

LOBA®

PPR

Plan for the Prevention
of Corruption Risks and
Related Offences

Version 2024

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1. Introduction

Corruption and related offences significantly threaten the proper functioning of the economy and societal development. Tackling corruption requires a concerted effort across all sectors to foster a culture of integrity and ethics. We must transition from reactive approaches to preventive strategies based on risk management, improving the effectiveness of prevention through transparent and organisation-wide methodologies.

The activities of Globaz S.A., operating under the LOBA brand, are conducted with a firm commitment to legal compliance and adherence to our internal codes and regulations. These are grounded in ethics, responsibility, transparency, rigour, and professionalism.

In this context, we do not tolerate any indication or act of corruption or related offences. We demand that all our employees, agents, partners, or any entity representing us refrain from engaging in such acts.

The reputation and trust placed in LOBA by its clients, suppliers, partners, shareholders, and society greatly depend on the ethical and socially responsible conduct of every community member.

2. Objectives and Scope of the Plan

This plan aims to implement LOBA's commitment to proactively combat and prevent corruption by defining principles and guidelines for avoiding such practices.

The Plan for the Prevention of Corruption Risks and Related Offences develops and enforces the principles and conduct rules in LOBA's Code of Conduct, establishing all employees' standards, regardless of role, employment status, or location.

This plan also aligns with other internal regulatory principles, including the Supplier Code of Conduct and the Sustainable Procurement Policy.

The Plan for the Prevention of Corruption Risks and Related Offences applies to LOBA in all its locations in Portugal.

In addition to applying to all LOBA employees, regardless of their contractual relationship, including directors and shareholders, this plan extends to various stakeholders directly or indirectly involved in LOBA's activities.

3. Definitions

This plan defines corruption as abusing power or function to benefit a third party in exchange for payment or another advantage.

A corruption offence always involves the combination of four elements:

- An action or omission;
- The practice of a lawful or unlawful act;
- The granting of an undue advantage;
- A benefit for the individual or a designated third party.

Criminal sanctions associated with acts of corruption and related offences are, in addition to those provided for in the Penal Code, namely for the crimes of active corruption, passive corruption, undue receipt of advantage, embezzlement, economic participation in business, extortion, abuse of power, misconduct in public office, influence peddling, and money laundering, those established under the legal framework of “Anti-Economic Offences and Offences Against Public Health” for the crimes of fraud in obtaining subsidies or grants, misappropriation of subsidies, grants or credit, and fraud in obtaining credit. Furthermore, they include those set out in the “Criminal Regime for Corruption in International Trade and the Private Sector” for the crimes of active corruption to the detriment of international trade, passive bribery in the private sector, and active corruption in the private sector. Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an incentive for an illegal, ethically improper action or a breach of trust. These incentives may include gifts, loans, fees, rewards, or other benefits.

LOBA defines improper conduct as behaviour that, among other things, includes the following actions:

- Offering, promising, giving, requesting, agreeing to receive, or accepting a bribe, including facilitation payments;
- Offering or receiving gifts that may influence ongoing or completed business transactions;
- Making a donation or sponsorship as a means of obtaining or maintaining an unlawful advantage for the benefit of the company or any of its employees;
- Establishing or maintaining business relationships with LOBA's various stakeholders while being aware that they do not comply with the principles and rules set out in LOBA's Code of Conduct;
- Participating in the assessment and decision-making process regarding business dealings, employees' professional situations, or procurement procedures where there is a risk of conflicts of interest arising or engaging in activities that could create such disputes;
- Providing monetary or financial support to political parties or related entities.

4. Management of Bribery, Corruption, and Related Risk

The measures outlined in the National Anti-Corruption Strategy 2020-2024 were considered in developing this plan.

Accordingly, this plan includes the following key activities:

In coordination with the administrators, the Compliance Officer identifies bribery, corruption, and related risks to which LOBA is exposed at least once a year.

The nature of LOBA's processes and activities, applicable legislation and regulations, codes of conduct, relationships with clients and stakeholders, and ethical principles are key factors in identifying areas of activity vulnerable to corruption and related offences.

