



PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED OFFENCES

SBM OFFSHORE

(SBM PRODUCTION CONTRACTORS INC. S.A. – Sucursal em Portugal and SINGLE BUOY MOORINGS INC. – Sucursal em Portugal)

Approved by the Board of Directors of SBM PRODUCTION CONTRACTORS INC. S.A. and SINGLE BUOY MOORINGS INC. on October 31st, 2024, and by the legal representatives of SBM PRODUCTION CONTRACTORS INC. SA – Sucursal em Portugal and SINGLE BUOY MOORINGS INC. – Sucursal em Portugal on October 31st, 2024

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1. FRAMEWORK

Following the National Anti-Corruption Strategy 2020-2024, Decree-Law no. 109-E/2021 was published in the Official Journal on 9 December 2021, creating the National Anti-Corruption Mechanism ("**MENAC**") and approving the General Regime for the Prevention of Corruption ("**GRPC**").

The GRPC requires entities obliged to comply to adopt and implement a Regulatory Compliance Programme ("**RCP**") in order to prevent, detect and sanction possible acts of corruption and related offences carried out against or through the entity in question. The Regulatory Compliance Programme must include at least the following elements: **(i)** a plan on the prevention of corruption and related offences risks; **(ii)** a Code of Conduct; **(iii)** a training program, and **(iv)** a whistleblowing channel.

SBM PRODUCTION CONTRACTORS INC. S.A. - Sucursal em Portugal and SINGLE BUOY MOORINGS INC. - Sucursal em Portugal (jointly referred to as "**SBM Portugal**") are legal persons with registered offices in Portugal that, combined, employ 50 or more employees, thus are obliged to comply with the GRPC.

This SBM Portugal Plan for the Prevention of Risks of Corruption and Related Offences (hereinafter, the "**PPR**") addresses the obligations set out in the GRPC and also reflects the strong commitment of SBM Portugal and SBM Offshore in general to scrupulous compliance with the applicable legal standards and the highest standards of ethics and integrity. It is the result of an analysis of the activities of SBM Portugal and SBM Offshore, identifying and classifying the factors that may expose the company to acts of corruption and related offences, as well as the control mechanisms in place to mitigate these risks.

2. PLAN FOR THE PREVENTION OF CORRUPTION AND RELATED OFFENCES RISKS

2.1 INTRODUCTION

Under the terms of the GRPC, this PPR:

- a. It covers the entire organization and activity of SBM Portugal, including management, administration, commercial, operational and support areas¹;
- b. It identifies, analyses and classifies the risks and situations that could expose SBM Portugal to acts of corruption and related offences, including those associated with the exercise of functions by members of the management bodies, taking into account the reality of the sector and the geographical areas in which it operates;
- c. It includes preventive and corrective measures to reduce the probability of occurrence and the impact of the risks and situations identified.

¹ SBM Portugal is part of SBM Offshore Group, with a head office based in the Netherlands, i.e. SBM Offshore N.V..

2.2 OVERALL RESPONSIBILITY FOR THE EXECUTION, CONTROL AND REVISION OF THE PLAN

The management of SBM Portugal has appointed Mariana Rachid to the position of Regulatory Compliance Officer. The Regulatory Compliance Officer has overall responsibility for the execution, control and review of the PPR.

2.3 IDENTIFYING, ANALYZING AND CLASSIFYING RISKS OF CORRUPTION AND RELATED OFFENCES

2.3.1 Corruption and related offences: definition

Under the terms of article 3 of the GRPC, "corruption and related offences" 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 under the following legislation: the Criminal Code, the Regime for Crimes against Political Office Holders, the Code of Military Justice, the Regime for Criminal Liability for Anti-Sports Behavior, the Regime for Criminal Liability for Crimes of Corruption in International Trade and Private Activity and the Regime for Anti-economic Offences and Offences against Public Health.

For ease of reference, an exhaustive list of the aforementioned types of crime is attached as **Annex I**.

2.3.2 Probability, impact and grading of risks

The assessment of risks involves combining their probability of occurrence - greater or lesser degree of certainty as to the occurrence of the identified risk - with the foreseeable impact of each situation - direct and indirect consequences on the macro-social legal interests affected and on SBM Portugal's corporate criminal liability.

In order to identify, analyze and classify the risks of corruption and related offences at SBM Portugal, the following methodology was used, based on national and international best practices and recommendations, including, but not limited to, MENAC Guide no. 1/2023 of September ⁽²⁾:

- a. Identification of the risks and risk factors associated with the main areas of SBM Portugal's activities that could prove critical in terms of corruption and related offences;
- b. Risk assessment according to the criteria and scales identified below;
- c. Identification and implementation of compliance programs, especially with regard to anti-corruption, fraud, bribery and money laundering, with measures specifically designed to prevent or correct each of the risks identified in the various areas and entities of SBM Portugal;

² Guide on "The Instruments of the General Regime for the Prevention of Corruption - Some indications and explanatory notes on methodological precautions for their preparation, adoption and dynamization".

