

novobanco

**ANTI-BRIBERY &
CORRUPTION POLICY**

2022

novobanco Group



Table of contents

1. Scope	3
2. Application of the Policy to the novobanco Group entities	4
3. Definitions	6
4. Responsible for Regulatory Compliance	8
5. Powers of the Compliance Department.....	9
6. Prohibited Behaviours.....	10
7. Gifts and Hospitality	10
8. Donations	12
9. Third Party Risk	12
10. Accounting Obligations	13
11. Training	14
12. Disciplinary Action and Criminal Sanctions	15
13. Communication of Irregularities and Whistleblowing	15
14. Monitoring and Reporting.....	16
15. Legal Framework and Best Practices.....	17
16. Revision.....	19
17. Communication.....	19

1. Scope

- 1.1. Bribery, corruption and related contraventions represent one of the key challenges for modern companies. Fighting them requires a joint effort by all sectors of society, including banking, which plays an important role in promoting a culture of public integrity.
- 1.2. The reactive approaches used up to now have shown themselves to be insufficient in fighting this phenomenon, so it has proven necessary to adopt a new risk-based preventive paradigm to minimize the impact of corruption and bribery on civil society and in the economy. In light of this new paradigm, the fight against the practices of corruption and bribery becomes everyone's responsibility, requiring the development of a new set of preventive duties and methodologies that are cross-sectional with organizations, domestic and international, and public and private entities.
- 1.3. In this context, novobanco decided to adopt and implement this Anti-Bribery and Corruption Policy ("Policy" or "ABC Policy") in order to prevent and mitigate the risk of bribery, corruption and related contraventions, reaffirming its commitment in building a more upright society.
- 1.4. Bribery, corruption and related contraventions practices may expose novobanco and its employees to criminal and regulatory liability, and it may cause severe reputational and financial damages to novobanco and its stakeholders.
- 1.5. This Policy is based upon the following main principles:
 - a) Zero tolerance to bribery, corruption and related contraventions;
 - b) Protection of whistle-blowers;
 - c) High ethical standards;
 - d) Loyalty and transparency to clients and stakeholders.
- 1.6. The adoption of this Policy reflects novobanco's commitment to fight and prevent bribery, corruption and related contraventions and to conduct business in an ethical and lawful manner.

- 1.7. This Policy sets out the main principles and rules for preventing bribery, corruption and related contraventions, in line with applicable laws and regulations.
- 1.8. This Policy aims to:
- a) Clarify the main definitions adopted by novobanco in the management of bribery, corruption and related infractions risks;
 - b) Outline principles and rules of action for preventing bribery, corruption and related contraventions, ensuring business is conducted with integrity and with high ethical standards;
 - c) Define the type of behaviors that are strictly forbidden in light of anti-bribery and anti-corruption related laws and regulations;
 - d) Promote a culture of compliance and ethics among the novobanco Group employees and stakeholders.
- 1.9. This Policy applies to all members of the management and supervisory bodies of the novobanco Group entities, key function holders and other employees of the novobanco Group entities, as well as its tied agents, representatives, credit intermediaries, promoters, outsourcers, and associates (together referred to as "Covered Person").
- 1.10. This Policy strengthens and does not prevent the application of the provisions set out in novobanco 's **Code of Conduct** ⁽¹⁾.

2. Application of the Policy to the novobanco Group entities

- 2.1. This Policy is applicable to novobanco and, with the necessary adaptations and internal approvals, to the credit and financial institutions controlled by it: namely novobanco dos Açores, BEST – Banco Eletrónico de Serviço Total and GNB Gestão de Ativos, SGPS, S.A and the companies controlled by it, as well as external branches of novobanco (the “novobanco Group”).

(¹) Available at:
<https://www.novobanco.pt/content/dam/novobancopublicsites/docs/pdfs/compliance/ingles/Code%20of%20Conduct.pdf.coredownload.inline.pdf>

2.2. Coordination between novobanco and novobanco Group entities for the implementation by these entities of the principles applicable according to this Policy shall be undertaken through the novobanco Compliance Department.

3. Definitions

- **Bribery:** Convincing another person, through a gift or the promise of a patrimonial or non-patrimonial advantage, to provide a false deposition, statement, testimony, report, interpretation or translation.

