

# Bribery and Corruption Policy

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## Introduction

Promarinha is committed to observing the laws which govern our activities. This policy sets out Promarinha's actions to prevent acts of bribery and corruption; it helps you identify the situations in which you deal with bribery and corruption in order to avoid bad practices and being outside the law.

Promarinha strives to undertake business in a fair and honest manner, acting with integrity in all our dealings. All our activities are conducted in accordance with all applicable legal and regulatory requirements. Promarinha does not tolerate any form of bribery and corruption.

## Promarinha's Policy on Bribery and Corruption

We have a zero tolerance towards bribery by our employees, suppliers and clients. As such, it is our policy to comply with all rules and legislation governing anti-bribery and corruption laws of Portugal (L 20/2008). All our employees are required to comply with our anti-bribery policy and this requirement is extended to our suppliers and clients.

We also have a strong culture where employees are empowered to report any conduct that they believe to be in breach of our policy.

It is a condition of employment that all staff complies with this policy

## What is Bribery?

Bribery is offering, receiving, giving, promising or soliciting of a financial or other non-financial advantage to somebody for the purpose of influencing their actions in the discharge of their duties. The Portuguese law defines improper performance as a breach of trust, lack of impartiality or performance in bad faith.

Bribes can take many forms, for example: cash; unreasonable gifts, entertainment or hospitality; kickbacks; unwarranted rebates or excessive fees; facilitation payments; payments made to perform their normal job; prioritize a particular person; personal favours; political/charitable contributions; anything else of value;

## Facilitation payments

Facilitation payments are small unofficial payments to ensure or speed up performance of routine or necessary action. These will be seen as bribes by the law and are against Promarinha's policy.

Promarinha and its Employees do not make and not accept facilitation payments of any kind.

## Concerns

If you are concerned about possible improper conduct, please refer your concerns directly to Promarinha's Management.