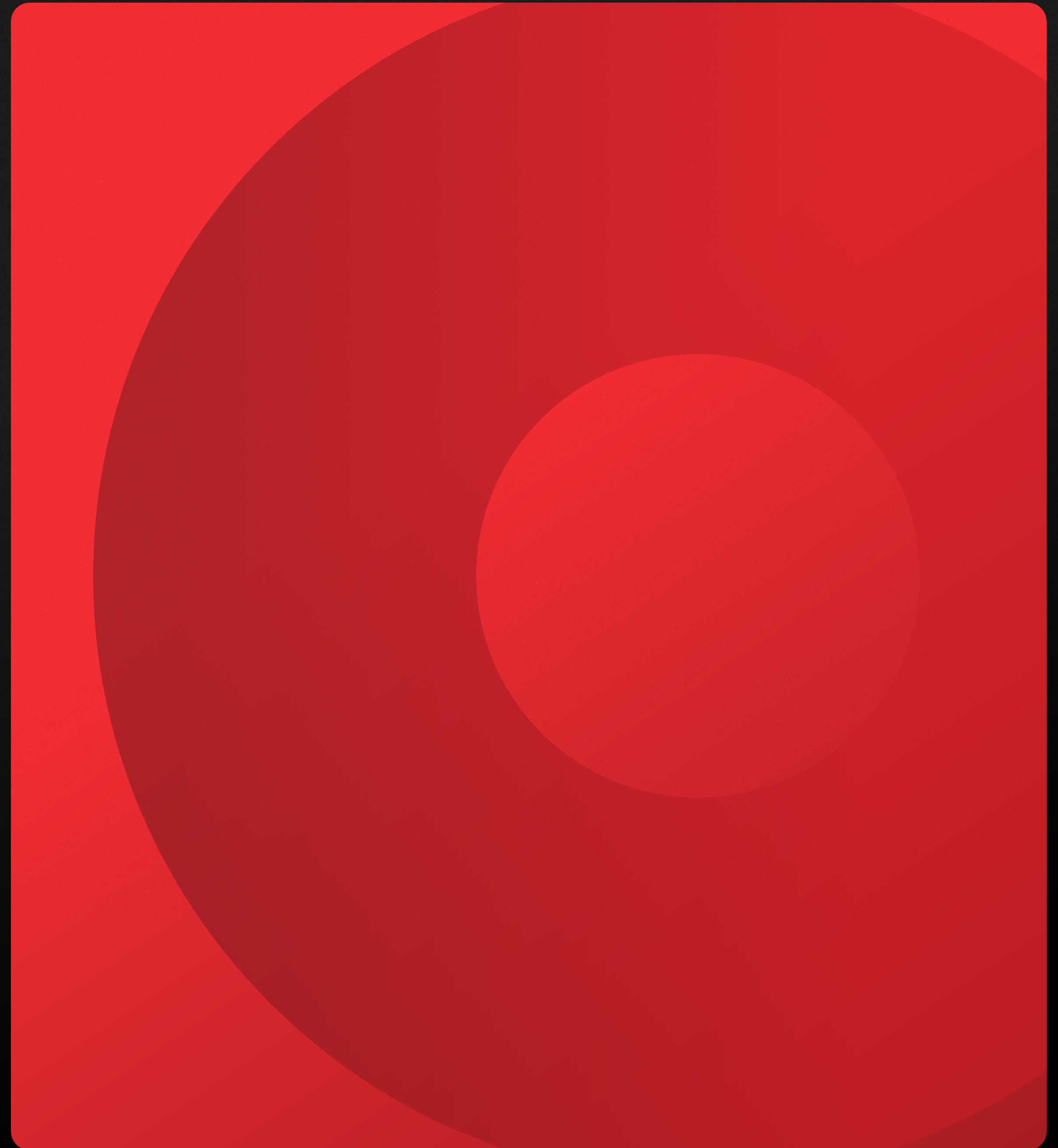


Code of Business Conduct and Ethics



Introduction

There is a phrase in Portugal, “afinal de contas”, which roughly translates to “when all is said and done”. Ultimately, results matter, and OutSystems has always been focused on helping our customers get results.

