



Corruption and Related Offenses Risk Prevention Plan

Three-Year Period 2025-2028

Corruption and Related Offenses Risk Prevention Plan

TABLE OF CONTENTS

1.	INTRODUCTION	3
2.	HYDRA CHARACTERISTICS.....	4
2.1	OUR PURPOSE.....	4
2.2	OUR VALUES.....	4
3.	PREVENTION OF CORRUPTION AND RELATED OFFENSES AT HYDRA IT	5
3.1	CONCEPT OF CORRUPTION AND RELATED OFFENSES.....	5
3.2	RISK IDENTIFICATION AND ASSESSMENT METHODOLOGY	6
4.	APPENDICES	9
4.1	CORRUPTION AND RELATED OFFENSES RISK MATRIX.....	9
4.2	CONCEPTS OF CORRUPTION AND RELATED OFFENSES – CRIMINAL CODE	18
5.	CONTROL MECHANISMS.....	19
6.	MONITORING, REVIEW, AND DISCLOSURE OF THE PPR	21

Corruption and Related Offenses Risk Prevention Plan

1. INTRODUCTION

Decree-Law No. 109-E/2021, of December 9, classifies corruption as a phenomenon that “offends the essence of democracy and its fundamental principles, namely those of equality, transparency, free competition, impartiality, legality, integrity, and the fair redistribution of wealth.”.

In this regard, the same Decree-Law creates, in an attachment, the General Corruption Prevention Regime (RGPC) and the National Anti-Corruption Mechanism (MENAC).

HYDRA IT – Tecnologias de Informação e Conteúdos Lda, hereby referred to as Hydra IT, applies zero tolerance in matters of corruption. It prohibits and strongly condemns all fraudulent practices and all acts of corruption, of any kind, directed at any person, including public authorities.

The RGPC, which came into force in June 2022, applies to legal entities based in Portugal that employ 50 or more workers and to branches in Portugal of legal entities based outside Portugal that employ 50 or more workers.

In this sense, this Plan seeks to comply with the obligations set out in the RGPC, namely in its Article 6, as well as to promote a culture of integrity and transparency for which Hydra IT prides itself.

The PPR is the result of an extensive analysis of the entire Hydra IT organization, in which risks were identified in each area of activity, as well as preventive and corrective measures to mitigate these risks.

With the implementation of this Plan, Hydra IT intends to continue its commitment to the prevention and mitigation of corruption risks and related offenses, establishing the following goals:

1. identify, analyze, and classify the risks of corruption and related offenses to which the organization is exposed, ensuring firm and rigorous action on any suspicions of this type of crime;
2. develop activities to control and mitigate the identified risks, namely identifying and implementing preventive and corrective measures to reduce the probability of occurrence and the degree of impact of the risks;
3. Increase employee awareness and training;
4. Monitor the implementation of the PPR periodically or whenever changes occur that justify a review.

Corruption and Related Offenses Risk Prevention Plan

2. HYDRA CHARACTERISTICS

Hydra IT is a Portuguese company founded in 2006, specialized in the implementation and development of integrated global solutions in the area of information systems, mobility, and content for the business segment. With our experience, we are committed to guiding our clients' businesses, using innovative technologies that guarantee the efficiency and digital transformation of their businesses.

2.1 OUR PURPOSE

Our purpose is to be in the market and in society with the goal of building trust and solving important problems. We believe that the way we live with our values makes a difference, distinguishes us, and sets us apart in the market and in the communities where we operate. Hydra IT is committed to conducting its business in accordance with a robust framework of ethical and professional standards, as well as in compliance with laws, regulations, internal policies, and the following core values:

- **we act with integrity:** we stand up for and speak confidently about what is right, and we deliver high-quality results;
- **we make a difference:** we create a positive impact on our colleagues, customers, and society through our actions;
- **we care about others:** we make an effort to understand each person and recognize their value;
- **we work together:** we collaborate and share ideas and knowledge;
- **we (re)imagine what is possible:** we innovate and are open to new ideas.

2.2 OUR VALUES

From Portugal to a global scale, Hydra iT continues to grow and align its values with the paradigms of the future labor market, supported by the following values.

