



**TRANSPARENCY
AND
ANTI-CORRUPTION
CODE OF CONDUCT**

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MESSAGE FROM THE PRESIDENT

All those involved in football have a responsibility - in addition to competently overcoming professional demands - to renew their commitment to building a football with strong ethical values.

The trust of fans and all partners in professional football is earned through relationships based on exemplary behaviour and conduct, but it can be lost at any moment due to actions or conduct perceived as less professional.

It is in this context that it is created, through a collaborative process with the governing bodies, employees and delegates of the Portuguese Professional Football League (hereinafter Liga Portugal), the Transparency and Anti-Corruption Code of Conduct of Liga Portugal, which will serve as a reference that will guide us every day, but especially in the most demanding and challenging situations.

We will be faced, in our daily lives, with situations that will test our decision-making ability and integrity. We believe that each one of us will act in accordance with the principles set out in this Code.

Only this way will we be able to preserve the excellence that defines Portuguese professional football.

PEDRO PROENÇA

PRESIDENT



1. OBJECTIVES AND SCOPE OF APPLICATION OF THE TRANSPARENCY AND ANTI-CORRUPTION CODE

The main purposes of Liga Portugal are to organise and regulate professional competitions, to promote the management of matters inherent to the organisation and practice of professional football and its competitions and to carry out, in regard to its members, the disciplinary control and supervisory duties established in the Portuguese legislation and in Liga's respective Statutes and Regulations.

The Transparency and Anti-Corruption Code of Conduct of Liga Portugal (hereinafter referred to as the Code) integrates the principles that regulate the activity within the organisational framework of the professional competitions held by Liga Portugal and a set of rules to be complied with by the Members of the Governing Bodies, Staff (employees and service providers) and Delegates of Liga Portugal.

On the other hand, this Code is also applicable to third parties contracted by or acting on behalf of Liga Portugal, in cases where the latter may be held responsible for their acts or omissions.

The Code was established with the fundamental objective of:

- a) Sharing the principles and rules of transparency that govern the activity of Liga Portugal and guide the conduct of all Employees, League Delegates and Members of the Governing Bodies of Liga Portugal, as well as to promote the practice of ethical principles and conduct by our Partners;
- b) Encouraging behaviours that sustain and promote the integrity and institutional image of the Liga Portugal whose values are Credibility, Aggregation, Talent and Spectacle.

2. INTEGRITY AND TRANSPARENCY

In the course of its duties and in the external and internal relationship, the recipients of this Code shall adopt a suitable and dignified behaviour, being prohibited from using the affiliation with Liga Portugal and the respective image of Liga Portugal for their own personal advantage, or that of their family members or any third party.

Specifically, they must abide by the general principles of professional conduct and those of integrity, independence, neutrality, objectivity and sportsmanship, and generally, their obligation to abstain from any activity that may jeopardise the integrity of Liga Portugal or its Competitions.

Namely, it is prohibited:

- a) All forms of sports betting related to the competitions organised by Liga Portugal;
- b) All participation and promotion, directly or through third parties, in sports betting related to competitions organised by Liga Portugal;
- c) The affiliation to companies or organisations that promote, negotiate, organise, conduct events or transactions related to sports betting. The aforementioned affiliation shall be deemed to exist when it involves the corresponding members of the governing bodies, employees and delegates of Liga Portugal and their spouses or equivalent;
- d) With the exception of the Executive Board of the Liga Portugal, the involvement of sports societies participating in competitions organised by the Liga Portugal;
- e) With the exception of the Executive Board of the Liga Portugal, the association with natural or legal persons who hold shares in the share capital of sports societies participating in competitions organised by the Liga Portugal or who are beneficial owners thereof;
- f) The association with legal or natural persons who, either for compensation or free of charge, represent players or clubs in negotiations aimed at signing a sports employment contract or a transfer contract (intermediaries).

The recipients of this Code must, within 30 days of its publication, provide Liga Portugal with a sworn statement certifying that they are not involved in any of the situations of incompatibility and conflict of interest foreseen in the Code. The declaration must be always updated once the previous situation is changed.

The occurrence of situations of incompatibility or conflict of interest must be immediately reported to Liga Portugal.

2.1. INDEPENDENCE AND CONFLICT OF INTEREST

The recipients of the Code have the responsibility to carry out their duties independently, avoiding putting Liga Portugal in situations that could be considered a threat to the impartiality and suitability of the entity that organises the professional football competitions in Portugal.

With the exception of carrying out duties on the Executive Board of Liga Portugal, Portuguese Football Federation and district associations, the recipients of the Code also have the obligation to not participate or perform functions in entities, organisations, projects or events whose activity may conflict with their duties in Liga Portugal.

2.2. OFFERS AND HOSPITALITY

The offering of gifts and hospitality must be preceded by a rigorous analysis of suitability, so that they are not perceived as indirect means of corruption, and must always comply with the Gifts and Hospitality Procedure.

The recipients of the Code must not accept, for their own benefit, goods, services or any advantages, with an individual value of more than €150 from the sports societies participating in professional competitions, from suppliers or natural or legal entities that have had or intend to have commercial relations with Liga Portugal.

