

ODDS:GATE

**PLAN FOR THE
PREVENTION OF RISKS
OF CORRUPTION AND
RELATED INFRACTIONS**

Oddsgate, S.A.

April 2025

(English Translation)

TABLE OF CONTENT

1. INTRODUCTION

2. OBJECTIVES

3. ODDSGATE - COMPANY, ACTIVITIES AND VALUES

4. GUIDING PRINCIPLES FOR THE PREVENTION OF CORRUPTION RISKS AT ODDSGATE

- 4.1. Collective Responsibility in the Prevention of Corruption Risks
- 4.2. Integrating Corruption Prevention with Business Strategy
- 4.3. Supervision and Monitoring Risk Management
- 4.4. Commitment to Ethical Standards and Compliance
- 4.5. Developing a Culture of Integrity and Transparency
- 4.6. Responsible investment management and resource (allocation) management
- 4.7. Human Capital Development and Ethical Leadership
- 4.8. Risk Prevention and Management with Diversity and Equity
- 4.9. Transparent Communication and Stakeholder Relations
- 4.10. Promotion of Governance and Compliance Platforms

5. ODDSGATE ORGANIZATIONAL STRUCTURE

6. IDENTIFICATION, ANALYSIS AND ASSESSMENT OF RISKS OF CORRUPTION AND RELATED OFFENSES

- 6.1. Corruption and related offenses
 - 6.2. Risk identification and assessment methodology
 - 6.2.1. Methodology
 - 6.2.2. Risk areas
 - 6.3. Control measures and mechanisms
-

7. MONITORING, EVALUATION AND REVISION OF THE PLAN FOR THE PREVENTION OF RISKS

- 7.1. Monitoring - the Regulatory Compliance Officer
 - 7.2. Evaluation
 - 7.3. Review
 - 7.4. Entry into force
-

Annex I - ODDSGATE ORGANIZATIONAL STRUCTURE

Annex II - CORRUPTION AND RELATED INFRINGEMENTS RISK MATRIX

Annex III - CONCEPTS OF CORRUPTION AND RELATED INFRINGEMENTS

Annex IV - CODE OF CONDUCT

Annex V - INTERNAL COMPLAINTS CHANNEL

Annex VI - TRAINING PLAN

1. INTRODUCTION

As a result of the National Anti-Corruption Strategy 2020-2024, Decree-Law no. 109-E/2021 of December 9th (“DL 109-E/2021”) was published in the Official Gazette, establishing the National Anti-Corruption Mechanism (“**MENAC**”) and approving the General Regime for the Prevention of Corruption (“**RGPC**”).

The RGPC requires entities obliged to comply to adopt and implement a Regulatory Compliance Program (“NCP”) in order to prevent, detect and sanction any acts of corruption and related infractions carried out against or through the entity in question.

The Regulatory Compliance Program, pursuant to Article 5 of the RGPC, must include at least the following elements:

- (i) a plan to prevent risks of corruption and related offenses;
- (ii) a code of conduct;
- (iii) a training program; and
- (iv) a whistleblowing channel.

In accordance with the above and in order to fulfil the aforementioned legal requirements, ODDSGATE, S.A. (“ODDSGATE”) has drawn up this **Corruption Risk Prevention Plan** (“PPR”), whose applicability is transversal to the entire organization of the ODDSGATE Group and its activity, and is therefore applicable to:

- (i) all ODDSGATE employees, i.e. any persons who, regardless of their relationship and the territory in which they are located or operate, perform duties for the company, whether in their relations with each other or with customers, suppliers, shareholders and other stakeholders; and
- (ii) consultants, agents, representatives or any persons who represent and/or act in the name of and on behalf of ODDSGATE and who are related to ODDSGATE.

2. OBJECTIVES

By drawing up this PPR, ODDSGATE is reinforcing its commitment to promoting ethical, responsible and transparent action as a way of being in the business in which it operates, establishing as the main objectives of its implementation:

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- (i)** Identify, analyse and classify the situations and risks of corruption and related infractions to which ODDSGATE may be exposed;
 - (ii)** Develop and implement preventive and corrective measures to control and mitigate the risks identified, so as to minimise both the likelihood of their occurrence and the impact of their effects;
 - (iii)** Increase employee awareness and training; and
 - (iv)** Ensure compliance with applicable legal and regulatory obligations.
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3. ODDSGATE - COMPANY, ACTIVITIES AND VALUES

ODDSGATE is a public limited company **incorporated and registered** in Portugal since 2021, which belongs to a wider group of other commercial companies spread across several jurisdictions in different countries known as the Oddsgate Group.

Oddsgate's main **business activity** is computer programming, the creation of online sites and the development of applications for mobile devices both inside and outside the universe of companies to which it belongs.

Within the scope of its commercial activity, ODDSGATE is guided by its **values**, both in the relationships it establishes with its employees and with third parties:

- (i) human development**, placing people's dignity at the centre of decisions, contributing to the development of their capacities and encouraging autonomy and continuous learning;
- (ii) innovation**, fostering an entrepreneurial culture and an awakened mindset in the constant search for new solutions and value-creating opportunities;
- (iii) competence**, encouraging a permanent attitude of proactivity through individual responsibility and teamwork, striving for excellence and consistency;
- (iv) integrity**, promoting ethical and honest behaviour and creating relationships of trust and loyalty, treating everyone fairly and truthfully.