Corruption and Related Offenses Risk Prevention Plan

1. Customer focus: identifying their needs and expectations and developing solutions to meet them;
2. Innovation in products, services, and processes as a permanent approach to problems and to developing and implementing solutions;
3. Development of partnerships in different areas of knowledge as the preferred way to build more complex solutions with greater added value;
4. Motivation and continuous training of employees, strengthening and expanding the company's skills;
5. Digital culture, imagination, and productivity;
6. Rigor, professionalism, and ethical behavior.
7. A sense of active social responsibility, contributing to the improvement of the society in which we operate, guiding our conduct by environmental concerns and sustainable development policies.

3. PREVENTION OF CORRUPTION AND RELATED OFFENSES AT HYDRA IT

3.1 CONCEPT OF CORRUPTION AND RELATED OFFENSES

Although there is no definition of corruption that is common to all countries, there is an agreement that corrupt conduct involves the abuse of public power or office to benefit a third party, in exchange for payment or some other type of benefit.

In Portugal, Articles 373 and 374 of the Penal Code provide for the crime of corruption in the exercise of public functions, which is defined as a crime in which a public official promises, grants, requests, or accepts, "for themselves or for a third party, a financial or non-financial advantage, for the performance of any act or omission contrary to the duties of their office." On the one hand, active corruption is committed by those who promise or offer an illicit advantage, while on the other hand, passive corruption is committed by those who accept it.

In addition to the Penal Code, the crime of corruption is also provided for in Articles 8 and 9 of Law No. 20/2008 of April 21, and is described as the crime whereby a private sector employee, either personally or through an intermediary, promises, grants, requests, or accepts, "for themselves or for a third party, without being entitled to it, a financial or non-financial advantage for any act or omission that constitutes a violation of their functional duties." If, on the one hand, active corruption is

Corruption and Related Offenses Risk Prevention Plan

practiced by those who promise or offer an illicit advantage, on the other hand, passive corruption is committed by those who accept it.

In addition, the concept of corruption has a broader meaning in society, covering other behaviors that are also criminalized. These behaviors, considered related offenses, allow, as in the case of corruption, the obtaining of an illicit advantage. Examples of such offenses include embezzlement, economic participation in business, extortion, abuse of power, malfeasance, influence peddling, bribery, or money laundering, the concepts and legal norms of which are detailed in chapter 4.2.

3.2 RISK IDENTIFICATION AND ASSESSMENT METHODOLOGY

The International Organization for Standardization (ISO) defines risk as an effect of uncertainty on certain objectives, often expressed as the combination of the probability of an event and its consequences/impacts (including changes in circumstances).

The methodology adopted in the preparation of the PPR, namely in the identification, classification, and assessment of corruption risks and related offenses, comprises a process of identification, assessment, recommendation/implementation of corrective measures, and monitoring/reporting.

In this sense, the first phase of the process (risk identification) stems from a thorough and detailed analysis of the various areas and activities of HYDRA IT and its context, with a view to identifying, in each of them, the skills or responsibilities that may promote situations that constitute risks of corruption and related offenses.

In turn, the assessment and classification of risks stems from the combination of the probability of occurrence of situations that entail risk with the severity of their expected impact, which results in a degree of risk that follows a five-level scale (very low, low, medium, high, and very high), according to which different response strategies will be defined. The probability and impact scale is outlined according to the following risk matrix:

Corruption and Related Offenses Risk Prevention Plan

Risk Degree		Probability of Occurrence		
		High	Average	Low
Expected Impact	High	Very High	High	Moderate
	Average	High	Moderate	Reduced
	Low	Moderate	Reduced	Very Reduced

Impact can be understood as the expected consequence of an event that affects HYDRA IT's strategic objectives, and is graded as follows:

- **High:** when there is very significant damage to HYDRA IT's reputation, a violation of the code of ethics and conduct, or another consequence with significant costs that affects the mission, values, objectives, business opportunities, and operational activity;
- **Medium:** when there is a medium impact on HYDRA IT's reputation or on the performance of operational activities and strategic objectives, or another consequence with bearable costs;
- **Low:** when there may be no potential to impact HYDRA IT's reputation or the performance of operational activities and objectives, with insignificant associated costs.

