

C-001CA

# CODE OF ETHICS AND CONDUCT – FLOENE GROUP

Code

Approved by

Board of Directors



## Index

<b>OUR IDENTITY</b>	<b>6</b>
<b>OBJECTIVES OF THE CODE</b>	<b>7</b>
GROUP CODE OF ETHICS AND DSO CODES OF CONDUCT. WHAT ARE THE DIFFERENCES?	8
ORGANIZATION OF THE CODE	9
<b>SCOPE</b>	<b>9</b>
<b>SUPERVISORY BODY</b>	<b>10</b>
<b>ETHICS COMMITTEE</b>	<b>10</b>
<b>REPORTING AND RAISING QUESTIONS</b>	<b>10</b>
<b>GENERAL RESPONSIBILITIES</b>	<b>12</b>
<b>01. COLLABORATION – COMMITMENTS REGARDING OUR PEOPLE</b>	<b>13</b>
HEALTH, SAFETY, HYGIENE, AND WELL-BEING	13
HARASSMENT	13
PROMOTION OF EQUALITY, DIVERSITY AND INCLUSION	14
PRIVACY AND PERSONAL DATA PROTECTION	14
TRAINING	15
<b>02. RESPECT – COMMITMENTS TO OUR STAKEHOLDERS</b>	<b>16</b>
<b>02.1 COMMITMENTS TO SHAREHOLDERS AND INVESTORS</b>	<b>16</b>
COMPLIANCE WITH THE LAW AND REGULATIONS	16
TRANSPARENCY AND INTEGRITY	16
BRIBERY AND INFLUENCE PEDDLING	16
PAYMENTS TO PUBLIC/PRIVATE ENTITIES AND THEIR EMPLOYEES	17
HOSPITALITY, ENTERTAINMENT, AND GIFTS	17



MONEY LAUNDERING	17
CONFLICT OF INTERESTS	18
USE OF BUSINESS INFORMATION	18
PROTECTION OF FLOENE'S ASSETS	19
SHAREHOLDERS AND CORPORATE GOVERNANCE	19
<b>02.2 COMMITMENTS TO OUR BUSINESS PARTNERS AND SUPPLIERS</b>	<b>21</b>
IMPARTIALITY	21
NON-SOLICITATION	21
INTELLECTUAL PROPERTY AND CONFIDENTIALITY	21
<b>02.3 COMMITMENTS TO OUR CLIENTS</b>	<b>22</b>
QUALITY OF OUR SERVICES	22
COMPETITION LAW	23
DATA PROTECTION	23
<b>02.4 COMMITMENTS TO OUR COMMUNITIES</b>	<b>24</b>
HUMAN RIGHTS	24
CORPORATE RESPONSIBILITY	24
<b>02.5 COMMITMENTS TO RESEARCH AND ACADEMIA</b>	<b>25</b>
<b>02.6 COMMITMENTS TO THE PUBLIC OPINION</b>	<b>25</b>
<b>03. AUDACITY – A SECTOR IN TRANSFORMATION</b>	<b>26</b>
<b>03.01 ENVIRONMENT</b>	<b>26</b>
<b>03.02 PROMOTING ENERGY TRANSITION</b>	<b>27</b>
<b>03.03 STRATEGIC PARTNERSHIPS</b>	<b>28</b>
<b>04. CODE COMPLIANCE</b>	<b>28</b>
CONSEQUENCES IN CASE OF CODE VIOLATION OR ABUSIVE USE	28



INVESTIGATIONS	29
NON-RETALIATION	29
<b>05. ANNEX – DISCIPLINARY SANCTIONS</b>	<b>30</b>



## Responsible

Approval: Board of Directors

## Revision

The Code of Ethics and Conduct - Floene Group approved, cancels, and replaces Our Code of Ethics and Conduct Galp Gás Natural Distribuição of January 16, 2018.

## Disclosure

The Board of Directors of Floene will promote the disclosure of this Code of Conduct, making it available for consultation by all recipients on the company's institutional website, at [floene.pt](https://floene.pt), and provided in an online version on the intranet ([sharepoint](#) Floene), in order to consolidate the application of the principles and the adoption of the expected behaviours.

Revisions to this document will be accompanied by appropriate information to all interested parties.



## Our Identity

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Floene Energias, S.A. (Floene) Group is the largest gas distribution network operator in Portugal, with approximately 400 employees, a network of more than 13 000 km, and a presence in more than 100 municipalities from north to south of the country, through its participation in nine gas distribution companies. Through its controlled companies, the Floene Group is responsible for managing the medium and low-pressure gas distribution network, operated under a public service regime and in accordance with the terms defined by the concession or license contract, specific sector legislation, and the Regulatory Entity for Energy Services (ERSE). The distribution operations of the Group's companies are responsible for supplying natural gas to approximately one million active consumption points. With a network consisting mostly of polyethylene (94%), the Floene Group has one of the most modern and efficient infrastructures in Europe, allowing it to ensure a supply with total safety and quality service, complying with all criteria defined by ERSE and specific sector legislation. The Floene Group is also at the forefront of renewable gas distribution since the polyethylene network allows the transport of hydrogen (mixed or pure) and non-fossil origin gases such as biomethane.

The company's identity focuses on promoting sustainability among all its stakeholders, driving the transformation and development of the communities where Floene operates, in order to continuously improve results in economic, social, and environmental aspects.

The company's long history and ability to always bring cleaner and more efficient energy solutions to the communities are based on a culture of respect and collaboration, attentive to the expectations of employees, shareholders, suppliers, customers, and other stakeholders. Over time, it has maintained a commitment to integrity, ensuring compliance with applicable legislation and regulations, as well as maintaining an internal control system.

In addition to its mission, the central role in promoting sector transformation reflects its audacity in developing new projects in the field of renewable gases, continuing to build trust and implement essential projects for the well-being of communities.



## Purpose

We Promote Sustainable Communities.

Existing since 1847, we are here to stay and embrace transformation and the sustainable progress of the communities where we operate.



## Mission

We bring you new energies with over 175 years of experience.

We lead by example and by our ability to consistently bring more efficient and cleaner energy solutions.

## Values



### COLLABORATION

We are all one.



### RESPECT

We take care of our surroundings.



### AUDACITY

We imagine and make it happen.

# Objectives of the Code

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This Code of Ethics and Conduct (hereinafter referred to as the Code of Ethics) is a guide for the conduct of our people and business partners of Floene Energias, S.A. (Floene, company, or group) and is intended to materialise in principles of action its purpose, mission and values, as well as to guide and direct daily action, so that each behaviour or action of each recipient of the code can align with Floene's corporate culture.

- Recipients: employees and every person or entity acting on behalf of Floene (business partners, suppliers, outsourcers, legal consultants, among others).
- Beneficiaries: investors, shareholders, customers, community in general.

The code outlines the fundamental ethical guidelines for Floene's actions, with a perspective of assuming ethical commitments towards:



- its people
- its stakeholders
- its business/sector.

The code establishes, for each of the situations listed within it, the commitments, and responsibilities, but also, and no less importantly, how they should be put into practice.

Built on the values that characterize our identity, the principles and commitments of the code are integrated into defining a corporate culture focused on collaboration, respect, and performance responsibility, to strengthen transparency and develop trust in relationships with stakeholders.

