



PLAN FOR THE PREVENTION OF CORRUPTION RISKS AND RELATED OFFENSES

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I

INTRODUCTORY NOTE

Corruption is one of the main threats to the Democracy and to equality, freedom, justice, and transparency. This led to the creation of the National Anti-Corruption Strategy 2020-2024.

Under this strategy, Decree-Law No. 109-E/2021 of December 9 (hereinafter referred to as DL 109-E/2021) established the Portuguese National Anti-Corruption Mechanism (NACM) and the General Corruption Prevention Regime (GCPR).

This legislation requires companies with 50 or more employees to adopt instruments that promote a culture of integrity and enforce mandatory practices to prevent corruption, including:

- a) Corruption Risk Prevention Plans;
- b) Codes of Conduct;
- c) Internal and External Whistleblowing Channels;
- d) Training and Communication Programs;
- e) Internal Control Systems;
- f) Appointment of a Compliance Officer.

Non-compliance with these measures lead to sanctions.

In compliance with this legislation and maintaining high standards of professional responsibility and ethics, 3HB Hotels Group developed this Corruption Risk Prevention Plan (hereinafter referred to as “CRPP”).

According to the GCPR, this CRPP:

- a) Covers the entire organization and operations of 3HB Hotels Group, including all obligated companies;
- b) Identifies, analyzes and classifies risks that may expose Grupo 3HB Hotels to corruption and related issues;
- c) Implements preventive and corrective measures to minimize these risks and to mitigate their impact if they happen.

CRPP was developed based on an analysis of the activities and processes of 3HB Hotels Group, with a special focus on corruption risks and their control mechanisms.

The plan is structured into three main areas:

- a) Identification and assessment of corruption risks, along with preventive and corrective control measures;
- b) Implementation of the CRPP;
- c) Plan monitoring and evaluation.

III

SCOPE OF APPLICATION

- 2.1. The CRPP applies to all employees of the 3HB Hotels Group, including all individuals working under an employment contract, as well as in training programs or professional internships. The CRPP is also applicable, with the necessary adaptations, to the Group's governing bodies, including shareholders, directors and managers, and to suppliers, service providers and subcontractors, in accordance with the specific terms and conditions resulting from their agreements.
- 2.2. The scope of the Plan covers all units of the 3HB Hotels Group, in order to identify, prevent and mitigate the occurrence of corruption risks and related infractions.
- 2.3. All employees must be guided by the provisions of this Plan and their conduct in professional relationships with third parties must be in harmony with its terms, the Code of Conduct and also with all applicable legislation and regulations.

III

COMPLIANCE OFFICER

- 3.1. The Compliance Officer is appointed by the Board Members and oversees monitoring, controlling and executing the Regulatory Compliance Program.
- 3.2. The Compliance Officer performs his/her duties with independence and decision-making autonomy, having access to internal information and the technical and human resources necessary to perform his/her duties.
- 3.3. The Compliance Officer must provide all clarifications regarding the 3HB Hotels Group's regulatory compliance program and will promote the carrying out of regular internal audits with a view to assessing compliance.

IV

GENERAL RESPONSIBLE FOR THE EXECUTION, CONTROL AND IMPLEMENTATION OF THE CRPP

The Compliance Officer is responsible for the execution, control and review of the CRPP.

V

IDENTIFICATION, ANALYSIS AND CLASSIFICATION OF CORRUPTION RISKS AND RELATED OFFENCES

The 3HB Hotels Group condemns any act of corruption or illicit conduct, requiring strict compliance with national and international anti-corruption regulations.

Employees are expressly forbidden to have any conduct that could constitute potential acts of corruption or other related offenses, as detailed in **Annex I**.

5.1. METHODOLOGY FOR THE DEVELOPMENT, IMPLEMENTATION, AND EXECUTION OF THE PLAN

To ensure that situations potentially leading to corruption and related offenses are properly managed, it is necessary to assess risk activities and determine the organization's level of exposure.

The risk assessment considers:

- a) Probability of Occurrence: The degree of certainty regarding the occurrence of the risk.
- b) Impact: Consequences (financial and reputational) for the organization.

