

## DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

### FINAL ASSESSMENT

#### OGMA – INDÚSTRIA AERONÁUTICA DE PORTUGAL S.A.

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	5/8
2. Internal Controls	6	1/12
3. Support to Employees	7	5/14
4. Conflict of Interest	4	2/8
5. Customer Engagement	7	2/14
6. Supply Chain Management	5	2/10
7. Agents, Intermediaries and Joint Ventures	10	6/20
8. Offsets	4	0/8
9. High Risk Markets	4	2/8
10. State-Owned Enterprises	5	0/10
<b>TOTAL</b>		<b>25/112</b>
<b>BAND</b>		<b>E</b>

\*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

## 1. Leadership and Organisational Culture

<b>Question</b>
<b>1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
Based on publicly available evidence, the company publishes a Code of Ethics and Conduct, which includes an anti-bribery and corruption commitment and policy, and is authorised by the company's leadership. However, the leadership statement itself relates to ethics and integrity instead of directly referring to anti-bribery and corruption, so the company receives a score of '1'.
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>  [p.2] Message from OGMQ Chairman &amp; Chief Executive Officer</p> <p>In this never ending quest for renewal and improvement that has brought OGMA this far over the past 100 years, we are pleased to present the newest version of our Code of Ethics and Conduct (the "Code"). This document renews our intention to put ethics, transparency, integrity and sustainability in everything we do to achieve our goals.</p> <p>The new version integrates our most relevant business values, which have been consolidated over the years, as well as our sincerest and most determined commitment to the integrity of our procedures, both in our internal relationships and in those we keep with the communities where we operate. We further develop our operations making sure that we act in Compliance with the applicable laws and regulations, at all times.</p> <p>OGMA's prestige and credibility are built on the actions performed and on the behavior shown by each and every one of us, every single day. Therefore, the Code applies to all OGMA employees, regardless of their managerial level within the Company, including trainees, directors, members of corporate bodies, service providers and third parties acting on behalf of the Company. Included herein are also OGMA subsidiaries and other companies controlled by OGMA, or affiliates.</p> <p>Ensuring that all business actions and decisions do comply with the dispositions in the Code is an opportunity and a corporate and social mission each of us will be personally responsible for. In this regard, we thank everyone for their dedication and commitment to fully appreciating and observing the contents of this Code, and to protecting the integrity of our Company and our future.</p> <p>Marco Tulio Pellegrini  Chairman &amp; CEO  OGMA</p>

<b>Question</b>
<p><b>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</b></p> <p><b>a) All employees, including staff and leadership of subsidiaries and other controlled entities;</b></p> <p><b>b) All board members, including non-executive directors.</b></p>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>Based on publicly available evidence, the company publishes an explicit anti-bribery and corruption policy, which specifically prohibits bribery, payments to public officials, commercial bribery, and facilitation payments. There is evidence that this policy applies to all employees and board members.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>  [p.27] 4.6 Anti-Corruption  OGMA is strongly committed to fighting corruption in all its forms, including extortion and bribery.  For the purpose of complying with the anticorruption laws and regulations in all places where it operates, OGMA established and implemented an Anticorruption Policy and related procedures, which meet the highest standards of ethics and integrity.</p> <p>In this regard, OGMA shall not tolerate any form of active or passive corruption, such as extortion or bribery, in the attempt to influence negotiations, or to obtain any undue advantage, either to the Company or to the individual, and shall require all its employees to be aware of and comply with such Anticorruption Policy.</p> <p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p.1] This Anti-corruption Policy ("Policy") constitutes the formalization of this set of rules that OGMA requires, across all of its activities, to conduct business with ethics, integrity and transparency. The Policy requires the compliance with the OGMA's Code of Ethics and Conduct ("Code of Ethics and Conduct") and all applicable laws and regulations against bribery, corruption or related offences, including, but not limited to, the Portuguese laws, the United States Foreign Corrupt Practices (Foreign Corrupt Practices Act or "FCPA"), the United Kingdom Bribery Act of 2010 (UK Bribery Act or "UKBA") or other applicable anti-bribery laws, and rules and regulations on the matters that are implemented.  [...]  The policy prohibits, specifically, its administrators, as well as its directors and employees (collectively referred to as "Employees"), and all Intervening Third Parties contracted by OGMA, from getting involved in any corrupt act and, directly or indirectly, offer, promise, give or authorize any person to provide money or "Anything of Value" (as defined in paragraph 4.2) to any "Public Entity" (as defined in paragraph 4.1) or any natural or legal person with the purpose of obtaining or accumulate any "Improper Advantage" (as defined in paragraph 4.3).</p> <p>[p.2] 2. Objective of the Anti-corruption Policy  The purpose of this Policy is to describe and explain some of the prohibitions against bribery, corruption or related offences in all OGMA operations, highlight the specific Compliance requirements related to these prohibitions and reinforce the Company's commitment to conduct its business globally with the highest standards of ethics, integrity and transparency.</p> <p>[p.3] 4. Definitions 4.1.  The term "Public Entity" means:</p> <ol style="list-style-type: none"> <li>Any administrator or employee, appointed or elected, from any department, agency, or ministry of a government, whatever that country is, or from bodies of a municipal, state, regional, federal or multinational government;</li> <li>Any natural person who, although temporarily or without receiving payment, holds a public position, job or function;</li> <li>Any administrator or employee of a public international organization such as, for example, the United Nations or the World Bank;</li> </ol>

- d) Any natural person acting in the capacity of authority by, or on behalf of, a public regulatory agency, department, public prosecutor or international organization;
- e) A political party, an official of a political party or any candidate for a political office;
- f) Any administrator or employee of a public company or controlled by the State, as well as public services concessionaires or utility companies (such as ports and airports, electrical power distribution, power generation, water and sewage companies or power plants);
- g) Any member of the a royal family (which, despite not having formal authority, can, otherwise exert influence in favor of OGMA's commercial interests, either because they hold partial ownership of public companies or state-controlled companies, or administer in any form).

[p.6] 5. Prohibited and restricted payments

This Policy explicitly prohibits, without prejudice to any other similar situations that may be considered contrary to the spirit of this Policy, the offer, promise, the authorization or payment of cash or Anything of Value, directly or indirectly through an Intervening Third Party, to a Public Entity, a natural person or a legal person, to ensure any Improper Advantage.

It is important to note that the main anti-corruption standards prohibit these payments in cash or Anything of Value, whether these are carried out directly or indirectly through Intervening Third Parties.

The provision of cash or Anything of Value in the way described above is prohibited, regardless of the money or item of value be accepted or not by the intended recipient.

5.1. Types of bribery

5.1.1. Public Entities Bribery

According to the terms established in this Policy, offer, give, promise or authorize the offer, delivery, or promise of cash or Anything of Value to a Public Entity, directly or indirectly, to obtain an Improper Advantage, is classified as bribery.

5.1.2. Private sector bribery

OGMA also prohibits bribery in the private sector. Thus, no Employee can offer, give, promise or receive cash or Anything of Value of or from a natural person or legal person in the private sector, to obtain an Improper Advantage.

[p.7] 6.1. Gifts and hospitality (include meals and entertainment)

OGMA's and its business partner's decisions should be taken objectively, without the influence of gifts or favors. A small gift, whose price is reasonable or a gesture of respect or appreciation may represent an appropriate way through which certain business people demonstrate respect for others. Nevertheless, regardless of the value, the act of giving or receiving a gift, a meal, entertainment or other hospitality benefit should not be carried out with the purpose of improperly influence, any Public Entity, or any other OGMA's business partner.

[p.10] 7. Facilitating payments

The use of facilitating payments (as defined in paragraph 4.5.) may be considered a usual way of doing business in some countries. However, it is important to understand that such payments are prohibited by the anti-corruption laws of many countries. In addition, customers whose projects OGMA is eventually supporting may prohibit such payments. In addition, facilitating payments are generally illicit pursuant to the...

[p.11] ... local laws of most countries. Based on the exposed above, this Policy prohibits Employees or Intervening Third Parties to carry out facilitating payments on behalf of OGMA.