### Group Code of Ethics and DSO Codes of Conduct. What are the differences?

The legal foundations as well as the recipients are different when we talk about the Code of Ethics or the Code of Conduct of the ORD (Distribution Network Operators). The Code of Conduct has a legal basis and obligation, considering the gas distribution activity, establishing the legal framework for Floene as a distributor in the National Gas System. There are, therefore, 9 Codes of Conduct, one for each Distribution System Operator, whose recipients are all managers and other employees (internal public) who directly or indirectly perform functions in the Operator and in its natural gas distribution network operation structure. These codes can be consulted at [floene.pt](http://floene.pt).

The Code of Ethics, as a single document, aims to embody the company's purpose, mission, and values in uniform behaviours and principles of action in its daily operations, ensuring that the actions of each recipient of the Code align with Floene's culture. Thus, in addition to employees, this Code of Ethics is intended for all other stakeholders of Floene (internal and external public).

	Code of Conduct	Code of Ethics
Foundations	DL 62/2020 Art.º 143º RRC Art. 340.º	Floene's Purpose, Mission and Values
Recipients	BRG, DNG, DSG LBG, LTG, MDG, PXG, STG, TGG	Floene, shareholders, investors, customers, business partners and suppliers





## Organization of the Code

This Code of Ethics is based on our identity and is therefore organized into three main chapters that represent the commitments and expected behaviours by all stakeholders of the Floene Group. These chapters reflect our commitments and behaviours based on the company's values (Collaboration, Respect, Audacity), explicitly outlining the behaviours that should be followed to ensure uniformity and consistency throughout the organization. Each chapter provides examples of situations that may occur in a question-and-answer format, without constituting an exhaustive list of situations that may arise in our daily lives.

## Scope

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The code applies to Floene and to entities in which Floene holds, directly or indirectly, at least half of the share capital or voting rights or the ability to appoint at least half of the members of the management or supervisory body.

This Code applies to all employees, regardless of their employment status and the territory in which they are located or where they operate, as well as to all members of the governing bodies of any legal entity that is part of the Group. Each employee is responsible for compliance with it. The Code of Ethics also applies to consultants, agents, representatives, or any individuals representing and/or acting on behalf of any Floene company or in relation to it. All employees who, in the course of their duties, contract third parties to act on behalf of Floene must ensure that they expressly accept the rules of this Code, as well as the applicable Code of Conduct.

The commitments of the code reflect the criteria of conduct that Floene and its people should adopt and demand from each other, promoting an appropriate work environment and protecting the reputation and sustainability of the company.



**We need everyone at Floene to act in accordance with our values and with integrity and respect for others.**

The group of external recipients consists of entities that have economic, institutional, or social relationships with Floene. As external stakeholders, shareholders, investors, customers, business partners, and suppliers of Floene, among others, are bound by the code and/or benefit from it, as applicable.

Any agents, representatives, or consultants acting on behalf of Floene are recipients of this code and are bound to respect its content through contractual means. They must act consistently with the commitments made by our people and/or by Floene, as applicable, for the benefit of stakeholders.



## Supervisory Body

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The Audit Board, elected by the general assembly of this company, is the corporate body responsible for ensuring the proper functioning and application of the code.

## Ethics Committee

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### Operating powers

The Ethics and Conduct Committee (ECC) of Floene consists of three members and constitutes an independent internal structure reporting to the Audit Board. It is responsible for monitoring the implementation of the Code of Ethics, as well as clarifying any doubts about its application. The Committee is also the body that receives and handles information transmitted under *ComunicaÉtica* - Reporting of irregularities concerning alleged violations of the norms of the Code of Ethics and Conduct or internal legislation, regulations, and rules. It is also responsible for providing training to employees on ethics and conduct matters. For more information, please visit the [floene.pt](https://floene.pt) page on our portal.

## Reporting and Raising Questions

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Our code and internal policies and norms provide various essential elements for ethical behaviour. However, it may not be possible to provide a response for every situation, and doubts may arise about the decisions to be made. Therefore, it is important to be aware of the various resources available to raise questions or concerns about well-founded suspicions or confirmation of behaviours incompatible with this Code. In such situations, we support, encourage, and defend communication as provided in this Code.



To assist in making decisions or adopting behaviours in each situation, it is recommended to act sensibly and consider, at least, the following aspects:

Question	In case of doubt
Am I acting ethically, respecting the Code?	Consult the Ethics Committee
Am I aware of the potential risks, including reputational risks, and their alignment with the level of tolerance for those risks?	Consult the person with management responsibility for your function
If the situation is made public, do I still think I have acted correctly?	Consult the Ethics Committee

As important as knowing how to adjust behaviours to each situation is knowing how to communicate effectively and in a timely manner, and to whom to communicate. Communications regarding ethics and conduct matters are directed to Floene's Ethics and Conduct Committee, and the whistle-blowers' anonymity is guaranteed through the following channels:

At Floene, we act responsibly when faced with indications of behaviours incompatible with the code, actively contributing to its compliance and improvement.



#### Hierarchies

- [ComunicaÉtica Channel \(floene.pt/en/whistleblowing\)](#)
- [Letter to the ECC](#)
- [Request for a face-to-face meeting or clarification via email to \[comunicaetica@floene.pt\]\(mailto:comunicaetica@floene.pt\)](#)

We take responsibility for reporting, and we do so through the ethics channel (*ComunicaÉtica*), which is intended to prevent and/or address irregularities within Floene, within the permitted domains and scope provided by the applicable legal norms at any given time. This mechanism also serves to address other ethics and conduct issues, even if not specifically covered in the code, to the extent allowed by law.

Floene's ethics channel ensures the strictest confidentiality of the information conveyed, and the rights of access and rectification of data are also guaranteed, in compliance with the current legal regulations.

In the scope of Law 93/2021 of December 20, which establishes the general regime for the protection of whistle blowers of irregularities, Floene is developing an integrated management process for reporting.

In the case of processing data for the purpose of verifying the truthfulness of suspicions of criminal offenses, the right of access is exercised through the authority with the jurisdiction assigned in each case. The use of the *ComunicaÉtica* channel is optional, without prejudice to situations in which criminal and procedural law requires mandatory communication.



# General Responsibilities

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## What do we expect from our people?



- Act according to our code
- Read, understand and follow it on a daily basis
- Participate in training actions on this code



- Ask questions in case of need for advice on how to act
- Report potential infringements through the means provided for in our code

## What do we expect from our managers?

People in supervisory and management roles in our company have increased responsibilities in terms of responsible leadership:



- Being a role model for our teams
- Acting with integrity and consistency
- Creating an environment of inclusion and respect



- Promoting Floene's ethical standards
- Supporting teams in understanding the code and the importance of their actions in preventing non-compliant situations.



- Being vigilant for violations of our code and reporting them to the Ethics Committee
- Ensuring that no person is subjected to retaliation for reporting a potential irregularity



# 01. Collaboration – Commitments regarding our people

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## Health, Safety, Hygiene, and Well-being

We prioritize the protection of life and the safety of people and assets as the highest concern in our activities, providing the necessary resources and adopting industry reference practices.

We promote a culture of health and safety as a primary objective for sustainable development, to be achieved through continuous improvement and compliance with current legislation. The prevention of accidents and the safeguarding of health and safety at the workplace are promoted at all levels of the company and among business partners, particularly through training and awareness activities.