- **Corruption and related contraventions:** The crimes of corruption, receiving and offering undue advantage, embezzlement, economic participation in business, concussion, abuse of power, prevarication, influence peddling, laundering or fraud in obtaining or diverting a subsidy, grant or credit

- **Covered Person:** Employees of novobanco and novobanco Group entities, as well as its tied agents, representatives, credit intermediaries, promoters, outsourcers and associates.

- **Credit Intermediary:** Person or corporation acting on behalf of and / or under the full and unconditional responsibility of novobanco, under a non-employment relationship, to present the Bank's credit products.

- **Holder of high public office:**
 - a) Public administrators;
 - b) Holders of the managing body of a company owned by the State, when designated by the latter;
 - c) Directors and officers of companies that are part of the local business sector;
 - d) Members of the governing bodies of public institutions;
 - e) Members of independent public entities provided by the Constitution or by law;
 - f) Top level management officers and similar

- **Holder of political office:**
 - a) The President of the Republic;
 - b) The President of the Assembly of the Republic;
 - c) Elected Members of the Assembly of the Republic;
 - d) Member of Government;
 - e) Elected Members of the European Parliament;
 - f) The Representative of the Republic in the autonomous regions;

	g) Members of the governing body of an Autonomous Region Madeira, Açores);
	h) Members of the representative body of the local government.
• The Novobanco Group Employees:	The members of the board of directors and supervisory bodies of novobanco and novobanco Group entities, other members of senior management, holders of essential functions and other employees of novobanco and of novobanco Group entities, regardless of the nature of their contractual relationship or job position.
• Officeholder:	<p>a) Civil servants;</p> <p>b) Administrative agents;</p> <p>c) Arbitrators;</p> <p>d) Jurors;</p> <p>e) Specialists;</p> <p>f) When called upon to carry out or participate in carrying out an activity that falls within administrative civil or jurisdictional service or, under the same circumstances, carry out functions in public utilities bodies or take part in them;</p> <p>g) Managers, holders of supervisor bodies and workers for companies that are public, nationalised, of public capital or majority owned with public capital and also companies that are concessionaires of public services.</p>
• Outsourcer:	The third-party entity that performs all or part of an activity, process or service that would otherwise be performed by novobanco under an outsourcing agreement with the novobanco.
• Promoter:	Person acting on behalf of and /or under the full and unconditional responsibility of novobanco, under a non-employment relationship, to present the Bank's banking products (other than credit).
• Public official:	<p>a) Officeholder;</p> <p>b) Holders of high public positions;</p> <p>c) Holders of political positions.</p>
• Tied agent:	Person or corporation acting on behalf of and /or under the full and unconditional responsibility of novobanco, under a non-employment relationship, to present the Bank's financial intermediation services.

4. Responsible for Regulatory Compliance

- 4.1. The Executive Board of Directors (“EBD”) has nominated a member of its senior management, who is part of the Compliance Department of novobanco (second line of defense), as the person responsible for regulatory compliance in matters of prevention of corruption and related infractions (the "RCN") of the novobanco Group.
- 4.2. Likewise, the other entities in the Group nominate a RCN, as an element of senior management or equivalent, who guarantees and controls the application of the regulatory compliance program in each entity.
- 4.3. The RCN of each entity performs his duties with decision-making autonomy and independence, having the necessary human and technical means and resources and timely access to all relevant internal information.
- 4.4. The RCN of each entity is responsible for:
 - a) Monitoring and controlling the implementation of the Regulatory Compliance Program, which includes the definition of a risk prevention plan (the "PPR"), a code of conduct, a training program and a whistleblowing channel, aimed at preventing, detecting and sanctioning acts of corruption and related contraventions
 - b) Participating in the definition and giving prior advice on policies, procedures and controls to prevent bribery, corruption and related contraventions;
 - c) Ensuring the implementation and ongoing adequacy, sufficiency and timeliness of this Policy, and other procedures and controls regarding the prevention of bribery, corruption and related contraventions;
 - d) Participating in the definition, monitoring and evaluation of the bank’s internal training policy;
 - e) Ensuring the centralization of all relevant information from the various business areas of the novobanco Group;

- f) Playing the role of interlocutor of judicial, law enforcement and supervisory authorities, by complying with the reporting obligations and by ensuring the exercise of other reporting and cooperation obligations.
- g) Monitoring and controlling the of implementation of this Policy, and other procedures and controls on matters of prevention of bribery, corruption, and related contraventions, proposing remediation actions for the findings or weaknesses detected; and
- h) Advising and informing the EBD on the measures to be taken to ensure compliance with applicable laws, rules, regulations, and standards on matters of prevention of bribery, corruption and related contraventions .