- d. Creation and implementation of internal control systems to monitor risks and adopt corrective measures when necessary.

In order to identify, analyze and classify the risks referred to here, interviews were held with the heads of all of SBM Portugal's departments.

To this end, these criteria (likelihood and impact) should be weighted according to the following scales:

Probability of Occurrence	Description
Low	Low probability of occurrence (less than 40%)
Average	Likely to occur (40%-90%), but preventable through additional measures
High	Probable occurrence (over 90%) and difficult to prevent, even with additional measures

Severity of Consequence	Description
Low	Damage to organizational effectiveness and performance with limited financial impact.
Average	Damage to organizational effectiveness and performance with moderate financial impact.
High	Damage to the image and reputation of integrity, as well as effectiveness and performance with a high financial impact.

From the correlation of the classification given to each risk, based on the two indicators mentioned above, we obtain the **Risk Grading (RG)**, which can be *Low*, *Medium* or *High*, which influences the priority and completeness to be given to preventive and corrective measures for each of the risks identified.

		Probability of Occurrence		
		Low	Average	High
Severity of Consequence	High	Medium	High	High
	Average	Low	Medium	High
	Low	Low	Low	Medium

2.3.3 Areas of activity and associated risks

Annex II lists in detail the risks identified, taking into account the activity carried out by SBM Portugal.

2.4 PREVENTIVE AND CORRECTIVE MEASURES

2.4.1 General measures

Without prejudice to the provisions of the Code of Conduct (including the annex for SBM Portugal), the anti-bribery and corruption and anti-money laundering and anti-fraud policies, SBM Portugal also implements the following general measures to prevent corruption and related offences:

- a. Make available and publicize SBM Portugal's entire compliance program, which includes ABAC policies, procedures, annual training, a whistleblowing channel and structured approval processes for gifts, hospitality and donations;
- b. Ensure the necessary resources and means for the implementation of the instruments referred to in the previous paragraph;
- c. Increase and maintain SBM Portugal's risk perception and awareness, compared to the company's real ABAC risk;
- d. Promote a corporate culture of applying ethical principles and responsible behavior, encouraging the prevention, control and repression of illegal or fraudulent acts;
- e. Encourage the reporting of situations that constitute risky or effectively "corrupt" behavior, ensuring the appropriate means for receiving, forwarding and processing complaints, as well as the confidentiality and protection of whistleblowers;
- f. Carry out regular checks in order to detect new activities/situations that could constitute the practice of corruption or related offences, ensuring that the compliance programme keeps pace with the company's activities and the evolution of risks;
- g. For each breach of the Code of Conduct, draw up a report identifying the rules violated, the sanction applied and the measures adopted or to be adopted;
- h. Ensure that the PPR complies with the applicable legislation and, to this end, review it at least every three years or whenever there is a change in the organization's duties or organic or corporate structure that justifies its review;
- i. Reinforce SBM Portugal's articulation and transparency with public institutions in its field of competence, namely with MENAC - the National Anti-Corruption Mechanism.

2.4.2 Other regulations

In addition to this PPR, SBM Portugal also has policies on anti-bribery and corruption and anti-money laundering and fraud.

2.4.3 Specific measures for the risks identified

With regard to the risks identified and graded in the terms set out in subchapters 2.3.2 e 2.3.3 above, SBM Portugal has implemented the prevention and/or mitigation mechanisms indicated in **Annex II**.

3. CODE OF CONDUCT AND SOCIAL RESPONSIBILITY

SBM Offshore Group has a Code of Conduct that sets forth the core principles applicable to SBM Offshore Group’s activities – in Portugal and elsewhere.

To address the specific requirements of the GRPC, SBM Portugal drafted an Annex supplementing the Code of Conduct, taking into account the criminal rules on corruption and related offences. The Code of Conduct and the Annex for SBM Portugal are applicable to all directors and employees in Portugal.

These documents are attached as Annex III.

4. WHISTLEBLOWING CHANNEL

SBM Offshore has an internal whistleblowing channel, under the terms of the GRPC and Law no. 93/2021, of 20 December, the regulation of which is set out in the Speak Up Policy (Whistleblowing Channel). This policy can be found in Annex IV.

To avoid any doubts, it should be clarified that the whistleblowing channel regulated by the aforementioned regulations applies to cases of corruption and related offences.

5. TRAINING PLAN

As a first step towards implementing the RCP, SBM Offshore implements a specific Training Plan to equip its employees and managers to put it into practice.

The training programs will also be adapted to the areas of activity and functions of their target audience, thus taking into account their respective exposure to the risks of corruption and related infractions identified, but also their respective involvement in the prevention or correction of measures or in the evaluation system. That said, the training programs will cover at least the following subjects: **(i)** the content of the PPR, **(ii)** the rules contained in the Code of Conduct (including the annex for SBM Portugal), **(iii)** the operation of the whistleblowing channel and the rights associated with whistleblower protection.