### Your collaboration:

- No safety practice, behaviour, or condition should be compromised for the execution of any activity/task, regardless of the location where it is performed (including teleworking).
- Any observed unsafe act or condition should be immediately reported by any employee, using the following [link](#), and the right to refuse unsafe conditions for performing an activity should be allowed.
- All accidents (including teleworking), regardless of the damage caused, should be reported according to NS-GGND-008CA, and their investigation to identify root causes and subsequent action plans to prevent future events should be ensured.
- Do not ignore signs of stress, distress, or burnout among employees, promoting a workplace where everyone is available to speak openly, without fear of retaliation.

It is mandatory that we all comply with established health and safety standards and promote a culture of safety and trust based on appropriate behaviour, contributing to a transparent and trustworthy organisation.

## Harassment

The work environment must be based on mutual respect, sharing experiences and knowledge, and collaboration. Therefore, any behaviour that may constitute harassment, whether moral (mobbing) or sexual, including forms of intimidation, such as bullying, and bad-faith reporting, is not tolerated.

At Floene, we reject and condemn any form of violence, abuse, threats, intimidation, or any other form of physical, verbal, psychological, or sexual abuse. We denounce and punish any behaviour or act aimed at or resulting in humiliation, promoting dignity and respect for human beings in the workplace.

### Your collaboration:

- Reject any intimidating behaviours and be duty-bound to report to Floene's ECC any situations that you are aware of or have reasonable suspicious of, affecting the Group or any of our people, which may constitute harassment and/or bullying.



- Refrain from improperly appropriating ideas, proposals, projects, or work from colleagues or employees.

We do not tolerate any systematic devaluation of the work of employees, promoting isolation or ridiculing attitudes towards employees or colleagues.

### **Promotion of Equality, Diversity and Inclusion**

We oppose any form of discrimination related, among others, to ethnicity, disability, age, political affiliation, gender identity, language, sexual orientation, race, religion, gender, marital or family status, ensuring equal opportunities as an employer and among our suppliers.

We promote policies and measures aimed at preventing discriminatory actions, including measures to deepen gender diversity within the organization.

At Floene, we hold our people accountable and value them based on merit, enabling them to assume autonomy and responsibilities associated with their abilities and commitment.

#### **Your collaboration:**

- Foster dignified employment, reject any acts of forced labour or labour exploitation within Floene or among its stakeholders.
- Ensure that prejudices or personal preferences are not used to influence decisions regarding the hiring of employees or suppliers, evaluation, training, dismissal, among others.
- Treat people with respect, dignity, and professionalism, without resorting to threats or other forms of humiliation.
- Respect rest time and personal and family privacy.

### **Privacy and Personal Data Protection**

We are committed to strict compliance with the current data protection legislation and ensuring the effective rights arising therefrom for our people. We also commit to ensuring adequate protection for those affected by personal data processing and protecting the right to privacy of our people and stakeholders, in accordance with the applicable legislation.

#### **Your collaboration:**

- Strictly comply with the data protection principles set out in the legislation and applicable internal rules in the exercise of your duties.
- React immediately and appropriately in case of privacy and data protection violations, promptly reporting them to the Risk Management area.
- Not share personal data with third parties without the explicit consent of the data subject or other lawful basis.
- Respect the rights of data subjects and ensure a prompt response to received requests to exercise their rights.



## Training

We provide appropriate training to our people, including training on this code.

### Your collaboration:

- Actively seek professional development that contributes to continuous updating of essential skills.
- Attend the training sessions proposed by the company.



## Questions and Answers

**Q1.** Can Floene access data from my personal electronic communications?

**A1.** This is only allowed under applicable legal terms, especially when there is suspicion of a crime.

**Q2.** If I am a victim of harassment or bullying or witness such behaviour, how can I ensure that these behaviours are addressed under this code?

**A2.** Report it to the ECC (Ethics and Conduct Committee).

**Q3.** Is anyone at Floene exempt from training on this code?

**A3.** No. Our employees must receive periodic training on this code.

**Q4.** If I am questioned or devalued, explicitly or implicitly, regarding my worth or merit to hold a position within the organization, are these behaviours covered by this code?

**A4.** Yes, and you should report it to the ECC.

**Q5.** At my workplace, I came across an unsafe practice that could lead to an environmental problem. What should I do?

**A5.** Internally communicate this to Floene's Safety, Health, and Environment area to prevent serious harm to the company and the environment.

**Q6.** My boss can be quite intimidating. Is there anything I can do about it?

**A6.** Your boss is expected to challenge and lead the team to deliver excellent performance. However, it is also expected that bosses treat everyone with respect and act with appropriate sensitivity. If you feel that you are not being treated with respect, try speaking to your boss. If the situation does not improve, you can turn to the People Management Department or, as a last resort, use the *ComunicaÉtica* channel. A healthy work environment can only be achieved with the support and involvement of everyone.

**Q7.** I am aware that a colleague is experiencing workplace harassment. Knowing that no complaint has been made due to fear of retaliation, can I be the one to report this situation??

**A7.** You took the correct first step by advising your colleague to report. If you believe it is truly a case of moral harassment, you can make the report yourself using the appropriate channels.



## 02. Respect – Commitments to our stakeholders

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### 02.1 Commitments to shareholders and investors

#### Compliance with the law and regulations

At Floene, we observe and implement the necessary measures to comply with applicable legal and regulatory duties.

##### Your collaboration:

- Comply with the current legislation regarding legal and regulatory matters and provide all requested or deemed useful or necessary collaboration to regulatory authorities, refraining from adopting any behaviour that may hinder the exercise of their competencies.

#### Transparency and integrity

At Floene, we are committed to maintaining accurate and complete information and reporting the company's performance transparently, in accordance with applicable legal duties and good practices in the capital market.

##### Your collaboration:

- Comply with the legislation and best practices related to transparency in the performance of your duties.
- Not engage in any fraudulent schemes related to handling funds or assets, nor falsify any documents or information.
- Treat all financial and non-financial indicators records authentically, complying with legal and internal requirements for the treatment of documentary information and ensuring the integrity, accuracy, and clarity of published information.

#### Bribery and influence peddling

We only contract services and acquire goods legally, paying their fair value. We act in accordance with applicable laws and the best international practices to combat bribery and influence peddling. Moreover, we strive to influence our business partners to act according to the best international practices in this matter.

##### Your collaboration:

- Commit not to resort to bribery or influence peddling, in any form or manner, to obtain any legitimate or illegitimate result, contrary or not to the company's objectives.
- Explicitly reject the receipt of any bribes.





- Internally report, through the channels provided in this code, any solicitations to engage in behaviours related to such illicit practices.
- Comply with internal procedures regarding due diligence in identifying and analysing the integrity of third parties before establishing business relationships, ensuring the adoption of applicable and provided risk mitigation mechanisms.
- Be aware that allegations of corruption seriously damage the Group's reputation.

### **Payments to public/private entities and their employees**

At Floene, any payments or benefits to public/private entities or any of their employees are based on legitimate justifications, whether based on applicable legislation or contracts. We systematically keep detailed records of the payment recipient, its strict necessity, nature, and legal basis. We do not make contributions to political entities, directly or indirectly, or donations in place of such payments, for any purposes other than those strictly allowed by applicable law.