5. Powers of the Compliance

Department

- 5.1. Notwithstanding the competences proper to the General and Supervisory Board of novobanco and the respective Committees, it is the responsibility of the Compliance Department of novobanco, as the reference body in ABC risk management, to promote the implementation, execution, monitoring, and revision of this Policy.
- 5.2. The Compliance Department may recommend the adoption of procedures to prevent bribery, corruption and related contraventions that are more demanding than those provided in this Policy, whenever deemed necessary by circumstances, that is, when the risk of bribery, corruption and related contraventions is not merely residual.
- 5.3. The Compliance Department has authority to conduct onsite assessments, including, but not limited to, internal investigations, in order to evaluate the level of compliance of novobanco's operations with the principles and rules set out in this Policy.

6. Prohibited Behaviours

- 6.1. In addition to their obligations under novobanco's Code of Conduct, Covered Person are prohibited from promising or offering, directly or indirectly, any type of advantage, monetary or not, to public officials or employees of other entities that is not owed to them ("active corruption"). Such practices may constitute crimes punishable under the terms of the Penal Code or other legislation, namely the Laws mentioned in Clause no. 15 of this Policy.
- 6.2. Covered Person are prohibited from requesting or receiving, directly or indirectly, any type of advantage, monetary or not, from customers, public officials or employees of other private entities that is not owed to them ("passive corruption"). Such practices may constitute crimes punishable under the terms of the Penal Code or other legislation, namely, the Laws mentioned in Clause no. 14 of this Policy.
- 6.3. Included in the previous prohibitions are facilitation payments. A "facilitation payment" is any advantage that is promised or given to a public official and that is not legally required, in order to ensure the performance or speed up a procedure that this public official had the legal duty to perform.
- 6.4. An "advantage" is anything of value, including, but not limited to, payments, services, loans, meals, entertainment and the release from outstanding penalties or obligations.

7. Gifts and Hospitality

- 7.1. By principle, gifts and hospitality may not be offered or received by any Covered Person.
- 7.2. However, gifts, services or other advantages, including meals, entertainment and travel expenses, given or received by a Covered Person may be accepted if protocol, courtesy or other special circumstances exist, as sometimes happens with different cultures where refusing a gift might be considered offensive or inappropriate. All such situation, as well as the gifts, services or other advantages, if exceed the allowance / waiver specified in 7.3., shall be reported to the RCN and, when possible, delivered to the Compliance Department, who may decide that

such gifts be forfeited in favour of a charitable organization, among those in a list sanctioned by the Executive Board of Directors, or in favour of the Bank.

- 7.3. An “allowance / waiver” for the cases in the preceding number is set at EUR 200, per person / entity on an yearly basis. Related persons or entities are considered a single person or entity, for this limit.
- 7.4. When considering whether the offering or acceptance of a gift, a service or another advantage, including meals, entertainment and travel expenses, complies with usage or social customs or whether protocol, courtesy or other special circumstances exist, Covered Person should consider, among other aspects:
 - a) Whether giving or receiving the gift, service or other advantage is reasonable and proportionate given the circumstances and context;
 - b) Whether the offering or acceptance is done in a transparent manner;
 - c) Whether there is an expectation or appearance of quid pro quo;
 - d) Whether it could create an appearance that the beneficiary’s judgement is compromised;
 - e) Whether the other party is a public entity or official;
 - f) Whether the gifts are in cash or its equivalent.
- 7.5. Gifts in cash or its equivalent or the ones given by a public entity or official are strictly prohibited under any circumstances.
- 7.6. The novobanco may reimburse travel expenses of clients or partners if they are reasonable and incurred in the context of a legitimate corporate activity. Likewise, Covered Person, if authorized by the Compliance Department, may be reimbursed of travel expenses under the same conditions, provided that they are not prohibited by law (if applicable ²).
- 7.7. If there is a doubt regarding whether the offering or acceptance of a gift, a service, or another advantage, including meals, entertainment and travel, falls under the above exception in 7.2., Covered Person should, whenever possible, consult with the Compliance Department before offering or accepting the advantage in question.

² E.g., MIFID2 requirements.