<b>Question</b>
<b>1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
There is some evidence that the Board of Directors oversees the company's anti-bribery and corruption programme. However, there is no evidence that it engages in formal oversight functions, such as reviewing reports from management or receiving the results of audits.
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a></p> <p>[p.9] This Program is coordinated by OGMA Compliance Office, under the sponsorship of OGMA Chairman &amp; CEO, and with permanent support from Embraer Compliance Office.</p> <p>[p.12] 1.2 Responsibility of employees                  [...]                  Seek, where necessary, support and guidance from the related Compliance Agents and/or leaders, who, in turn, shall seek clarification of doubts and of rules to be observed from OGMA corporate areas such as the Legal Department, Compliance Office and Human Resources;</p> <p>[p.33] SUPERVISION OF THE CODE AND THE HELPLINE                  5.1. Supervision                  The Board of Directors, through the Chairman &amp; CEO, shall supervise OGMA Management in regard to the compliance with this Code, of which the dissemination and support to related implementing actions shall be provided for by OGMA Compliance Office.</p>

<b>Question</b>
<b>1.4. Is responsibility for implementing and managing the company’s anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company’s programme?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that a designated senior executive – the Chairman and CEO – has ultimate responsibility for implementing and managing the company’s anti-bribery and corruption programme, through the Compliance Office. There is some evidence of a reporting line between this individual and the Board of Directors, which is responsible for oversight of the programme. However, the company receives a score of ‘1’ because the level of involvement of the Chairman and CEO in the day-to-day management of the programme is insufficiently clear and evidence of reporting activities is lacking.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>                  [p.9] This Program is coordinated by OGMA Compliance Office, under the sponsorship of OGMA Chairman &amp; CEO, and with permanent support from Embraer Compliance Office.</p> <p>[p.12] 1.2 Responsibility of employees                  [...] Seek, where necessary, support and guidance from the related Compliance Agents and/or leaders, who, in turn, shall seek clarification of doubts and of rules to be observed from OGMA corporate areas such as the Legal Department, Compliance Office and Human Resources;</p> <p>1.3 Responsibility of Leaders                  [...] Seek, where necessary, support and corporative guidance from the Legal Department, Compliance Office and/or Human Resources in the clarification of doubts and of rules to be observed;</p> <p>[p.28] Any suspicious activities shall be promptly reported to the Compliance Office or Legal Department.</p> <p>[p.33] SUPERVISION OF THE CODE AND THE HELPLINE</p> <p>5.1. Supervision                  The Board of Directors, through the Chairman &amp; CEO, shall supervise OGMA Management in regard to the compliance with this Code, of which the dissemination and support to related implementing actions shall be provided for by OGMA Compliance Office.</p>

## 2. Internal Controls

<b>Question</b>
<b>2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
There is some evidence that the company has a formal bribery and corruption risk assessment procedure that informs the design of the anti-corruption and bribery programme. However, the company receives a score of '1' because there is no evidence that the results of risk assessments are reviewed at board level on an annual basis.
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>                  [p.9] OGMA Enhanced Compliance Program is based on fundamental issues such as responsible leadership, organization and managerial structure, permanent mapping and risk management, appropriate policies and internal control standards, internal communication and continuous training, as well as monitoring, auditing and reporting channels, the last of which is intended for the assessment of potential deviance from expected conduct or established procedures ("Essential Elements of Compliance").</p>

<b>Question</b>
<b>2.2. Is the company’s anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is evidence that the company’s anti-bribery and corruption programme is subject to audit and that the findings from such reviews are used to update the programme. However, the company receives a score of ‘0’ because there is no evidence indicating the frequency of these audits or where responsibility for this process lies.
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>                  [p.9] OGMA Enhanced Compliance Program is based on fundamental issues such as responsible leadership, organization and managerial structure, permanent mapping and risk management, appropriate policies and internal control standards, internal communication and continuous training, as well as monitoring, auditing and reporting channels, the last of which is intended for the assessment of potential deviance from expected conduct or established procedures (“Essential Elements of Compliance”).</p> <p>[p.12] 1.3. Responsibility of Leaders                  [...] Supervise related internal processes, seeking support from the Compliance Office and the Internal Audit Office, where necessary, in order to ensure compliance with the policies and requirements of the law;</p>



<b>Question</b>
<b>2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is insufficient public evidence that the company has a system for tracking, investigating and responding to bribery and corruption allegations or incidents. Although there is evidence that the company provides information on its whistleblowing hotline, there is no evidence that it provides any further details on how cases are handled at each step in the process. There is no evidence that the company takes steps to ensure the independence of its investigations, nor that it requires documentation of case material. There is also no evidence that the company commits to inform whistleblowers of the outcome of investigations and there is no evidence that a senior central body reviews summary information of all incidents and their status on a regular basis.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>  [p.34] Additionally, all issues, concerns, complaints or violations reported through the Helpline shall be treated with confidentiality and respect for anonymity. In order to reinforce such commitment to confidentiality and non-retaliation, OGMA hired an independent company to administrate the channel for harmful practices. Please access our confidentiality and non-retaliation policies on the Helpline, which are intended to provide users with the safety and comfort necessary for appropriate reporting.</p> <p>NOTE: In some countries, the laws concerning the provisions in the Code do not permit anonymous reporting. Therefore, in such situations, OGMA shall inform the concerned complainant thereof.</p> <p>[p.35] This channel should be exclusively used to report concerns relating to ethical conduct and compliance with the applicable laws, regulations and OGMA internal policies.</p> <p>5.3. Penalties for Violations  Board Members, directors, employees and all individuals or legal entities that carry out activities for or on behalf of OGMA shall be subject to disciplinary measures in the event of violation of the principles and values established herein, including termination of employment contract or of contractual business relationship, as applicable.</p> <p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p.13] 10.1. Penalties  From the submission to the set of standards and rules referred, OGMA and its Employees can be investigated by regulatory entities in different jurisdictions and, depending on the circumstances, may be criminal, civil or administrative prosecuted. These investigations may result in fines and severe sanctions, exclusions or prison if OGMA and its Employees are effectively considered to violate the applicable anti-corruption laws or regulations.</p> <p>Any Employee who is deemed in violation of this Policy will be subject to disciplinary actions, which may include dismissal with just cause, in accordance with applicable law and OGMA's policies. The agents, consultants and other Intervening Third Parties who work for OGMA and that violate this Policy will be subject to termination of their business relationship, as well as to any other corrective measures at OGMA's disposal in accordance with the applicable law.</p> <p>10.2. Notification of facts and suspicions  It is the responsibility of all Employees to ensure the compliance with this Policy.</p> <p>In case of doubt, suspicion or concern about past actions or proposed by anyone in OGMA (or any Intervening Third Party who works on the Company at any title) that may violate this Policy or the applicable law, should notify them to the Legal Department.</p>

<b>Question</b>
<b>2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company takes steps to assure itself of the quality of its internal investigations, for example by ensuring that staff conducting investigations are properly trained and outlining a procedure to handle complaints about the reporting or investigation process.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company commits to report material findings of investigations to the board or relevant authorities.
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>                  [p.13] 10. Other issues relating to this Policy and to anti-corruption Compliance standards</p> <p>10.1. Penalties                  From the submission to the set of standards and rules referred, OGMA and its Employees can be investigated by regulatory entities in different jurisdictions and, depending on the circumstances, may be criminal, civil or administrative prosecuted. These investigations may result in fines and severe sanctions, exclusions or prison if OGMA and its Employees are effectively considered to violate the applicable anti-corruption laws or regulations.</p>

<b>Question</b>
<b>2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.
<b>Evidence</b>
No evidence found.

### 3. Support to Employees

<b>Question</b>
<b>3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company provides a training module that outlines the basic principles of its anti-bribery and corruption policy. However, the company receives a score of '1' because there is no evidence that training is provided to all employees systematically, across all divisions, in all countries/regions of operation or in all appropriate languages, nor is there evidence of how frequently employees are required to undertake or refresh their training.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p. 13] 10.4. Training  Regular training on OGMA's anti-corruption program will take place according to the planning set annually by the Company's Board of Directors. Training shall include, at least, OGMA's senior management and Employees whose responsibilities require that they interact with Public Entities, as well as employees from the financial, commercial and quality areas – in addition to the Intervening Third Parties, as necessary and appropriate.</p> <p><b>[1] Code of Ethics and Conduct (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>  [p.9] OGMA Enhanced Compliance Program is based on fundamental issues such as responsible leadership, organization and managerial structure, permanent mapping and risk management, appropriate policies and internal control standards, internal communication and continuous training, as well as monitoring, auditing and reporting channels, the last of which is intended for the assessment of potential deviance from expected conduct or established procedures ("Essential Elements of Compliance").</p> <p>[p.11] 1.2. Responsibility of employees  [...]  Participate in all Events, Training Sessions and Workshops concerning the Company's policies and internal written procedures for which they are designated, so that they are capable of complying and enforcing compliance with such policies and procedures;</p> <p>[p.13] Participate and encourage their teams to participate in all Training Sessions and Workshops concerning the Company's policies and internal procedures for which they are designated, so that they are capable of complying and enforcing compliance with such policies and procedures;</p>

<b>Question</b>
<p><b>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</b></p> <p>a) Employees in high risk positions, b) Middle management, c) Board members.</p>
<b>Score</b>
1
<b>Comments</b>
<p>There is some evidence that employees in certain positions receive different or tailored anti-bribery and corruption training. The company refers specifically to senior management and employees in high risk positions.</p> <p>However, the company receives a score of '1' because there is no evidence that board members receive this enhanced training. There is also no evidence that training for employees in high risk positions is refreshed on at least an annual basis.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p. 13] 10.4. Training  Regular training on OGMA's anti-corruption program will take place according to the planning set annually by the Company's Board of Directors. Training shall include, at least, OGMA's senior management and Employees whose responsibilities require that they interact with Public Entities, as well as employees from the financial, commercial and quality areas – in addition to the Intervening Third Parties, as necessary and appropriate.</p> <p><b>[1] Code of Ethics and Conduct (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>  [p.9] OGMA Enhanced Compliance Program is based on fundamental issues such as responsible leadership, organization and managerial structure, permanent mapping and risk management, appropriate policies and internal control standards, internal communication and continuous training, as well as monitoring, auditing and reporting channels, the last of which is intended for the assessment of potential deviance from expected conduct or established procedures ("Essential Elements of Compliance").</p> <p>[p.11] 1.2. Responsibility of employees  [...]  Participate in all Events, Training Sessions and Workshops concerning the Company's policies and internal written procedures for which they are designated, so that they are capable of complying and enforcing compliance with such policies and procedures;</p> <p>[p.13] Participate and encourage their teams to participate in all Training Sessions and Workshops concerning the Company's policies and internal procedures for which they are designated, so that they are capable of complying and enforcing compliance with such policies and procedures;</p>