#### **Your collaboration:**

- In the performance of your duties, commit to strictly comply with the applicable legislation regarding corruption prevention, not making any payments or granting any financial benefit beyond what is permitted by applicable law and supported by documentation.
- Be aware that offering advantages, whether material or non-material, to any individuals representing directly or indirectly, in any form or link, local, regional, national, or international public administrations, with the purpose of obtaining any illicit advantage, whether material or not, for Floene, themselves, or third parties, are behaviours that we will not engage in due to being contrary to the law and our code.

### **Hospitality, entertainment, and gifts**

At Floene, we are aware that offering and accepting gifts, entertainment, and hospitality should be subject to a rigorous analysis of appropriateness to avoid being perceived as a means to unduly influence decision-making or as an indirect form of corruption.

#### **Your collaboration:**

- Whenever there are doubts about the appropriateness of offering or accepting, consult the Ethics and Conduct Commission.
- Do not receive or offer gifts, entertainment, or hospitality that are socially inappropriate or aim to unduly influence decisions made by Floene or third parties.

### **Money laundering**

We are aware that money laundering involves the introduction into the financial system and/or the conscious or seriously negligent use of funds from illegal activities in a legitimate transaction, as well as the use of funds to support criminal activities, including acts of terrorism. Therefore, we commit not to engage in any illicit solicitations and report them as provided in applicable legislation.

**Your collaboration:**

- In the performance of your duties, understand the need to identify the origin of any funds from which Floene benefits, committing to act in a manner consistent with applicable legislation and international best practices in the prevention of money laundering.
- Report all suspicious situations and doubts as soon as possible through the internally defined channels, maintaining strict confidentiality about them.
- Ensure that the transfer of any amounts from Floene to third parties occurs in compliance with applicable legal standards, not starting a business relationship or conducting any operation if there are suspicions that the counterpart is involved in money laundering practices or financing terrorism or any other illicit act.

**Conflict of interests**

We are committed to developing and implementing internal rules to prevent conflicts of interest and to ensure that contracts in which we participate have mechanisms for preventing conflicts of interest.

**Your collaboration:**

- Understand that your special relationship of proximity or influence over or by a Floene stakeholder may affect the company's impartiality and impartiality regarding the appointment, hiring, or treatment of a person or entity. Therefore, you should report the situation to the functional manager in your area of responsibility so that they can evaluate the situation and decide on the need to appoint another person to handle the matter.
- Be aware that there are limitations on transactions and the hiring of services by Floene from related parties, and Floene is committed to complying with applicable internal rules.
- Do not engage in any external professional activity, with or without remuneration, that may hinder the fulfilment of your professional duties or the activities or interests of Floene. Also, do not intervene in decision-making processes that directly or indirectly involve organizations with which we collaborate, directly or indirectly, or with people or entities with whom we have family or affinity ties.

**Use of business information****Your collaboration:**

- Understand that, due to the functions you occupy, you may have access to non-publicly available information about Floene that may be considered relevant for a third party to decide whether to invest in the company's debt securities ("inside information"). The use or disclosure of inside information is illegal and may result in severe sanctions for Floene and its employees.
- Do not buy or sell, directly or through third parties, the company's debt securities whenever you have inside information; do not transmit any inside information to third parties, including family and friends.
- Do not discuss or work with confidential information, whether in public or private areas where its confidentiality may be compromised.
- Commit not to use business information to illicitly take advantage of business opportunities.



- Comply with these rules regarding information from other listed companies, even if you are no longer a Floene employee.

### **Protection of Floene's assets**

We act to protect our assets by creating necessary security conditions, particularly ensuring that access credentials are secure, and that information technology equipment is used securely against cyber-attacks. These assets include facilities, goods and equipment, computers and information technology systems, business opportunities, business information, and financial resources.

#### **Your collaboration:**

- Protect Floene's tangible and intangible assets and use them most efficiently in Floene's interest, preventing their damage, loss, destruction, or misuse.
- Understand that IT equipment, phones, email, and internet access should be used for professional purposes, and their occasional, brief, and secure personal use is allowed. The use of personal equipment (mobile phone, PC, tablet, ...) to access the company's systems should be a last resort and done securely. For example:
  - Do not share credentials among colleagues.
  - Do not share sensitive data with too many recipients and in an insecure manner, such as attaching files to emails without any protection.
- Be attentive to cyber-attacks and frauds, such as phishing, and immediately report any incidents to the Information Systems area.
- Be aware of the duties to protect Floene's confidential information and intellectual property, including patents, trademarks, know-how, industrial secrets related to operations or technology, and copyrights.
- Support the creation of action plans in case of emergencies to reinforce business continuity and promote infrastructure resilience, such as ensuring their functioning in case of extreme events.

### **Shareholders and corporate governance**

At Floene, we act to create shareholder value and protect the interests of our shareholders and investors. We commit to respecting the principle of equal treatment of shareholders, ensuring the timely provision of information in compliance with applicable legal duties. We also commit to implementing and consolidating the best corporate governance practices and adapting the Group to the most advanced practices of corporate organization, with a view to mitigating the risks listed in the code.

#### **Your collaboration:**

- In the exercise of your functions, commit to always act to protect the interests of shareholders and investors. We commit to complying with the legal standards and internal regulations in force regarding corporate governance.



## Questions and Answers

**Q1.** I receive an offer for a product that exceeds normal market conditions and involves a third party unrelated to the business. What should I do?

**A1.** You should refuse the offer and submit the matter to Floene, as this fact may represent a violation of applicable legislation and the internal regulation against money laundering.

**Q2.** I work in an area with decision-making responsibilities in awarding contracts. I am assigned the task of evaluating the economic and/or technical proposal of a company where I have relatives in management positions. What should I do?

**A2.** You should report this fact to the responsible area so that they assign the process to another colleague.

**Q3.** In the analysis of a potential partner for a new business, various risk criteria, such as financial and profitability, were taken into account. Should the ethical and integrity evaluation of the future management team of the partner also be ensured if the business is materialized?

**A3.** Yes, the risk analysis of the partnership from an ethical and integrity perspective is essential to ensure that any new relationship with third parties does not compromise Floene's reputation in any way.

**Q4.** While certifying an installation, I identified a defect that will require its rejection, according to applicable regulations. The client became very upset and proposed to hire me to repair the equipment. I know that these regulations are sometimes excessive, and this installation does not have great risk. Can I repair the equipment because I have the technical knowledge to do so and then proceed with the approval?

**A4.** No, you should inform the client that you have no alternative but to reject the installation and explain specifically the identified defect, so that the client is properly informed. By doing so, you are complying with the applicable law, not putting the client at risk, and being loyal to the company. Additionally, the client could have the impression that they influenced your decision to reject the certification and try to reward you for that.

**Q5.** I am participating in a recruitment process where there is a person whose profile seems to be the most suitable for the open position. However, this person is my friend. I would like to give a favourable opinion, but I am afraid that it may be a conflict of interest. Does the conflict of interest only apply to family, or does it also cover these situations?

**A5.** The conflict of interest can be raised by family relationships or relationships of proximity, so in this case, you should inform your hierarchy and the Risk Management area of the personal relationship and step away from the decision-making process.