We take pride in our accomplishments and celebrate our success from being recognized as a leader in the modern application space. And when all is said and done, it is how we do our work, it is the values and ethics we bring to our daily interactions with each other, our customers, communities and business partners that are the keys to our healthy growth and continuing success.

Our Code of Business Conduct and Ethics outlines the Company’s principles and sets expectations for business conduct. You are responsible for reading and understanding our Code. It applies to everyone at OutSystems and its subsidiaries, including employees, officers, directors, and contractors around the world. This Code provides guidance to help you make the right decisions and do the right thing when carrying

out your responsibilities, and you are encouraged to speak up if you are ever unsure about what to do or have a question or concern.

Our commitment to integrity and the hard work we do everyday underpins OutSystems' mission to help every company innovate through the power of software.



Purpose

This Code of Business Conduct and Ethics sets forth the guiding principles by which OutSystems and its subsidiaries (“OutSystems” or the “Company”) conducts its business. OutSystems promotes honesty and the highest standards of integrity. Our commitment to the principles and ethical standards by which we work every day provides the foundation for strong and successful relationships with each other, our customers, investors and all who have a stake in OutSystems’ success.

Who must follow this Code?

Every person makes a difference. Every person at OutSystems should do the right thing: follow the law, act honestly and ethically and treat co-workers with courtesy and respect. We expect all of our employees, the members of the Board of Directors, officers, and all individuals serving as independent contractors of the Company (collectively “OutSystems Personnel” or “you”), to follow the letter and spirit of this Code.

What if I have a Code-related question or concern?

If you have a question, doubt or concern, please speak up. If you have an issue to report, do so with appropriate urgency. No matter how small the situation or concern, we do not want to let anything fester. We encourage honesty and openness so we can address our issues early and keep our Company safe and strong.

There are several avenues you can use to direct your questions:

- Your manager, or another manager you trust
- OutSystems Compliance Officer
- OutSystems SpeakUp Helpline

Good faith reporting and non-retaliation

If you have a good faith complaint or concern about a suspected or actual violation of this Code, Company policy or law, you should report it promptly. OutSystems prohibits retaliation against any employee with respect to such reports, and if you believe you are being retaliated against, please contact the People Team. Anyone who engages or attempts to engage in retaliatory action will be subject to disciplinary action up to and including termination.

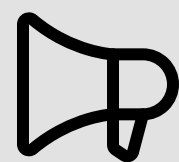
Please consult the OutSystems Whistleblower and Complaint Policy for additional guidance.



Expectations for Managers

Expectations for Managers

OutSystems Personnel in managerial positions have a special responsibility as leaders in our Company to set the right tone and model our commitment to integrity and honesty at OutSystems. Doing the right thing as a manager includes:



Speaking up when you see a problem, never discouraging and always encouraging others to do the same.



Ensuring those who report to you understand this Code and know the laws, regulations and policies that apply to their work and areas of responsibility.



Always being receptive to questions and comments and directing issues and areas of concern with appropriate urgency to people who can help.



Our Principles

Customer Success and Serving Our Customers

Our mission at OutSystems is to help every company innovate through the power of software and our passion is customer success! We put our customers first while we excel in our work and keep building value in our Company. Our customers continue to use our products and services and laud our accomplishments because we have great products and because we hold ourselves to the very highest standards of service and integrity. They trust us to act according to the principles outlined in our Code of Conduct and in so doing we earn and deliver on that trust.