<b>Question</b>
<b>3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company measures or reviews the effectiveness of its anti-bribery and corruption communications or training programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company’s employee incentive schemes incorporate ethical or anti-bribery and corruption principles.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company commits to support or protect employees who refuse to act unethically.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company promotes a policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents, which explicitly applies to all employees across the organisation, including those employed by the group as third parties, suppliers and joint venture partners.</p> <p>However, the company receives a score of ‘1’ because there is no evidence that it assures itself of employees’ confidence in this commitment through surveys, usage data, or other clearly stated means.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>                  [p.34] OGMA shall not tolerate any retaliation, veiled or otherwise, against any person who reports a concern in good faith through the appropriate channels made available by the Company.</p> <p>Additionally, all issues, concerns, complaints or violations reported through the Helpline shall be treated with confidentiality and respect for anonymity. In order to reinforce such commitment to confidentiality and non-retaliation, OGMA hired an independent company to administrate the channel for harmful practices. Please access our confidentiality and non-retaliation policies on the Helpline, which are intended to provide users with the safety and comfort necessary for appropriate reporting.</p> <p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>                  [p. 13] 10.3. No retaliation</p> <p>Regardless of the validity of the fact or suspicion reported, or of the method used for this purpose and the results of the investigation on the allegations by OGMA, no retaliatory actions against the person responsible for the information supplied in good faith about an alleged violation of the Code of Ethics and Conduct, of this Policy, and other applicable policies or applicable laws and regulations will be tolerated.</p>

<b>Question</b>
<b>3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company has multiple channels to report instances of suspected corrupt activity, and to seek advice on the company's anti-bribery and corruption programme. There is evidence that these channels are sufficiently varied to allow employees to raise concerns across the management chain and to an external channel operated by an independent third party, and that these channels allow for confidential and, wherever possible, anonymous reporting. There is also evidence that they are available and accessible to all employees, in all jurisdictions where the company operates, including those employed by the group as third parties, suppliers and joint venture partners. Although there is no evidence that the company's hotline is available in all relevant languages, a score of '2' has been awarded on the basis that there is no evidence that the company operates overseas and therefore no other languages would be necessary.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>  [p.11] 1.1. Compliance with the Code  Strict compliance with the Code is expected from all members of corporate bodies, directors, administrators, employees (regardless of their managerial level within the Company), trainees, OGMA subsidiaries and other companies controlled by OGMA, or affiliates. The Company further assures that, by means of the established policies and internal procedures, OGMA service providers and third parties acting on its behalf will comply with the provisions in this Code.</p> <p>[p.33] 5.2. The Helpline  All OGMA stakeholders, including, but not limited to, employees, suppliers, customers, shareholders and business partners, are encouraged to report any concern regarding any potential or effective violation of the principles and values in the Code.  For this purpose, OGMA provides various channels for reporting of concerns or violations, as follows:</p> <ul style="list-style-type: none"> <li>• The Board of Directors;</li> <li>• The Leader or Manager;</li> <li>• The Compliance Office or the related Compliance Agent;</li> <li>• The Human Resources Department;</li> <li>• The Legal Department; or</li> <li>• The Helpline (on <a href="http://www.ogma.pt">www.ogma.pt</a> or on <a href="http://portal.ogma.pt">portal.ogma.pt</a>).</li> </ul> <p>[p.34] The Helpline is a confidential channel for employees and other stakeholders to report or seek support in regard to ethical conduct concerns relating to potential or effective violation of OGMA policies, this Code, or any applicable law or regulation.</p> <p>OGMA shall not tolerate any retaliation, veiled or otherwise, against any person who reports a concern in good faith through the appropriate channels made available by the Company.</p> <p>Additionally, all issues, concerns, complaints or violations reported through the Helpline shall be treated with confidentiality and respect for anonymity. In order to reinforce such commitment to confidentiality and non-retaliation, OGMA hired an independent company to administrate the channel for harmful practices. Please access our confidentiality and non-retaliation policies on the Helpline, which are intended to provide users with the safety and comfort necessary for appropriate reporting.</p> <p>NOTE: In some countries, the laws concerning the provisions in the Code do not permit anonymous reporting. Therefore, in such situations, OGMA shall inform the concerned complainant thereof.</p>

[p.35] This channel should be exclusively used to report concerns relating to ethical conduct and compliance with the applicable laws, regulations and OGMA internal policies.

For further information, please contact OGMA Compliance Office on: [helpline@ogma.pt](mailto:helpline@ogma.pt)

#### [4] Helpline – Channel for Harmful Practices (sic) (Webpage)

Accessed 04/12/2019

[http://www.ogma.pt/index.php?page=chp\\_en](http://www.ogma.pt/index.php?page=chp_en)



The Helpline is a significant tool of OGMA's corporate policy and is mainly intended to protect Business Values and Corporate Culture.

Through this Channel, OGMA provides all its employees, customers, shareholders, service providers and suppliers with an appropriate mechanism to report practices that characterize a breach to our Code of Ethics and Conduct and that conflict with the Company's corporate policies and the applicable laws and regulations.

As an Embraer Group Company and following the practices extendable to all companies within the Group, OGMA provides the Helpline service on the employees' intranet system, on OGMA corporate website and by telephone.

- Portugal: 800-180-838

The Helpline is operated by a specialized third party. Your contact may remain anonymous, if you wish so, and will be kept confidential at all times, ensuring that no retaliation of any kind will occur. Calls are free of charge. Click below to access Helpline, the link will automatically direct you to the third party's website.

#### [05] Helpline (Webpage)

Accessed 04/12/2019

<https://canalconfidencial.com.br/ogmahelpline/>

Helpline

O Helpline é exclusivo da OGMA e das empresas do Grupo Embraer e tem por finalidade uma comunicação segura e, se desejada, anónima de condutas que violem o Código de Ética e Conduta e as boas práticas da OGMA Embraer ou a legislação vigente.

Se desejar, seu relato pode ser feito também pelo telefone abaixo, de segunda à sexta das 08h00 às 20h00:

Portugal: 800 180 838

Para esclarecimentos sobre nossos serviços, elogios, sugestões ou reclamações, por favor aceda [www.ogma.pt](http://www.ogma.pt)

Realizar relato    Acompanhar relato

#### Translation:

Helpline

The helpline is exclusive to OGMA and the companies in Embraer Group and is intended for secure communication and, if desired, anonymous complaints about conduct that violates the Code of Ethics and Conduct and the best practices of OGMA Embraer or the relevant legislation.

If you wish, your complaint can also be made by the telephone number below, Monday to Friday from 08h00 to 20h00:

Portugal: 800 180 838

For clarification about our services, compliments, suggestions or complaints, please visit [www.ogma.pt](http://www.ogma.pt).

Make complaint      Track complaint

**[2] Anticorruption Policy (Document)**

Accessed 16/10/2019

[http://www.ogma.pt/pdf/antic\\_en.pdf](http://www.ogma.pt/pdf/antic_en.pdf)

[p.13] 10. Other issues relating to this Policy and to anti-corruption Compliance standards

[...]

10.3. Notification of facts and suspicions

It is the responsibility of all Employees to ensure the compliance with this Policy.

In case of doubt, suspicion or concern about past actions or proposed by anyone in OGMA (or any Intervening Third Party who works on the Company at any title) that may violate this Policy or the applicable law, should notify them to the Legal Department.

[p.14] 11. Clarification of doubts and notification of facts or suspicions

OGMA Employees are encouraged to clarify doubts regarding this Policy.

Any questions or concerns about a specific situation that somehow relates to this Policy (or related policies and procedures) should be addressed to the Legal Department before adopting any conduct.

Employees should immediately report any bribery, improper request or offer of payment or advantage.

If you have any doubt or need to make any report, OGMA's Legal Department should be contacted. In addition, OGMA's complaints channel can be used if you need any assistance or additional information.