**Q6.** I have a cousin who has a dispute with Floene and is asking me to intervene internally to resolve the matter. He says he is tired of trying to resolve the issue and is confident that he is right. Should I intervene?

**A6.** No, while you can try to identify the problem internally to help your cousin, you should not promote its resolution or request that it be resolved in a way that would unjustifiably benefit your relative.

**Q7.** Can I take equipment from the company that no one uses anymore and that would be useful for me at home?

**A7.** No, even if the item is at the end of its useful life, it should not be made available to anyone without the proper authorizations. All assets belong to the company, regardless of their current use.



## 02.2 Commitments to our business partners and suppliers

### Impartiality

At Floene, we commit to hiring our suppliers of goods and services based on competitive and transparent processes, where competitors are treated with non-discriminatory rules, and their ethical and professional behaviour is evaluated in addition to commercial conditions and technical competencies.

### Non-solicitation

At Floene, we commit not to individually approach employees of our suppliers of goods and services, as well as employees of our business partners, during the period in which their commercial or partnership relationships exist.

### Intellectual Property and Confidentiality

It is our responsibility to ensure the ownership, availability, and integrity of internal business information or third-party information. Unauthorized transmission of sensitive information, alteration, destruction, or unauthorized disclosure can cause significant harm to companies.

Therefore, we ensure necessary measures to prevent the misuse of sensitive information from the companies. We recognize the intellectual property of competitors and business partners.

Business relationships with third parties should be subject to confidentiality agreements if there is a possibility of accessing Floene's information, ensuring appropriate security measures for the protection of the information in question.

### Your collaboration:

- Ensure strict respect for the intellectual and industrial property rights of business partners whenever they are used or become known in the performance of your duties.
- Protect the intellectual and industrial property of third parties with security measures established based on the information classification determined in the Data Protection and Privacy Policy.
- Use information only as agreed with the partner or supplier.
- Ensure that all information you become aware of in the performance of your duties is strictly for internal use.
- Commit not to share outside the company, including after the termination of employment, any information you have become aware of as a direct and exclusive result of your position in the company.



## Questions and Answers

**Q1.** As part of a partnership, I accessed a valuable commercial formula from a Floene partner. Can Floene use this formula for commercial benefit?

**A1.** Floene conducts its activities with total respect for the intellectual property of its partners and does not appropriate their commercial formulas for its own benefit.

**Q2.** In a contracting process, Floene invites service providers to submit proposals. Two service providers submit a technically equivalent proposal. What should be done?

**A2.** The award decision should be made according to the criteria established in the current internal rules at Floene.

**Q3.** In the context of a joint venture in which Floene is a part, there is an employee from a partner whose competence is of interest to Floene. Should Floene approach them for potential hiring?

**A3.** During the period of the partnership relationship, Floene should refrain from approaching this employee for hiring purposes.

**Q4.** In a new hiring process, the responsible person for a specific area receives a commercial proposal from a company with which they had a contractual relationship. Can the responsible person directly award the proposal to this company?

**A4.** No, they cannot directly award the proposal. They should remain impartial and comply with the rules and steps of the contracting process according to internal norms.

**Q5.** I was contacted by a supplier who wanted to know the reason they were not awarded a certain bid. Can I provide them with the justification?

**A5.** If authorized to do so, you can explain the reasons why their proposal was not selected for the award.

## 02.3 Commitments to our clients

### Quality of our services

At Floene, we understand that our customers are the reason for our existence, and therefore, we commit to act with the highest professionalism, respect, and courtesy in our relationship with them. We develop processes that allow us to achieve excellence in the provision of services in our industry. We commit to implementing and developing customer relationship models that enable us to value their opinions and suggestions for improving quality and safety.

### Your collaboration:

- Commit to conducting the company's activities with the strictest principles of conduct, respecting the specified operational requirements.
- Ensure the quality and integrity of the services provided, always alerting to any anomalies that may compromise their quality.



- Provide relevant, truthful, and accurate information, using accessible language adapted to the needs, and respond clearly to requests, doubts, and complaints.
- Interact with customers with correctness, courtesy, and professional pride, respecting their rights, sensibilities, and diversity.

## Competition law

At Floene, we adhere to market rules, promoting fair competition and not adopting practices that restrict competition.

### Your collaboration:

- Comply with applicable competition rules, as well as Floene's internal rules on this matter.

## Data protection

At Floene, we place particular importance on protecting the data of our customers. We commit to ensuring the implementation and maintenance of mechanisms and procedures that guarantee the lawfulness, loyalty, transparency, minimization, accuracy, integrity, confidentiality, and responsibility in the processing of their personal data.

### Your collaboration:

- Commit to respecting the rules applicable to the processing of customers' personal data, including not using their data for purposes other than those for which they were collected or for marketing purposes without the necessary consent of the data subject.
- All processing of customers' personal data must comply with the company's privacy policy.
- Demand that everyone complies permanently with the rights and obligations established in the company's Privacy Policy.



## Questions and Answers

**Q1.** The marketing department of Floene is considering using third parties to promote Floene's marketing activities, involving the processing of customer data by these third parties. Should I contact any specific department?

**A1.** You should contact Floene's Data Protection Officer (DPO) so that this marketing action can be framed under the applicable data protection legislation.

**Q2.** During an assistance service, a customer asked which was the best supplier to contract with. Can I give my opinion?

**A2.** No. Floene operates in a regulated market and emphasizes transparency and compliance with market rules, not adopting practices that restrict competition. In this sense, you should inform the customer that there are several suppliers in the market, and they should look for the proposal that best suits their needs.



## 02.4 Commitments to our communities

### Human rights

At Floene, we commit to conducting our activities with careful consideration for the recognition and safeguarding of human dignity, freedom, and equality, as well as the protection of labour and union rights, health, safety in the workplace, and the environment.

We undertake to respect, promote, and enforce human rights with stakeholders and take measures to prevent our actions from causing, directly or indirectly, abuses or violations of internationally recognized human rights.

We commit to minimizing the negative impact that our activities may have or may have on the local communities where we operate. We seek to maintain close relationships by establishing communication channels to understand the needs and expectations of the communities where we are present.

#### Your collaboration:

- Provide and contract goods and services only from those who, to the best of our knowledge, respect human rights in a manner equivalent to what we do at Floene.
- Make every effort to minimize the negative impact of your activities on local communities in the territories where you operate, contributing to their development.
- Promote a culture of health and safety as a primary goal for sustainable development, to be achieved through continuous improvement and compliance with current legislation.

### Corporate responsibility

At Floene, we commit to contribute to the promotion of the quality of life and sustainable development in the communities where we operate. In addition to fully respecting applicable legislation associated with our activities, we incorporate social responsibility topics into our culture, including ethical, social, economic, and environmental aspects. We recognize that the benefits of our activities are also a result of how we interact with the communities where we operate, and it is our responsibility to give back to these communities and contribute to their development.



#### Questions and Answers

**Q1.** In my role, I have the responsibility to decide where to build a certain infrastructure. I realize that one of the decisions will involve the relocation of a community. What should I do?

**A1.** You should initiate a dialogue with your team and raise the issue, starting a conversation with the potentially affected local communities as well as local authorities to make the decision with the greatest economic benefit and the least impact on the local population.