Respect in our Workplace and Supporting Each Other

Diversity and Equal Employment Opportunity

We recognize that it is important to have a diverse and inclusive workplace. The diversity of our teams is a tremendous asset to our ability to be creative and open to finding new solutions together and challenging the status quo in a safe and supportive workplace. Our employees have the opportunity at OutSystems to reach their fullest potential and are expected to do their best to create a supportive work environment free of harassment, intimidation, bias and unlawful discrimination. We are firmly committed to equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment of any kind on the basis of race, color, religion, gender, age, sexual orientation, gender identity, national origin, disability, genetic information, pregnancy status, or any other protected characteristic as established by applicable law. The types of characteristics protected by law vary across our global locations.

Safe Workplace, Harassment and Bullying

The Company strives to provide OutSystems Personnel with a safe, secure and healthy work environment. We do not tolerate violence and threatening behavior. Discrimination, harassment and bullying in any form, verbal, physical, sexual or otherwise, through any means is prohibited.

Each of you has the responsibility for maintaining a safe, secure and healthy work environment. If you have a good faith complaint or concern about a suspected or actual violation of this Code, you should report it promptly. For further guidance, consult the OutSystems Global Policy Prohibiting Workplace Discrimination, Harassment, and Bullying.



Health and Safety

Individuals are expected to follow all health and safety rules. OutSystems Personnel should report to work in a condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs or inappropriate or excessive use of alcohol in the workplace will not be tolerated. Possession and use of weapons are not permitted in the workplace.

If you see something suspicious or unsafe, speak up and say something by reporting accidents, injuries, and unsafe equipment, practices, or conditions.

Modern Slavery and Human Trafficking

OutSystems is committed to conducting our business in a manner consistent with all applicable employment and human rights laws, rules, and regulations wherever we operate. We have a zero-tolerance policy for the use of child labor, forced or indentured labor, or for human trafficking practices. We will not knowingly do business with business partners, vendors or suppliers who engage in these practices. OutSystems Personnel are prohibited from using unlawful forced labor or child labor or engaging in human trafficking practices when performing services for or on behalf of the Company. OutSystems Personnel are expected to abide by such restrictions and are required to report any potential violations of labor or human trafficking laws of which they become aware.



Transparency, Fairness, & Integrity

Conflicts of Interest

All OutSystems Personnel should be scrupulous in avoiding situations that present a potential or actual conflict between their interest and the best interest of OutSystems. A conflict of interest may occur if your outside activities or personal relationships influence or appear to influence your ability to make objective and effective decisions in the course of your job responsibilities. You owe a duty to OutSystems to advance its legitimate interests when the opportunity to do so arises.

Conflicts of interest may also arise if you or a member of your family receives improper personal benefits as a result of your position with the Company, whether from a third party or from OutSystems. You must avoid participating in any decision affecting OutSystems directly or indirectly when you, or even someone in your family, might personally benefit. Situations involving a conflict of interest may not always be obvious or easy to resolve. It would be impossible to describe every situation in which a conflict of interest may arise.

The following are examples of situations that may give rise to a potential or actual conflict of interest:

- Financial interests, especially in competitors, customers or suppliers of OutSystems
- Outside work, advisory roles, board seats, starting your own business
- Developing or helping to develop outside inventions that relate to or compete with existing or reasonably anticipated OutSystems products and services
- Taking advantage personally of business or investment opportunities that are discovered through the use of corporate property, business or information
- Working with or for family members

Sometimes conflicts of interest or the appearance of a conflict of interest will develop accidentally or unexpectedly. If you believe you may have a potential conflict of interest, discuss it with your manager right away for assistance in managing the conflict. It is your responsibility to act appropriately until the situation has been addressed. In some cases, the situation presenting a conflict of interest will require review and approval from your manager and the General Counsel.

Please note that such disclosure, which is consistent with your general obligation to act in good faith toward OutSystems, does not include personal or private information that is not strictly necessary and relevant to your ability to perform your duties to OutSystems.



