

## **ANTI-CORRUPTION & ANTI-BRIBERY POLICY**

### ***ANTI-CORRUPTION LAWS & BRIBERY***

Inforlandia S.A. complies with the anti-corruption laws and treaties of the countries in which it does business. It will not directly or indirectly offer or give anything of value to anyone, including government officials, to influence official action or secure an improper advantage as defined by applicable law. "Government officials" include any government employee; candidate for public office; or employee of government-owned or controlled companies, public international organizations, or political parties. Anything of value includes cash or cash equivalents, gifts, meals, travel, political or charitable contributions, and job offers to relatives of government officials. These requirements apply to Inforlandia S.A. employees and representatives, as well as their channel partners, agents or other third parties who work on behalf of Inforlandia S.A., regardless of business location.

No employee or representative of Inforlandia S.A. will suffer any retaliation for refusing to pay or accepting a bribe or commission, even if it results in loss of business to Inforlandia S.A..

Inforlandia S.A. prohibits direct payments of any amount to public officials, either directly or through third parties, including to expedite routine non-discretionary governmental actions, including visa processing; obtaining permits and licenses; provide police protection or courier service; or schedule inspections associated with contract performance. These types of payments are sometimes referred to as "facilitation" or "expediting" payments.

### ***GIFTS, ENTERTAINMENT, CORPORATE HOSPITALITY & TRAVEL***

Inforlandia S.A.'s relationships with suppliers, customers and others must be based entirely on sound business decisions and fair dealing. Gifts for business, entertainment, and corporate hospitality can help build relationships, but they can also hinder the objectivity of the person or company providing them. Inforlandia S.A. employees or representatives may not:

- Solicit, offer, accept, or provide gifts, entertainment, corporate hospitality, or travel if it is required or appears to be binding on the recipient.
- Solicit, offer, accept or provide someone with cash or cash equivalents, luxurious or frequent gifts or entertainment, or anything that may appear to be a bribe.
- Provide or accept sexual orientation gifts or entertainment.

### ***GIVING & RECEIVING GIFTS***

Inforlandia S.A. employees or representatives may not offer or receive gifts from suppliers, customers or other business-related entities unless all of the following conditions are true:

1. Moderate value: This value varies from country to country. A cheap complimentary gift, such as a promotional item, has a "moderate value" anywhere. Contact the Commercial Department for guidance on which gifts may be accepted or offered.
2. Habitual and appropriate. The item is considered a customary and appropriate business gift in the country in which it is offered and offering or accepting it would not reflect damage to Inforlandia S.A. if the details were made public.
3. No treatment favored. The gift is not offered in the expectation of special or favored treatment.
4. Legal and approved. Offering or accepting the gift is legal at the place and under the given circumstances and does not violate the policies of the donor or recipient, and the donor and recipient have received appropriate approval to accept the gift.

### ***ENTERTAINMENT & TRAVEL***

With appropriate approval, business or entertainment amenities such as meals may be offered or accepted, provided that expenses are reasonable and not prohibited by law or by either party's policies or rules of conduct. Inforlandia S.A. employees or representatives must always obtain a pre-approval from their superior before accepting or offering any entertainment or travel gift to customers, suppliers, businesses or other third parties.

### ***PROVIDING GIFTS, ENTERTAINMENT OR TRAVEL TO GOVERNMENT OFFICIALS OR EMPLOYEES***

Laws on the giving of gifts, hospitality and travel to civil servants (which include executives and employees of state-owned companies, newspapers, television, universities and others) are complex and may vary from country to country. In many cases, it is illegal and improper to provide gifts to government officials. Special care is required in this highly regulated area as Inforlandia S.A. wishes to avoid the appearance of inconvenience.

Contact the Commercial Department for guidance on which gifts may be accepted or offered.

Aveiro, 28 of August 2019