Thus, the risk identification process:

- Facilitates the identification of potential bribery and corruption-related events with materially significant impact, considering the nature and characteristics of LOBA's products, services, processes, systems, organisational structure, business segments, and geographic presence;
- Enables the identification of emerging risks and the review of existing ones;

- Allows for prioritising identified risks and their association with the products, activities, processes, or systems they are exposed to.

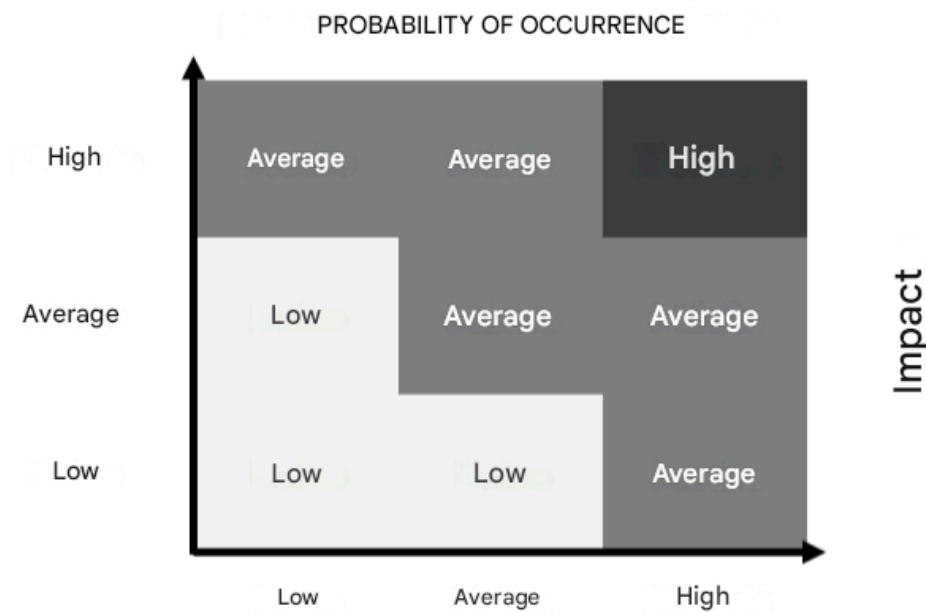
4.1 Risk Assessment Matrix

After identifying the risk, it is assessed at least once a year based on its likelihood of occurrence and impact, as shown in the following tables:

Probability of Occurrence	Low	Average	High
	1	2	3
	Arises from a process that will only occur under exceptional circumstances	Associated with a sporadic process that may happen throughout the year	Arises from a regular and frequent organisational process

Impact	Low	Average	High
	1	2	3
	Damage to organisational performance (customer dissatisfaction, litigation), with limited financial impact	Loss in operations management (credibility and/or confidence of stakeholders, contracts, etc.) with moderate financial impact	Damage to the image and reputation of integrity, as well as to efficiency and performance, has a high financial impact

The combination of the probability of occurrence and the estimated impact determines the exposure (assessment) to risk according to the following matrix:



4.2 Control Mechanisms

For the identified risks, a set of measures has been implemented to reduce the probability of their occurrence and the extent of their impact.

Alongside these measures, it is also important to highlight that LOBA has a set of global controls which embody the company's fundamental principles and values and reinforce its unwavering stance against corruption and related offences. These include:

- LOBA Code of Conduct;
- Supplier Code of Conduct;
- Gifts and Hospitality Policy.

4.3 Risk and Control Matrix

The Risk and Control Matrix (RCM) presented below identifies 12 risks across LOBA's different areas of activity, which have been analysed in terms of their probability of occurrence and impact. In addition, for each of these risks, the respective mitigation controls, applicable prevention policies, and existing mitigation measures are also identified.