The Training Plan will consist of the training sessions listed below:

Object of the session	Frequency	Duration	Recipients
Plan on the Prevention of Risks at SBM Portugal and related instruments	Every three years	2 hours	All employees and collaborators of SBM Portugal
Code of Conduct and Whistleblowing Channel	Every three years	2 hours	All employees and collaborators of SBM Portugal

Training hours count as continuous training hours that SBM Offshore must provide to its employees.

6. CONTROL OF THE PLAN FOR THE PREVENTION OF CORRUPTION AND RELATED OFFENCE RISKS

The execution of this PPR is subject to control by the Regulatory Compliance Officer, who, for this purpose, undertakes the following commitments:

- a. Drawing up a mid-term evaluation report in October of each year for situations identified as high or maximum risk;
- b. Drawing up an annual assessment report in April of the year following the year of implementation, containing, 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.

7. EVALUATION OF THE REGULATORY COMPLIANCE PROGRAMME

The Regulatory Compliance Programme is evaluated by means of:

- a. Monitor the development of the program and report the implementation of the respective initiatives;
- b. Consolidation and internal reporting of information on the progress of the implementation of the regulatory compliance program, covering in particular **(i)** analysis of relevant risks, **(ii)** implementation of controls, **(iii)** situations of non-compliance that have occurred and **(iv)** degree of implementation of identified opportunities for improvement;
- c. Periodic evaluation of the existence and implementation of opportunities for improvement.

8. REVIEW

This PPR and the Code of Conduct, including the annex for SBM Portugal, will be reviewed **(i)** every three years and, in any case, **(ii)** whenever there is a change in SBM Portugal's duties or organizational or corporate structure.

9. PUBLICITY OF THE PLAN FOR THE PREVENTION OF CORRUPTION AND RELATED OFFENCES RISKS AND OTHER INSTRUMENTS

SBM Portugal ensures that this PPR, the code of conduct (including the annex for SBM Portugal) and the reports provided for in chapter 6 above, will be publicly available to its employees, via the intranet and its official website, within ten days of its implementation and any revisions or drafting.

ANNEX I

List of corruption offences and related offences

Diploma	Criminal offence	Text-standard
Criminal Code	Undue receipt or offer of an advantage (Article 372)	<p>1 - An official who, in the performance of his/her duties or because of them, 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 that is not due to him/her, shall be punished with imprisonment of 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 exclude conduct that is socially appropriate and conforms to 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 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 him/herself or through an intermediary, with his/her consent or ratification, gives or promises to an official, or to a third party on his/her recommendation or with his/her 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 (Article 375)	<p>1 - An official who unlawfully appropriates, for his/her own benefit or for the benefit of another person, money or any movable or immovable item or animal, whether public or private, which has been handed over to him/her, is in his/her possession or is accessible to him/her as a result of his/her duties, shall be punished with imprisonment from 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>

	<p>Economic participation in a business (Article 377)</p>	<p>1 - An official who, with the intention of obtaining, for him/herself or for a third party, unlawful economic participation, damages in a legal transaction the property interests which, in whole or in part, he/she is required to administer, supervise, defend or realise by reason of his/her function, shall be punished with imprisonment for up to 5 years.</p> <p>2 - An official who, in any way, receives, for him/herself or for a third party, a pecuniary advantage as a result of a legal-civil act relating to interests of which he/she had, by virtue of his/her duties, at the time of the act, total or partial disposal, administration or supervision, even without harming them, shall be punished with imprisonment of up to 6 months or a fine of up to 60 days.</p> <p>3 - The penalty provided for in the previous paragraph shall also apply to an official who receives, for him/herself or for a third party, in any way, a pecuniary advantage as a result of the recovery, collection, liquidation or payment that, by virtue of his/her duties, in whole or in part, he/she is charged with ordering or making, provided that there is no damage to the Public Treasury or to the interests entrusted to him/her.</p>
	<p>Concussion (Article 389)</p>	<p>1 - An official who, in the exercise of his or her functions or de facto powers arising therefrom, 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, by means of inducement into error or exploitation of the victim's error, a pecuniary advantage that is not due to him or her, or is greater than that due, namely a contribution, fee, emolument, fine or penalty, shall be punished with imprisonment of 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>
	<p>Abuse of power (Article 382)</p>	<p>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 him/herself or for a third party, an illegitimate benefit or causing harm to another person, 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>
	<p>Denial of justice and malpractice (Article 369)</p>	<p>1 - An official who, in the context of a procedural enquiry, legal proceedings, administrative offence or disciplinary proceedings, knowingly and against the law, promotes or fails to promote, conducts, decides or fails to decide, or performs an act in the exercise of powers arising from the office he or she holds, shall be punished with imprisonment of up to two 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 carried out with gross negligence, the perpetrator shall be punished with imprisonment of up to 2 years or a fine.</p>
	<p>Influence peddling (Article 335)</p>	<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 pecuniary or non-pecuniary advantage, or the promise thereof, in order to abuse their influence, real or supposed, with any national or foreign public entity, shall be punished:</p> <p>a) With imprisonment of 1 to 5 years, if a more serious penalty does not apply by virtue of another legal provision, if the purpose is to obtain a favorable 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 aim is to obtain a favorable 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 previous number:</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 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>Money 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 unlawful 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 unlawful acts of:</p> <p>a) Lenocinium, sexual abuse of children or dependent minors, or child pornography;</p> <p>b) Computer and communications fraud, extortion, abuse of a guarantee card or payment card, device or data, counterfeiting of currency or similar securities, depreciation of the value of currency or similar securities, passing counterfeit currency in agreement with the counterfeiter or similar securities, passing counterfeit currency or similar securities, or acquiring counterfeit currency to be put into circulation or similar securities;</p> <p>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 computer program or other data, computer sabotage, illegitimate access, illegitimate interception or illegitimate reproduction of a protected program;</p> <p>d) Criminal association;</p> <p>e) Terrorist offences, offences related to a terrorist group, offences related to terrorist activities and terrorist financing;</p> <p>f) Trafficking in narcotics and psychotropic substances;</p> <p>g) Arms trafficking;</p>