Gifts and Entertainment

Exchanging gifts and entertainment can help build good working relationships with our customers and business partners. In some cases, accepting gifts, entertainment and other business courtesies can create the appearance of a conflict of interest or bias that could influence business decisions or even be seen as a bribe, especially if the value of the gift or business entertainment or courtesy is more than nominal. Before giving or accepting any gift or courtesy, consult with the OutSystems Gifts and Entertainment Policy. Gifts and hospitality received or offered must be done in accordance with the guidelines and procedures set forth therein. This policy should be read in conjunction with the Finance Policy and the Anti-Corruption Compliance Policy especially when gifts and hospitality involve Government Officials as defined in the Anti-Corruption Compliance Policy. Be aware that you may need to obtain prior approval, and in all circumstances, use good judgment. Cash gifts are prohibited. Generally, “token” low value, non-cash gifts are permissible and, as long as any gifts or business entertainment or courtesy is not excessive but is modest, happens infrequently and does not create the appearance of impropriety, it will likely be considered appropriate.

If you have any doubts or questions, please consult with your manager or contact the Compliance Officer and make sure to record all payments, gifts and hospitality accurately and completely.

Anti-Corruption, Bribery and Kickbacks

Bribery is never allowed. The Company is strongly committed to complying with all applicable anti-corruption, anti-bribery and anti-kickback laws. All OutSystems Personnel are strictly prohibited from paying or accepting bribes or kickbacks or from participating in corruption in any form regardless of local laws or customs. OutSystems is subject to a number of local anti-corruption laws, applicable in virtually every jurisdiction where OutSystems conducts business, including the U.S. Foreign Corrupt Practices Act, Portugal's General Regime on Corruption Prevention, and the UK Bribery Act 2010.



A note about relationships with government officials

If you interact with government officials or their representatives on behalf of the Company, you must be especially careful and understand the limits and rules regarding gifts, entertainment and hospitality provided to them. OutSystems does business with government entities in many countries. Relevant laws and regulations are very strict and can subject you and the Company to civil and criminal penalties. Contact the Compliance Officer for approval before offering or providing gifts, meals, entertainment or any other business courtesy no matter how small to government officials or representatives. If you are unsure whether you are doing business with a government entity or official, ask the Compliance Officer or the General Counsel for guidance. Familiarize yourself with the OutSystems Anti-Corruption Compliance Policy and if you have any questions or concerns, contact the Compliance Officer or General Counsel.

Third Parties and Government Contracts

OutSystems Personnel may engage with agents, distributors, resellers, and other third-party intermediaries (collectively, “Business Partners”) but should take care not to engage with Business Partners who have a history or reputation for engaging in unethical or illegal practices or who would otherwise cause reputational damage to OutSystems.

OutSystems engages in business with governmental entities in the US and elsewhere around the world. Doing business in the public sector is highly regulated and government contracting laws are complex. Improper conduct by the Company can result in price reductions, contract cancellation, and suspension or debarment from doing business with such governmental entities. If you have questions about these laws and how they apply to you in your dealings with government customers, contact the Legal Team.

Certain Business Partners will undergo a legal due diligence review. Contact the Compliance Officer if you have any questions on such matters. OutSystems expects its agents, representatives, and certain other business partners to comply with the principles contained in this Code and the OutSystems Business Partner Compliance Guide which is provided to them by OutSystems.



Competition and Fair Dealing

OutSystems strives to outperform its competition fairly and honestly, through our superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing, or utilizing trade secret information that was obtained without the owner's consent or inducing such disclosures by OutSystems Personnel from other companies is prohibited. If you receive another company's confidential or proprietary information by mistake, return or destroy it. You should never misrepresent the quality, features or availability of our products and never take unfair advantage of anyone by manipulating, concealing or abusing confidential or proprietary information, misrepresenting material facts, or engaging in any other unfair dealing. Never do anything illegal or lacking integrity to win business.