**Q2.** I heard that a non-profit organisation in my area is running a fundraising campaign and I decided to join. Can I ask my colleagues to contribute?





**A2.** In the workplace you should refrain from making such requests. However, through your hierarchy, you can try to see if there is room to involve the company in the effort to help that institution by using the areas with responsibility for donations and sponsorships.

## 02.5 Commitments to Research and Academia

At Floene, we are aware that the development and well-being of the communities in which we operate, present and future, also depend on contributing to technological innovation and research and sharing knowledge. We commit to cooperating with various institutions of this nature to promote technological development and more sustainable technologies that serve the present needs of local communities without compromising the ability of future generations to meet their own needs.

## 02.6 Commitments to the Public Opinion

The actions of the Group and the way it communicates, whether as an employee, representative, or service provider acting on behalf of Floene, have the potential to affect the company's image and reputation.

New technologies facilitate communication and also bring new risks, so it is essential to be aware of interventions in public spaces, physical or virtual, especially when Floene's name and activity are involved.

Aware of what new communication methods and trends represent in society and the potential impact they have on Floene and its people, we are committed to using social networks and traditional means of communication in an ethically responsible manner, contributing to strengthening the image of cohesion, creating value and dignifying Floene.

At Floene, we acknowledge that communication with the media and investors should be conducted only by people from the communication and investor relations areas or those designated by the company for this purpose. We also assume that the content about the company to be disclosed externally should be verified by Floene's Communication Office.

### Your collaboration:

- Distinguish between personal opinion and the company's position, representing the company based on its values and commitments, especially in the field of Ethics and Sustainability.
- Represent the company, valuing its principles and commitments, particularly in terms of Ethics, Conduct, and Sustainability.
- Ensure the consistency and coherence of the information disclosed through all communication channels of the company.
- Do not publish on the internet or through other channels any content that has not been made public previously without the Company's proper authorization.
- Do not share any content that may be considered inappropriate or offensive.
- Whenever you express opinions, comments, or content, use appropriate language, with respect and courtesy to the audience.



- Since social media posts can impact the company's image, whenever Floene employees express views or opinions on their social media, they should clarify that these opinions are personal and do not necessarily reflect the position of the Company.
- In case of doubt about any content you intend to share, always contact the Communication Office.



### Questions and Answers

**Q1.** In a conversation among friends, various topics were discussed, and one of them questioned Floene's reputation. What should I do?

**A1.** If you do not have sufficient knowledge, you should refrain from commenting. However, you can mention that Floene acts with integrity. If you have knowledge about the topic, you should present the company's position and even mention that Floene has proper channels for reporting situations that are considered improper.

**Q2.** While browsing social media, I found negative opinions about Floene. What should I do?

**A2.** You should not react to negative or derogatory content about Floene unless you are properly informed and authorized to do so. Nevertheless, you should inform your superiors immediately.

## 03. Audacity – A sector in transformation

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The commitment to decarbonization and Floene's role as a key promoter in the national energy transition place increased responsibilities on all employees and their respective stakeholders.

To ensure the achievement of these business and stakeholder sustainability objectives, the company's activities are guided by the commitments inherent in ethically responsible conduct.

### 03.01 Environment

At Floene, we are committed to reducing emissions from our activities and promoting the decarbonization of the gas distribution infrastructure by 2050, reinforcing our commitment to contribute to the well-being of the communities where we operate. In line with national and international regulatory frameworks, we strive to align our activities and Sustainable Development Goals with environmental protection strategies, collaborating with environmental authorities and international associations at the European level.

To achieve this, we seek to promote our environmental policy among stakeholders, focusing on the protection of people, the environment, and assets as an essential condition for generating sustainable value. We take responsibility for managing risks and impacts of activities, as well as preventing serious accidents.

We commit to ensuring environmental protection in our projects and activities throughout their life cycle, as well as efficient use of energy and the incorporation of safe and innovative technologies in activity management.

**Your collaboration:**

- Know, understand, and comply with applicable environmental regulations and rules, participating in all training activities developed by the company.
- Commit to actively participate in the implementation of advanced environmental policies at Floene, aiming for sustainable development.
- Use resources efficiently, minimizing waste creation.
- Integrate sustainability into all activities, including identification and management of environmental aspects.
- Report any abnormal situations or environmental risks encountered during your activities.
- Communicate the commitments of the environmental policy to partners, suppliers, and other stakeholders.

**Questions and Answers**

**Q1.** During a weekend walk, I found waste from cables and packaging of hazardous products near one of our facilities that had undergone maintenance. What should I do?

**A1.** You should report this situation as soon as possible, preferably to the responsible area for the work, and alert them to collect the waste left at the work site and properly dispose of it with a licensed Waste Operator, as well as restore the environmental conditions at the site.

## 03.02 Promoting Energy Transition

As promoters of national decarbonization, we are committed to stimulating the energy transition among partners, suppliers, local communities, and customers, based on their regulatory framework limitations.

Considering our position, at Floene, we aim to ensure renewable energy distribution solutions, such as injecting renewable gases into the grid and distributing this more sustainable type of energy to as many communities as possible, promoting access to renewable energy for an increasing number of people and industries.

**Your collaboration:**

- Incorporate the concept of sustainability into all activities you carry out within the company.
- Plan solutions and investments with prior analysis of their climate, environmental, and social impacts.
- Contribute to raising awareness about climate change and the energy transition.

**Questions and Answers**

**Q1.** We were planning a series of team meetings that would require several trips across the country. I suggested conducting the meetings that were farther away via online sessions to avoid extensive travel. Although my suggestion was not appreciated, did I act correctly?



**A1.** Yes, you acted correctly. An action that is more consistent with Floene's commitments regarding the reduction of pollutant emissions is more appropriate.

## 03.03 Strategic Partnerships

In the new transformative context of the industry, promoting partnerships and cooperation among various stakeholders is essential to ensure the fulfilment of needs and evaluation of expectations, risks, and opportunities.

The audacity to imagine and implement projects is only possible with an ethically responsible practice of knowledge sharing and partnerships, reducing the action time and promoting an increase in the quality of service provided, ensuring that the pace of transformation does not override any of the ethical principles assumed by Floene.

### Your collaboration:

- Ensure that everyone knows and complies with Floene's Code of Ethics.
- Promote a culture of learning from mistakes and transparency among parties, aiming to enhance the final outcome of projects/partnerships.
- Foster the identification and analysis of risks, creating conditions for experimentation and testing of common solutions.
- Ensure confidentiality and respect for the intellectual property of partners.
- Avoid purchasing products or services without assessing the impacts of the supply chain and ensuring compliance with the sustainability principles advocated by Floene.

## 04. Code Compliance

The Code of Ethics must be read and understood by all employees.

### Consequences in case of code violation or abusive use

The recipients of the code are bound to comply with it and use it responsibly. At Floene, we do not tolerate any use of our code for purposes incompatible with those mentioned in this document.

Without prejudice to applicable criminal and civil procedures, behaviours contrary to the code, when committed by a Floene employee, may be subject to censure within a procedure established for this purpose.

If Floene becomes aware, through legally or contractually available means, that an act or omission inconsistent with the provisions of the code has been committed by a business partner, supplier, or customer, Floene will make efforts to ascertain the extent to which preventive actions have been taken to avoid such inconsistency from recurring in the future. The potential impact of such fact on the commercial or partnership relationships with them will be assessed accordingly.