As for the probability of occurrence, this can be understood as the possibility of an event occurring or not occurring in a given period. The three criteria for probability of occurrence can be defined as follows:

- **High:** when the event can occur regularly and/or with a reduced possibility of prevention or remediation, even if it includes additional control actions;
- **Medium:** when the event may occur sporadically and/or with the possibility of prevention or remediation, even if it includes additional control actions;
- **Low:** when the event is unlikely to occur or when it occurs in exceptional circumstances and can be prevented or remedied with the controls in place.

Corruption and Related Offenses Risk Prevention Plan

Once the risks have been assessed, appropriate responses are defined to ensure that HYDRA IT is not exposed to residual risks above the defined level. These responses may be based on three alternative strategies, namely (i) risk treatment (elimination, transfer, or control), (ii) risk acceptance, or (iii) the definition of contingency plans for them.

As a result of the identification and assessment of risks, HYDRA IT has developed, with the involvement of its various areas, the risk matrix presented in Chapter 4, in which (i) the risks identified in HYDRA IT's areas of activity with exposure to corruption risks and related offenses are presented, (ii) the probability of occurrence, the potential impact and, consequently, the degree of risk of each identified risk, and (ii) the preventive and control measures (implemented and/or being implemented) associated with the mitigation of each risk are identified.

Corruption and Related Offenses Risk Prevention Plan

4. APPENDICES

4.1 CORRUPTION AND RELATED OFFENSES RISK MATRIX

The risk matrix presented below covers the entire organization and activity of Hydra IT, pursuant to Article 6(3) of Decree-Law No. 109-E/2021.

CAPTION		
PRA	IP	DR
Probabilistic Risk Assessment	Impact Prediction	Degree of Risk

Activities	Potential Risks	Assessment ^[2]			Preventive Measures ^[3]
		PRA	IP	DR	
Commercial fundraising	Lack of independence in the decision to commercially acquire projects from clients who are related parties or whose project is of personal interest	Low	Low	Very Low	<ul style="list-style-type: none"> - Application and compliance with a conflict-of-interest management policy - Identification of related parties with whom Hydra IT and its partners have business relationships - Mandatory completion of a questionnaire attesting to the independence between potential Hydra IT clients and team members who will provide the services
	Establishing business relationships with clients: (i) with a poor image, reputation, and integrity; (ii) associated with investigations and/or adverse court decisions related to corruption crimes or related offenses; (iii) subject to sanctions imposed by the European Union, the United Nations, or the government of a country where the third party operates; and/or (iv) whose shareholders, directors, beneficial owners, and key stakeholders are Politically Exposed Persons (PEPs) or are associated with investigations, adverse court decisions, and/or included on sanctions lists	Low	High	Moderate	<ul style="list-style-type: none"> - Application and compliance with a Policy for the Prevention of Money Laundering and Combating the Financing of Terrorism - Conducting client analysis and assessment procedures prior to accepting new clients - Continuous monitoring of client risk and definition of enhanced due diligence measures for clients classified as high risk
	The occurrence of bribery, influence peddling, and/or offers to public or private sector officials with the aim of winning a (public or private) tender or securing the awarding of a contract.	Medium	High	Moderate	<ul style="list-style-type: none"> - Application and compliance with the offers and hospitality policy, with pre-established criteria and procedures. - Segregation and restriction of access and transaction powers to bank accounts. - Formalization of applications for public tenders through existing platforms for this purpose. - Approval of expenses incurred by employees by independent supervisors.