8. Donations

- 8.1. Donations to political parties and/or political campaigns on behalf of novobanco are strictly prohibited, pursuant to articles 8 and 16 of the Law on Political Party and Electoral Campaign Financing.
- 8.2. Charitable donations on behalf of novobanco are prohibited unless they are coherent with novobanco's corporate values and cultural patronage and are expressly authorized by the Executive Board of Directors.

9. Third Party Risk

- 9.1. Before entering a contract for consortium, joint venture or any other type of intercompany cooperation, as well as contracts for supply and/or vending, novobanco shall perform a risk evaluation in order to determine the degree of risk bribery, corruption or related contraventions of the other party and/or of the operation at stake.
- 9.2. The Compliance Department may establish, according to a risk-based approach, general or specific requirements and procedures for any *due diligence* to determine the degree of risk of bribery, corruption, or related contraventions of the other party. Possible requirements and procedures may include:
 - a) Conducting research on potential business partners;
 - b) Analysing the other party's anti-bribery and anti-corruption policies;
 - c) Obtaining information on the legal structure and ultimate beneficial owners of the other party;
 - d) Gathering information on the connection between the other party and public bodies and public officials;
 - e) Reviewing relevant corporate documents;
 - f) Inquiring persons related to the other party's organization.
- 9.3. Whenever the degree of risk of bribery, corruption or related contraventions is not merely residual, novobanco shall require the other party to implement measures to mitigate this risk, namely to adopt an anti-bribery and anti-corruption policy with

similar standards to this Policy and to provide adequate training on the prevention of corruption and bribery to its employees.

- 9.4. If it is not possible to implement measures to mitigate the other party's risk of bribery, corruption or related contraventions or if the other party does not implement the measures required by novobanco, the EBD, under the Compliance Department's advice, shall consider terminating negotiations with the other party, taking into account the inherent degree of risk of bribery, corruption or related contraventions.
- 9.5. The Compliance Department shall periodically review existing relationships to assess whether there has been an increase of the degree of risk of bribery, corruption or related contraventions of the other party or whether the original risk assessment did not correctly determine the degree of risk bribery, corruption or related contraventions of the other party.
- 9.6. When reviewing existing relationships, the Compliance Department shall employ a risk-based approach and specific measures may include, among others:
 - a) Requesting proof of analysis of undocumented payments, and eventually, subsequent control of such payments;
 - b) Requiring periodical certification with applicable anti-corruption and anti-bribery laws; and
 - c) Requiring occasional meetings to assess and review new business arrangements.
- 9.7. If there has been an increase of the degree of risk of bribery, corruption, or related contraventions of the other party or whether the original risk assessment did not correctly determine the degree of risk of corruption or bribery of the other party, the EBD, under the Compliance Department's advice, shall consider employing the measures set out in 9.3. and 9.4.

10. Accounting Obligations

- 10.1. Covered Person are reminded of the prohibition from creating or maintaining alternative or shadow accounting systems, when acting on novobanco's behalf.

- 10.2. Covered Person, when applicable, shall record accurately and reliably all transactions, assets, expenses, as well as any other data with accounting significance, as per applicable accounting rules and in provided IT systems.
- 10.3. For the purposes of 10.1. and 10.2. above, “alternative or shadow accounting systems” should be understood as any form of accounting or bookkeeping not adopted or implemented by novobanco, which is liable to conceal or distort the occurrence or details of a transaction or any other business dealing or to inaccurately reflect novobanco’s assets and/or liabilities.

11. Training

- 11.1. The novobanco’s Group employees shall receive regular training on the prevention of bribery, corruption and related contraventions suitable to their category and functions. The training on the prevention of bribery, , corruption and related contraventions may be part of a general training on compliance.
- 11.2. New employees shall receive training on the prevention of bribery, corruption and related contraventions within 3 months of joining the novobanco Group.
- 11.3. The training programme on the prevention of corruption and bribery must discuss, at least, the following topics:
- a) The importance of preventing bribery, corruption and related contraventions;
 - b) Definition of bribery, corruption and related contraventions and other basic notions;
 - c) Duties on preventing bribery, corruption and related contraventions;
 - d) Duty of reporting;
 - e) Consequences of breaching the principles, rules, and duties under this Policy.
- 11.4. The novobanco Group adopts the necessary measures to make this Policy and its procedures known to the entities with which it relates.