## Investigations

Upon receiving communications regarding suspicions or confirmations of non-compliance with this Code, Floene proceeds to investigate the relevant facts. Internal investigations are conducted as follows:

- The agent who identified the possible irregularity is heard, provided that the communication is not anonymous, and the agent is available to provide additional clarifications;
- The accused agent is heard, and they cannot obtain information about the identity of the reporting agent, also hearing other relevant entities involved;
- Any other necessary diligences are carried out;
- A report is prepared on the investigations carried out, indicating the recommendations or measures to be adopted or promoting the closure of the investigations;
- Adequate feedback is provided to the agent who reported the situation, the accused agent, and other relevant entities involved.

Cooperation in investigations is the duty of the recipients of this code, including before external entities supporting the conducted inquiries. The fundamental rights of the accused, including the defence of their good name, privacy, and the right to file a complaint for false denunciation, cannot be prejudiced in any case.

## Non-retaliation

The *ComunicaÉtica* channel is also the means for reporting any well-founded suspicion of retaliation, such as threats, intimidation, exclusion, humiliation, or malicious acts.



**In compliance with the law and the company's values, at Floene, we do not retaliate against the agent who has reported knowledge or well-founded suspicion of behaviours incompatible with the code. We ensure necessary protection to the recipient who fulfils their duty to report**



## Questions and Answers

**Q1.** If I suffer any form of retaliation as a result of reporting as provided in this chapter, what should I do?

**A1.** Retaliations, by any direct or indirect means, against the recipient of the code who, in good faith, reports knowledge or well-founded suspicion of behaviors incompatible with our code, are not tolerated and should be reported through the *ComunicaÉtica* channel as provided in this chapter.

**Q2.** Can I refuse to cooperate with the investigation process described in this chapter?

**A2.** Cooperation in investigations is our duty as recipients of this code, including cooperating with external entities supporting the conducted inquiries.



## 05. Annex – Disciplinary Sanctions

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**Disciplinary sanctions provided for in Law No. 7/2009, of February 12th, in force, which approves the revision of the Labour Code, namely Article 328:**

### Article 328 - Disciplinary sanctions

1. In the exercise of disciplinary power, the employer may apply the following sanctions:
  - a) Reprimand;
  - b) Recorded reprimand;
  - c) Monetary fine;
  - d) Loss of vacation days;
  - e) Suspension from work with loss of remuneration and seniority;
  - f) Termination without compensation or severance pay.
2. The collective labour regulation instrument may establish other disciplinary sanctions, as long as they do not harm the rights and guarantees of the worker.
3. The application of sanctions must respect the following limits:
  - a) Pecuniary sanctions imposed on a worker for offenses committed on the same day cannot exceed one-third of the daily remuneration and, in each calendar year, the remuneration corresponding to 30 days;
  - b) The loss of vacation days cannot affect the enjoyment of 20 working days;
  - c) Work suspension cannot exceed 30 days for each offense, and in each calendar year, a total of 90 days.
4. Whenever justified by the special work conditions, the limits established in points (a) and (c) of the previous number may be increased up to twice by a collective labour regulation instrument.
5. The sanction may be aggravated by its disclosure within the company.
6. Violation of the provisions in paragraphs 3 or 4 constitutes a serious offense.

**Sanctions related to corruption crimes and related offenses provided for in Decree-Law No. 48/1995, of March 15, which approves the Penal Code, in its current version, namely those transcribed below:**

### Article 335 - Influence Peddling

1. Anyone who, for themselves or through an intermediary, with their consent or ratification, solicits or accepts, for themselves or for others, a patrimonial or non-patrimonial advantage, or its promise, to abuse their real or alleged influence with any public entity, national or foreign, shall be punished:
  - a) With imprisonment from 1 to 5 years, if a more severe penalty does not apply by force of another legal provision, if the purpose is to obtain any unlawful favourable decision;



- b) With imprisonment up to 3 years or with a fine, if a more severe penalty does not apply by force of another legal provision, if the purpose is to obtain any lawful favourable decision.
2. Anyone who, for themselves or through an intermediary, with their consent or ratification, provides or promises a patrimonial or non-patrimonial advantage to the persons referred to in the preceding paragraph:
  - a) For the purposes specified in point (a), shall be punished with imprisonment of up to 3 years or with a fine;
  - b) For the purposes specified in point (b), shall be punished with imprisonment of up to 2 years or with a fine of up to 240 days.
3. Attempt is punishable.
4. The provisions of Article 374-B apply correspondingly.

### **Article 363 - Bribery**

Anyone who convinces or attempts to convince another person, through a gift or promise of a patrimonial or non-patrimonial advantage, to commit the acts provided for in Articles 359 or 360, without these acts being actually committed, shall be punished with imprisonment of up to 2 years or with a fine of up to 240 days, if a more severe penalty does not apply by force of another legal provision.

### **Article 372 - Improper Receipt or Offering of Advantage**

1. The official who, in the exercise of their duties or on account of them, by themselves or through an intermediary, with their consent or ratification, solicits or accepts, for themselves or for a third party, a patrimonial or non-patrimonial advantage that is not due to them, shall be punished with imprisonment up to five years or with a fine of up to 600 days.
2. Whoever, by themselves or through an intermediary, with their consent or ratification, gives or promises an official, or a third party indicated or known by the official, a patrimonial or non-patrimonial advantage that is not due to them, in the exercise of their functions or because of them, shall be punished with imprisonment up to three years or with a fine of up to 360 days.
3. The socially appropriate and customary conduct is excluded from the previous provisions.

### **Article 373 - Passive Corruption**

1. The official who, by themselves or through an intermediary, with their consent or ratification, solicits or accepts, for themselves or for others, a patrimonial or non-patrimonial advantage, or its promise, for the practice of any act or omission contrary to the duties of the office, even if prior to such solicitation or acceptance, shall be punished with imprisonment from one to eight years.
2. If the act or omission is not contrary to the duties of the office and the advantage is not due to them, the agent shall be punished with imprisonment from one to five years.



### **Article 374 - Active Corruption**

1. Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises a patrimonial or non-patrimonial advantage to a civil servant, or to a third party indicated or known by that civil servant, for the purpose referred to in article 373.º, paragraph 1, shall be punished with imprisonment from one to five years.
2. If the purpose is as indicated in paragraph 2 of article 373, the perpetrator shall be punished with imprisonment of up to three years or with a fine of up to 360 days.
3. Attempting to commit the offense is punishable.