Corruption and Related Offenses Risk Prevention Plan

Activities	Potential Risks	Assessment ^[2]			Preventive Measures ^[3]
		PRA	IP	DR	
Drafting and formalizing contracts with clients	Drafting and formalizing contracts with ambiguous terms regarding payment conditions and/or with a broad/ambiguous/unclear contractual purpose, making it difficult to interpret/verify/supervise services and control payments	Low	Low	Very Low	<ul style="list-style-type: none"> - Use of draft contracts prepared with the legal department - Review of contracts with public entities by the legal department - Review by the legal department of changes to the general terms and conditions
Negotiation and definition of prices/discounts and other conditions to be applied to customers	Assigning excessive/unjustified discounts to customers and/or whose reasonableness is ambiguous, in exchange for benefits unrelated to the organization	Low	Low	Very Low	<ul style="list-style-type: none"> - Establishment of system controls that require additional approvals for excessive discounts to customers
	Negotiating and awarding commercial proposals with customers that are not very profitable and/or directly harmful to Hydra IT in exchange for benefits unrelated to the organization	Medium	Low	Low	<ul style="list-style-type: none"> - Participation of several stakeholders in the negotiation and formalization of contracts - Definition of minimum returns per project, which require independent approval to be exceeded
Purchases					
Contracting suppliers and subcontracting third parties	Hiring or subcontracting third parties: (i) with a poor image, reputation, and integrity; (ii) associated with investigations and/or adverse court decisions related to corruption crimes or related offenses; (iii) subject to sanctions imposed by the European Union, the United Nations, or the government of a country where the third party operates; and/or (iv) whose shareholders, directors, beneficial owners, or key players in the relationship are Politically Exposed Persons (PEPs) or are associated with investigations, adverse court decisions, and/or included in sanctions lists	Low	Low	Very Low	<ul style="list-style-type: none"> - Conducting detailed supplier due diligence procedures prior to establishing relationships with new suppliers - Application and compliance with specific rules for business partnerships with third parties - Requiring suppliers to sign a code of conduct for third parties - Continuously monitoring the risk posed by suppliers and partners and defining enhanced due diligence measures for suppliers classified as high risk
	Contracts/subcontracts not approved or approved with an inappropriate level of delegation of authority	Medium	Low	Low	Mandatory involvement of different levels of approval
	Setting prices and payment and/or supply conditions that are unreasonable and disproportionate to the services/products purchased	Medium	Low	Low	<ul style="list-style-type: none"> - Application and enforcement of purchasing policy - Involvement of different levels of approval

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Corruption and Related Offenses Risk Prevention Plan

Drafting and formalizing contracts with ambiguous payment terms and/or with a broad/ambiguous/unclear contractual purpose, making it difficult to interpret/check/supervise services and control payments	Low	Low	Very Low	<ul style="list-style-type: none"> - Mandatory issuance of purchase orders for all purchases, followed by their registration in the system and completion of the subject matter of the contract - Involvement of the legal department in the subcontracting of services
Inconsistencies/failures in complying with established procedures for the procurement of goods and services, resulting from the decentralization of these procedures across various areas of Hydra IT's organizational structure	Medium	Low	Low	<ul style="list-style-type: none"> - Application and compliance with purchasing policy - Existence of workflow in the system, involving different levels of approval

Corruption and Related Offenses Risk Prevention Plan

Activities	Potential Risks	Assessment ^[2]			Preventive Measures ^[3]
		PRA	IP	DR	
	Occurrence of bribery/corruption by entities representing or acting on behalf of Hydra IT	Low	Low	Very Low	<ul style="list-style-type: none"> - Conducting detailed supplier due diligence procedures prior to establishing relationships with new suppliers - Application and compliance with specific rules for business partnerships with third parties - Obligation for suppliers to sign the code of conduct for third parties
	Excessive renewal/extension of contract terms or signing of contract amendments without reviewing the negotiated terms and conditions, avoiding market consultations and following the approval workflow	Low	Low	Very Low	<ul style="list-style-type: none"> - Involvement of the purchasing department in the analysis of contract term extensions and/or amendments to contracts with suppliers - Establishment of rules regarding amendments, renewals/contract extensions
	Transactions with related parties involving management elements whose business logic is not transparent and/or for which the scope of the business is not formalized	Low	Medium	Low	<ul style="list-style-type: none"> - Application and compliance with a conflict-of-interest management policy - Identification of related parties with whom Hydra IT and its partners and employees have business relationships - Continuous monitoring of transactions with related parties
	Receipt of bribes/undue advantage for selecting, hiring, and/or favoring one supplier over another	Low	Low	Very Low	<ul style="list-style-type: none"> - Application and compliance with purchasing policy - Existence of workflow involving different levels of approval
Purchase order registration	Acquisition of goods that do not result from real needs for benefits unrelated to the organization	Low	Low	Very Low	<ul style="list-style-type: none"> - Application and compliance with purchasing policy - Existence of workflow involving different levels of approval
	Splitting of purchases/expenses so as not to exceed the defined purchase approval limits and/or delegations of authority for approval	Low	Low	Very Low	<ul style="list-style-type: none"> - Existence of a workflow in the system, involving different levels of approval (regardless of the value of the services to be contracted)
Accounting and Treasury					
Classification, entry, and recording of invoices and other documents from suppliers and customers	Misappropriation of funds due to the recording of invoices (i) without contractual basis, (ii) without supporting documentation, (iii) without evidence of delivery/provision of goods/services, (iv) without approval, and/or (v) inconsistent with contracts and/or purchase orders without apparent justification	Low	Low	Very Low	<ul style="list-style-type: none"> - Automatic control in the system, not allowing payment for goods/services above the contracted/requested amount - Existence of an invoice approval workflow prior to payment - Exceptions are approved by employees independent of the transaction
	Issuance of credit notes and unjustified refunds or write-offs to obtain benefits unrelated to the organization	Low	Low	Very Low	<ul style="list-style-type: none"> - Only authorized with the express approval of management