Following the previously outlined criteria, the risks are:

Responsible	Risk	Risk Assessment			Preventive and Corrective Measures
		Impact	Probability	Risk Exposure	
CSSO	Inadequate payments through intermediaries such as Strategic Advisors, Business Developers, Partners, etc. (excluding co-contractors and subcontractors) to obtain a client/tender	High	Low	Medium	Ensuring compliance with payment and procurement procedures: - Segregation of duties between teams proposing payments and those processing them; - Payment correspondence to specific documents; - Approval limits for supplier documents as per budgets; - Additional approval for purchases not included in the budget. - Conducting training sessions on anti-corruption and awareness-raising actions for employees.
DAN	Inappropriate gifts or payments related to contract awarding	High	Low	Medium	The allocation of gifts or invitations is subject to a prior approval process with different levels whenever certain reference limits outlined in the global hospitality and gifts policy are exceeded. All gifts and invitations exceeding the reference value must be duly recorded and documented. All employee expenses are subject to limits and approvals as defined in the Travel Policy.
DAN	Conflict of interest and/or influence peddling in the context of public tenders	Medium	Low	Low	Clients with whom a business relationship is intended must undergo a Know Your Client process, which includes a risk assessment of both the client and the specific project. The allocation of gifts or invitations is subject to a prior approval process with different levels whenever

					certain reference limits outlined in the global hospitality and gifts policy are exceeded. All gifts and invitations exceeding the reference value must be duly recorded and documented. Conducting training sessions on conflict of interest and awareness-raising actions for employees.
DAN	Conflict of interest and/or influence peddling in the context of private tenders	Medium	High	Medium	A conflict-of-interest policy exists, including assessing conflicts of interest between clients or candidates. This policy considers additional approval levels according to the risk. The allocation of gifts or invitations is subject to a prior approval process with different levels whenever certain reference limits outlined in the global hospitality and gifts policy are exceeded. All gifts and invitations exceeding the reference value must be recorded and documented. Conducting training sessions on conflict of interest matters and raising awareness actions for employees.
CSSO	Issuing a fictitious invoice for a client above/below the established amount in exchange for an undue advantage	High	Low	Medium	Ensuring compliance with payment and procurement procedures: - Segregation of duties between teams proposing payments and those processing them; - Payment correspondence to specific documents; - Approval limits for supplier documents as per budgets; - Additional approval for purchases not included in the budget.

					Conducting training sessions on anti-corruption and awareness-raising actions for employees.
Admin	Lobbying with public decision-makers to favour LOBA	High	Medium	Medium	Existence of a Global Code of Conduct, mandatory for all employees. Existence of a conflict-of-interest policy, including an assessment of conflicts of interest involving politically exposed persons (PEPs), close associates of PEPs - clients and prospective clients. Conducting training sessions on anti-corruption, conflict of interest, and awareness-raising actions for employees. Employees intending to hold external roles must submit a declaration for approval.
DAN	Influencing the outcome of the project	Medium	Low	Low	Existence of a Global Code of Conduct, mandatory for all employees. Regular qualitative review process for projects.
CSSO	Payment of a fictitious service or over-invoicing in exchange for an undue advantage	High	Low	Low	Existence of a Supplier Code of Conduct. Ensuring compliance with payment and procurement procedures: - Segregation of duties between teams proposing payments and those processing them; - Payment correspondence to specific documents; - Approval limits for supplier documents as per budgets; - Additional approval for purchases not included in the budget. Conducting training sessions on anti-corruption and awareness-raising actions for employees.

CTO	Procedures for recovering information and operations in case of disaster	High	High	High	Supplier Code of Conduct. Developing a Disaster Recovery Plan. Conducting training sessions and awareness-raising actions for employees.
CTO	Management of IT access, particularly regarding password confidentiality and access to systems containing restricted information	High	High	High	Existence of a Global Code of Conduct, mandatory for all employees. Policy – Development of an Information Security Manual. User Access Audit.
CTO	Website vulnerabilities to intrusions that may compromise their availability or the confidentiality/integrity of information	High	High	High	Analysis supported by Cyber Security tools. Policy – Development of an Information Security Manual.
CTO	Management of material assets, specifically IT equipment	Low	Medium	Medium	Existence of a Global Code of Conduct, mandatory for all employees. Policy on hardware, software, and office supplies.