### **Article 374-A - Aggravation**

1. If the advantage referred to in Articles 372 to 374 is of high value, the perpetrator shall be punished with the penalty applicable to the respective crime, increased by one-fourth within its minimum and maximum limits.
2. If the advantage referred to in Articles 372 to 374 is of considerably high value, the perpetrator shall be punished with the penalty applicable to the respective crime, increased by one-third within its minimum and maximum limits.
3. For the purposes of the provisions of the preceding paragraphs, the provisions of points (a) and (b) of Article 202 shall be correspondingly applicable.
4. Without prejudice to the provisions of Article 11, when the perpetrator acts in accordance with Article 12, the penalty applicable to the respective crime shall be increased by one-third within its minimum and maximum limits.
5. Without prejudice to the provisions of the preceding paragraphs, a public servant holding a high public office shall be punished as follows:
  - a) With imprisonment from 1 to 5 years if the crime is that provided for in paragraph 1 of Article 372;
  - b) With imprisonment from 2 to 8 years if the crime is that provided for in paragraph 1 of Article 373;
  - c) With imprisonment from 2 to 5 years if the crime is that provided for in paragraph 2 of Article 373.
6. Without prejudice to the provisions of paragraphs 1 to 4, in the case of a public servant holding a high public office, the perpetrator shall be punished as follows:
  - a) With imprisonment of up to 5 years or with a fine of up to 600 days in the situations provided for in paragraph 2 of Article 372;
  - b) With imprisonment from 2 to 5 years in the situations provided for in paragraph 1 of Article 374; or
  - c) With imprisonment of up to 5 years in the situations provided for in paragraph 2 of Article 374.
7. A public servant holding a high public office who, in the exercise of his functions or because of them, by himself or through an intermediary, with his consent or ratification, gives or promises to a public servant, a public servant holding a high public office, or a political office holder, or to a third party with the knowledge of the latter, a patrimonial or non-patrimonial advantage that is not due to him, shall be punished with imprisonment from 2 to 8 years if the purpose is as indicated in paragraph 1 of Article 373, and with imprisonment from 2 to 5 years if the purpose is as indicated in paragraph 2 of Article 373.
8. The following are considered to be holders of high public office:
  - a) Public managers and members of the administration board of publicly owned companies exercising executive functions;





- b) Members of the management board of companies in which the State participates, when appointed by the State;
- c) Members of the management boards of companies integrated in the regional or local business sectors;
- d) Members of the governing bodies of public institutes;
- e) Members of the administrative board of independent administrative entities;
- f) Holders of positions of senior management of the 1st and 2nd degrees and equivalent.

#### **Article 374-B - Exemption or Mitigation of Penalty**

1. The agent is exempt from penalty whenever they have reported the crime before the initiation of criminal proceedings and, in the following situations:
  - a) In paragraph 1 of Article 373, they have not committed an act or omission contrary to the duties of the position for which they requested or accepted the advantage, and they voluntarily restore or renounce the advantage, or, in the case of fungible things or animals, return their value;
  - b) In paragraph 1 of Article 372 and paragraph 2 of Article 373, they voluntarily restore or renounce the advantage, or, in the case of fungible things or animals, return their value;
  - c) In paragraph 1 of Article 374, they have withdrawn the promise of an advantage or requested its restitution or renunciation from the official or third party before the commission of the act or omission contrary to the duties of the position;
  - d) In paragraph 2 of Article 372 and paragraph 2 of Article 374, they have withdrawn the promise of an advantage or requested its restitution or renunciation from the official or third party.
2. The agent may be exempt from penalty whenever, during the investigation or instruction, and subject to the provisions of paragraph 1, as applicable, they have decisively contributed to the discovery of the truth.
3. The exemption from penalty covers crimes that are an effect of the crimes provided for in Articles 372 to 374, or that were intended to continue or conceal these crimes or the benefits arising from them, provided that the agent has reported them or has decisively contributed to their discovery.
4. The provisions of the previous paragraph do not apply to crimes committed against eminently personal goods.
5. The penalty is particularly mitigated if, until the closing of the trial hearing at first instance, the agent actively cooperates in the discovery of the truth, making a relevant contribution to the proof of the facts.
6. The exemption and mitigation of the penalty are not excluded in the situations of aggravation provided for in Article 374.<sup>o</sup>-A.

#### **Article 375 - Misappropriation**

1. The official who illegitimately appropriates, for themselves or for another person, money or any movable or immovable thing or animal, whether public or private, that has been entrusted to them, is in their possession or is accessible to them by reason of their functions, shall be punished with imprisonment from 1 to 8 years, unless a more severe penalty is applicable by force of another legal provision.
2. If the values or objects referred to in the previous paragraph are of negligible value, according to the terms of Article 202(c), the agent shall be punished with imprisonment up to 3 years or with a fine.



3. If the official lends, pledges, or in any way encumbers the values or objects referred to in paragraph 1, they shall be punished with imprisonment up to 3 years or with a fine, unless a more severe penalty is applicable by force of another legal provision.

#### **Article 376 - Misappropriation of Use**

1. The official who makes use of or allows another person to use, for purposes other than those for which they are intended, immovable property, vehicles, other movable property, or animals of considerable value, whether public or private, which have been entrusted to them, are in their possession, or are accessible to them by virtue of their duties, shall be punished with imprisonment of up to 1 year or with a fine of up to 120 days.
2. If the official, without special reasons of public interest justifying it, allocates public funds for a public use different from the one to which they are legally assigned, they shall be punished with imprisonment of up to 1 year or with a fine of up to 120 days.

#### **Article 377 - Economic Participation in Business**

1. The official who, with the intention of obtaining, for themselves or for a third party, illicit economic benefits, harms the financial interests that they are required to administer, oversee, defend, or carry out by virtue of their position, shall be punished with imprisonment of up to 5 years.
2. The official who, in any manner, receives, for themselves or for a third party, financial advantages as a result of a civil legal act concerning interests that they had control, administration, or oversight of, either wholly or partially, due to their official duties, even if they do not cause harm, shall be punished with imprisonment of up to 6 months or with a fine of up to 60 days.
3. The penalty provided in the preceding paragraph is also applicable to the official who receives, for themselves or for a third party, in any manner, financial advantages as a result of collection, receipt, settlement, or payment that, by virtue of their official duties, they are responsible for ordering or executing, even if no damage occurs to the Public Treasury or to the entrusted interests.

#### **Article 379 - Extortion**

1. The official who, in the exercise of their functions or powers in fact arising therefrom, either personally or through an intermediary with their consent or ratification, receives, for themselves, for the State, or for a third party, through inducement in error or taking advantage of the victim's error, a patrimonial advantage that is not due to them, or is higher than due, namely contribution, fee, emolument, fine, or penalty, shall be punished with imprisonment for up to 2 years or with a fine of up to 240 days, if a more severe penalty does not apply by force of another legal provision.
2. If the act is committed through violence or serious threat, the offender shall be punished with imprisonment from 1 to 8 years, if a more severe penalty is not applicable pursuant to another legal provision.

**Article 382 - Abuse of Power**

The official who, outside the cases provided for in the previous articles, abuses powers or violates duties inherent to their functions, with the intention of obtaining, for themselves or for others, 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 severe penalty does not apply by force of another legal provision.

**Article 383 - Violation of Confidentiality by an Official**

1. The official who, without being duly authorized, discloses a secret that they have become aware of or that has been entrusted to them in the exercise of their functions, or whose knowledge has been facilitated by the position they hold, with the intention of obtaining, for themselves or for another person, benefit, or with the awareness of causing harm to the public interest or to third parties, shall be punished with imprisonment of up to three years or with a fine.
2. If the official commits the act provided for in the previous paragraph, creating danger to the life or physical integrity of others or to third-party property of significant value, they shall be punished with imprisonment from one to five years.
3. The criminal procedure depends on the participation of the entity that supervises the respective service or on a complaint from the offended party.