Hydra iT

Corruption and Related Offenses Risk Prevention Plan

Activities	Potential Risks	Assessment ^[2]			Preventive Measures ^[3]
		PRA	IP	DR	
Classification, entry, and recording of invoices and other documents from suppliers and customers	Use of generic or ambiguous accounting entries to record costs not related to the company's activity	Low	Medium	Low	<ul style="list-style-type: none"> - Periodic monitoring and analysis of accounting items most susceptible to manipulation and recording of undue costs by an independent team - Cost structure divided by business areas
Preparation of financial reports, financial statements, and consolidation	Manipulation of financial statements to obtain benefits unrelated to the organization	Low	Medium	Low	<ul style="list-style-type: none"> - Monthly analytical review of accounting items and comparisons with the budget, previous periods, and corresponding periods - Monthly monitoring and periodic analysis of accounting items most prone to manipulation and to the recording of undue costs
Bank reconciliations	Manipulation of bank reconciliations to obtain benefits unrelated to the organization in order to conceal/modify suspicious and/or unrelated movements in bank accounts	Low	Low	Very Low	<ul style="list-style-type: none"> - Review and approval of bank reconciliations by different employees
Registration of third parties in master databases	Creation of fictitious or duplicate third-party entities	Low	Low	Very Low	<ul style="list-style-type: none"> - Automation of alerts in the computer system for blocking/flagging in case of invalid and/or duplicate tax identification numbers, names, addresses, and/or IBANs - Validation of new customer and supplier information by an independent team
	Use, disclosure, and/or manipulation of information from third parties registered in the computer system	Low	Low	Very Low	<ul style="list-style-type: none"> - Control through rules and profiles for system access based on the functions performed - Existence of an approval workflow for the registration and alteration of third-party master data, involving various areas of the organization
Validation and reimbursement of expenses submitted by employees	Approval of expenses incurred by employees and management personnel that are undocumented, not related to Hydra IT's activities, and/or whose amount is not appropriate given the nature of the expense	Low	Low	Very Low	<ul style="list-style-type: none"> - Compliance with the policy for submitting, approving, and reimbursing employee expenses - Existence of an approval workflow for expenses, involving various areas of the organization