5. Monitoring, Evaluation, and Oversight of the PPR

The monitoring of the plan is ensured through periodic reviews and controls, as well as the implementation and documentation of evidence regarding their execution.

Additionally, under the provisions of points a) and b) of paragraph 4 of Article 6 of Decree-Law No. 109-E/2021 of 9 December, the execution of the PPR is subject to further controls, namely:

Under the supervision of the Board of Directors, the Compliance Officer (CPO) must prepare an annual execution report on this plan at the end of each calendar year. This report must include, in particular, a quantification of the degree of implementation of the identified preventive and corrective measures and an estimate for their full implementation.

The annual execution report must be submitted to the Board of Directors.

It is also worth noting that the PPR is reviewed every three years or whenever a change in LOBA's responsibilities, organisational structure, or corporate structure justifies its revision.

6. Final Provisions

LOBA's PPR, as stipulated in paragraph 6 of Article 6 of the previously mentioned legal decree, will be made available within 10 days of its implementation, revisions, or drafting on LOBA's Connect platform, as well as on its official website in the *bfiercelypositive* section at <https://www.loba.com/bfiercelypositive>. In addition to the PPR, the interim and annual evaluation reports will be made available through the same channels.

7. Annex

7.1 Applicable Crimes/Offences (Following the Penal Code)

List of Offences		
Corruption		
Unlawful Receipt of an Advantage	Article 372.º of the Penal Code	A public official who, in exercising their functions or due to them, either directly or through an intermediary, with their consent or ratification, requests or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage that is not rightfully due.
		Anyone who, either directly or through an intermediary, with their consent or ratification, gives or promises a patrimonial or non-patrimonial advantage to a public official or to a third party on their indication or with their knowledge, which is not rightfully due, in the exercise of their functions or due to them.
Passive Corruption	Article 373.º of the Penal Code	A public official who, either directly or through an intermediary, with their consent or ratification, requests or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage or its promise in exchange for any act or omission contrary to the duties of their position, even if the advantage is not rightfully due.
Passive Corruption in the Private Sector	Article 8.º of the Penal Regime for Corruption in International Business and the Private Sector	A private sector worker who, either directly or through an intermediary, with their consent or ratification, requests or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage that is not rightfully due, or its promise, in exchange for any act or omission that constitutes a violation of their professional duties.
Active Corruption	Article 374.º of the Penal Code	Anyone who, either directly or through an intermediary, with their consent or ratification, gives or promises a public official or a third party on their indication or with their knowledge, a patrimonial or non-patrimonial advantage or its promise, in exchange for any act or omission contrary to the duties of their position.
Active	Article 7.º of the	Anyone who, either directly or through an

Corruption with Detriment to International Trade	Penal Regime for Corruption in International Business and the Private Sector	intermediary, with their consent or ratification, gives or promises a public official, whether national, foreign, or from an international organisation, or a political officeholder, national or foreign, or a third party with their knowledge, a patrimonial or non-patrimonial advantage, which is not rightfully due, to obtain or maintain a business, contract, or any undue advantage in international trade.
Active Corruption in the Private Sector	Article 9.º of the Penal Regime for Corruption in International Business and the Private Sector	Anyone who, either directly or through an intermediary, with their consent or ratification, gives or promises a patrimonial or non-patrimonial advantage, which is not rightfully due, to pursue an unlawful purpose as outlined in Article 8.
Related Offences		
Embezzlement	Article 375.º of the Penal Code	A public official who unlawfully appropriates money or any other movable or immovable property, animals, public or private securities they hold or have access solely due to their functions.
Misuse of Use	Article 376.º of the Penal Code	A public official who uses or allows another person to use, for purposes unrelated to those for which they are intended, real estate, vehicles, other movable property, or animals of appreciable value, whether public or private, which have been entrusted to them, are in their possession, or have been made accessible due to their functions, or who, without special reasons of public interest justifying it, diverts public funds intended for public use to a purpose other than that to which they are legally allocated.
Economic Participation in Business	Article 377.º of the Penal Code	A public official who: - To obtain an illicit economic benefit for themselves or a third party causes patrimonial damage in a legal transaction to interests that they are responsible for administering, overseeing, defending, or executing, in whole or in part, due to their role; - In any way, receives for themselves or a third party a patrimonial advantage resulting from a civil-legal act concerning interests over which they had, by their functions at the time of the act, full or partial control, administration, or oversight or - Receives for themselves or a third party, in any way, a patrimonial advantage resulting from the collection, raising, liquidation, or payment of amounts that, due to their functions, they are fully or partially responsible for ordering or executing, even if there is no damage to the Public Treasury or the interests entrusted to them.