12. Disciplinary Action and Criminal Sanctions

- 12.1. Violating this Policy represents a violation of the duties of the employee, which may result in the application of disciplinary sanctions, according to the law, namely dismissal without indemnification or compensation.
- 12.2. The application of disciplinary sanctions does not affect the possible reporting by novobanco of facts that may constitute illicit criminal or administrative offences.
- 12.3. A violation of the rules and duties established in this Policy by Partners and other Third Parties considered as Covered Persons may constitute grounds for termination of the contract, in an appropriate and proportional manner.
- 12.4. A violation of the rules and duties established in this Policy, if associated with corruption crimes and related contraventions, may also lead to the criminal liability of the perpetrators and result in the application of fines or prison sentences, depending on the legal framework and severity of the violation, as well as the application of accessory penalties, namely, prohibition from exercising positions or activities, restrictions on receiving government loans, subsidies or incentives, loss of assets and, in the case of legal entities, even the dissolution of the company.
- 12.5. The RCN shall prepare a report for each infraction committed with identification of the rules violated, the disciplinary sanction applied, and the measures adopted or to be adopted by the novobanco in the management of the risks of bribery, corruption, and related infractions.

13. Communication of Irregularities and Whistleblowing

- 13.1. Employees of novobanco must communicate any suspected practices of bribery, corruption, and related contraventions.

13.2. The reports under this Policy shall be made under the terms of the Policy of Communication of Irregularities/Whistleblowing of novobanco ⁽³⁾ and benefit from the same warranties provided therein.

14. Monitoring and Reporting

14.1. Monitoring of this Policy is ensured by the RCN, along with the Compliance Department, which shall take the steps it deems suitable (including sharing information with competent legal authorities), considering the risk of each situation and the respective mitigation measures implemented.

14.2. Without prejudice to the due diligence required under this Policy, the RCN, of each entity, shall perform a periodic risk analysis of the Bank's ABC profile, on a yearly basis, or whenever warranted by circumstances, namely, when there are significant legislative changes or when there is a concrete increase in the risk of bribery, corruption and related contraventions related to the activity of novobanco.

14.3. When monitoring the Bank's compliance with this Policy, the RCN must pay special attention to factors with a heightened risk of corruption and bribery, such as:

- a) Payments made or received without documentary support;
- b) Discrepancies between invoices and agreed upon values;
- c) Requests for payment in cash or to non-cooperating fiscal jurisdictions;
- d) Business dealing with persons or companies with relevant connexions to jurisdictions with a high Corruption Perception Index; or
- e) Business dealing with persons or companies with relevant connexions to the public sector.

14.4. The results of monitoring this Policy shall be presented by the RCN, within the time period and to the bodies and committees that this deems convenient. For novobanco it should be at least the General Supervisory Board, the Executive Board of Directors and the Compliance Committees.

⁽³⁾ Available at:
<https://www.novobanco.pt/content/dam/novobancopublicsites/docs/pdfs/compliance/ingles/Whistleblowing%20Policy.pdf.coredownload.inline.pdf>

15. Legal Framework and Best Practices

For more information about the relevant legal framework, please see:

- a) **Penal Code**, approved by Decree-Law No. 400/82, of 23 October ⁽⁴⁾;
- b) **Law of Crimes that are the Responsibility of Holders of Political Positions**, approved by Law No. 34/87, of 16 July ⁽⁵⁾;
- c) **Penal Regime of Corruption in International Commerce and in the Private Sector**, approved by Law No. 20/2008, of 21 April ⁽⁶⁾;
- d) **Law on Political Party and Electoral Campaign Financing**, approved by Law no. 19/2003, of 20 June ⁽⁷⁾.
- e) **Convention of the United Nations against Corruption**, ratified by Portugal on 28 September 2007 ⁽⁸⁾;
- f) **Convention on the Fight against Corruption of Foreign Public Agents in the International Commercial Transactions of the Organisation of Cooperation and Economic Development**, ratified by Portugal on 23 November 2000 ⁽⁹⁾;
- g) **Convention regarding the Fight against Corruption Involving Employees of the European Communities or the Member States of the European Union**, ratified by Portugal on 15 November 2001 ⁽¹⁰⁾;

⁽⁴⁾ Consolidated version available at: https://dre.pt/web/guest/legislacao-consolidada/-/lc/115959478/201908291228/diploma?did=34437675&_LegislacaoConsolidada_WAR_drefrontofficeportlet_rp=indice&q=c%C3%B3digo+penal