Corruption and Related Offenses Risk Prevention Plan

Activities	Potential Risks	Assessment ^[2]			Prevention Measures ^[3]
		PRA	IP	DR	
Payment and receipt management	Misappropriation of funds as a means of obtaining/granting illicit advantage	Medium	Medium	Moderate	<ul style="list-style-type: none"> - Existence of a system control that prevents the sending of invoices for payment without verification of compliance with invoice approval workflows and verification of the receipt of goods and/or services - Existence of controls on duplicate payments - Formalization of procedures relating to cash receipts and payments - Restricted access to bank account access credentials - Periodic bank reconciliations - Annual circularization to banks - Operation of the cash register under a fixed fund system - Performance of cash movement controls through cash register sheets - Prior approval of the assignment of system access profiles based on the functions performed and periodic review of the same - Regular circularization to third parties, with a focus on those with the highest risk - Periodic monitoring of supplier and customer current accounts with a view to regularizing balances and analyzing discrepancies
IT					
Management and allocation of access to computer systems	Incorrect configuration of employee access, considering the roles performed	Medium	Medium	Moderate	<ul style="list-style-type: none"> - Compliance with information security policy - Application of audit mechanisms that allow for periodic review of access to systems
Marketing & Communication					
Allocation of donations / sponsorships	The allocation of donations and/or sponsorships with the purpose of exerting undue influence over the beneficiary entity and/or granting/obtaining undue advantage	Low	Low	Very Low	<ul style="list-style-type: none"> - Implementation of procedures for the allocation, monitoring, and approval of donations and/or sponsorships, including the identification of third-party beneficiaries and prior assessment of their risk profile to be validated. - Prohibition of the allocation of donations and/or sponsorships to political parties and election campaigns. - Development of an annual budget for donations and sponsorships and analysis of deviations from it. - Formalization of sponsorship contracts

Corruption and Related Offenses Risk Prevention Plan

Activities	Potential Risks	Assessment ^[2]			Preventive Measures ^[3]
		PRA	IP	DR	
	Lack of independence and impartiality in the allocation of donations and/or sponsorships resulting from conflicts of interest (family, political, commercial, or personal) to third parties (public and/or private)	Medium	Medium	Moderate	<ul style="list-style-type: none"> - Application and compliance with a conflict-of-interest management policy - Implementation of procedures for the allocation, monitoring, and approval of donations and/or sponsorships, including the identification of third-party beneficiaries and prior assessment of their risk profile
People & Culture					
Recruitment and selection	Accumulation, by employees, of public/private functions and/or other situations that may generate conflicts of interest that could interfere with the performance of their duties	Medium	Medium	Moderate	<ul style="list-style-type: none"> - Compliance with employee hiring policy, respecting the various stages of the recruitment process - Compliance with personal relations policy - Where applicable, submission of requests for accumulation of functions, complying with a specific approval workflow
	Undue favoring or disadvantaging of candidates in the recruitment and selection process	Medium	Low	Low	<ul style="list-style-type: none"> - Mandatory intervention by the People & Culture department or an independent party in the recruitment process - Impossibility for an employee who refers to a candidate to be part of the analysis and decision-making process regarding their hiring - Compliance with the employee hiring policy, respecting the various stages of the recruitment process
	Existence of relationships with employees without formal contracts and/or whose contract clauses are manipulated/ambiguous and directly detrimental to Hydra IT	Low	Low	Very Low	<ul style="list-style-type: none"> - Mandatory use of contract templates with mandatory clauses pre-approved by the legal department in the event of changes.
Performance evaluation	Occurrence of inappropriate behavior by employees due to a policy of awarding bonuses based on aggressive commercial targets, where applicable	Low	Low	Very Low	<ul style="list-style-type: none"> - Consideration of various criteria in employee performance evaluations, to strike a balance between commercial and non-commercial and technical objectives

Corruption and Related Offenses Risk Prevention Plan

Human Resources					
Salary processing	Manipulation of information related to employee salary processing, resulting in potential undue payments	Low	Low	Very Low	<ul style="list-style-type: none"> - Segregation of duties between the employee responsible for registering employees and their respective salaries in the database and the employee who performs salary processing - Prior approval for the assignment of access profiles to systems based on the functions performed and periodic review of these profiles - Restriction of access to consult and edit the payroll processing file - Reconciliation of payroll processing - Random verification of pay slips and comparison with amounts actually paid