ODDSGATE adopts a zero-tolerance policy towards any type of act that does not comply with the applicable legal and regulatory rules and guarantees its willingness to collaborate with the authorities in order to eliminate such practices.

Therefore, it has implemented and will continue to implement and improve policies and procedures to prevent and mitigate, to the greatest extent possible, the risk of illicit practices occurring in its activities and will also adopt the necessary policies and procedures to detect any such occurrences and to report them to the competent authorities (including, among others, in matters of competition and data protection).

ODDSGATE also undertakes to periodically review and adapt its internal procedures and mechanisms, and immediately whenever they prove to be inadequate, safeguarding their alignment with legal requirements and best market practices.

4. GUIDING PRINCIPLES FOR THE PREVENTION OF CORRUPTION RISKS AT ODDSGATE

4.1. Collective Responsibility in the Prevention of Corruption Risks:

Managing corruption risks is a responsibility shared by all ODDSGATE employees at all levels of the organization. Every member of the company must be committed to identifying and preventing corrupt practices, ensuring the integrity of operations.

4.2. Integrating Corruption Prevention with Business Strategy:

ODDSGATE adopts a risk management process, which includes identifying and controlling corruption risks in all its business areas, with the aim of guaranteeing the continuity of operations without compromising the ethics and principles of the organization.

4.3. Supervision and Monitoring Risk Management:

The person responsible for the direct supervision of risk management, including corruption risks, must ensure that ODDSGATE implements processes to identify, assess and control corruption risks that could impact the integrity and reputation of ODDSGATE and its stakeholders.

4.4. Commitment to Ethical Standards and Compliance:

ODDSGATE guarantees that all its activities are carried out in accordance with high ethical standards, ensuring that corrupt behaviour is prevented and avoided, and that all operations comply with current legislation and best corporate governance practices.

4.5. Developing a Culture of Integrity and Transparency:

ODDSGATE is committed to promoting an organizational culture that values integrity and transparency, ensuring that all its workers/collaborators, at all levels, understand the importance of avoiding any form of corruption or unethical practice.

4. GUIDING PRINCIPLES FOR THE PREVENTION OF CORRUPTION RISKS AT ODDSGATE

4.6. Responsible investment management and resource (allocation) management:

ODDSGATE adopts a rigorous approach to the evaluation and management/ allocation of investments, ensuring that all capital reallocation processes and new investments are made in an ethical and transparent manner, without favouring personal interests or involving corrupt practices.

4.7. Human Capital Development and Ethical Leadership:

The company invests in the continuous development of human capital, with a focus on training managers with ethical excellence. Promoting a culture of transparent and responsible leadership is fundamental to prevent any risk of corruption in the group's operations.

4.8. Risk Prevention and Management with Diversity and Equity:

Corruption risk management must be carried out in an inclusive manner, ensuring that prevention practices involve diverse teams and that the leadership of all ODDSGATE departments is committed to ethics and the values of transparency and accountability.

4.9. Transparent Communication and Stakeholder Relations:

ODDSGATE is committed to maintaining transparent communication with all stakeholders, including investors, partners and clients. Building relationships based on trust and ethics is essential to avoiding corrupt practices and ensuring a healthy and sustainable business environment.

4.10. Promotion of Governance and Compliance Platforms:

The company opts for governance and compliance principles that ensure that all risk management processes, including those related to corruption, are effective and that all employees have access to prevention and training resources.

5. ODDSGATE ORGANIZATIONAL STRUCTURE

ODDSGATE is organized as described in **Annex I.**

The decisions made at ODDSGATE are in line with the objectives and values of the ODDSGATE Group and are ultimately the responsibility of the Board of Directors who, together with the internally designated, for purely practical purposes, “Executive Committee” (made up of the main people responsible for each of ODDSGATE’s business areas), define ODDSGATE’s options and vision. In addition to its other responsibilities, the Board of Directors, also has the mission of defining, pursuing and supervising ODDSGATE’s policies, strategies, direction and management.

6. IDENTIFICATION, ANALYSIS AND ASSESSMENT OF RISKS OF CORRUPTION AND RELATED OFFENSES

6.1. Corruption and related offenses

Although there is no definition of corruption that is common to all countries, there is a consensus that corrupt conduct involves the abuse of a power or function in order to benefit a third party, against payment of a sum or other type of advantage, which is sanctioned in the Portuguese legal system, both in the Penal Code and in other separate legislation.

For the purposes of applying the RGPC, and taking into account the provisions of its Article 3., “*corruption and related offenses*” means the crimes of (i) corruption, (ii) undue receipt and offering of an advantage, (iii) embezzlement, (iv) economic participation in business, (v) concussion, (vi) abuse of power, (vii) influence peddling, (viii) money laundering and (ix) fraud in obtaining or diverting a subsidy, grant or credit, as provided for and punished in the following legislation: the Penal Code, the Regime for Crimes Against Political Office Holders, the Code of Military Justice, the Regime for Criminal Liability for Unsportsmanlike Behaviour, the Regime for Criminal Liability for Crimes of Corruption in International Trade and Private Activity and the Regime for Anti-economic Offenses and Offenses against Public Health.