There are antitrust and fair competition laws throughout the world meant to protect consumers by prohibiting anti competitive conduct that can restrict free competition. All OutSystems Personnel are expected to follow competition laws throughout the world. Their application in situations is complex, so always contact the Legal Team if you have questions about these laws and how they apply to you.



Maintain Trust and Protect our Assets

Protecting Confidential and Proprietary Information

One of our most important assets is the Company’s confidential and proprietary information. Failure to protect this information could be harmful to OutSystems’ continuing success and useful to our competitors. You must safeguard the Company’s proprietary and sensitive business information, including all confidential and proprietary knowledge, data, or information about OutSystems, its subsidiaries and affiliates. Unauthorized use or distribution of proprietary information violates this Code and other OutSystems policies. It could also be illegal and result in civil or criminal penalties.

By way of illustration, confidential and proprietary information includes, but is not limited to: business plans or strategies; product designs and concepts; financial results; prices and costs; sales and marketing plans; information regarding customers, potential customers and Business Partners of OutSystems, including customer lists, names, representatives

and any non-public information concerning them; employee and supplier information; computer software and programs; any data, reports, analysis, techniques, algorithms, processes, technical information, ideas, trademarks, copyrights, know-how, trade secrets, patents, patent applications or inventions and any other proprietary technology and all of OutSystems proprietary rights therein.

OutSystems Personnel must not disclose, use, lecture on, or publish any such confidential or proprietary information, except as such disclosure, use or publication may be required in connection with your work for OutSystems. Notwithstanding the foregoing, OutSystems Personnel are expected to obtain the Company’s written approval before publishing or submitting for publication any material (written, verbal, or otherwise) that discloses and incorporates any such information.

OutSystems Personnel are expected to take all reasonable

precautions to prevent the inadvertent or accidental disclosure of such information.

All OutSystems Personnel must, upon termination of employment or relationship with OutSystems, return all confidential information to OutSystems, including originals and copies, whether in an electronic format or hard copy. In some cases, the disclosure of any confidential information, even after termination of employment or other relationship, may result in civil liability to the individual.



Confidential Information of Others

Additionally, OutSystems Personnel must maintain the confidentiality of information, including any Protected Health Information (“PHI”) and Personally Identifiable Information (“PII”), entrusted to them by OutSystems customers, suppliers, business partners, and prospective business partners, except when disclosure is either expressly authorized by OutSystems or otherwise required or permitted by law. It is essential that you protect this information.

Protection and Proper Use of Assets

OutSystems provides you with tools and equipment needed to do your job effectively and relies on you to be responsible with them. All OutSystems Personnel should endeavor to protect OutSystems assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the profitability of OutSystems. You are strongly encouraged to immediately report any suspected incident of fraud or theft to your manager or to the Compliance Officer for investigation. Company equipment should not be used for non-Company business, although incidental personal use may be permitted. OutSystems Personnel are expected to adhere to best security practices when using or interacting with Company-owned or managed resources and you should consult the Company’s Security Policies for further information and guidance.

Data Privacy

Customer data, personal data and the systems that process such data must be protected and handled in accordance with all relevant Company security and data privacy policies. The Company safeguards confidential customer data and personal data and limits access only to those people who need it to do their job.

Communications and Social Media

OutSystems Personnel should ensure that their outside communications including online and social media posts do not disclose confidential or proprietary information. When acting in your professional capacity on behalf of the Company, you should take steps to protect OutSystems’ brand and reputation. Before speaking on behalf of the Company, communicating with the press or participating in public speaking engagements, you should contact your manager for guidance and approval if required.



Financial Integrity – Statements and Accounting

All OutSystems books, records, accounts, and financial statements must be maintained in reasonable detail, accurately and completely record information, and properly reflect OutSystems’ transactions and business activities. The Company’s financial, accounting and legal teams are responsible for procedures designed to assure proper internal and disclosure controls, and everyone must follow these procedures. These records must conform to applicable legal requirements and to the OutSystems system of internal controls. Unrecorded or “off the books” funds or assets are prohibited.