For an effective evaluation of the risks, it's necessary to:

- a) Identify risk situations in the group's activities that may expose the entity to acts of corruption and related infractions;
- b) Analyze the probability and impact, namely considering the complexity and frequency of activities, the automation and standardization of processes, the internal controls and the cost of correcting errors, the segregation of functions and employee profiles, the access to confidential information or the use of third parties and the quality of support systems;
- c) Classify the risks based on probability and impact (Weak, Moderate or High).

Once the risk and the risk level have been examined, corrective measures are defined in order to ensure the proper mitigation of the identified risks.

Therefore, in this Plan:

1. Risk activities are identified;
2. The probability of the risk occurring is analysed according to the following levels:

PROBABILITY OF OCCURRENCE (PO)	
Low	The risk event occurs in exceptional circumstances; There are no sanctions or fines; Possibility of avoiding the event through existing control mechanisms.
Medium	The risk event occurs at some point during the year; One or two sanctions occur in the same year; Possibility of avoiding the event through preventive decisions and actions
High	The risk event occurs several times throughout the year; Three or more sanctions occur in the same year; Difficulty in preventing the event with preventive decisions and actions.

3. Subsequently, the impact of the occurrence is analysed, according to the following levels:

SEVERITY OF CONSEQUENCE (SC)	
Low	Does not impact new business opportunities; There is no breach of legal obligations; Damage with little or no impact on the group's reputation.
Medium	Obstacles to new business opportunities in the short or medium term; Failure to comply with legal obligations for short periods; Medium-impact damage to the group's reputation.
High	Barriers new business opportunities; Failure to comply with legal obligations for long periods; Significant damage to the group's reputation.

4. From the correlation between the probability of occurrence and the severity of the consequence of each risk, we obtain the Risk Degree (RD), which can be weak, moderate or high:

RISK DEGREE (RD)				
		Probability of Occurrence		
		Low	Medium	High
Severity of Consequence	High	Moderate	High	High
	Medium	Weak	Moderate	High
	Low	Weak	Weak	Moderate

Where the following are considered:

- *High Risk*: Serious situation that could lead to very high financial losses, serious violation of the company's strategy, policies and values, considerable damage to the group's reputation/prestige and serious non-compliance with legal and regulatory provisions;
- *Moderate Risk*: Situation that may lead to financial losses and/or result in damage to the group's reputation;
- *Low Risk*: Situation in which the financial and reputational impact is limited.

5. Considering the risk degree, preventive and corrective measures and the actions necessary to mitigate the risk are planned.

Annex II to this Plan has the risk matrix and preventive measures specifically designed to prevent or correct each of the identified risks, established in accordance with the 3HB Hotels Group's methodology and risk assessment described here.

Without prejudice to the measures specifically designed to prevent or correct each of the risks identified in the various areas – listed in Annex II – the 3HB Hotels Group also adopts general measures to prevent corruption and related infractions, which are described in **Annex III** to this Plan.

5.2. APPLICATION AND MONITORING OF THE CORRUPTION AND RELATED INFRACTIONS RISK PREVENTION PLAN

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

- a) Preparation of interim assessment report in October of each year, regarding identified high-risk situations;
- b) Preparation of an annual assessment report in April of the year following the execution period, that includes the quantification of the degree of implementation of the preventive and corrective measures, as well as the forecast for their implementation.

Furthermore, the Group has implemented an internal control procedure that involves the key managers of each area and that implies the direct and daily management of risks, with the practical application of preventive and corrective mechanisms and measures and the periodic assessment of the existence and implementation of opportunities for improvement.

The 3HB Hotels Group will review the Corruption Prevention and Related Offenses Plan every three years or whenever there is a change in the attributions or in the organic or corporate structure that justifies the review of any of its elements.

VI

DISCLOSURE

The 3HB Hotels Group ensures the publication of the Corruption Risk Prevention Plan and the respective interim and annual assessment reports, making them accessible to all managers, employees, suppliers, customers and third parties, through their publication on the official website, within 10 days from the implementation of the Plan and respective revisions.

This CRPP must be read and understood by all employees. Commitment to the standards established here is essential to maintaining a productive work environment.