Corruption and Related Offenses Risk Prevention Plan

Activities	Potential Risks	Assessment ^[2]			Preventive Measures ^[3]
		PRA	IP	DR	
Transversal					
Giving/receiving gifts and offers to/from third parties	Offering or receiving gifts or similar benefits, gratuities, remuneration, commissions, trips, accommodation, favors, privileges, or any other type of incentive or financial or non-financial advantage that could compromise the impartiality of the duties performed, be perceived as bribery or illegitimate influence, and/or be a way of granting/obtaining an undue benefit	Low	Medium	Low	<ul style="list-style-type: none">- Implementation of procedures for offering and/or receiving gifts and hospitality, including, among others, (i) determining the nature and the number of gifts allowed, (ii) identifying third-party beneficiaries and assessing their risk profile in advance, and (iii) requiring formal requests and approvals prior to granting/accepting gifts and hospitality- Implementation of enhanced control/monitoring measures on transactions with public entities/agents- Monitoring of gifts and hospitality offered and received
Management and handling of complaints	Lack of independence in receiving, analyzing, and handling complaints received through the channels in place for this purpose	Medium	Medium	Moderate	<ul style="list-style-type: none">- Existence of a person responsible for managing the complaints channel- Documentation of procedures related to the complaint channel, indicating those responsible and their responsibilities at each stage of the process- Existence of a complaint reporting policy- Existence of robust mechanisms for reporting irregularities that promote the independent handling of complaints, with several actors who can receive and investigate complaints received
Monitoring of audits conducted by external entities	Granting of undue advantages to third parties, including public officials, judicial authorities, supervisory authorities, or external auditors to obtain favorable treatment in the conduct of proceedings and/or to influence the decisions of public officials	Low	High	Moderate	<ul style="list-style-type: none">- Reporting, formalization, and archiving meetings and/or interactions with public entities and officials and other oversight or supervisory entities- Implementation of enhanced control/monitoring measures on transactions with public entities/agentes- Monitoring of gifts and hospitality offered and received

Corruption and Related Offenses Risk Prevention Plan

4.2 CONCEPTS OF CORRUPTION AND RELATED OFFENSES – CRIMINAL CODE

Passive corruption (Article 373): An official who, either personally or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or the promise thereof, for the performance of any act or omission contrary to the duties of their office, even if prior to that request or acceptance.

If the act or omission is not contrary to the duties of the position and the advantage is not due to them, the agent shall be punished with imprisonment of one to five years.

Active corruption (Article 374): Anyone who, for themselves or through an intermediary, with their consent or ratification, gives or promises a civil servant, or a third party on their recommendation or with their knowledge, a pecuniary or non-pecuniary advantage for the purpose indicated in Article 373(1).

Undue receipt and offering of advantages (Article 372): An employee who, in the exercise of their duties or because of them, either personally or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a financial or non-financial advantage that is not due to them. Anyone who, either personally or through an intermediary, with their consent or ratification, gives or promises a public official, or a third party at the recommendation or with the knowledge of the public official, a financial or non-financial advantage to which they are not entitled, in the exercise of their duties or because of them.

Misconduct (Article 375): An employee who unlawfully appropriates, for their own benefit or that of another person, money or any movable or immovable property or animal, whether public or private, that has been entrusted to them, is in their possession, or is accessible to them by virtue of their duties.

Economic participation in business (Article 377): An employee who, with the intention of obtaining, for himself or for a third party, unlawful economic participation, harms in a legal transaction the financial interests that, in whole or in part, he is responsible for administering, supervising, defending, or carrying out due to his position.

Extortion (Article 379): An official who, in the exercise of his or her duties or powers arising therefrom, either personally or through an intermediary with his or her consent or ratification, receives for himself or herself, for the State, or for a third party, by misleading or taking advantage of the victim's mistake, a financial advantage that is not due to him or her, or that is greater than what is due, namely a contribution, fee, emolument, fine, or penalty.

Corruption and Related Offenses Risk Prevention Plan

Abuse of power (Article 382): An employee who, outside the cases provided for in the previous articles, abuses their powers or violates the duties inherent to their functions, with the intention of obtaining, for themselves or for a third party, an illegitimate benefit or causing harm to another person.

Malfeasance (Article 369): Any employee who, in the context of a procedural inquiry, judicial proceedings, administrative offense, or disciplinary proceedings, knowingly and unlawfully promotes or fails to promote, conducts, decides or fails to decide, or performs an act in the exercise of the powers arising from the position they hold.

Bribery (Article 363): Anyone who persuades or attempts to persuade another person, through a gift or promise of financial or non-financial advantage, to commit the acts provided for in Articles 359 or 360, without these being committed.