For ease of reference, a list of the above types of crime is attached as **Annex III.**

6. IDENTIFICATION, ANALYSIS AND ASSESSMENT OF RISKS OF CORRUPTION AND RELATED OFFENSES

6.2. Risk identification and assessment methodology

6.2.1. Methodology

This PPR was drawn up in strict compliance with the applicable legal regulations and MENAC guidelines, in accordance with the following methodology:

- (i) Analysis of ODDSGATE's main activities with** a view to identifying the **risks of committing acts of corruption and related offenses** associated with each of them;
- (ii) Classification of risks**, according to a risk scale, based on the combination of the probability of occurrence and the degree of foreseeable impact of each situation, so as to allow the risks to be graded.
- (iii) Identification of preventive and corrective measures** to control the probability of occurrence and/or the impact of the risks identified.

6.2.2. Risk areas

Regarding the activities and/or processes carried out by the different **areas of ODDSGATE, the following were identified as being most exposed to the risks of corruption and related infractions:**

- (i)** Relations with suppliers of goods and services
- (ii)** Attracting / Hiring Customers and Maintaining Business Relationships with Pre-Existing Customers
- (iii)** Employee relations
- (iv)** Payments and receipts
- (v)** Accounting and invoicing
- (vi)** Financial management
- (vii)** Allocation and receipt of gifts
- (viii)** Donations and sponsorships

6. IDENTIFICATION, ANALYSIS AND ASSESSMENT OF RISKS OF CORRUPTION AND RELATED OFFENSES

6.2.3. Risk classification

Risks were assessed and classified according to a judgment based on a **combination of the likelihood of risk situations occurring and the degree of severity of their occurrence**, specifically with regard to the economic, operational and reputational effects resulting from them.

For this purpose, these criteria (probability and impact) should be weighted according to the following scales:

The **probability of occurrence** was assessed according to the following metrics:

Low: the event is not likely to occur or only occurs in exceptional circumstances and can be remedied with the control measures in place

Moderate: the event may occur sporadically and can be prevented or controlled, even with the use of additional control measures

High: the event may occur regularly and/or with minimal possibility of prevention or control, even if additional control measures are taken

The impact was graded as follows:

Low: damage with very limited financial impact and no external visibility

Moderate: damage with some financial losses and limited impact on reputation and image

High: damage with a high financial impact and harm to reputation and image

The correlation **of** these two variables results in a **risk matrix or ranking with three (3) classification levels:** Low (B), Moderate (M) or High (A):

IMPACT (IP)	PROBABILITY OF OCCURRENCE (PO)		
	Low	Moderate	High
Low	Low (B)	Low	Moderate (M)
Moderate	B	M	High (A)
High	M	A	A

6. IDENTIFICATION, ANALYSIS AND ASSESSMENT OF RISKS OF CORRUPTION AND RELATED OFFENSES

6.3. Control measures and mechanisms

For the identified risks, a set of measures has been implemented (or is in the process of being implemented) to either reduce the likelihood of occurrence or mitigate the impact of their occurrence.

These measures, described in **Annex II** to this PPR, apply to the various risk situations identified and classified according to the aforementioned risk matrix.

In addition to these measures, ODDSGATE is progressively implementing an integrated compliance programme, under which various documents are being drawn up and approved to establish control mechanisms that cut across the entire organization and its activities, specifically with regard to the prevention of corruption and related infractions.

These documents include, namely, the following:

- Code of Conduct
- Whistleblowing policy and channel

ODDSGATE already has an internal complaints channel, under the terms of the RGPC and Law no. 93/2021, of December 20th, whose regulation is set out in the following provisions (also within the scope of the ODDSGATE Group):

- Whistleblowing Channel privacy policy.
The whistleblowing channel essentially applies to cases of corruption and related offenses.
- Code of Conduct for accepting clients ("Know Your Client" or "KYC")
- Anti-corruption policy
- Policy for the Prevention of Money Laundering and Terrorist Financing
- Gifts, hospitality and donations policy
- Training Programme

The results of the risk identification and classification analysis, as well as the measures considered most appropriate for their mitigation and/or elimination, are detailed in **Annex II** to this PPR.

7. MONITORING, EVALUATION AND REVISION OF THE PLAN FOR THE PREVENTION OF RISKS

7.1. Monitoring - the Regulatory Compliance Officer

Entities covered by the RGPC have a legal obligation, under the terms of Article 5. of Decree-Law 109-E/2021, to appoint a **compliance officer**, whose role is to guarantee and control the application of the entire PPR.

Likewise, the ODDSGATE Board must **appoint a person responsible for the execution, control and review of the PPR**, both of which may be carried out by the same person, appointed for this purpose.

ODDSGATE has therefore appointed Vasco Bismark, Senior Legal & Compliance Officer, as ODDSGATE's compliance officer for a period of three years (**with the possibility of reappointment**) **and as the person responsible for the execution, control and review of this PPR.**

These duties are carried out independently, on a permanent basis and with decision-making autonomy.

The said appointed individual may be contacted at:
compliance@oddsgate.com

7.2. Evaluation

In addition to the continuous monitoring of its implementation, the PPR is also subject to the following controls, under the terms of the law:

- i) An annual assessment report, drawn up in April of the following year in which the PPR is being implemented, which must include, in particular, a quantification of the degree of implementation of the preventive and corrective measures identified, as well as a forecast of their full implementation;
- ii) A mid-term assessment report, drawn up in October, for situations of high or maximum risk.

7. MONITORING, EVALUATION AND REVISION OF THE PLAN FOR THE PREVENTION OF RISKS

7.3. Review

This PPR will be **reviewed every 3 (three) years** or whenever there is a change in ODDSGATE's duties or organic or corporate structure that justifies its review.