## 4. Conflict of Interest

<b>Question</b>
<b>4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company formally addresses conflicts of interest as a corruption risk, and that it has a policy and procedure that defines possible conflicts, including those actual, potential and perceived. There is evidence that the policy covers employee relationships, financial interests and other employment. However, the company receives a score of '1' because there is no evidence that its policy references or addresses government relationships as a possible category of conflict.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>                  [p.23] 4.1. Conflict of interests                  A conflict of interests occurs when an individual's interest in personal gain or advantage interferes in OGMA's business decisions. Situations that may create, or appear to create, a conflict of interests shall be avoided. Examples of potential conflicts of interests are, not limited to:</p> <ul style="list-style-type: none"> <li>• Deciding upon deals with suppliers, customers, competitors, business partners or third parties in general, where such deals involve companies or any other entity owned or managed, or which belong to, or are operated by, relatives or close friends or professional acquaintances;</li> <li>• Requesting presents, gifts, courtesies, bonuses, favors or any other benefit, whether professional or personal, for oneself, one's relatives, close friends or third parties;</li> <li>• Performing services or works other than those set out by the Company, whether internal or external, paid or unpaid, that may result in competition or conflict with OGMA activities and negotiations, including sales or promotion of products and/or information of any type in OGMA's premises, during or outside standard working hours;</li> </ul> <p>[p.24]</p> <ul style="list-style-type: none"> <li>• Using OGMA's resources, working hours, equipment, materials or information to perform services that impair the performance of OGMA's activities or interests, or that violate any of its policies or written procedures;</li> <li>• Using one's position or influence at OGMA to provide unfair advantage in hiring people, unduly supervising or benefiting family members, relatives or acquaintances, or even using one's position to improperly benefit from external activities not related to the Company;</li> <li>• Performing activities related with a third party in which the employee has economic and/or financial interest, to an extent that such interest may, in any manner, influence one's actions on behalf of the Company;</li> </ul> <p>When faced with a situation that poses or may pose a potential conflict of interests, or in situations where such conflict of interests cannot be avoided, the employee shall inform the related manager or the Company's Compliance Office, without prejudice of using the Helpline either on OGMA Portal or on OGMA's Website.</p> <p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>                  [p.9] 6.6 Conflict of interest                  All Employees must avoid conflicts of interest and they are expected to perform their duties with integrity and according to the best interests of OGMA. Employees should not abuse of their positions, use confidential information improperly for personal gain or of Intervening Third Parties, nor have any direct involvement in any business that is contrary to OGMA's commercial interests or somehow compromise their independence and impartiality.</p>

<b>Question</b>
<b>4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the company has procedures to identify, declare and manage conflicts of interest, including actual, potential and perceived conflicts. The company indicates that the Compliance Office is responsible for this process.</p> <p>However, the company receives a score of '1' because there is no evidence that all employee and board member declarations are held in a central register that is accessible to those responsible for oversight of the process. There is also no evidence that the policy mentions examples of criteria for recusals or that it states that disciplinary measures will apply if breached.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>                  [p.24] When faced with a situation that poses or may pose a potential conflict of interests, or in situations where such conflict of interests cannot be avoided, the employee shall inform the related manager or the Company's Compliance Office, without prejudice of using the Helpline either on OGMA Portal or on OGMA's Website.</p> <p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>                  [p.9] 6.6 Conflict of interest                  All Employees must avoid conflicts of interest and they are expected to perform their duties with integrity and according to the best interests of OGMA. Employees should not abuse of their positions, use confidential information improperly for personal gain or of Intervening Third Parties, nor have any direct involvement in any business that is contrary to OGMA's commercial interests or somehow compromise their independence and impartiality.</p>

<b>Question</b>
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company has a policy regulating the employment of current or former public officials.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>4.4. Does the company report details of the contracted services of serving politicians to the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company reports details of the contracted services of serving politicians.
<b>Evidence</b>
No evidence found.

## 5. Customer Engagement

### 5.1 Contributions, Donations and Sponsorships

Question
<b>5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?</b>
Score
<b>0</b>
Comments
<p>There is evidence that the company has a policy on political contributions, which generally prohibits such donations but indicates that they may be permissible under certain circumstances. In such cases, the company states that contributions must receive authorisation from the Board of Directors. There is evidence that this policy applies to all employees, board members, third parties and other entities controlled by the company.</p> <p>However, the company receives a score of '0' because there is no evidence that it has a blanket prohibition on political contributions.</p>
Evidence
<p><b>[1] Code of Ethics and Conduct (Document)</b>            Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>            [p.11] 1.1. Compliance with the Code            Strict compliance with the Code is expected from all members of corporate bodies, directors, administrators, employees (regardless of their managerial level within the Company), trainees, OGMA subsidiaries and other companies controlled by OGMA, or affiliates. The Company further assures that, by means of the established policies and internal procedures, OGMA service providers and third parties acting on its behalf will comply with the provisions in this Code.</p> <p>[p.26] 4.4 Political Contributions            OGMA shall not participate in political campaigns, nor shall it make contributions to political parties or candidates running for political office. For this reason, such donations or contributions shall be prohibited, whether they are made by the Company or by any members of the Board of Directors or of the Management.</p> <p><b>[2] Anticorruption Policy (Document)</b>            Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>            [p.9] 6.5. Political contributions            This Policy prohibits OGMA of performing any political contribution, including to any political party or candidate for political office, by or on behalf of OGMA, without the Board of Directors authorization, in accordance with the Code of Ethics and Conduct, as well as in accordance with this Policy and all applicable laws and regulations.</p> <p>However, this Policy does not have the purpose of preventing that its Employees participate in the political process in their country of residence (or wherever they are located), or making personal political contributions. Nevertheless, if they wish to do so, these Employees will not be able to declare that their own political contributions (or any related opinions or affiliations) are related with OGMA.</p>

<b>Question</b>
<b>5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that company discloses any details of its political contributions.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is some evidence that the company has a policy covering both charitable donations and sponsorships, whether made directly or through corporate foundations. There is evidence that the company has internal procedures in place to ensure that such donations are not used to improperly influence business decisions, such as appropriate due diligence, documentation and sign-off.</p> <p>However, the company receives a score of '1' because there is no evidence that it publishes any details of its charitable donations or sponsorships, such as details of the recipient, amount, country of recipient and which corporate entity made the payment.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>                  [p.25] 4.3. Donations and Sponsorship                  As part of its corporate responsibility, OGMA may donate products, services or funds in order to support scientific research activities...</p> <p>[p.26] ... arts and culture, social and educational projects. As a principle, all donations shall meet transparency requirements, with clearly defined aims and objectives and without any expectation of return or exchange, and shall be substantiated by appropriate documentation, with appropriate accounting records and in accordance with relevant laws and regulations.</p> <p>Sponsorship shall be allowed which is used in brand promotion, advertising, or opportunities for OGMA to demonstrate or promote its products and services, or in the exercise of its corporate responsibility.</p> <p>Donations and sponsorship shall not be used to gain undue advantages, either directly or indirectly, whether for the Company or for individuals.</p> <p>For further information, please consult our policies and internal procedures, such as OGMA Anticorruption Policy (ONS-000618), OGMA Donation Procedure (ONS-000595), OGMA Sponsorship Procedure (ONS-000538), or contact your Compliance Agent and/ or the Compliance Office.</p> <p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>                  [p.8] 6.3. Donations and sponsorships                  OGMA supports contributions to the communities in which it operates and authorizes reasonable donations to charities. However, OGMA should always take reasonable care to confirm that such contribution does not represent an illicit payment made to a Public Entity in violation of the Policy and of any applicable anti-corruption standards. Donations and sponsorships are allowed, provided that they strictly comply with the internal procedures, OGMA's Statutes and any applicable laws and regulations in force, and may not be used as a way to improperly influence business decisions. OGMA shall ensure that donations and sponsorships, consisting of money, services or Anything of Value, are not used to promote illegal payments and should lead the appropriate due diligence, to prevent that the receipt charity does not act as a channel to fund illicit activities in violation of this Policy and of any applicable anti-corruption standards.</p> <p>Any OGMA's Employee that makes a request for a donation to a charity should submit the appropriate supporting documentation, in order to allow that such donation is recorded accurately in OGMA's books and records.</p>

## 5.2 Lobbying

<b>Question</b>
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
<b>Score</b>
0
<b>Comments</b>
There is no publicly available evidence that the company has a policy on lobbying.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any information on its lobbying aims, topics or activities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
5.2.3 Does the company publish full details of its global lobbying expenditure?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company publishes any details about its global lobbying expenditure.
<b>Evidence</b>
No evidence found.

### 5.3 Gifts and Hospitality

Question
<b>5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?</b>
Score
<b>1</b>
Comments
<p>There is evidence that the company has a policy on the giving and receipt of gifts and hospitality, which includes procedures designed to ensure that such promotional expenses are bona fide and not used for bribery. The policy also explicitly addresses the risks associated with gifts and hospitality given to and/or received from domestic and foreign public officials. The company's policy includes a statement that all gifts and hospitality above certain thresholds are recorded in a dedicated register.</p> <p>However, the company receives a score of '1' because there is no evidence that its policy specifies financial or proportional limits, or different approval procedures for different types of promotional expenses.</p>
Evidence
<p><b>[1] Code of Ethics and Conduct (Document)</b>            Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>            [p.24] 4.2. Gifts, Presents and Hospitality (Entertainment, Travel Expenses, Accommodation and Other Benefits)            Offering and receiving of gifts, presents and hospitality such as entertainment, travel expenses, accommodation or other advantages or benefits that may create the impression of impropriety, or that allow the employee to act towards obtaining undue advantage, should be avoided. In such situations, it is recommended as an example of good practice, that the employee thank ...</p> <p>[p.25] ... his/her interlocutor for the recognition of a mutually valued relationship between both parties and explain why such offer may not be accepted under the observance of OGMA's policies.</p> <p>Gifts, presents and hospitality of a modest nature, reasonable in value and not extravagant may be exceptionally offered or accepted in connection with the promotion, demonstration or explanation of OGMA products and services.</p> <p>Gifts, presents or hospitality shall not be offered or accepted: (a) in money, (b) if there is any intention to obtain an undue advantage, or (c) where prohibited under the laws or regulations applicable to the related parties. As for Public Authorities, which are required to comply with specific standards and regulations, offering and accepting of gifts, presents and hospitality are, as a rule, prohibited, and the employee shall elucidate the concerned Public Authority that the reason for declining such offer is intended to prevent any undue procedure and, thus, is beneficial to both parties. Any exception hereto shall be handled in advance with the Compliance Office.</p> <p>For further information, please consult our policies and internal procedures, such as OGMA Anticorruption Policy (ONS-000618), OGMA Gifts and Presents Procedure (ONS-000811) and OGMA Hospitality Procedure (ONS-000797), or contact your Compliance Agent and/or the Compliance Office.</p>
<p><b>[2] Anticorruption Policy (Document)</b>            Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>            [p.6] 6. Allowed practices and conducts</p> <p>This Policy allows the Employees to offer gifts, meals or entertainment classified as "Hospitality" acts, as well as travel benefits or other things of value to the Public Entities and to private natural persons, provided that the provision of these items is lawful and directly related to:</p> <ol style="list-style-type: none"> <li>The promotion or demonstration of OGMA's products and services;</li> <li>The fulfillment of a contract concluded between OGMA and a Government, a public company or a company operated by the State. Below are described OGMA's requirements provided in this Policy related to the circumstances in which certain items of value may be offered.</li> </ol>



[p.7] 6.1. Gifts and hospitality (include meals and entertainment)

OGMA's and its business partner's decisions should be taken objectively, without the influence of gifts or favors. A small gift, whose price is reasonable or a gesture of respect or appreciation may represent an appropriate way through which certain business people demonstrate respect for others. Nevertheless, regardless of the value, the act of giving or receiving a gift, a meal, entertainment or other hospitality benefit should not be carried out with the purpose of improperly influence, any Public Entity, or any other OGMA's business partner.