However, should it become unfeasible or inadvisable to accept or return it, the gift must be returned to the offeror or reverted to Liga Portugal, which will use it for the appropriate purpose, namely for social solidarity actions.

Whenever the estimated unit value of the gift is over €150, it must be reported to the Transparency Commission by filling in the declaration of acceptance of the gift to that effect.

The previous restriction does not apply to offers of goods or services, such as travelling, meals, accommodation or shows, which are given by third parties to the recipients of this Code due to the their position, within the scope of their representative functions and in the interest of Liga Portugal.

It is forbidden to offer or receive, under any circumstances and regardless of value, cash, paychecks or other means of payment.

2.3. BRIBERY, INFLUENCE PEDDLING

It is expressly forbidden to obtain any advantage through any improper method.

Any attempts to engage in corruption, bribery or influence peddling behaviour must be reported to Liga Portugal immediately via email/link on the website.

2.4. INSIDER INFORMATION

Preserve, in a responsible way, the confidentiality of Liga Portugal's information, treating it with special concern, with the aim to its control and protection.

The disclosure of inside information about Liga Portugal to third parties is prohibited, with the exception of situations in which there is a legal or professional right or duty to do so, and situations in which Liga Portugal's written consent has been obtained.

Under no circumstances shall Liga Portugal's information be used for personal benefit or for the benefit of third parties.

Anyone who has access to inside information, under any title, is expressly forbidden to pass it on, use it or facilitate its use for personal gain.

3. COMMUNICATION

Liga Portugal promotes a healthy communication environment that encourages the raising of concerns about transparency and corruption and provides the possibility of identifying and reporting possible infringements of this Code.

In this sense, the act of reporting the existence or reasonable suspicion of any behaviour incompatible with the Code represents an obligation for each of its recipients.

3.1. WHOM AND HOW TO CONTACT

Just as important as knowing how to adapt our behaviour to each situation is knowing how to communicate and with whom to communicate, effectively and in good time.

Communications on transparency and corruption shall be addressed to the Transparency Commission (hereinafter CT), which shall be composed of members appointed by the Executive Board of Directors, in accordance with the regulations of said Commission.

Communications can be addressed to the following e-mail address: transparencia@ligaportugal.pt or through the form available on the website page. This communication channel from Liga Portugal is anonymous and ensures the strictest confidentiality of the information transmitted.

3.2. NON-RETALIATION

Without prejudice to cases of defamatory accusation, in compliance with the law and the values and principles of Liga Portugal, any form of retaliation against an agent who has communicated the existence or reasonable suspicion of behaviour incompatible with this Code shall not be permitted.

4. CONSEQUENCES

The recipients of the Code are bound to learn and apply the provisions of this Code.

Non-compliance with the policies and documents of the Anti-Corruption Management System may lead to disciplinary or criminal proceedings, depending on the gravity and specificity of the case.

5. DOUBTS

Regardless of the position or function, Liga Portugal expects any recipient of this Code to act with honesty, integrity and professionalism.

To enable the respective recipients to deal with situations not contemplated in this Code that may constitute infringements of its scope and principle, we suggest that the following points be reflected upon:

1. What are the consequences of my behaviour for me, for Liga Portugal, or for any other person or entity involved?
2. What Principles of the Code may be applicable to the situation in question?
3. Am I being fair and honest in the way I am dealing with this situation?
4. Am I fulfilling my responsibilities and acting in a professional manner, despite the troubles that my conduct may cause me?
5. If my actions or decisions were reported to the media, would my reputation or that of Liga Portugal be affected?
6. Have I complied with the regulations and the present Code?

5.1. THE 4 R's POLICY

Many of the recommendations presented in this Code are commonsensical.

However, its implementation may, in some specific situations, be ambiguous and leave room for interpretation. In order to identify the best solution, one must question oneself in accordance with the Code.

The following 4 questions can also help you make the best decision:

Is it Regulatory? Is the procedure in accordance with the Portuguese regulations? Have you checked the legal requirements?

Is it Reasonable? Is the behaviour in line with local practices and usages? Would I be reassured if my conduct should be exposed in a newspaper or if I should talk about it with my friends?

Is it Responsible? Is the procedure in line with LIGA's operating principles and ethical values? Is it within my delegation of power?

Is it Reported? Is the procedure clearly recorded in our accounting or administrative documents?

Should any doubts about compliance with the principles of transparency/integrity and corruption remain and consultation is feasible in a timely manner, the recipients of the Code should address consultation to the Transparency Commission of Liga Portugal.

Any questions related to the interpretation or application of this Code should be addressed to the Transparency Commission through transparencia@ligaportugal.pt.

6. ENTRY INTO FORCE AND DISCLOSURE

This Code shall enter into force upon its approval, and shall be disclosed to all employees and other stakeholders.

At the beginning of their functions at Liga Portugal, the Member of a corporate body, the Employee and the Delegate of Liga Portugal sign a statement attesting their knowledge of the Code and their individual commitment to its compliance.



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