8. ENTRY INTO FORCE

The PPR, including its amendments, as well as the annual and interim evaluation reports will be made available within 10 (ten) days of their implementation, revision or drafting in the internal programme and on ODDSGATE's institutional website.

This version will be published in Portuguese with an English translation. In case of discrepancy between the two, the Portuguese version shall prevail.

Lisbon, April 2025.

ODDSGATE ORGANIZATIONAL STRUCTURE

ODDSGATE S.A.
(Portugal)

Board of Directors

Financial
(Finance Team)

**Operations and
Development
Technology**
(Operation & IT
Development
Team)

**Human
Resources**
(HR Team)

**Legal &
Compliance**
(Legal &
Compliance
Team)

**Marketing
& Business
Development**
(Marketing
& Business
Development
Team)

RISK MATRIX FOR CORRUPTION AND RELATED INFRACTIONS

Activity	Risk Description	Risk Assessment and Classification			Preventive/Corrective Measures
		PO	IP	Classification	
Relations with third-party suppliers of goods and services	Illicit favouritism in the choice of suppliers or service providers	B	B	B	- Segregation of functions between the areas that identify business needs and those that carry out the process of negotiating and acquiring goods and services
	Negotiating and awarding commercial proposals with unfavourable conditions	B	B	B	- Existence of an annual budget for all departments - Reduction of contracts to writing with the support of the Legal and Compliance Department and the Department responsible for contracting
	Purchasing of goods and/or services that exceed real needs and/or at inappropriate prices	B	B	B	- Implementation of a process for negotiating and signing contracts with the intervention of the Legal Department and the Administration. - Requesting quotes from various entities beforehand in order to select the most suitable one for the intended purpose.
	Use and/or disclosure of privileged or confidential information to obtain an advantage and/or benefit for oneself or a third party	B	B	B	- Invoice approval process with different approval levels and departments. - Creation and monitoring of shared document management for mandatory archiving of all contracts signed by ODDSGATE.
	Situations of bribery events, influence peddling and/or offers to private sector workers/employees, with the aim of securing the award of a contract or a business opportunity	B	B	B	- Implementation and reinforcement of specifically prepared internal compliance policies, such as: (i) <i>Anti-bribery Policy</i> ; (ii) <i>Due Diligence Policy</i> ; (iii) <i>Confidential Data & Information Policy</i> . - Code of Conduct. - Internal whistleblowing channel.
Attracting / Hiring Clients and Maintaining Business Relationships with Pre-Existing Clients	Lack of impartiality in the decision to commercialise projects with clients who are related parties or whose project is of personal interest (conflict of interest)	B	B	B	- Creation and monitoring of shared document management for mandatory archiving of all contracts signed by ODDSGATE. - Implementation and reinforcement of internal Compliance policies, specifically prepared, such as: (i) <i>Anti-bribery Policy</i> ; (ii) <i>Due Diligence Policy</i> ; (iii) <i>Confidential Data & Information Policy</i> .

ANNEX II

Relations with Employees	Establishing business relationships with clients who are the subject of investigations and/or judicial decisions in criminal proceedings relating to corruption offenses or related offenses or who are Politically Exposed Persons	M	M	M	<ul style="list-style-type: none"> - Carrying out <i>Know Your Customer</i> (KYC) procedures before establishing any business relationship with a new client and, periodically, for clients with longer contracts and their archive. - Code of Conduct. - Internal whistleblowing channel.
	Accumulation of public/private functions by employees likely to generate conflicts of interest situations	B	B	B	<ul style="list-style-type: none"> - The involvement of more than one department in recruitment processes and, whenever possible, ensuring diversity in the people involved in recruitment processes (involvement of the department responsible for human resources recruitment and at least one member of the Legal Department during the recruitment and selection process). - Division of functions: those responsible for recruitment and selection, those responsible for processing salaries and fees and those responsible for commercial and legal conditions. - Implementation of a performance management model with control levels. - Internal computer program with individualized information, per employee and/or collaborator, with personalized access, on, among other things, their career progression, rights, duties, functional area to which they belong and the immediate superior to whom they should address themselves and the possibility of interaction. - Implementation and reinforcement of <i>internal compliance policies</i>. - Code of Conduct. - Whistleblowing channel.
	Undue favoring/disfavoring candidates in recruitment and selection processes	B	B	B	
	Manipulation of information relating to remuneration and/or benefits and/or fees	B	B	B	
	Manipulation of information relating to worker/employee performance	B	B	B	
Payments and receipts	Approval of expenses incurred by employees and members of management that are not documented, do not fall within the scope of ODDSGATE's activity and/or whose amount is not appropriate taking into account the nature of the expense	B	B	B	<ul style="list-style-type: none"> - Shared internal process for approving expenses and invoices, with different levels of approval and control. - Budget control and account reconciliation. - Auditing the accounts.