Albufeira, February 13, 2025.

ANNEX I

List of corruption crimes and related offenses

Under article 3 of the GCPR, "corruption and related offenses" include crimes such as corruption, receiving or offering undue advantages, economic participation in business, abuse of power, influence peddling, money laundering, among others, as provided for in applicable legislation.

- **Corruption** (Articles 372.º to 374.º-A of the Portuguese Penal Code): The practice of any act or omission thereof, whether in either case lawful or unlawful, in exchange for receiving an undue advantage, for oneself or for a third party.
- **Undue receipt of advantage** (Article 372.º, n.º 1 of the Portuguese Penal Code): When the civil servant, in the exercise of his/her functions or by reason thereof, by himself/herself or through an intermediary, with his/her consent or ratification, requests or accepts, for himself/herself or for a third party, a patrimonial or extra-patrimonial advantage, which is not due to him/her.
- **Passive corruption for an unlawful act** (Article 373.º, n.º 1 of the Portuguese Penal Code): When the employee, by himself or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, a patrimonial or non-patrimonial advantage, or its promise, for the practice of any act or omission contrary to the duties of the position, even if prior to that request or acceptance.
- **Passive corruption for a lawful act** (Article 373.º, n.º 2 of the Portuguese Penal Code): When the employee, by himself or through an intermediary, with his consent or ratification, requests or accepts, for himself or for a third party, a patrimonial or non-patrimonial advantage, or its promise, for the practice of any act or omission not contrary to the duties of the position and the advantage is not due to him, even if prior to that request or acceptance.
- **Active corruption** (Article 374.º, n.º 1 of the Portuguese Penal Code): When someone, personally or through an intermediary with their consent or ratification, gives or promises to an employee, or to a third party with the knowledge of the latter, a patrimonial or non-patrimonial advantage that is not due to the employee, with the aim of obtaining any act or omission contrary to the duties of the position.
- **Embezzlement** (Article 375.º, n.º 1 of the Portuguese Penal Code): When an employee illegitimately appropriates, for his own benefit or that of another person, money or any movable property, public or private, that has been given to him, is in his possession or is accessible to him by reason of his duties.
- **Embezzlement of use** (Article 376.º, n.º 1 of the Portuguese Penal Code): When an employee uses or allows another person to use, for purposes other than those for which they are intended, vehicles or other movable property of appreciable value, public or private, which are handed over to him, are in his possession or are accessible to him by reason of his functions.
- **Economic participation in business** (Article 377.º, n.º 1 of the Portuguese Penal Code): When an employee, with the intention of obtaining, for himself or for a third party, illicit economic participation, harms in a legal transaction the patrimonial interests that, in whole or in part, he is responsible for, by reason of his function, administering, supervising, defending or carrying out.
- **Violation of confidentiality** (Article 383.º, n.º 1 of the Portuguese Penal Code): When an employee, without being duly authorized, reveals a secret that he has become aware of or that was entrusted to him in the exercise of his

functions, or whose knowledge has been facilitated by the position he holds, with the intention of obtaining, for himself or for another person, a benefit, or with the awareness of causing harm to the public interest or to third parties.