Thus, OGMA allows the offering of gifts, meals, entertainment, OGMA's promotional items and other items of reasonable value, under certain limited circumstances, to Public Entities or any other OGMA's business partner that already has or not a contractually established relationship.

Therefore, the following are requirements for any gift and hospitality benefit:

- a) Not be offered with the purpose of influencing the recipient for obtaining or retaining any improper business advantage for OGMA, for any other natural person or legal person, nor as an implicit or explicit exchange of favors or benefits and, above all, for any other less clear or corrupt purpose;
- b) Not be assigned to any Public Entity, legal person or natural person related to a contract or while any OGMA's regulatory decision is pending from that authority, natural person or legal person;
- c) Do not include cash or cash equivalent (such as gift certificates or proof of payments);
- d) Not be luxurious or extravagant and, on the contrary, be of reasonable value (for example, insignificant when compared with the local wage average);
- e) Being provided (or received) sporadically;
- f) Do not include expenses for any relatives of the recipient;
- g) Being provided in a clear and transparent way;
- h) Be related with the promotion, demonstration or explanation of OGMA's products or services;
- i) Comply with the local laws and cultures in the country;
- j) Be fully documented by invoices and corresponding document
- k) Be timely and accurately recorded in OGMA's books and records.

[p.8] 6.2. Travel education and related expenses

OGMA may receive requests to host Public Entities as a result of training actions or other related business issues in facilities to be provided by OGMA, or in training actions sponsored by external suppliers. OGMA may also receive requests to host Public Entities in operational meetings, project meetings or other events. Any request to pay travel expenses of any Public Entity, inside or outside their place of residence, must be carefully analysed in order to ensure consistency in relation to this Policy and the applicable laws of the country of that entity. In addition, even in the situations where local laws eventually allow OGMA to pay the expenses of a Public Entity, there may be additional legal requirements that apply to the procedure, accounting and accountability of such payments. These standards shall be considered in the planning of trips of any Public Entity or private natural person paid by OGMA.

## 6. Supply Chain Management

<b>Question</b>
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company requires the involvement of its procurement department in the establishment and oversight of its supplier base.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has formal procedures to conduct risk-based due diligence when engaging and re-engaging with suppliers. The due diligence process explicitly includes establishing the ultimate beneficial ownership of the supplying company. The company's due diligence procedure is accompanied by a clear statement that supplier relationships will be subject to review, and potential termination, if any red flags highlighted in the due diligence cannot be mitigated.</p> <p>However, the company receives a score of '1' because there is no evidence that higher risk suppliers are subject to enhanced due diligence. In addition, there is no evidence that the company includes suppliers in its definition of "Intervening Third Parties" referenced in its policy.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p.4] Implementation of the Anti-corruption Policy</p> <p>This Policy fully applies to OGMA, including the international operations of the Company and any business activities managed or conducted on behalf of OGMA by Intervening Third Parties. All Employees should become familiar with this Policy and comply with it. The Policy also applies to the Company's affiliated, its direct or indirect subsidiaries to which the Code of Ethics and Conduct applies, representatives, consultants, service providers and other Intervening Third Parties contracted by OGMA.</p> <p>Any OGMA's subsidiaries not covered by the Code of Ethics and Conduct shall also adhere to the principles expressed in this Policy. The Legal Department will collaborate with these subsidiaries to ensure that they adopt the policies and procedures that promote the same standards, principles and objectives proposed by this Policy.</p> <p>[p.5] 4.4. The term "Intervening Third Party" means any natural person (other than an OGMA employee) or legal person hired (formally or informally) by OGMA to act for or on behalf of OGMA, regardless of the name or position of the natural or legal person. This definition includes, in particular:</p> <ol style="list-style-type: none"> <li>Any natural person or legal person used to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives and partners of a partnership (joint venture);</li> <li>Any natural person or legal person acting to ensure the obtaining of a license, visa, permit or other form of authorization from a Public Entity, or intervening in a regulatory issue next to a Public Entity;</li> <li>Any natural person or legal person used to represent the Company or its interests vis-a-vis government, a state entity, public company or controlled by the State;</li> <li>Any natural person or legal person used to represent OGMA in tax or legal matters;</li> <li>Any natural person or legal person used to represent OGMA in customs processes.</li> </ol> <p>[p.9] 6.7. Due diligence mandatory for contracting intervening third parties and other business partners</p> <p>OGMA may be liable for the actions of associated persons, agents, suppliers, consultants, service providers and other business partners that perform business – mainly Intervening Third Parties - especially when an Intervening Third Party Intervener is providing services or conducting business, discussions or negotiations on behalf of OGMA with public or private organizations (and/or its authorities, directors, or other employees).</p> <p>[p.10] Any OGMA's Employee that seeks to establish a business relationship between OGMA and an Intervening Third Party shall, before contracting this Intervening Third Party carefully review and comply with OGMA's Due Diligence Procedure.</p> <p>The time and effort required for the execution of the Intervening Third Party due diligence will depend on the amount and complexity of the issues raised during the due diligence procedure itself and of the countries involved. Likewise, the scope of the due diligence procedure should be sufficient to define the risks related to the Compliance</p>

standards that OGMA could face when conducting business with the potential Intervening Third Party or other business partner.

In general, the due diligence procedure shall determine, inter alia: (i) if the natural person or legal person that proposes to provide service to OGMA in exchange for payment is a Public Entity; (ii) if the legal person employs a Public Entity or whether it is a society in which a Public Entity has equity interest or has seat on the Board of Directors; (iii) if the services that the natural person or legal person intends to provide are required to promote a business initiative or existing contract; (iv) if the natural person or legal person has the expertise, experience and other qualifications to legitimately perform the required services and (v) if the natural person or legal person demonstrates likelihood to engage in practices that may expose OGMA to any responsibility.

Any questions or Red Flags (as defined in Chapter 9) raised during the due diligence procedure should be properly handled as determined by the Legal Department before the relationship is formally held or maintained. If necessary, OGMA may contract the services of external entities to search for the ownership, expertise, experience and other qualifications of the Intervening Third Party considered for the provision of service established in a proposed or existing contract with OGMA.

OGMA is committed to perform appropriate and reasonable due diligences about the reputation and integrity of any companies in which it invests. In this way, due diligence related to possible mergers, acquisitions and partnerships (joint ventures) will be conducted.

Finally, OGMA will require written contracts for all the hiring of Intervening Third Parties and other business partners. Only in given and limited circumstances that involve the acquisition of goods and services from a supplier, the written contract may be in the form of Purchase Order.

#### [p.11] 9. Red Flags

While all proposed payments related to business operations, contracts or related shall be assessed based on specific facts, special attention should be given to Red Flags related to bribery and corruption. Red Flags are considered to exist whenever any particular fact or circumstance suggest that an operation, relationship or hiring involves a probable risk of bribery or corruption.

When a Red Flag is identified, you must carefully consider the measures that need to be taken in order to minimize or eliminate the risk of bribery or corruption that such particular relationship may present, including the eventual extinction of such relationship.

If there is knowledge or suspicion of the existence of any of these facts or circumstances, these should be notified through the existing channels for that purpose or to the Legal Department. Thus, examples of non compliance with this Policy, or that represent risk areas associated with corruption are:

- a) Operations involving countries known for corrupt payments;
- b) Payments provided or carried out in cash;

#### [p.12]

- c) Extravagant or luxurious gifts or hospitality involving a Public Entity;
- d) Payments made for off-shores or in countries traditionally known as tax havens;
- e) Payments or expenses documented inappropriately;
- f) Requests from Employees or Intervening Third Parties requiring that an operation is structured in such a way as to disguise relevant fact or circumvent local laws;
- g) The Intervening Third Party request the payment in a country other than that where its headquarters or main administrative offices, or where a permanent Office directly involved in the performance of the business for which was been hired are located;
- h) The Intervening Third Party is not qualified or do not have the experience and resources necessary to carry out the duties for which it has been hired;
- i) The Intervening Third Party has been recently formed or otherwise lacks historical information;
- j) The Intervening Third Party refuses to certify the compliance with anti-corruption practices or opposes to the statements, warranties, agreements, anti-corruption due diligence procedures related to contracts with OGMA;
- k) The Intervening Third Party is related to current or previous cases of corruption or other legal violations;
- l) The Intervening Third Party has been recommended by a Public Entity;
- m) The Intervening Third Party has a personal, family or commercial relationship with a Public Entity;

- n) The Intervening Third Party request unusual contractual terms or payment agreements that raise concerns in terms of the standards referred in Chapter 1. of this policy, such as cash payments, payments in the currency of another country, payments to a third party who has no relationship with the business operation, or payments prior to the conclusion of a purchase contract (or any other form of advance payment);
- o) The commissions or fees of the Intervening Third Party exceed the usual rate practiced for similar services in that geographic area, or unreasonable exceed the prices paid by OGMA for similar services elsewhere.