ANNEX II

	Misappropriation of funds by employees with powers to operate bank accounts	B	B	B	<ul style="list-style-type: none"> - List of authorized persons and individualized approval and autonomy matrix, with defined levels, for making payments, always requiring prior validation by the finance department, the head of the functional area and a member of the board of directors; - Implementation and reinforcement of <i>internal compliance policies</i>. - Code of Conduct. - Whistleblowing channel.
	Tampering with accounting records in order to obtain an advantage or benefit for oneself or a third party	B	B	B	
	Manipulation of receipt activity to obtain an advantage or benefit for oneself or a third party	B	B	B	
Accounting and invoicing	Alterations and deviations from the financial statements to obtain benefits outside the organization	B	B	B	<ul style="list-style-type: none"> - Regular analysis of accounting headings. - Specialized audit of company accounts. - Whistleblowing channel.
Allocating and receiving gifts	Offering or receiving gifts or similar benefits, whether pecuniary or not, that could affect impartiality and impartiality	B	B	B	<ul style="list-style-type: none"> - Monitoring the offers made and received. - Internal Compliance Policies, specifically prepared such as: (i) <i>Anti-bribery Policy</i>, (ii) <i>Gifts, Hospitality & Donations Policy</i>. - Code of Conduct. - Internal whistleblowing channel.
Allocation of donations and sponsorships	Manipulation of information relating to worker/employee performance	B	B	B	<ul style="list-style-type: none"> - Monitoring the offers made and received. - Implementation and reinforcement of specifically prepared internal Compliance policies, such as: (i) <i>Anti-bribery Policy</i>, (ii) <i>Gifts, Hospitality & Donations Policy</i>. - Code of Conduct. - Internal whistleblowing channel.

CONCEPTS OF CORRUPTION AND RELATED OFFENSES

Legal Diploma	Criminal offense and legal provision	Legal definition
Penal Code	Undue receipt or offer of an advantage (Article 372)	<p>1 - An official who, in the performance of his duties or because of them, by himself or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, a pecuniary or non-pecuniary advantage that is not due to him, shall be punished by imprisonment for up to five years or a fine of up to 600 days.</p> <p>2 - Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises an official, or a third party on their recommendation or knowledge, a pecuniary or non-pecuniary advantage that is not due to them, in the course of their duties or because of them, shall be punished with imprisonment of up to three years or a fine of up to 360 days.</p> <p>3 - The preceding paragraphs do not apply to conduct that is socially appropriate and in accordance with custom.</p>
	Passive corruption (Article 373)	<p>1 - An official who, by him/herself or through an intermediary, with his/her consent or ratification, requests or accepts, for him/herself or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, for the performance of any act or omission contrary to the duties of the office, even if prior to that request or acceptance, shall be punished with imprisonment from one to eight years.</p> <p>2 - If the act or omission is not contrary to the duties of the office and the advantage is not due to him, the agent shall be punished with imprisonment of one to five years.</p>
	Active corruption (Article 374)	<p>1 - Whoever, by himself or through an intermediary, with his consent or ratification, gives or promises to an official, or to a third party on his recommendation or with his knowledge, a pecuniary or non-pecuniary advantage for the purpose indicated in article 373 (1), shall be punished with imprisonment of one to five years.</p> <p>2 - If the purpose is as indicated in Article 373 (2), the perpetrator shall be punished with imprisonment of up to three years or a fine of up to 360 days.</p> <p>3 - Attempt is punishable.</p>
	Embezzlement (in Portuguese "Peculato") (Article 375)	<p>1 - An official who unlawfully appropriates, for his own benefit or for the benefit of another person, money or any movable or immovable property or animal, whether public or private, which has been handed over to him, is in his possession or is accessible to him by reason of his duties, shall be punished with imprisonment for a term of 1 to 8 years, if a more serious penalty does not apply to him by virtue of another legal provision.</p> <p>2 - If the valuables or objects referred to in the previous paragraph are of low value, under the terms of Article 202 (c), the perpetrator shall be punished with imprisonment for up to 3 years or a fine.</p> <p>3 - If the official lends, pledges or in any way encumbers the valuables or objects referred to in paragraph 1, he shall be punished with imprisonment of up to 3 years or with a fine, if a more serious penalty is not imposed by virtue of another legal provision.</p>
	Active corruption (Article 374)	<p>1 - An official who, with the intention of obtaining, for himself or for a third party, illicit economic participation, damages in a legal transaction the property interests which, in whole or in part, he is obliged, by reason of his function, to administer, supervise, defend or realize, shall be punished with imprisonment for up to 5 years.</p> <p>2 - An official who, in any way, receives, for himself or for a third party, a pecuniary advantage as a result of a legal-civil act relating to interests of which he had, by virtue of his duties, at the time of the act, total or partial disposal, administration or supervision, even without harming them, shall be punished with imprisonment for up to 6 months or a fine of up to 60 days.</p>