- **Money laundering** (Article 368.º-A of the Portuguese Penal Code): When an employee converts, transfers, assists or facilitates any operation involving the conversion or transfer of benefits, obtained by him/herself or by a third party, directly or indirectly, with the aim of disguising their illicit origin, or of preventing the author or participant of these infractions from being criminally prosecuted or subjected to criminal reaction.
- **Influence Peddling** (Article 335.º of the Portuguese Penal Code): When someone, 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, or the promise thereof, to abuse their influence, real or supposed, with any public entity.
- **Illegal appropriation of public assets** (Article 234.º of the Portuguese Penal Code): Anyone who, by virtue of the position they hold, holds the administration, management or simple capacity to dispose of assets of the public or cooperative sector, and in any way illegitimately appropriates them or intentionally allows another person to illegitimately appropriate them.
- **Harmful administration** (Article 235.º of the Portuguese Penal Code): When someone, intentionally violating control standards or economic rules of rational management, causes significant property damage to an economic unit in the public or cooperative sector.
- **Abuse of power** (Article 382.º of the Portuguese Penal Code): When an employee abuses his powers or violates duties inherent to his functions, with the intention of obtaining, for himself or for a third party, an illegitimate benefit or causing harm to another person.
- **Concussion** (Article 379.º of the Portuguese Penal Code): When an employee, in the exercise of his/her functions or powers arising therefrom, by himself/herself or through an intermediary with his/her consent or ratification, receives, for himself/herself, for the State or for a third party, by misleading or taking advantage of the victim's error, a financial advantage that is not due to him/her, that is, greater than what is due, notably a contribution, fee, emolument, fine or penalty.
- **Bribery** (Article 363.º of the Portuguese Penal Code): An act of bribery is committed by anyone who convinces or attempts to convince another person, through a donation or promise of a financial or non-financial advantage, to give false testimony or declaration in a legal proceeding, or to give false testimony, expertise, interpretation or translation, without these acts being committed.
- **Forgery committed by a public worker** (Article 257.º of the Portuguese Penal Code): When the public servant, in the exercise of his/her duties, omits in a document, to which the law attributes public faith, a fact that this document is intended to certify or authenticate, or inserts an act or document in a protocol, register or official book, without complying with the legal formalities, with the intention of causing harm to another person or to the State, or of obtaining an illegitimate benefit for himself/herself or another person.
- **Improper use of a secret** (Article 196.º of the Portuguese Penal Code): This crime is committed by anyone who, without consent, takes advantage of a secret relating to another person's commercial, industrial, professional or artistic activity, of which they have become aware by reason of their status, office, employment, profession or art, and thereby causes harm to another person or to the State.

- **Forgery or counterfeiting of a document** (Article 256.º of the Portuguese Penal Code): This crime is committed by anyone who, with the intention of causing harm to another person or the State, of obtaining an illegitimate benefit for themselves or another person, or of preparing, facilitating, executing or covering up another crime:
 - a) Manufactures or prepares a false document, or any of the components intended to embody it;
 - b) Falsify or alter a document or any of its components;
 - c) Abusing another person's signature to falsify or counterfeit a document;
 - d) Falsely state in a document or any of its components a legally relevant fact;
 - e) Use the document referred to in the previous paragraphs; or
 - f) By any means, provide or hold a forged or counterfeit document.
- **Damage or subtraction of a document or technical notation** (Article 259.º of the Portuguese Penal Code): This crime is committed by anyone who, with the intention of causing harm to another person or the State, or of obtaining an illegitimate benefit for themselves or another person, destroys, damages, renders unusable, causes to disappear, conceals or subtracts a document or technical notation, which they cannot or cannot exclusively dispose of, or which another person can legally demand delivery or presentation of.
- **Computer and communications fraud** (Article 221.º of the Portuguese Penal Code): This crime is committed by anyone who, with the intention of obtaining illegitimate enrichment for themselves or a third party, causes financial loss to another person, interfering in the result of data processing or through incorrect structuring of a computer program, incorrect or incomplete use of data, use of data without authorization or intervention in any other unauthorized way in the processing.

ANNEX II

Areas of activity, associated risks, respective qualifications and prevention measures