<b>Question</b>
<b>6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company requires that its suppliers have adequate anti-bribery and corruption policies and procedures in place. There is evidence that the company requires that all third parties must observe the company's own Anti-corruption Policy document, which is inclusive of policies that prohibit foreign and domestic bribery, prohibit facilitation payments, as well as policies and procedures to address conflicts of interest, gifts and hospitality, and whistleblowing.</p> <p>However, the company receives a score of '1' because the evidence suggests that it only assures itself of this when onboarding new suppliers and there is no evidence that it does so when there is a significant change in the business relationship. In addition, although there is evidence that the company requires suppliers to sign task orders, it is unclear what the contractual obligations are under such agreements, and it is therefore unclear whether the company assures itself in practice of its suppliers' adherence to its anti-bribery and corruption policies. Finally, there is no evidence that the company's policies relating to intervening third parties includes suppliers in its definition.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a></p> <p>[p. 1] The policy prohibits, specifically, its administrators, as well as its directors and employees (collectively referred to as "Employees"), and all Intervening Third Parties contracted by OGMA, from getting involved in any corrupt act and, directly or indirectly, offer promise, give or authorize any person to provide money or "Anything of Value" (as defined in paragraph 4.2) to any "Public Entity" (as defined in paragraph 4.1) or any natural or legal person with the purpose of obtaining or accumulate any "Improper Advantage" (as defined in paragraph 4.3).</p> <p>[p.2] It is expected that all OGMA's Employees and business partners become familiar with this Policy and comply with it, recognize and report possible issues related with understandable situations like corruption, so they are properly handled by the Legal Department.</p> <p>[p.4] Implementation of the Anti-corruption Policy                  This Policy fully applies to OGMA, including the international operations of the Company and any business activities managed or conducted on behalf of OGMA by Intervening Third Parties. All Employees should become familiar with this Policy and comply with it. The Policy also applies to the Company's affiliated, its direct or indirect subsidiaries to which the Code of Ethics and Conduct applies, representatives, consultants, service providers and other Intervening Third Parties contracted by OGMA.</p> <p>Any OGMA's subsidiaries not covered by the Code of Ethics and Conduct shall also adhere to the principles expressed in this Policy. The Legal Department will collaborate with these subsidiaries to ensure that they adopt the policies and procedures that promote the same standards, principles and objectives proposed by this Policy.</p> <p>[p.5] 4.4. The term "Intervening Third Party" means any natural person (other than an OGMA employee) or legal person hired (formally or informally) by OGMA to act for or on behalf of OGMA, regardless of the name or position of the natural or legal person. This definition includes, in particular:</p> <ul style="list-style-type: none"> <li>a) Any natural person or legal person used to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives and partners of a partnership (joint venture);</li> <li>b) Any natural person or legal person acting to ensure the obtaining of a license, visa, permit or other form of authorization from a Public Entity, or intervening in a regulatory issue next to a Public Entity;</li> <li>c) Any natural person or legal person used to represent the Company or its interests vis-a-vis government, a state entity, public company or controlled by the State;</li> <li>d) Any natural person or legal person used to represent OGMA in tax or legal matters;</li> <li>e) Any natural person or legal person used to represent OGMA in customs processes.</li> </ul> <p>[p.6] 5.1 Types of bribery</p>

5.1.1. Public Entities Bribery

According to the terms established in this Policy, offer, give, promise or authorize the offer, delivery or promise of cash or Anything of Value to a Public Entity, directly or indirectly, to obtain an Improper Advantage, is classified as bribery.

5.1.2. Private sector bribery

OGMA also prohibits bribery in the private sector. Thus, no Employee can offer, give, promise or receive cash or Anything of Value of or from a natural person or legal person in the private sector, to obtain an Improper Advantage.

[p.9] 6.7. Due diligence mandatory for contracting intervening third parties and other business partners

OGMA may be liable for the actions of associated persons, agents, suppliers, consultants, service providers and other business partners that perform business – mainly Intervening Third Parties - especially when an Intervening Third Party Intervener is providing services or conducting business, discussions or negotiations on behalf of OGMA with public or private organizations (and/or its authorities, directors, or other employees).

In accordance with the applicable laws, OGMA may be held responsible for the illegal actions of such Intervening Third Parties, regardless of whether or not having effective knowledge of the alleged misconduct. Therefore, the Employee shall never ask an Intervening Third Party to get involved, in any way, in any conduct in which the Employee himself is prohibited to engage according to the terms of this Policy. In addition, the Employee shall never neglect any suspicious of violations of this Policy by Intervening Third Parties, nor disregard other suspicious circumstances. Any effective or suspected misconduct must be immediately reported through the channels appropriate for that purpose or through notification to the Legal Department.

[p.10] All Intervening Third Parties conducting business with OGMA or on its behalf must act with the highest level of commercial, professional and legal integrity.

[...]

Finally, OGMA will require written contracts for all the hiring of Intervening Third Parties and other business partners. Only in given and limited circumstances that involve the acquisition of goods and services from a supplier, the written contract may be in the form of Purchase Order.

<b>Question</b>
<b>6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required throughout the supply chain.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.
<b>Evidence</b>
No evidence found.

## 7. Agents, Intermediaries and Joint Ventures

### 7.1 Agents and Intermediaries

<b>Question</b>
7.1.1 Does the company have a clear policy on the use of agents?
<b>Score</b>
1
<b>Comments</b>
<p>There is some evidence that the company has a policy covering the use of agents. However, the company receives a score of '1' because there is no evidence that its policy addresses the potential corruption risks associated with the use of agents, nor that it explicitly commits to establishing that the use of agents is, in each case, necessary to perform a legitimate business function.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p.4] Implementation of the Anti-corruption Policy  This Policy fully applies to OGMA, including the international operations of the Company and any business activities managed or conducted on behalf of OGMA by Intervening Third Parties. All Employees should become familiar with this Policy and comply with it. The Policy also applies to the Company's affiliated, its direct or indirect subsidiaries to which the Code of Ethics and Conduct applies, representatives, consultants, service providers and other Intervening Third Parties contracted by OGMA.</p> <p>Any OGMA's subsidiaries not covered by the Code of Ethics and Conduct shall also adhere to the principles expressed in this Policy. The Legal Department will collaborate with these subsidiaries to ensure that they adopt the policies and procedures that promote the same standards, principles and objectives proposed by this Policy.</p> <p>[p.5] 4.4. The term "Intervening Third Party" means any natural person (other than an OGMA employee) or legal person hired (formally or informally) by OGMA to act for or on behalf of OGMA, regardless of the name or position of the natural or legal person. This definition includes, in particular:</p> <ol style="list-style-type: none"> <li>Any natural person or legal person used to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives and partners of a partnership (joint venture);</li> <li>Any natural person or legal person acting to ensure the obtaining of a license, visa, permit or other form of authorization from a Public Entity, or intervening in a regulatory issue next to a Public Entity;</li> <li>Any natural person or legal person used to represent the Company or its interests vis-a-vis government, a state entity, public company or controlled by the State;</li> <li>Any natural person or legal person used to represent OGMA in tax or legal matters;</li> <li>Any natural person or legal person used to represent OGMA in customs processes.</li> </ol> <p>[p.9] In accordance with the applicable laws, OGMA may be held responsible for the illegal actions of such Intervening Third Parties, regardless of whether or not having effective knowledge of the alleged misconduct. Therefore, the Employee shall never ask an Intervening Third Party to get involved, in any way, in any conduct in which the Employee himself is prohibited to engage according to the terms of this Policy. In addition, the Employee shall never neglect any suspicious of violations of this Policy by Intervening Third Parties, nor disregard other suspicious circumstances. Any effective or suspected misconduct must be immediately reported through the channels appropriate for that purpose or through notification to the Legal Department.</p> <p>[p.10] All Intervening Third Parties conducting business with OGMA or on its behalf must act with the highest level of commercial, professional and legal integrity.</p>