Records Management and Retention

All OutSystems Personnel are responsible for the accuracy and integrity of the Company’s documents and records. Documents and records must be retained and destroyed in accordance with the law and the OutSystems Records Management Policy.



Follow the Law

All OutSystems Personnel are expected to understand, respect, and comply with all laws, regulations, policies, and procedures that apply to their positions with OutSystems. This Code complements and does not supersede those requirements. OutSystems Personnel are responsible for talking to their managers to determine which laws, regulations, and Company policies apply to their positions and what training is necessary to understand and comply with them. Should there be any conflict between this Code and any applicable local law, regulation, or policy, the local law or regulation shall prevail.

Anti-Money Laundering

OutSystems prohibits Personnel from engaging in any activity that facilitates money laundering or the funding of terrorist or criminal activities. Please consult the OutSystems Export Control, Trade Sanctions, and Anti-Money Laundering Compliance Policy for additional guidance.

Export Controls and Trade Sanctions

OutSystems is subject to the trade laws of the countries where it operates or conducts business, including the U.S. export control laws and trade sanctions. OutSystems Personnel must comply with all such applicable laws. When delivering products or services internationally you should keep in mind that there may be additional local legal and regulatory requirements. Please consult the OutSystems Export Control, Trade Sanctions, and Anti-Money Laundering Compliance Policy for additional guidance.

Insider Trading

Trading while in possession of material information that is not known to the public (“inside information”) is illegal. OutSystems Personnel who have access to such inside information may not use or share that information for stock trading purposes or for any other purpose except conducting our business. All non-public information about OutSystems is to be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision based on this information is not only unethical, it is also illegal.



Asking Questions, Doing The Right Thing

Asking Questions, Doing The Right Thing

This Code cannot describe or anticipate every situation that will arise. If you find yourself in a situation where you are unsure whether a decision or action is the most appropriate one, you should keep the following steps and questions in mind:

- Make sure you have all the facts. To reach the right solution, you must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Is it the right thing to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your good judgment and common sense. If something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your manager. This is the basic guidance for all situations. In many cases, your manager will be more knowledgeable about the question which can help solve the problem and will appreciate being brought into the decision-making process.
- Seek help from OutSystems resources. In the rare case where it may not be appropriate to discuss an issue with your manager, or where you do not feel comfortable approaching your manager with your question, discuss it with another member of the management team or the Compliance Officer.
- Always ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.



Revision

This Code is reviewed and updated periodically and at least on an annual basis.

Violations

Violation of this Code and its Appendix (applicable to employees in certain specified countries and attached hereto) is grounds for sanction up to and including termination of employment or contractual relationship with just cause or for gross misconduct. Such action is in addition to any civil or criminal liability that might be imposed by any court or regulatory agency.

Related Documents

- Anti-Corruption Compliance Policy
- Gifts and Entertainment Policy
- Whistleblower and Complaint Policy
- Records Management Policy
- Export Control, Trade Sanctions, and Anti-Money Laundering Compliance Policy
- Business Partner Compliance Guide
- Global Policy Prohibiting Workplace Discrimination, Harassment, and Bullying
- IMS Glossary
- Control of Documents Policy



Appendix

Framework

This appendix is an integral part of OutSystems' Code of Conduct and applies to all OutSystems – Software Em Rede S.A. employees.

Pursuant to article 7, paragraph 2, of the General Regime for the Prevention of Corruption ("RGPC") (approved by Decree–Law No. 109–E/2021 of 9 December), the Code of Conduct must specify the disciplinary sanctions that may be applied under the law in the event of non– compliance with the rules contained therein, as well as the criminal sanctions associated with acts of corruption and related offenses.