Penal Code		<p>3 - The penalty provided for in the preceding paragraph shall also apply to an official who receives, for himself or for a third party, in any form whatsoever, a financial advantage as a result of the collection, assembly, liquidation or payment which, by virtue of his duties, in whole or in part, he is charged with ordering or making, provided that there is no damage to the Public Treasury or to the interests entrusted to him.</p>
	Concussion (Article 379)	<p>1 - An official who, in the exercise of his or her functions or de facto powers deriving from them, by himself or herself or through an intermediary with his or her consent or ratification, receives, for himself or herself, for the State or for a third party, through inducement into error or taking advantage of the victim's error, a financial advantage that is not due to him or her, or is greater than that due, namely a contribution, fee, emolument, fine or fine, shall be punished with imprisonment for up to 2 years or a fine of up to 240 days, if a more serious penalty does not apply to him or her under another legal provision.</p> <p>2 - If the act is committed by means of violence or threats of serious harm, the perpetrator shall be punished with imprisonment from 1 to 8 years, if a more serious penalty is not imposed by virtue of another legal provision.</p>
	Abuse of power (Article 382)	<p>1 - An official who, outside the cases provided for in the previous articles, abuses his powers or violates the duties inherent in his functions, with the intention of obtaining, for himself or for a third party, an illegitimate benefit or causing harm to another person, shall be punished with imprisonment up to 3 years or with a fine, if a more serious penalty is not imposed by virtue of another legal provision.</p>
	Denial of justice and prevarication (Article 369)	<p>1 - An official who, in the context of a procedural inquiry, judicial proceeding, administrative offense or disciplinary proceeding, knowingly and against the law, promotes or does not promote, conducts, decides or does not decide, or performs an act in the exercise of powers arising from the office he holds, shall be punished with imprisonment of up to 2 years or a fine of up to 120 days.</p> <p>2 - If the act is committed with the intention of harming or benefiting someone, the official shall be punished with imprisonment of up to 5 years.</p> <p>3 - If, in the case of paragraph 2, a person's liberty is deprived, the perpetrator shall be punished with imprisonment from 1 to 8 years.</p> <p>4 - The penalty provided for in the previous paragraph shall be incurred by an official who, being competent to do so, orders or executes a measure involving deprivation of liberty illegally, or omits to order or execute it in accordance with the law.</p> <p>5 - In the case referred to in the previous paragraph, if the act is committed with gross negligence, the perpetrator shall be punished with imprisonment of up to 2 years or a fine.</p>
	Influence peddling (Article 335)	<p>- Anyone who, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, in order to abuse their influence, real or supposed, with any public entity, national or foreign, shall be punished:</p> <p>a) With imprisonment of 1 to 5 years, if not more severe by virtue of another legal provision, if the purpose is to obtain a favourable unlawful decision;</p> <p>b) With imprisonment of up to 3 years or a fine, if a more serious penalty is not imposed by virtue of another legal provision, if the purpose is to obtain a favourable legal decision.</p> <p>2 - Whoever, by themselves or through an intermediary, with their consent or ratification, gives or promises a pecuniary or non-pecuniary advantage to the persons referred to in the preceding paragraph:</p> <p>a) For the purposes set out in paragraph a), shall be punished with imprisonment for a term of up to 3 years or with a fine;</p> <p>b) For the purposes set out in paragraph b), shall be punished with imprisonment for a term of up to 2 years or a fine of up to 240 days.</p> <p>3 - Attempt is punishable.</p> <p>4 - Article 374b shall apply accordingly.</p>

<p>Penal Code</p>	<p>Laundering (Article 368-A)</p>	<p>1 - For the purposes of the following paragraphs, assets derived from the commission, in any form of co-participation, of typical illegal acts punishable by a prison sentence of a minimum of more than six months or a maximum of more than five years or, regardless of the applicable penalties, of typical illegal acts of:</p> <ul style="list-style-type: none"> a) pimping, sexual abuse of children or dependent minors, or child pornography; b) Computer and communications fraud, extortion, abuse of a guarantee card or payment card, device or data, counterfeiting currency or similar securities, devaluing the value of currency or similar securities, passing counterfeit currency in concert with the counterfeiter or similar securities, passing counterfeit currency or similar securities, or acquiring counterfeit currency to be put into circulation or similar securities; c) Computer forgery, counterfeiting of cards or other payment devices, use of counterfeit cards or other payment devices, acquisition of counterfeit cards or other payment devices, acts preparatory to counterfeiting, acquisition of cards or other payment devices obtained through computer crime, damage to programs or other computer data, computer sabotage, illegitimate access, illegitimate interception or illegitimate reproduction of a protected program; d) Criminal association; e) Terrorist offenses, offenses related to a terrorist group, offenses related to terrorist activities and terrorist financing; f) Trafficking in narcotics and psychotropic substances; g) Arms trafficking; h) Trafficking in persons, facilitating illegal immigration or trafficking in human organs or tissues; i) Damage to nature, pollution, activities dangerous to the environment, or danger to animals or plants; j) Tax fraud or fraud against social security; k) Influence peddling, undue receipt of advantage, corruption, embezzlement, economic participation in business, harmful administration in a public sector economic unit, fraud in obtaining or diverting a subsidy, grant or credit, or corruption to the detriment of international trade or in the private sector; l) Insider trading or market manipulation; m) Infringement of the exclusive patent, utility model or topography of semiconductor products, infringement of exclusive rights relating to designs, counterfeiting, imitation and illegal use of trademarks, sale or concealment of products or fraud on goods. <p>2 - Goods obtained through the goods referred to in the previous paragraph shall also be considered advantages.</p> <p>3 - Anyone who converts, transfers, assists or facilitates any operation of conversion or transfer of advantages, obtained by themselves or by a third party, directly or indirectly, with the aim of concealing their illicit origin, or of preventing the perpetrator or participant of such offenses from being criminally prosecuted or subjected to a criminal reaction, shall be punished with imprisonment of up to 12 years.</p> <p>4 - The same penalty shall apply to anyone who conceals or disguises the true nature, origin, location, disposition, movement or ownership of advantages, or the rights relating thereto.</p> <p>5 - The same penalty shall also apply to anyone who, while not being the perpetrator of the typical unlawful act from which the advantages originate, acquires, holds or uses them, with knowledge, at the time of acquisition or at the initial moment of holding or use, of that capacity.</p> <p>6 - Punishment for the crimes provided for in paragraphs 3 to 5 shall take place even if the place of commission of the typical illegal acts from which the advantages originate or the identity of the perpetrators is unknown, or even if such acts were committed outside national territory, except in the case of acts that are lawful under the law of the place where they were committed and to which Portuguese law does not apply under the terms of article 5.</p>
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ANNEX III