Concussion	Article 378.º of the Penal Code	A public official who, in the exercise of their functions or by abusing the powers derived from them, either directly or through an intermediary with their consent or ratification, receives for themselves, for the state, or a third party by inducing an error or exploiting the victim's error, a patrimonial advantage that is not due, or that exceeds the legally established amount, namely in the form of a contribution, tax, fee, emolument, fine, or penalty.
Refusal of Cooperation	Article 381.º of the Penal Code	A public official who, having received a lawful request from a competent authority to provide due cooperation to the administration of justice or any public service, refuses to provide it or unjustifiably fails to do so.
Abuse of Power	Article 382.º of the Penal Code	A public official who abuses their powers or violates duties inherent to their role to obtain an illegitimate benefit for themselves or a third party or cause harm to another person.
Bribery	Article 363.º of the Penal Code	Anyone who persuades or attempts to persuade another person, through gifts or the promise of a patrimonial or non-patrimonial advantage, to provide false testimony or a false statement in a judicial proceeding, to give a false expert opinion, interpretation, or translation, even if these acts are not ultimately committed.
Denial of Justice and Malfeasance	Article 369.º of the Penal Code	A public official who, in the context of an investigative, judicial, administrative offence, or disciplinary process, knowingly and unlawfully promotes or fails to promote, conducts, decides or fails to decide, or performs an act in the exercise of powers derived from the position they hold.
Influence Peddling	Article 335.º of the Penal Code	Anyone who, either directly or through an intermediary with their consent or ratification, solicits or accepts, for themselves or a third party, a patrimonial or non-patrimonial advantage or its promise to abuse their real or supposed influence over any public entity. Anyone who, either directly or through an intermediary with their consent or ratification, gives or promises a patrimonial or non-patrimonial advantage to the persons referred to in the previous paragraph to obtain any illicit favourable decision.
Breach of Secrecy	Article 383.º of the Penal Code	A public official who, without proper authorisation, discloses a secret that they have become aware of or that has been entrusted to them in the exercise of their functions, or whose knowledge was facilitated by the position they hold, to obtain a benefit for themselves or another person or with

		the awareness that it may cause harm to the public interest or third parties.
Violation of Secrecy	Article 385.º of the Penal Code	A public official who unlawfully, to prevent or interrupt public service, abandons their duties or neglects their fulfilment.
Usurpation of Functions	Article 358.º of the Penal Code	Anyone who: - Without proper authorisation, exercises functions or performs acts exclusive to a public official or public security force, explicitly or implicitly claiming such status; - Exercises a profession or performs an act exclusive to a profession for which the law requires a title or fulfilment of certain conditions, explicitly or implicitly claiming to have such a title or fulfil the conditions when they do not; or - Continues to exercise public functions after being officially notified of dismissal or suspension from their duties.
Conflict of Interest		
Cases of Impediment	Article 69.º of the Code of Administrative Procedure	Holders of public administration bodies and their agents, as well as any other entities exercising public powers regardless of their nature, may not intervene in administrative proceedings or any public or private law act or contract of the public administration in the following cases: a) When they have an interest in the matter, whether directly, as representatives, or as business managers of another person; b) When their spouse or a person with whom they live in a relationship similar to marriage, a relative or in-law in a direct line or up to the second degree in the collateral line, or any person with whom they share a typical household or have a relationship of adoption, guardianship, or civil sponsorship, has an interest in the matter, whether directly or as representatives or business managers of another person; c) When they, either directly or as representatives or business managers of another person, have an interest in a matter similar to the one to be decided, or when such a situation applies to a person covered by the previous paragraph; d) When they have intervened in the procedure as an expert or legal representative or have provided an opinion on the issue to be resolved; e) When their spouse or a person with whom they live in a relationship similar to marriage, a relative or in-law in a direct line or up to the second degree in the collateral line, or any person with whom they share a typical household or have a relationship of adoption, guardianship, or civil sponsorship, has