⁽⁵⁾ Consolidated version available at: https://dre.pt/web/guest/legislacao-consolidada/-/lc/67055375/201908291229/diploma?did=34492375&_LegislacaoConsolidada_WAR_drefrontofficeportlet_rp=indice&q=CRIMES+DA+RESPONSABILIDADE+DE+TITULARES+DE+CARGOS+POL%C3%8DTICOS

⁽⁶⁾ Consolidated version available at: https://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=983&tabela=leis

⁽⁷⁾ Consolidated version available at: https://dre.pt/web/guest/legislacao-consolidada/-/lc/66960263/view?p_p_state=maximized

⁽⁸⁾ Available in Portuguese at: <https://dre.pt/application/conteudo/642261>

⁽⁹⁾ Available in Portuguese at: <https://dre.pt/application/conteudo/506040>

⁽¹⁰⁾ Available in Portuguese at: <https://dre.pt/application/conteudo/604406>

- h) **Framework Decision 2003/568/JAI of the Council**, of 22 July 2003 ⁽¹¹⁾;
- i) **Criminal Law Convention on Corruption of the Council of Europe**, ratified by Portugal on 07 May 2002 ⁽¹²⁾;
- j) **Additional Protocol to the Criminal Law Convention on Corruption of the Council of Europe**, ratified by Portugal on 12 March 2015 ⁽¹³⁾;
- k) **Recommendation of the Counsel for the Prevention of Corruption on Plans for Preventing the risks of Corruption and Related Infractions**, of 01 July 2015 ⁽¹⁴⁾.
- l) **Action Programme Against Corruption of the Committee of Ministers of the Council of Europe**, of 21 November 1996 ⁽¹⁵⁾;
- m) **Resolution (97) 24 of the Committee of Ministers of the Council of Europe regarding the Twenty Guideline Principles of the Fight Against Corruption**, of 06 November 1997 ⁽¹⁶⁾;
- n) **Evaluation Report regarding the Prevention of Corruption in Portugal by the Group of States Against Corruption**, of 04 December 2015 ⁽¹⁷⁾;
- o) **Summary of the Guidelines for Integrity Compliance of the World Bank Group** ⁽¹⁸⁾;
- p) **Guidelines for the Anti-Bribery and Corruption Compliance Programme of the Wolfsberg Group** ⁽¹⁹⁾; The National Anti-Corruption Mechanism and

⁽¹¹⁾ Available in Portuguese at: <https://eur-lex.europa.eu/legal-content/PT/TXT/PDF/?uri=CELEX:32003F0568&qid=1567086784719&from=PT>

⁽¹²⁾ Available in Portuguese at: <https://dre.pt/application/conteudo/583376>

⁽¹³⁾ Available in Portuguese at: <https://dre.pt/application/conteudo/66012660>

⁽¹⁴⁾ Available at https://www.cpc.tcontas.pt/documentos/recomendacoes/recomendacao_cpc_20150701_2.pdf

⁽¹⁵⁾ Available in English at: <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806ccfb6>

⁽¹⁶⁾ Available in English at: <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806cc17c>

⁽¹⁷⁾ Available in English at: <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806c7c10>

⁽¹⁸⁾ Available in English at: <https://www.worldbank.org/content/dam/documents/sanctions/other-documents/sanctions-board/Summary%20of%20Integrity%20Compliance%20Guidelines.pdf>

⁽¹⁹⁾ Available in English at: <https://www.wolfsberg-principles.com/sites/default/files/wb/pdfs/wolfsberg-standards/3.%20Wolfsberg-Group-ABC-Guidance-June-2017.pdf>

the General Regime for the Prevention of Corruption, approved by Decree-Law No. 109-E/2021, of December 9, 2021 ⁽²⁰⁾.

16. Revision

This Policy shall be reviewed at least annually or whenever warranted by circumstances, specifically, when significant legislative changes occur or when there are changes in the organic or corporate structure of the novobanco Group.

17. Communication

This Policy is disclosed, in its most current version, to all the Covered Persons and is available on the Intranet page for consultation by all Employees.

This Policy is also publicly disclosed and is available on the official novobanco website (www.novobanco.pt).

⁽²⁰⁾ Available in Portuguese at: <https://data.dre.pt/eli/dec-lei/109-e/2021/12/09/p/dre/pt/html>