		<p>7 - The act is punishable even if the criminal proceedings relating to the typical unlawful acts from which the advantages derive depend on a complaint and the complaint has not been filed.</p> <p>8 - The penalty provided for in paragraphs 3 to 5 shall be increased by one third if the perpetrator carries out the conduct habitually or is one of the entities referred to in article 3 or article 4 of Law no. 83/2017, of August 18, and the offense was committed in the course of their professional activities.</p> <p>9 - When full reparation is made for the damage caused to the offended party by the typical unlawful act from which the advantages were derived, without illegitimate damage to a third party, up until the start of the trial hearing at first instance, the penalty shall be especially attenuated.</p> <p>10 - Once the requirements set out in the previous paragraph have been met, the penalty may be especially mitigated if the reparation is partial.</p> <p>11 - The penalty may be especially attenuated if the agent concretely assists in the collection of decisive evidence for the identification or capture of those responsible for committing the typical illicit acts from which the advantages come.</p> <p>12 - The penalty imposed under the terms of the preceding paragraphs may not exceed the maximum limit of the highest penalty provided for in the typical unlawful acts from which the advantages are derived.</p>
Criminal legal regime for corruption in international trade and private sector (Law no. 20/2008, of April 21st)	Article 7 (Active corruption damaging international trade)	<p>Anyone who gives or promises to a national, foreign or international organization official, or to a national or foreign political office holder, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage which is not due to them, in order to obtain or retain business, a contract or other undue advantage in international trade, shall be punished with imprisonment of one to eight years.</p>
	Article 8 (Passive corruption in the private sector)	<p>1 - A private sector worker who, by himself or, with his consent or ratification, through an intermediary, requests or accepts, for himself or for a third party, without being due, a pecuniary or non-pecuniary advantage, or the promise thereof, for any act or omission that constitutes a violation of his functional duties, shall be punished with imprisonment of up to five years or a fine of up to 600 days.</p> <p>2 - If the act or omission provided for in the preceding paragraph is likely to cause a distortion of competition or damage to the property of third parties, the perpetrator shall be punished with imprisonment of one to eight years.</p>
	Article 9 (Active corruption in the private sector)	<p>1 - Anyone who, by themselves or, with their consent or ratification, through an intermediary, gives or promises to a person referred to in the previous article, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage which is not due to them, in order to pursue the purpose indicated therein, shall be punished with imprisonment of up to three years or a fine.</p> <p>2 - If the conduct provided for in the preceding paragraph is intended to obtain or is likely to cause a distortion of competition or damage to the property of third parties, the perpetrator shall be punished with imprisonment of up to five years or a fine of up to 600 days.</p> <p>3 - Attempt is punishable.</p>
Crimes of responsibility of political office holders (Law no. 34/87, of July 16th)	Article 16 (Undue receipt or offer of advantage)	<p>1 - The holder of a political office who, in the exercise of their functions or because of them, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a patrimonial or non-patrimonial advantage that is not due to them, shall be punished with imprisonment from 1 to 5 years.</p> <p>2 - Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises to a political office-holder, or to a third party on their recommendation or knowledge, a pecuniary or non-pecuniary advantage that is not due to them, in the exercise of their functions or because of them, shall be punished with imprisonment of up to 5 years or a fine of up to 600 days.</p> <p>3 - A political office-holder who, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises to another political office-holder, senior public office-holder or official, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage, or the promise thereof, which is not due to him/her, in the performance of his/her duties or because of them, shall be punished with the penalties provided for in the preceding paragraph.</p>

Crimes of responsibility of political office holders (Law no. 34/87, of July 16th)		<p>4 - The preceding paragraphs do not apply to conduct that is socially appropriate and in accordance with custom.</p>
	Article 17 (Passive corruption)	<p>1 - The holder of a political office who, in the exercise of their functions or on account of them, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, for the performance of any act or omission contrary to the duties of the office, even if prior to that request or acceptance, shall be punished with imprisonment from 2 to 8 years.</p> <p>2 - If the act or omission is not contrary to the duties of the office and the advantage is not due, the holder of political office shall be punished with imprisonment from 2 to 5 years.</p>
	Article 18 (Active corruption)	<p>1 - Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises to a political office holder, or to a third party on their recommendation or with their knowledge, a pecuniary or non-pecuniary advantage for the purpose indicated in article 17(1), shall be punished with imprisonment from 2 to 5 years.</p> <p>2 - If the purpose is as indicated in article 17(2), the perpetrator shall be punished with imprisonment of up to 5 years.</p> <p>3 - The holder of a political office who, in the exercise of their functions or because of them, by themselves or through an intermediary, with their consent or ratification, gives or promises to an official, a holder of a high public office or another holder of a political office, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage that is not due to them, for the purposes indicated in article 17, shall be punished with the penalties provided for in the same article.</p>
	Article 20 Embezzlement (in Portuguese “Peculato”)	<p>1 - The holder of a political office who, in the exercise of his functions, unlawfully appropriates, for his own benefit or for the benefit of another person, money or any movable or immovable thing, public or private, which has been delivered to him, is in his possession or is accessible to him by reason of his functions, shall be punished with imprisonment from three to eight years and a fine of up to 150 days, if a more serious penalty does not apply to him by virtue of another legal provision.</p> <p>2 - If the offender lends, pledges or in any way encumbers any of the objects referred to in the previous paragraph, with the knowledge that they harm or may harm the State or their owner, they shall be punished with imprisonment of one to four years and a fine of up to 80 days.</p>
	Article 23 (Economic participation in business)	<p>1 - The holder of a political office who, with the intention of obtaining, for himself or for a third party, illicit economic participation, damages in a legal transaction the patrimonial interests that, in whole or in part, it is his duty, by reason of his functions, to administer, supervise, defend or realize, shall be punished with imprisonment of up to 5 years.</p> <p>2 - The holder of a political office who, in any way, receives a financial advantage as a result of a legal-civil act relating to interests which, by virtue of their functions, at the time of the act, they wholly or partially dispose of, administer or supervise, even without harming them, shall be punished with imprisonment of up to 6 months or a fine of up to 150 days.</p> <p>3 - The penalty provided for in the preceding paragraph shall also apply to a political office-holder who receives, in any way, an economic advantage as a result of the collection, assessment or payment of which, by reason of his or her duties, he or she is totally or partially in charge of ordering or making, provided that there is no economic damage to the Public Treasury or to the interests which he or she thereby affects.</p>
	Article 26 (Abuse of powers)	<p>1 - A political office-holder who abuses his powers or violates the duties inherent to his functions, with the intention of obtaining, for himself or for a third party, an illegitimate benefit or causing harm to others, shall be punished with imprisonment from six months to three years or a fine of 50 to 100 days, if a more serious penalty is not imposed by virtue of another legal provision.</p> <p>2 - A political office-holder who fraudulently grants concessions or enters into contracts for the benefit of a third party or to the detriment of the State shall incur the penalties provided for in the preceding paragraph.</p>