Question
<b>7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?</b>
Score
1
Comments
<p>There is evidence that the company has formal procedures to conduct risk-based anti-bribery and corruption due diligence prior to engaging its agents. There is evidence that the company commits to not engaging or terminating its engagement with agents or intermediaries where the risks identified in the due diligence cannot be mitigated.</p> <p>However, the company receives a score of '1' because there is no evidence that agents and highest risk intermediaries are subject to enhanced due diligence. There is also no evidence that the company repeats due diligence at least every two years or when there is a significant change in the business relationship.</p>
Evidence
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p.9] 6.7. Due diligence mandatory for contracting intervening third parties and other business partners</p> <p>OGMA may be liable for the actions of associated persons, agents, suppliers, consultants, service providers and other business partners that perform business – mainly Intervening Third Parties - especially when an Intervening Third Party Intervener is providing services or conducting business, discussions or negotiations on behalf of OGMA with public or private organizations (and/or its authorities, directors, or other employees).</p> <p>In accordance with the applicable laws, OGMA may be held responsible for the illegal actions of such Intervening Third Parties, regardless of whether or not having effective knowledge of the alleged misconduct. Therefore, the Employee shall never ask an Intervening Third Party to get involved, in any way, in any conduct in which the Employee himself is prohibited to engage according to the terms of this Policy. In addition, the Employee shall never neglect any suspicious of violations of this Policy by Intervening Third Parties, nor disregard other suspicious circumstances. Any effective or suspected misconduct must be immediately reported through the channels appropriate for that purpose or through notification to the Legal Department.</p> <p>[p.10] All Intervening Third Parties conducting business with OGMA or on its behalf must act with the highest level of commercial, professional and legal integrity. Any OGMA's Employee that seeks to establish a business relationship between OGMA and an Intervening Third Party shall, before contracting this Intervening Third Party carefully review and comply with OGMA's Due Diligence Procedure.</p> <p>The time and effort required for the execution of the Intervening Third Party due diligence will depend on the amount and complexity of the issues raised during the due diligence procedure itself and of the countries involved. Likewise, the scope of the due diligence procedure should be sufficient to define the risks related to the Compliance standards that OGMA could face when conducting business with the potential Intervening Third Party or other business partner.</p> <p>In general, the due diligence procedure shall determine, inter alia:</p> <ol style="list-style-type: none"> <li>i. if the natural person or legal person that proposes to provide service to OGMA in exchange for payment is a Public Entity;</li> <li>ii. if the legal person employs a Public Entity or whether it is a society in which a Public Entity has equity interest or has seat on the Board of Directors;</li> <li>iii. if the services that the natural person or legal person intends to provide are required to promote a business initiative or existing contract;</li> <li>iv. if the natural person or legal person has the expertise, experience and other qualifications to legitimately perform the required services and</li> <li>v. if the natural person or legal person demonstrates likelihood to engage in practices that may expose OGMA to any responsibility.</li> </ol> <p>Any questions or Red Flags (as defined in Chapter 9) raised during the due diligence procedure should be properly handled as determined by the Legal Department before the relationship is formally held or maintained. If necessary, OGMA may contract the services of external entities to search for the ownership, expertise, experience and other</p>

qualifications of the Intervening Third Party considered for the provision of service established in a proposed or existing contract with OGMA.

OGMA is committed to perform appropriate and reasonable due diligences about the reputation and integrity of any companies in which it invests. In this way, due diligence related to possible mergers, acquisitions and partnerships (joint ventures) will be conducted.

Finally, OGMA will require written contracts for all the hiring of Intervening Third Parties and other business partners. Only in given and limited circumstances that involve the acquisition of goods and services from a supplier, the written contract may be in the form of Purchase Order.

[p.11] 9. Red Flags

While all proposed payments related to business operations, contracts or related shall be assessed based on specific facts, special attention should be given to Red Flags related to bribery and corruption. Red Flags are considered to exist whenever any particular fact or circumstance suggest that an operation, relationship or hiring involves a probable risk of bribery or corruption.

When a Red Flag is identified, you must carefully consider the measures that need to be taken in order to minimize or eliminate the risk of bribery or corruption that such particular relationship may present, including the eventual extinction of such relationship.

If there is knowledge or suspicion of the existence of any of these facts or circumstances, these should be notified through the existing channels for that purpose or to the Legal Department. Thus, examples of non compliance with this Policy, or that represent risk areas associated with corruption are:

- a) Operations involving countries known for corrupt payments;
- b) Payments provided or carried out in cash;

[p.12]

- a) Extravagant or luxurious gifts or hospitality involving a Public Entity;
- b) Payments made for off-shores or in countries traditionally known as tax havens;
- c) Payments or expenses documented inappropriately;
- d) Requests from Employees or Intervening Third Parties requiring that an operation is structured in such a way as to disguise relevant fact or circumvent local laws;
- e) The Intervening Third Party request the payment in a country other than that where its headquarters or main administrative offices, or where a permanent Office directly involved in the performance of the business for which was been hired are located;
- f) The Intervening Third Party is not qualified or do not have the experience and resources necessary to carry out the duties for which it has been hired;
- g) The Intervening Third Party has been recently formed or otherwise lacks historical information;
- h) The Intervening Third Party refuses to certify the compliance with anti-corruption practices or opposes to the statements, warranties, agreements, anti-corruption due diligence procedures related to contracts with OGMA;
- i) The Intervening Third Party is related to current or previous cases of corruption or other legal violations;
- j) The Intervening Third Party has been recommended by a Public Entity;
- k) The Intervening Third Party has a personal, family or commercial relationship with a Public Entity;
- l) The Intervening Third Party request unusual contractual terms or payment agreements that raise concerns in terms of the standards referred in Chapter 1. of this policy, such as cash payments, payments in the currency of another country, payments to a third party who has no relationship with the business operation, or payments prior to the conclusion of a purchase contract (or any other form of advance payment);
- m) The commissions or fees of the Intervening Third Party exceed the usual rate practiced for similar services in that geographic area, or unreasonable exceed the prices paid by OGMA for similar services elsewhere.

<b>Question</b>
<b>7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the company aims to establish the ultimate beneficial ownership of its agents and intermediaries, and that it commits to independently verifying this information as part of its due diligence process.</p> <p>However, the company receives a score of ‘1’ because, although there is evidence that the company’s relationships may be terminated if red flags cannot be mitigated, there is no evidence that this would apply as a rule if ultimate beneficial ownership cannot be established.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a></p> <p>[p.9] 6.7. Due diligence mandatory for contracting intervening third parties and other business partners                  OGMA may be liable for the actions of associated persons, agents, suppliers, consultants, service providers and other business partners that perform business – mainly Intervening Third Parties - especially when an Intervening Third Party Intervener is providing services or conducting business, discussions or negotiations on behalf of OGMA with public or private organizations (and/or its authorities, directors, or other employees).</p> <p>[p.10] All Intervening Third Parties conducting business with OGMA or on its behalf must act with the highest level of commercial, professional and legal integrity. Any OGMA’s Employee that seeks to establish a business relationship between OGMA and an Intervening Third Party shall, before contracting this Intervening Third Party carefully review and comply with OGMA’s Due Diligence Procedure.</p> <p>[...]</p> <p>Any questions or Red Flags (as defined in Chapter 9) raised during the due diligence procedure should be properly handled as determined by the Legal Department before the relationship is formally held or maintained. If necessary, OGMA may contract the services of external entities to search for the ownership, expertise, experience and other qualifications of the Intervening Third Party considered for the provision of service established in a proposed or existing contract with OGMA.</p> <p>[p.11] 9. Red Flags                  While all proposed payments related to business operations, contracts or related shall be assessed based on specific facts, special attention should be given to Red Flags related to bribery and corruption. Red Flags are considered to exist whenever any particular fact or circumstance suggest that an operation, relationship or hiring involves a probable risk of bribery or corruption.</p> <p>When a Red Flag is identified, you must carefully consider the measures that need to be taken in order to minimize or eliminate the risk of bribery or corruption that such particular relationship may present, including the eventual extinction of such relationship.</p>

<b>Question</b>
<b>7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company's anti-bribery and corruption policy applies to all agents and intermediaries acting for or on behalf of the company. The company indicates that it includes anti-bribery and corruption clauses in its contracts with agents and that business relationships with those that violate its policy may be terminated.</p> <p>However, the company receives a score of '0' because there is no evidence that it includes audit rights in its contracts with these entities and it is therefore unclear how it assures itself of its suppliers' compliance with its policy in practice.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>                  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>                  [p.10] All Intervening Third Parties conducting business with OGMA or on its behalf must act with the highest level of commercial, professional and legal integrity. Any OGMA's Employee that seeks to establish a business relationship between OGMA and an Intervening Third Party shall, before contracting this Intervening Third Party carefully review and comply with OGMA's Due Diligence Procedure.</p> <p>[...]</p> <p>Finally, OGMA will require written contracts for all the hiring of Intervening Third Parties and other business partners. Only in given and limited circumstances that involve the acquisition of goods and services from a supplier, the written contract may be in the form of Purchase Order.</p> <p>[p.11] 9. Red Flags                  While all proposed payments related to business operations, contracts or related shall be assessed based on specific facts, special attention should be given to Red Flags related to bribery and corruption. Red Flags are considered to exist whenever any particular fact or circumstance suggest that an operation, relationship or hiring involves a probable risk of bribery or corruption.</p> <p>When a Red Flag is identified, you must carefully consider the measures that need to be taken in order to minimize or eliminate the risk of bribery or corruption that such particular relationship may present, including the eventual extinction of such relationship.</p> <p>If there is knowledge or suspicion of the existence of any of these facts or circumstances, these should be notified through the existing channels for that purpose or to the Legal Department. Thus, examples of non compliance with this Policy, or that represent risk areas associated with corruption are:</p> <p>[p.12] j) The Intervening Third Party refuses to certify the compliance with anti-corruption practices or opposes to the statements, warranties, agreements, anti-corruption due diligence procedures related to contracts with OGMA;</p> <p>[p.13] The agents, consultants and other Intervening Third Parties who work for OGMA and that violate this Policy will be subject to termination of their business relationship, as well as to any other corrective measures at OGMA's disposal in accordance with the applicable law.</p>