		intervened in the procedure as an expert or legal representative; f) When the case involves an appeal of a decision issued by them, with their intervention, or issued by any persons referred to in paragraph (b) or with their intervention.
Exemption and Recusal	Article 73.º of the Code of Administrative Procedure	Holders of public administration bodies and their agents, as well as any other entities exercising public powers regardless of their nature, may not intervene in proceedings or any public or private law act or contract of the public administration when there are circumstances that may reasonably cause serious doubt about their impartiality in conduct or decision, including: a) When a relative or in-law in a direct line or up to the third degree in the collateral line, or a ward or person under the guardianship of the official, their spouse, or a person with whom they live in a relationship similar to marriage, has an interest in the matter, either directly or as a representative or business manager of another person; b) When the official, their spouse, or a person with whom they live in a relationship similar to marriage, or a relative or in-law in a direct line, is a creditor or debtor of an individual or legal entity with a direct interest in the proceeding, act, or contract; c) When the official, their spouse, or a person with whom they live in a relationship similar to marriage, or a relative or in-law in a direct line, has received gifts before or after the procedure was initiated; d) If there is profound enmity or close intimacy between the official, their spouse, or a person with whom they live in a relationship similar to marriage, and the person with a direct interest in the proceeding, act, or contract; e) When legal action is pending between the official, their spouse, or a person with whom they live in a relationship similar to marriage, a relative in a direct line or a person with whom they share a typical household on one side, and, on the other, the interested party, their spouse, or a person with whom they live in a relationship similar to marriage, a relative in a direct line, or a person with whom they share a typical household.
Accumulation of Public Functions with Private Activities	Article 22.º of the General Law on Public Employment	The exercise of public functions may not be accumulated with private functions or activities, whether performed under self-employment or as a subordinate worker, with or without remuneration if they are competitive, similar, or conflicting with public functions. Private activities are considered competitive, similar, or conflicting with public functions when they have content identical to the public functions

		performed, are carried out permanently or habitually, and target the same group of recipients. In performing authorised private functions or activities, public administration employees may not engage in any acts contrary to or conflicting with the interests of the service to which they belong.
Specific Prohibitions	Article 24.º of the General Law on Public Employment	Workers may not, either personally or through an intermediary, provide services to third parties under self-employment or as a subordinate worker in the study, preparation, or financing of projects, applications, or requests that must be submitted for their review or decision, or for the review of bodies or services under their direct influence. Workers may not personally and improperly benefit from acts or participate in contracts in whose formation process bodies or organizational units under their direct influence are involved. Entities considered to be under the direct influence of the worker include those that: a) Are subject to their authority, supervision, or oversight; b) Exercise powers delegated or subdelegated by them; c) Have been established by them, or whose head they have been involved in appointing as a representative of the public employer, specifically to intervene in the relevant procedures; d) Are wholly or partially composed of employees designated by them; e) Have, within the past year, received a salary benefit or performance evaluation recognition in a process where the worker was involved; f) Collaborate with them at the same hierarchical level within the same body or service. For the purposes of the above prohibitions, the following are considered equivalent to the worker: a) Their spouse (if not legally separated), ascendants and descendants in any degree, collateral relatives up to the second degree, and a person with whom they live in a de facto union; b) A company in which the worker holds, directly or indirectly, alone or jointly with the persons referred to in the previous point, a stake of at least 10% in the capital.

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