	<p>h) Trafficking in persons, facilitating illegal immigration or trafficking in human organs or tissues;</p> <p>i) Damage to nature, pollution, activities dangerous to the environment, or danger to animals or plants;</p> <p>j) Tax fraud or fraud against social security;</p> <p>k) Influence peddling, improper receipt of an advantage, corruption, embezzlement, economic participation in a 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;</p> <p>l) Insider dealing or market manipulation;</p> <p>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 trade marks, sale or concealment of products or fraud on goods.</p> <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 offences 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 offences provided for in paragraphs 3 to 5 shall take place even if the place where the typical unlawful acts were committed, from which the advantages originate or the identity of the perpetrators, or even if such acts were committed outside national territory, are unknown, 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> <p>7 - The offence 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 on a habitual basis or is one of the entities referred to in article 3 or article 4 of Law no. 83/2017, of 18 August, and the offence was committed in the course of their professional activities.</p> <p>9 - When full reparation has been made for the damage caused to the offended party by the typical unlawful act from which the benefits were derived, without illegitimate damage to a third party, up to 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 verified, the penalty may be especially attenuated if the reparation is partial.</p>
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		<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 originate.</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>
<p>Anti-economic offences and offences against public health (Decree-Law no. 28/84 of 20 January)</p>	<p>Article 36 (Fraud in obtaining a subsidy or grant)</p>	<p>1. Whoever obtains a subsidy or grant:</p> <p>a) Providing the competent authorities or bodies with inaccurate or incomplete information concerning themselves or third parties and concerning facts which are important for the award of the grant or subsidy;</p> <p>b) Omitting, contrary to the legal provisions of the grant or subsidy, information on facts that are important for its award;</p> <p>c) Using a document justifying entitlement to the grant or subsidy or facts important to its award, obtained through inaccurate or incomplete information;</p> <p>will be punished with imprisonment of 1 to 5 years and a fine of 50 to 150 days.</p> <p>2. In particularly serious cases, the penalty is imprisonment for 2 to 8 years.</p> <p>3. If the acts provided for in this article are committed on behalf of and in the interests of a legal person or company, exclusively or predominantly set up to commit them, the court shall, in addition to the pecuniary penalty, order its dissolution.</p> <p>4. The judgement will be published.</p> <p>5. For the purposes of paragraph 2, particularly serious cases shall be considered to be those in which the perpetrator:</p> <p>a) Obtains for himself or for a third party a grant or subsidy of a considerably large amount or uses false documents;</p> <p>b) He/she abuses his/her functions or powers;</p> <p>c) Obtains assistance from the holder of a public office or employment who abuses their functions or powers.</p> <p>6. Anyone who commits the acts described in paragraph 1 a) and b) negligently shall be punished with imprisonment of up to 2 years or a fine of up to 100 days.</p> <p>7. The perpetrator shall be exempt from punishment if:</p> <p>a) Spontaneously prevents the grant or subsidy from being awarded;</p> <p>(b) In the event that they are not granted without his/her involvement, spontaneously and seriously endeavored to prevent them from being granted.</p> <p>8 The following facts shall be considered important for the granting of a subsidy or grant:</p> <p>a) Declared important by the law or organization granting the subsidy or grant;</p> <p>b) On which the authorization, award, reimbursement, renewal or maintenance of a grant, subsidy or advantage resulting therefrom is legally dependent.</p>