ANNEX III

Code of Military Justice (Law no. 100/2003, of November 15th)	Article 36 (Passive corruption for the commission of an illegal act)	<p>1 - Anyone who, as part of or in the service of the Armed Forces or other military forces, by themselves or through an intermediary with their consent or ratification, requests or accepts, for themselves or for a third party, without being owed, a pecuniary or non-pecuniary advantage, or the promise thereof, in return for an act or omission contrary to the duties of office and resulting in a danger to national security, shall be punished with imprisonment from 2 to 10 years.</p> <p>2 - If the perpetrator, before committing the act, voluntarily repudiates the offer or promise he had agreed to or returns the advantage or, in the case of a fungible item, its value, he shall be exempt from punishment.</p> <p>3 - Civilians who are employees of the Armed Forces or other military forces, within the meaning of Article 386 of the Penal Code, are considered to be in the service of the Armed Forces or other military forces, and the persons referred to in Article 4 are integrated.</p>
	Article 37 (Active corruption)	<p>1 - Anyone who, by him/herself or through an intermediary, with his/her consent or ratification, gives or promises any person belonging to or serving in the Armed Forces or other military forces, or to a third party with his/her knowledge, a pecuniary or non-pecuniary advantage which is not due to him/her, for the purpose indicated in the previous article and which results in a danger to national security, shall be punished with imprisonment from 1 to 6 years.</p> <p>2 - If the perpetrator of the crimes referred to in the previous paragraph is an officer of a higher rank than the military officer whom he seeks to corrupt or exercises command or leadership functions over, the minimum applicable penalty is doubled.</p>
Criminal liability for unsportsmanlike conduct (Law no. 50/2007, of August 31st)	Article 8 (Passive corruption)	<p>A sports agent who, by him/herself or through an intermediary, with his/her consent or ratification, requests or accepts, for him/herself or for a third party, without being due, a pecuniary or non-pecuniary advantage, or the promise thereof, for any act or omission aimed at altering or distorting the result of a sports competition, even if prior to that request or acceptance, shall be punished with imprisonment from 1 to 8 years.</p>
	Article 9 (Active corruption)	<p>1 - Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises a sports agent, or a third party with their knowledge, a pecuniary or non-pecuniary advantage that is not due to them, for the purpose indicated in the previous article, shall be punished with imprisonment from 1 to 5 years.</p> <p>2 - The attempt is punishable.</p>
	Article 10 (Influence peddling)	<p>1 - Anyone who, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a financial or non-financial advantage, or the promise thereof, in order to abuse their influence, real or supposed, with any sports agent, with the aim of obtaining any decision aimed at altering or distorting the result of a sports competition, shall be punished with imprisonment from 1 to 5 years, if a more serious penalty does not apply to them by virtue of another legal provision.</p> <p>2 - Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises another person a pecuniary or non-pecuniary advantage, for the purpose referred to in the previous paragraph, shall be punished with imprisonment of up to 3 years or a fine, if a more serious penalty does not apply by virtue of another legal provision.</p> <p>3 - Article 13 shall apply accordingly</p>
	Article 10a (Undue offer or receipt of advantage)	<p>1 - A sports agent who, by himself or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, directly or indirectly, in the exercise of his functions or because of them, without being owed, a pecuniary or non-pecuniary advantage, or the promise thereof, from an agent who has, has or may have a claim against him dependent on the exercise of his functions, shall be punished with imprisonment of up to 5 years or a fine of up to 600 days.</p> <p>2 - Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises a sports agent, or a third party on their recommendation or knowledge, a pecuniary or non-pecuniary advantage that is not due to them, in the exercise of their duties or because of them, shall be punished with imprisonment of up to 3 years or a fine of up to 360 days.</p> <p>3 - The preceding paragraphs do not apply to conduct that is socially appropriate and in accordance with custom.</p>



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