Crimes of corruption and related offenses and criminal sanctions

According to the RGPC, corruption and related offenses include the crimes of 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 – Software Em Rede S.A. 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 below could lead to its liability:



Legal Type	Description/Penalties
Active Corruption Article 374 of the Penal Code	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. Punishable by imprisonment for up to 5 years or a fine of up to 360 days (€1,800 – €180,000), for individuals. The legal entity can be sentenced to a fine of up to 600 days, between €60,000 and €6,000,000.
Active Corruption with Detriment to International Trade Article 7 of Law No. 20/2008, of April 21	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. Punishable by imprisonment from 1 to 8 years, for individuals. The legal entity can be sentenced to a fine of up to 960 days, between €96,000 and €9,600,000.
Passive Corruption in the Private Sector Article 8 of Law No. 20/2008, of April 21	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. Punishable by imprisonment for up to 8 years or a fine of up to 600 days (€3,000 – €300,000), for individuals. The legal entity can be sentenced to a fine of up to 960 days, between €96,000 and €9,600,000.
Active Corruption in the Private Sector Article 9 of Law No. 20/2008, of April 21	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. Punishable by imprisonment for up to 5 years or a fine of up to 600 days (€3,000 – €300,000), for individuals. The legal entity can be sentenced to a fine of up to 600 days, between €60,000 and €6,000,000.
Undue Offering of Advantage Article 372 of the Penal Code	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. Punishable by imprisonment for up to 3 years or a fine of up to 360 days (€1,800 – €180,000), for individuals. The legal entity can be sentenced to a fine of up to 360 days, between €36,000 and €3,600,000.
Influence Peddling Article 335 of the Penal Code	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. Punishable by imprisonment for up to 5 years or a fine of up to 240 days (€1,200 – €120,000) for individuals. The legal entity can be fined up to 600 days, between €60,000 and €6,000,000.



Legal Type	Description/Penalties
Money Laundering Article 368-A of the Penal Code	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. Punishable by imprisonment for up to 16 years in the case of individuals. The legal entity can be fined up to 1920 days, between €192,000 and €19,200,000.
Fraud in Obtaining a Subsidy or Grant Article 36 of Decree-Law No. 28/84, of January 20	Whoever obtains a subsidy or grant: 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. Punishable by imprisonment from 1 to 8 years in the case of individuals. The legal entity can be fined up to 960 days, between €96,000 and €9,600,000 or even face dissolution.
Fraud in Obtaining a Credit Article 38 of Decree-Law No. 28/84, of January 20	Whoever, when presenting a proposal for the granting, maintenance, or modification of the conditions of a credit intended for an establishment or a company: 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 or incomplete, namely balance sheets, profit and loss accounts, general descriptions of assets, or appraisals; c) Conceals the deteriorations of the economic situation that have occurred since the credit request and that are important for the decision on the request. Punishable by imprisonment for up to 5 years or a fine of up to 200 days (€1,000 – €100,000) for individuals. The legal entity can be fined up to 600 days, between €60,000 and €6,000,000, or even face dissolution.
Misappropriation of Subsidy, Grant, or Subsidized Credit Article 37 of Decree-Law No. 28/84, of January 20	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. Punishable by imprisonment for up to 6 years or a fine of up to 200 days (€1,000 – €100,000) for individuals. The legal entity can be fined up to 720 days, between €72,000 and €7,200,000 or even face dissolution.

The risks of exposure of OutSystems – Software Em Rede S.A. to crimes of corruption and related offenses are included in the Risk Prevention Plan for Corruption and Related Offenses.



Disciplinary sanctions

In addition to the criminal sanctions that may result from the violation of the rules set forth in the Code of Conduct, the following disciplinary sanctions may be applied, depending on the severity of the violation(s) and the employee's level of culpability:

- a) Reprimand.
- b) Recorded reprimand.
- c) Financial penalty.
- d) Loss of vacation days.
- e) Work suspension with loss of salary and seniority.
- f) Dismissal without compensation or severance pay.

For each violation of the Code of Conduct, a report will be prepared identifying the rules violated, the sanction applied, and the measures adopted or to be adopted.