	<p>Article 37 (Misuse of subsidy, grant or subsidized credit)</p>	<p>1. Anyone who uses benefits obtained by way of a grant or subsidy for purposes other than those for which they were legally intended shall be punished with imprisonment for up to 2 years or a fine of not less than 100 days.</p> <p>2. The same penalty shall apply to anyone who uses a subsidized credit benefit for a purpose other than that provided for in the credit line determined by the legally competent authority.</p> <p>3. The penalty will be imprisonment from 6 months to 6 years and a fine of up to 200 days when the value or damage caused is considerably high.</p> <p>4. If the acts provided for in this article are repeatedly committed in the name and interest of a legal person or company and the damage has not been spontaneously repaired, the court shall order its dissolution.</p> <p>5. The judgement will be published.</p>
	<p>Article 38 (Fraud in obtaining credit)</p>	<p>1. Whoever, when submitting a proposal to grant, maintain or modify the conditions of a credit intended for an establishment or company:</p> <p>a) Providing inaccurate or incomplete written information intended to accredit him or important for the decision on the application;</p> <p>b) Use inaccurate or incomplete documents relating to the economic situation, such as balance sheets, profit and loss accounts, general descriptions of assets or expert reports;</p> <p>c) Conceal deteriorations in the economic situation that have occurred in the meantime in relation to the situation described at the time of the credit application and that are important for the decision on the application;</p> <p>will be punished with imprisonment of up to 3 years and a fine of up to 150 days.</p> <p>2. If the agent, acting in the manner described in the previous paragraph, obtains credit of a considerably high value, the penalty may be increased to up to 5 years in prison and up to 200 days' fine.</p> <p>3. In the case of the previous paragraph, if the offence was committed on behalf of and in the interests of a legal person or company, the court may order their dissolution.</p> <p>4. The perpetrator will be exempt from punishment:</p> <p>a) If the creditor is spontaneously prevented from delivering the desired service;</p> <p>b) If, in the event that the benefit has not been delivered without his agreement, he has previously made a serious and spontaneous effort to prevent delivery.</p>
<p>Crimes of responsibility of political office holders (Law no. 34/87 of 16 July)</p>	<p>Article 16 (Undue receipt or offer of an advantage)</p>	<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 pecuniary or non-pecuniary 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 previous paragraph.</p> <p>4 - The preceding paragraphs exclude conduct that is socially appropriate and conforms to custom.</p>
	Article 17 (Passive corruption)	<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 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 a political office-holder, or 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 - A political office-holder who, in the exercise of his or her functions or because of them, by him or herself or through an intermediary, with his or her consent or ratification, gives or promises to an official, a senior public office-holder or another political office-holder, or to a third party with his or her knowledge, a pecuniary or non-pecuniary advantage that is not due to him or her, for the purposes indicated in article 17, shall be punished with the penalties provided for in the same article.</p>
	Article 20 (Embezzlement)	<p>1 - A political office-holder who, in the exercise of his or her functions, unlawfully appropriates, for his or her own benefit or for the benefit of another person, money or any movable or immovable item, whether public or private, that has been handed over to him or her, is in his or her possession or is accessible to him or her by reason of his or her functions, shall be punished with imprisonment of between three and eight years and a fine of up to 150 days, if a more serious penalty does not apply to him or her 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 number, 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 a business)	<p>1 - The holder of a political office who, with the intention of obtaining, for himself or herself or for a third party, unlawful economic participation, damages in a legal transaction the patrimonial interests that, in whole or in part, it is his or her duty, by reason of his or her 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 pecuniary 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 recovery, collection, liquidation 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 he or she thereby affects.</p>
	Article 26 (Abuse of powers)	<p>1 - Political office-holders who abuse their powers or violate the duties inherent to their functions, with the intention of obtaining, for themselves 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 previous paragraph.</p>
Code of Military Justice (Law no. 100/2003, of 15 November)	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 due, 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 offence, voluntarily repudiates the offer or promise he/she had agreed to or returns the advantage or, in the case of a fungible item, its value, he/she shall be excused 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 to 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 that 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 offences referred to in the previous paragraph is an officer of a higher rank than the military person 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 31 August)	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 - 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 pecuniary or non-pecuniary 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 number, shall be punished with imprisonment of up to 3 years or with a fine, if a more serious penalty does not apply by virtue of another legal provision.</p> <p>3 - The provisions of Article 13 shall apply accordingly.</p>
	Article 10a (Undue offer or receipt of an advantage)	<p>1 - A sports agent who, by him/herself or through an intermediary, with his consent or ratification, requests or accepts, for him/herself or for a third party, directly or indirectly, in the exercise of his/her 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/her dependent on the exercise of his/her 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 course 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 - Excluded from the previous paragraphs are behaviors that are socially appropriate and conform to custom.</p>
Criminal regime for corruption in international trade and private activity (Law no. 20/2008, of 21 April)	Article 7 (Active corruption to the detriment of 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 a business deal, 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 - Private sector workers who, by themselves or, with their consent or ratification, through an intermediary, request or accept, for themselves 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 their 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>

	<p>Article 9 (Active corruption in the private sector)</p>	<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 that 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 aims 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>
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ANNEX II