FUNCTIONS/DEPARTMENTS	RISKS	RISK ANALYSIS AND CLASSIFICATION			PREVENTIVE/CORRECTIVE MEASURES
		OP	CS	RD	
All Departments	Active corruption in customer relations	Low	Low	Weak	<ul style="list-style-type: none"> - Disclosure, knowledge and compliance with the code of conduct; - Prohibition on granting any type of advantage, including gifts, offers, discounts or giveaways, to customers, except as established in the Code of Conduct; - Review of all tariffs by the autonomous Revenue Audit department; - Review of all receipts by the Revenue Control department.
Human Resources Management	Inadequacy or incorrectness in compliance with frequency control procedures, pay status, reporting of pay status and registration of new employees	Low	Medium	Weak	<ul style="list-style-type: none"> - Disclosure, knowledge and compliance with the code of conduct; - Double validation of procedures by the hierarchy; - Alerts of inaccuracy by other entities involved in HR management procedures.
	Conflict of interest in recruitment procedures	Low	Low	Weak	<ul style="list-style-type: none"> - Disclosure, knowledge and compliance with the code of conduct.
Financial Management	Inadequacy or incorrectness in the processing of payments of bonuses, salaries or others	Low	Medium	Weak	<ul style="list-style-type: none"> - Disclosure, knowledge and compliance with the code of conduct; - Double validation of procedures by the hierarchy; - Documentary comparison between documented and accounting movements and bank balances; - Alerts of incorrect information by employees and other creditors; - Periodic audits.
	Manipulation of accounts receivable for one's own benefit or that of third parties to the detriment	Low	Low	Weak	
	Making undue payments to the detriment/benefit of specific interests or for one's own benefit or that of third parties	Low	Low	Weak	
Financial Management Administration	Requests for granting, maintaining or changing bank financing	Low	High	Moderate	<ul style="list-style-type: none"> - Requests for granting, maintaining or changing bank financing are monitored jointly by the Finance Department and legal counsel; - Requests for granting, maintaining or changing bank financing are always validated, approved and signed by two directors.
	Fraud in obtaining or diverting subsidies or grants from the State, Social Security, bodies of the Ministry of Economy and any other public entities	Low	High	Moderate	<ul style="list-style-type: none"> - All requests for grants and subsidies are previously validated by the Director of the respective Department and, subsequently, by the administration.
Purchases	Receiving advantages and illicit favoritism in the relationship with suppliers of goods and services in the private sector or with agencies (selection, negotiation, conclusion, execution, monitoring, or	Low	Medium	Weak	<ul style="list-style-type: none"> - Disclosure, knowledge and compliance with the code of conduct; - Hierarchical validation in compliance with the execution of procedures; - To contract goods and services, at least three proposals must be requested from different

Sales Management	termination of contracts)				entities; - The decision to hire must be taken collectively; - Contracts must be signed by management; - Limitation on employees involved in the contracting of goods and services receiving, directly or indirectly, gifts or offers from suppliers of the goods or services in question.
	Acquisition of services that exceed real needs or at inflated prices in exchange for a benefit/advantage	Low	Medium	Weak	
	Granting (or promising to grant) benefits (pecuniary or otherwise) in exchange for the granting of advantages or benefits	Low	Medium	Weak	
Reception Reservations Department Sales & Revenue Financial Management	Improper sharing or disclosure of confidential or proprietary information, data and records	Medium	High	High	- Disclosure, knowledge and compliance with the code of conduct, especially in terms of duties of reservations, confidentiality and secrecy of the matters being dealt with; - Hierarchical validation of compliance in the execution of procedures; - Training.

ANNEX III

Areas of activity, associated risks, respective graduation and prevention measures

Without prejudice to the measures specifically designed to prevent or correct each of the identified risks, the 3HB Hotels Group also implements the following general measures to prevent corruption and related offenses:

- a) Make available and publicize the CRPP and the code of conduct, considering the criminal standards regarding corruption and related offenses;
- b) Make available and publicize the internal reporting channel to all employees and administrators;
- c) Make the external reporting channel available;
- d) Promote training actions adapted to the areas of activity and functions of its target audience, considering the exposure to the risks of corruption and related infractions identified but also the respective intervention in prevention or correction measures or in the evaluation system. That said, training programs will cover, at a minimum, the following topics:
 - (i) The content of the CRPP;
 - (ii) The rules contained in the Code of Conduct;
 - (iii) The functioning of the whistleblowing channel and the rights associated with the protection of whistleblowers.
- e) Promote a corporate culture of application of ethical principles and responsible behaviour, encouraging the prevention, control and repression of illegal or fraudulent acts;
- f) Make all employees and administrators aware of the importance of their individual responsibility in controlling risk behaviours;
- g) Encourage reporting of situations that constitute risky or effectively “corrupt” behaviour, ensuring appropriate means for receiving, forwarding and processing complaints, as well as confidentiality and protection of whistleblowers;
- h) Carry out regular verification actions with the aim of detecting new activities/situations capable of configuring the practice of corruption or related offenses;
- i) Ensure that the CRPP complies with applicable legislation and, in this sense, review it at least every three years.