



**POLYHEDRON**

SGPS

# Anticorruption policy



## Disclaimer

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## Version control

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Date	Name	Version	Description of changes
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## 1. Introduction

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Due to the complexity and diversity of threats and vulnerabilities, and consequently of typologies associated with the practice of acts of corruption, in its active and passive facets, an effective combat, in a triple aspect of prevention, detection and repression, will only be efficient and effective, if carried out in an integrated and transversal way.

Corruption has a financial, operational, regulatory, legal and reputational impact, jeopardizing the trust of partners, employees, and other stakeholders.

This policy establishes the commitment of Polyhedron SGPS in anticorruption matters, as well as in ensuring compliance with legislation and regulations and best practices in these matters, and should be applied in conjunction with the code of conduct.

## 2. Scope of application

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1. Partners, associates and collaborators, whatever the nature of the link are responsible for reading, knowing and applying the anticorruption policy.
2. Non-compliance with the anticorruption policy may incur the author(s) on labor, civil and/or criminal liability.
3. The occurrence of any events and incidents must be communicated immediately via the e-mail [info@polyhedron.pt](mailto:info@polyhedron.pt).
4. The regulatory compliance officer is responsible for reviewing and updating the anticorruption policy, and for its supervision and control.
5. The board of directors is responsible for approving the anticorruption policy and subsequent amendments.
6. Any exception to this policy requires written authorization from the board of directors.

### 3. Definitions

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«Active corruption» means a person who, by themselves or through an intermediary, with his or her consent or ratification, gives or promises to any person, with functions in the public or private sector, or to a third party by indication or with knowledge of the person, an economic or non-patrimonial advantage for the commission of any act or omission contrary to the duties of the office, even if prior to that request or acceptance.

«Corruption and related offences» means the offences of corruption, improper receipt and offer of advantage, embezzlement, economic participation in business, concussion, abuse of power, malfeasance, influence peddling, laundering, fraud in obtaining or diverting a subsidy, grant or credit.

«Passive corruption» means any person, with functions in the public or private sector, who by themselves, or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, an economic or non-financial advantage, or his promise, for the commission of any act or omission contrary to the duties of the office, even if prior to that request or acceptance.

## 4. Principles

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Polyhedron SGPS' anticorruption program consists of the code of conduct, anticorruption policy, corruption and related infractions risk management plan, training program and reporting channel.

### 4.1 Responsibilities

The board of directors is responsible for the following activities:

1. Approve anticorruption procedures and controls;
2. Be aware of the main corruption risks to which the operational areas are exposed, as well as the processes used to identify, assess, monitor and control these risks;
3. Ensure the existence of an organizational structure appropriate to anticorruption;
4. Promote an institutional anticorruption culture, based on high standards of ethics and integrity;
5. Appoint the regulatory compliance officer, ensuring the verification of his/her suitability, professional qualification, availability, independence and impartiality, as well as that he/she has unrestricted and timely access to all internal information relevant to the exercise of his/her function, has the appropriate means and resources, and is not subject to potential functional conflicts;
6. Monitor the activity of the other members of the top management, to the extent that they are in operational areas that are or may be exposed to corruption risks;
7. Regularly monitor and evaluate the effectiveness of policies and procedures and controls, ensuring the correction of deficiencies detected.

The regulatory compliance officer is responsible for:

1. Participate in the definition and issue a prior opinion on the anticorruption policy and



procedures and controls;

2. Monitor, at all times, the adequacy, sufficiency and timeliness of policies and procedures and controls, proposing the necessary updates;
3. Ensure the centralization of all relevant information coming from the various operational areas;
4. To play the role of interlocutor of the judicial, police, and supervisory authorities;
5. Participate in the definition, monitoring and evaluation of the internal training policy.

The regulatory compliance team is responsible for:

1. Control of the anticorruption process and its documentation;
2. Analysis and confirmation of the results of the screening tool;
3. Validation of the assigned scoring;
4. Provision of clarifications to the teams.

The employees of Polyhedron SGPS, whatever the nature of the bond, are responsible for ensuring that they fulfill their functions and responsibilities at the level of anticorruption procedures, that they implement the anticorruption measures assigned to them and that they attend the awareness-raising and training actions, under the terms of this policy.

## 4.2 Risk management

The corruption and related offences risk management plan describes the methodology to be used by Polyhedron SGPS in the management of corruption risk.

## 4.3 Offer, entertainment or hospitality

1. The realization or acceptance of an offer, entertainment or hospitality, must take into account the respective circumstances, not be motivated by an intention to exert

influence, respect good faith, applicable customs and good practices, as well as the extraterritoriality of some corruption prevention regimes;

2. The employees of Polyhedron SGPS may not make or accept offer, entertainment or hospitality of goods or services whose market value exceeds the defined limits;
3. Without prejudice to the limit set forth in the previous paragraph, Polyhedron SGPS employees may not make or accept offers to or from public entities, public office holders or related persons, which, in accordance with the legislation applicable to them, cannot be received or made by them;
4. Polyhedron SGPS employees may not make or accept offers, entertainment or hospitality to or from individuals with whom there is no legitimate professional or business relationship;
5. The value of the offer, entertainment or hospitality shall be recorded in the calculation of all offers of the same person, natural or legal, in the course of a calendar year;
6. Employees must declare, by completing the declaration of offers, entertainment and hospitality, all the offers, entertainment or hospitality, made or received, as well as those who have refused, indicating the reason for the refusal.

#### 4.4 Lobbying

1. Resort to lobbying is only admissible when it is legal, regulated and customary practice in the jurisdiction concerned, and the purposes of the activity are legitimate;
2. The lobbying service provider is duly registered and bound to comply with applicable laws and regulations.

#### 4.5 Sponsorship

1. It should not be motivated by an intention to exert influence;
2. It shall be preceded by a third-party integrity check;
3. It shall be based on a sponsorship contract which includes appropriate provisions relating to the prevention of corruption;
4. It must be made effective through a traceable means of payment.

#### 4.6 Anticorruption awareness and training

Polyhedron SGPS provides its employees with adequate training in anticorruption matters, enabling them to act in accordance with best practices.

#### 4.7 Data protection and processing

The personal data collected within the scope of the procedures provided for in this policy will be processed by Polyhedron SGPS, under the terms and in accordance with the limits arising from the authorization for processing, within the scope of the provisions of point a) of paragraph 1 of article 6 of the Data Protection Regulation (EU) 2016/679.

The data subject may exercise their rights, as is the case, for example, of the rights of access and rectification, with Polyhedron SGPS, and the submission of complaints must be made to the National Data Protection Commission (CNPD).

Security measures will be adopted in the storage of the information, in order to restrict its access only to authorized persons.

## 5. Final statement

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Polyhedron SGPS is committed to implementing the necessary measures and controls for proper anticorruption management, and to monitoring the evolution of best practices in this matter, with a view to continuous improvement.

## 6. Approval and entry into force

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This policy was approved by the board of directors of Polyhedron SGPS on September 4, 2023, and entered into force on the date of approval.

This policy is reviewed every two years or whenever there are changes that justify its review.



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