Areas of activity, associated risks and their classification

Risk Categories	Risk Factor Description	Risk Assessment			Preventive Measures Implemented
		PO	SC	RG	
Relations with third parties (i.e. distributors, agents, consultants, representatives)⁽³⁾	Establishing relationships with third parties that are not reasonable and/or proportionate to the services provided by third parties	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, in particular the rules on third party management, especially in the case of third parties classified as "high risk" (e.g. in high-risk countries and large suppliers) ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Monitoring of relations with third parties by employees with duties and/or competences in terms of regulatory compliance
	Establishing business relationships with third parties who are the subject of investigations and/or judicial decisions in criminal proceedings relating to crimes of corruption or related offences or who are Politically Exposed Persons	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, in particular the rules on third party management ✓ Monitoring of relations with third parties by employees with duties and/or competences in terms of regulatory compliance
	Offering or receiving gifts or similar benefits, gratuities, remuneration, commissions, travel, accommodation, favors, privileges or any other type of incentive or advantage, whether pecuniary or non-pecuniary, which	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, in particular the rules on gifts, hospitality, entertainment, and others

³ This category also covers indirect relationships involving other SBM Offshore entities.

	may affect the impartiality of the duties performed, be perceived as a bribe or illegitimate influence and/or as a means of granting/obtaining undue advantage				
Relations with Suppliers and Customers (4)	Establishing relationships with suppliers and/or customers that are not reasonable and/or proportional to the services provided/products traded	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients). ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Application of the approval and autonomy matrix grid, with defined levels, for approving commercial proposals ✓ Intervention of different SBM Portugal employees in commercial transactions ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools ✓ Mandatory archive of all contractual documentation relating to contracts executed by SBM Portugal
	Establishing business relationships with suppliers/customers who are the subject of investigations and/or judicial decisions in criminal proceedings relating to crimes of corruption or related offences or who are Politically Exposed Persons.	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, specifically with regard to carrying out due diligence procedures before establishing any business relationship with a new client/supplier and

⁴ This category also covers indirect relationships involving other SBM Offshore entities.

					periodically when relationships are extended over time, especially in case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients).
	Contracts/subcontracts not approved or approved with the wrong level of delegation of authority	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients). ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Application of the approval and autonomy matrix grid, with defined levels, for approving commercial proposals ✓ Intervention of different SBM Portugal employees in commercial transactions ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	Acceptance of prices and conditions of supply and/or payment that are not reasonable and proportionate to the services/products transacted	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients).

					<ul style="list-style-type: none"> ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Application of the approval and autonomy matrix grid, with defined levels, for approving commercial proposals ✓ Intervention of different SBM Portugal employees in commercial transactions ✓ Monitoring of commercial transactions by officials with duties and/or competences in terms of regulatory compliance ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	Establishment of business relationships without a written contract	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Creation and use of pre-defined draft contracts when contracting third parties, whenever possible ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	Drawing up and formalizing contracts that do not allow easy monitoring of the goods/services provided and/or control of payments	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients). ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Creation and use of pre-defined draft contracts when contracting third parties, whenever possible

					<ul style="list-style-type: none"> ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools ✓ Mandatory archive of all contractual documentation relating to contracts executed by SBM Portugal
	Excessive renewal/extension of the term of contracts or conclusion of amendments to contracts without reviewing the terms and conditions negotiated, avoiding market consultations	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, particularly with regard to the need to launch periodic tenders, especially in case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients) ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Creation and use of pre-defined draft contracts when contracting third parties, whenever possible ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	Receiving a bribe/undue advantage to select, hire and/or favor one supplier/customer in detriment of another	M	M	M	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of suppliers

					<p>and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients).</p> <ul style="list-style-type: none"> ✓ Application of the approval and autonomy matrix grid, with defined levels for approving commercial proposals ✓ Intervention of different SBM Portugal employees in commercial transactions ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools. ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	<p>Acquisition of goods that do not derive from real needs for benefits outside the organization</p>	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients). ✓ Application of the approval and autonomy matrix grid, with defined levels, for approving commercial proposals ✓ Intervention of different SBM Portugal employees in commercial transactions ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools.

					<ul style="list-style-type: none"> ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	Fractionation of purchases/expenditure, so as not to exceed the defined purchase approval matrixes and/or delegations of approval authority	L	L	L	<ul style="list-style-type: none"> ✓ Application of the approval and autonomy matrix grid, with defined levels, for approving commercial proposals ✓ Monitoring of commercial transactions and/or accounting movements by employees with duties and/or competences in terms of regulatory compliance
	Occurrence of bribery, influence peddling and/or gifts to private sector officials in order to win a tender or secure the award of a contract	M	M	M	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, especially in the case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients). ✓ Application of and compliance with Supply Chain's purchasing management processes ✓ Intervention of different SBM Portugal employees in commercial transactions ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools. ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	Offering or receiving gifts or similar benefits, gratuities, remuneration, commissions, travel, accommodation, favors, privileges or any other type of incentive or advantage, whether pecuniary or non-pecuniary, which may affect the impartiality of the duties performed, be	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, in particular the rules on gifts, hospitality, entertainment, and others, especially in case of suppliers and/or clients classified as "high risk" (e.g. in high-risk countries and large suppliers and/or clients).