Trafficking in influence (Article 335): Anyone who, either personally or through an intermediary, with their consent or ratification, solicits or accepts, for themselves or for a third party, a financial or non-financial advantage, or the promise thereof, to abuse their real or supposed influence with any public entity, whether national or foreign.

Money laundering (Article 368, paragraphs 3, 4, and 5): Anyone who converts, transfers, assists, or facilitates any operation to convert or transfer advantages obtained by themselves or by a third party, directly or indirectly, with the aim of concealing their illicit origin or preventing the perpetrator or participant in these offenses from being criminally prosecuted or subjected to criminal proceedings. The same penalty shall apply to anyone who conceals or disguises the true nature, origin, location, disposition, movement, or ownership of the proceeds, or the rights relating thereto. The same penalty shall also apply to anyone who, not being the perpetrator of the typical illegal act from which the proceeds originate, acquires, holds, or uses them, with knowledge, at the time of acquisition or at the initial moment of possession or use, of that quality.

5. CONTROL MECHANISMS

The preventive and control measures (implemented and/or being implemented) identified may be based on cross-cutting controls (policies, manuals, standards, among others that mitigate corruption risks and related offenses across the board) and operational controls (processes and procedures implemented at the operational level). The following are highlighted as cross-cutting controls/measures at Hydra IT:

Corruption and Related Offenses Risk Prevention Plan

- **Code of Ethics and Conduct**, which describes the purpose of Hydra IT's existence, the values that inspire and govern it, and the guidelines to be observed by all Management and Employees on a daily basis in their activities.
- **Code of Conduct for Third Parties**, which governs the behavior to be observed by the suppliers and service providers with whom Hydra IT interacts during its business;
- **Anti-Corruption Policy**, which describes the set of practices disapproved of by Hydra IT internally, as well as by all third parties with whom it interacts;
- **Irregularities reporting channel and respective policy**, which aims to define the guiding principles for the procedures for receiving, handling, recording, and storing reports of irregular practices and to ensure the adoption of preventive measures to avoid incorrect or irregular acts;
- **Conflict of Interest Management Policy**, which aims to (i) present the principles, rules of conduct, and procedures that enable the identification, prevention, reporting, assessment, management, and resolution of circumstances that may give rise to conflicts of interest, promoting greater awareness among employees, as well as (ii) the appropriate handling of all situations of conflict or potential conflict of interest, ensuring compliance with processes;
- **Customer acceptance procedure (Know Your Customer)**, requiring Hydra IT to obtain a set of information about its customers and beneficial owners and to carry out a series of steps to assess the reputation and suitability of the entities with which it deals;
- **Training plan, policy to encourage compliance with mandatory training, and periodic and regular communication** campaigns on matters related to ethical behavior and the role of each employee in preventing corruption and related offenses.
- Conducting **periodic audits** of the system for preventing corruption and related offenses.

Corruption and Related Offenses Risk Prevention Plan

6. MONITORING, REVIEW, AND DISCLOSURE OF THE PPR

Under the RGPC, Hydra IT has designated Management and the Legal Department as jointly responsible for regulatory compliance with the PPR, its monitoring, review, and disclosure.

As the body responsible for regulatory compliance, which includes Hydra IT's internal policies, the Legal Department ensures the control and application of these policies, exercising its functions independently, permanently, and with decision-making autonomy.

This Plan does not end with its preparation but requires periodic monitoring and control to ensure its proper implementation and the effectiveness and efficiency of the proposed prevention and mitigation measures.

The monitoring and control of the Plan's execution will include the preparation of reports identifying the measures defined and implemented and analyzing their implementation process, as follows:

- i. In October, an interim assessment report on the identified very high- or high-risk situations must be prepared;
- ii. In April of the year following the implementation of the PPR, an annual assessment report shall be prepared, containing, in particular, a quantification of the degree of implementation of the preventive and corrective measures identified, as well as a forecast of their full implementation.

The Plan shall be reviewed every three years or, alternatively, whenever changes occur that justify its review, namely in the duties and organizational structure of Hydra IT or if new risks with relevance and impact on the Plan are identified.

The Plan (including any revisions thereto) will be published on Hydra IT's official website and intranet within 10 days of its implementation or revision, allowing access to Hydra IT employees and other stakeholders.