	perceived as a bribe or illegitimate influence and/or as a means of granting/obtaining undue advantage				
	Lack of independence in the decision to commercialize projects with clients who are related parties or whose project is of personal interest (conflict of interest)	L	L	L	<ul style="list-style-type: none"> ✓ Application and compliance with the Conflicts of Interest Policy
	Diversion of funds due to recording invoices (i) without a contractual framework, (ii) without supporting documentation, (iii) without evidence of delivery/provision of the goods/services, (iv) without approval and/or (v) inconsistent with contracts and/or purchase orders without apparent justification	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy ✓ Application of and compliance with Supply Chain's purchasing management and Finance's Accounts Payable processes ✓ Intervention of different SBM Portugal employees in commercial transactions and/or accounting movements ✓ Monitoring of commercial transactions and/or accounting movements by officials with duties and/or competences in terms of regulatory compliance ✓ Mandatory archive of all contractual documentation relating to contracts signed by SBM Portugal
	Creation of fictitious third parties and/or manipulation of the information of third parties registered in the computer system	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy ✓ Application of and compliance with Supply Chain's purchasing management and Finance's Accounts Payable processes ✓ Application of a policy that requires confirmation from the supplier and/or customer of the veracity of changes to accounting and payment data
	Offering or receiving gifts or similar benefits, gratuities, remuneration, commissions, travel, accommodation, favors, privileges or any other type of incentive or	M	M	M	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, in particular the rules on gifts, hospitality, entertainment, and others

Business Development ⁽⁵⁾	advantage, whether pecuniary or non-pecuniary, which may affect the impartiality of the duties performed, be perceived as a bribe or illegitimate influence and/or as a means of granting/obtaining undue advantage				
	Awarding donations and/or sponsorships with the purpose of exerting undue influence over the beneficiary organization and/or granting/obtaining undue advantage	L	M	L	✓ Application of and compliance with the Anti-Bribery and Corruption Policy, in particular the rules on gifts, hospitality, entertainment, and others
	Lack of independence and impartiality when awarding donations and/or sponsorships due to conflicts of interest (family, political, commercial or personal) with third parties (public and/or private)	L	L	L	✓ Application and compliance with the Conflicts of Interest Policy
	Manipulation of financial statements to obtain benefits outside the organization	L	M	L	✓ Carrying out internal and external audits of SBM Portugal's accounting structure, in order to identify potential unwanted deviations
	Misappropriation of funds by employees with powers to operate bank accounts	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy ✓ Application of the approval and autonomy matrix grid, with defined levels, for making movements on bank accounts ✓ Intervention of different SBM Portugal employees in commercial transactions and/or accounting movements ✓ Monitoring of commercial transactions and/or accounting movements by officials with duties and/or competences in terms of regulatory compliance
	Manipulation of bank reconciliations to obtain benefits outside the organization in order to hide/modify	L	L	L	✓ Application of and compliance with the Anti-Bribery and Corruption Policy

⁵ This category also covers indirect relationships involving other SBM Offshore entities.

	movements in bank accounts that are suspicious and/or unrelated to the company's activity				<ul style="list-style-type: none"> ✓ Application of and compliance with Finance's Accounts Payable processes ✓ Application of the approval and autonomy matrix grid, with defined levels, for making movements on bank accounts ✓ Intervention of different SBM Portugal employees in commercial transactions and/or accounting movements ✓ Monitoring of commercial transactions and/or accounting movements by employees with duties and/or competences in terms of regulatory compliance
Involvement with the government or public bodies	Establishing business relationships with third parties who are Politically Exposed Persons	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, in particular the rules on interactions with public officials, political contributions and <i>lobbying</i> activities ✓ Monitoring of commercial transactions by employees with duties and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools.
	Offering or receiving gifts or similar benefits, gratuities, remuneration, commissions, travel, accommodation, favors, privileges or any other type of incentive or advantage, whether pecuniary or non-pecuniary, which may affect the impartiality of the duties performed, be perceived as a bribe or illegitimate influence and/or as a means of granting/obtaining undue advantage	L	M	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, specifically the rules on interactions with public officials, gifts, hospitality, entertainment, and others
	Events of bribery, influence peddling and/or gifts to public officials, with the aim of winning a public tender,	M	M	M	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy

	securing the award of a contract, facilitating the allocation of financial support or facilitating the conduct of an inspection of the company's activity.				<ul style="list-style-type: none"> ✓ Intervention of different SBM Portugal employees in commercial transactions ✓ Monitoring of commercial transactions by employees with functions and/or competences in the field of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools. ✓ Mandatory archive of all contractual documentation relating to tenders in which SBM Portugal participates and/or contracts entered into by SBM Portugal
Joint Ventures	Establishment of commercial partnerships (<i>joint ventures</i>) with other entities that are the subject of investigations and/or judicial decisions in criminal proceedings relating to crimes of corruption or related offences or that are Politically Exposed Persons.	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of business partners classified as "high risk" (e.g. in high-risk countries). ✓ Monitoring of relations with business partners by employees with duties and/or competences in the area of regulatory compliance
	Occurrence of bribery, influence peddling and/or offers to business partners, with the aim of achieving a certain advantage/obtaining a certain benefit (even if legitimate)	L	L	L	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy, especially in the case of business partners classified as "high risk" (e.g. in high-risk countries) ✓ Monitoring of relations with business partners by officials with duties and/or competences in the area of regulatory compliance
Geography ⁽⁶⁾	Establishing business relationships with third parties who are the subject of investigations and/or judicial	M	M	M	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk

⁶ This category also covers indirect relationships involving other SBM Offshore entities.

	<p>decisions in criminal proceedings relating to crimes of corruption or related offences or who are Politically Exposed Persons</p>				<p>management policy, especially in the case of third parties classified as "high risk" (e.g. in high-risk countries with high levels of corruption).</p> <ul style="list-style-type: none"> ✓ Monitoring of relations with third parties located in high-risk countries by employees with special functions and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools
	<p>Establishment of business relationships with third parties located in a specific risk jurisdiction, which could be perceived as bribery or illegitimate influence and/or as a way of granting/obtaining undue advantage</p>	M	M	M	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of third parties classified as "high risk" (e.g. in high-risk countries with high levels of corruption) ✓ Monitoring of relations with third parties located in high-risk countries by employees with special functions and/or competences in terms of regulatory compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools
	<p>Occurrence of events of bribery, influence peddling and/or gifts to public or private sector officials, with the aim of achieving a certain advantage/obtaining a certain benefit (even if legitimate) in a specific risk jurisdiction</p>	M	M	M	<ul style="list-style-type: none"> ✓ Application of and compliance with the Anti-Bribery and Corruption Policy and the third-party risk management policy, especially in the case of business partners classified as "high risk" (e.g. in high-risk countries) ✓ Monitoring of relations with third parties located in high-risk countries by employees with special functions and/or competences in terms of regulatory

					compliance, including the application of rules on the operation of internal and hierarchical reporting channels, the preparation of internal and external audits and the monitoring and management of risks using appropriate tools
Regulatory Compliance	Failure to comply with the policies, standards and objectives defined by SBM Offshore and/or SBM Portugal	L	M	L	<ul style="list-style-type: none"> ✓ Holding regular meetings with the teams, according to the needs of each team ✓ Periodically evaluate the effectiveness of the training, policies and measures implemented (at least every 18 months), monitoring the evolution of risks and the adequacy of the necessary responses ✓ Periodically adapt awareness-raising measures, such as specific training courses on criminal risks
	Occurrence of improper behavior on the part of employees, including the practice of behavior that entails potential risks of corruption and related offences and violation of safety rules by any employee	L	M	L	<ul style="list-style-type: none"> ✓ Drawing up appropriate policies to prevent risks in the workplace and effectively publicizing them to employees ✓ Effective dissemination of regulatory compliance policies by SBM Portugal, making them available to all employees when they start work and renewed periodically ✓ Periodically evaluate the effectiveness of the training, policies and measures implemented (at least every 18 months), monitoring the evolution of risks and the adequacy of the necessary responses. ✓ Periodically adapt awareness-raising measures, such as specific training courses on criminal risks ✓ Applying sanctions/disciplinary measures to employees who do not comply with the applicable standards ✓ Monitoring the proper functioning of the Speak Up Line (Whistleblowing Channel)

	Accumulation by employees of public/private functions and/or other situations likely to generate conflicts of interest that could interfere with the performance of their duties	L	L	L	✓ Application and compliance with the Conflicts of Interest Policy
	Approval of expenses incurred by employees and members of management that are not documented, do not fall within the scope of SBM Portugal's activity and/or whose amount is not appropriate taking into account the nature of the expense	L	M	L	✓ Application of a policy on reimbursement of expenses incurred by employees, whereby expenses that are not justified and approved in the context of SBM Portugal's activity are not reimbursed.
	Unduly favoring or disfavoring candidates in the recruitment and selection process	L	L	L	✓ Involvement of more than one person in recruitment processes and, where possible, ensuring diversity in the people involved in recruitment processes
	Manipulation of information related to employee salary processing, resulting in potential undue payments	L	L	L	<ul style="list-style-type: none"> ✓ Application of the approval and autonomy matrix grid, with defined levels, for making movements on bank accounts ✓ Monitoring of salary policy by employees with duties and/or competences in terms of regulatory compliance
	Favoring or disfavoring employees when approving salary increases	L	L	L	<ul style="list-style-type: none"> ✓ Regular market consultations before approving salary increases ✓ Monitoring of salary policy by employees with duties and/or competences in terms of regulatory compliance



ANNEX III

Code of Conduct and the Annex for SBM Portugal



ANNEX IV

Speak Up Policy (Complaints Channel)