<b>Question</b>
<b>7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the company addresses incentive structures and remuneration for agents as a factor in bribery and corruption risk. The company's anti-corruption policy lists several red flags relating to agent payment, such as risks stemming from payments to overseas accounts, cash payments, payments to a third party who has no relationship to the business operation, or excessive commission fees.</p> <p>However, the company receives a score of '1' because there is no evidence that the company imposes a threshold on the payment of sales commissions to agents, nor that there is a requirement that agent remuneration is paid in stage payments.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p.11] 9. Red Flags</p> <p>[p.12]</p> <ul style="list-style-type: none"> <li>f) Requests from Employees or Intervening Third Parties requiring that an operation is structured in such a way as to disguise relevant fact or circumvent local laws;</li> <li>g) The Intervening Third Party request the payment in a country other than that where its headquarters or main administrative offices, or where a permanent Office directly involved in the performance of the business for which was been hired are located;</li> </ul> <p>[...]</p> <ul style="list-style-type: none"> <li>n) The Intervening Third Party request unusual contractual terms or payment agreements that raise concerns in terms of the standards referred in Chapter 1. of this policy, such as cash payments, payments in the currency of another country, payments to a third party who has no relationship with the business operation, or payments prior to the conclusion of a purchase contract (or any other form of advance payment);</li> <li>o) The commissions or fees of the Intervening Third Party exceed the usual rate practiced for similar services in that geographic area, or unreasonable exceed the prices paid by OGMA for similar services elsewhere.</li> </ul>

<b>Question</b>
<b>7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of the agents currently contracted to act for and/or on behalf of the company.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any data on ethical or bribery and corruption-related investigations, incidents or the associated disciplinary actions involving agents.
<b>Evidence</b>
No evidence found.

## 7.2 Joint Ventures

Question
<b>7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?</b>
Score
<b>1</b>
Comments
<p>There is evidence that the company has formal procedures to conduct risk-based anti-bribery and corruption due diligence on all of its joint venture partners. The company states that this includes establishing the ultimate beneficial ownership of the partner company.</p> <p>However, the company receives a score of '1' because there is no evidence to suggest that joint ventures operating in high risk markets or with high risk partners, such as state-owned enterprises, are subject to enhanced due diligence. It is also unclear whether due diligence is repeated at least every two years.</p>
Evidence
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a></p> <p>[p.5] 4.4. The term "Intervening Third Party" means any natural person (other than an OGMA employee) or legal person hired (formally or informally) by OGMA to act for or on behalf of OGMA, regardless of the name or position of the natural or legal person. This definition includes, in particular:</p> <ol style="list-style-type: none"> <li>Any natural person or legal person used to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives and partners of a partnership (joint venture);</li> <li>Any natural person or legal person acting to ensure the obtaining of a license, visa, permit or other form of authorization from a Public Entity, or intervening in a regulatory issue next to a Public Entity;</li> <li>Any natural person or legal person used to represent the Company or its interests vis-a-vis government, a state entity, public company or controlled by the State;</li> <li>Any natural person or legal person used to represent OGMA in tax or legal matters;</li> <li>Any natural person or legal person used to represent OGMA in customs processes.</li> </ol> <p>[p.9] 6.7. Due diligence mandatory for contracting intervening third parties and other business partners</p> <p>OGMA may be liable for the actions of associated persons, agents, suppliers, consultants, service providers and other business partners that perform business – mainly Intervening Third Parties - especially when an Intervening Third Party Intervener is providing services or conducting business, discussions or negotiations on behalf of OGMA with public or private organizations (and/or its authorities, directors, or other employees).</p> <p>[p.10] All Intervening Third Parties conducting business with OGMA or on its behalf must act with the highest level of commercial, professional and legal integrity. Any OGMA's Employee that seeks to establish a business relationship between OGMA and an Intervening Third Party shall, before contracting this Intervening Third Party carefully review and comply with OGMA's Due Diligence Procedure.</p> <p>The time and effort required for the execution of the Intervening Third Party due diligence will depend on the amount and complexity of the issues raised during the due diligence procedure itself and of the countries involved. Likewise, the scope of the due diligence procedure should be sufficient to define the risks related to the Compliance standards that OGMA could face when conducting business with the potential Intervening Third Party or other business partner.</p> <p>In general, the due diligence procedure shall determine, inter alia: (i) if the natural person or legal person that proposes to provide service to OGMA in exchange for payment is a Public Entity; (ii) if the legal person employs a Public Entity or whether it is a society in which a Public Entity has equity interest or has seat on the Board of Directors; (iii) if the services that the natural person or legal person intends to provide are required to promote a business initiative or existing contract; (iv) if the natural person or legal person has the expertise, experience and other qualifications to legitimately perform the required services and (v) if the natural person or legal person demonstrates likelihood to engage in practices that may expose OGMA to any responsibility.</p>

Any questions or Red Flags (as defined in Chapter 9) raised during the due diligence procedure should be properly handled as determined by the Legal Department before the relationship is formally held or maintained. If necessary, OGMA may contract the services of external entities to search for the ownership, expertise, experience and other qualifications of the Intervening Third Party considered for the provision of service established in a proposed or existing contract with OGMA.

OGMA is committed to perform appropriate and reasonable due diligences about the reputation and integrity of any companies in which it invests. In this way, due diligence related to possible mergers, acquisitions and partnerships (joint ventures) will be conducted.

Finally, OGMA will require written contracts for all the hiring of Intervening Third Parties and other business partners. Only in given and limited circumstances that involve the acquisition of goods and services from a supplier, the written contract may be in the form of Purchase Order.

#### [p.11] 9. Red Flags

While all proposed payments related to business operations, contracts or related shall be assessed based on specific facts, special attention should be given to Red Flags related to bribery and corruption. Red Flags are considered to exist whenever any particular fact or circumstance suggest that an operation, relationship or hiring involves a probable risk of bribery or corruption.

When a Red Flag is identified, you must carefully consider the measures that need to be taken in order to minimize or eliminate the risk of bribery or corruption that such particular relationship may present, including the eventual extinction of such relationship.

If there is knowledge or suspicion of the existence of any of these facts or circumstances, these should be notified through the existing channels for that purpose or to the Legal Department. Thus, examples of non compliance with this Policy, or that represent risk areas associated with corruption are:

- a) Operations involving countries known for corrupt payments;
  - b) Payments provided or carried out in cash;
- [p.12]
- c) Extravagant or luxurious gifts or hospitality involving a Public Entity;
  - d) Payments made for off-shores or in countries traditionally known as tax havens;
  - e) Payments or expenses documented inappropriately;
  - f) Requests from Employees or Intervening Third Parties requiring that an operation is structured in such a way as to disguise relevant fact or circumvent local laws;
  - g) The Intervening Third Party request the payment in a country other than that where its headquarters or main administrative offices, or where a permanent Office directly involved in the performance of the business for which was been hired are located;
  - h) The Intervening Third Party is not qualified or do not have the experience and resources necessary to carry out the duties for which it has been hired;
  - i) The Intervening Third Party has been recently formed or otherwise lacks historical information;
  - j) The Intervening Third Party refuses to certify the compliance with anti-corruption practices or opposes to the statements, warranties, agreements, anti-corruption due diligence procedures related to contracts with OGMA;
  - k) The Intervening Third Party is related to current or previous cases of corruption or other legal violations;
  - l) The Intervening Third Party has been recommended by a Public Entity;
  - m) The Intervening Third Party has a personal, family or commercial relationship with a Public Entity;
  - n) The Intervening Third Party request unusual contractual terms or payment agreements that raise concerns in terms of the standards referred in Chapter 1. of this policy, such as cash payments, payments in the currency of another country, payments to a third party who has no relationship with the business operation, or payments prior to the conclusion of a purchase contract (or any other form of advance payment);
  - o) The commissions or fees of the Intervening Third Party exceed the usual rate practiced for similar services in that geographic area, or unreasonable exceed the prices paid by OGMA for similar services elsewhere.

<b>Question</b>
<b>7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture relationships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company considers potential anti-bribery and corruption risks when entering into a joint venture. However, the company receives a score of '1' because there is no evidence that it takes steps to detect, control and prevent breaches through the inclusion of audit and termination rights in its contracts with joint venture partners.</p>
<b>Evidence</b>
<p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a></p> <p>[p.5] 4.4. The term "Intervening Third Party" means any natural person (other than an OGMA employee) or legal person hired (formally or informally) by OGMA to act for or on behalf of OGMA, regardless of the name or position of the natural or legal person. This definition includes, in particular:</p> <ol style="list-style-type: none"> <li>a) Any natural person or legal person used to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives and partners of a partnership (joint venture);</li> <li>b) Any natural person or legal person acting to ensure the obtaining of a license, visa, permit or other form of authorization from a Public Entity, or intervening in a regulatory issue next to a Public Entity;</li> <li>c) Any natural person or legal person used to represent the Company or its interests vis-a-vis government, a state entity, public company or controlled by the State;</li> <li>d) Any natural person or legal person used to represent OGMA in tax or legal matters;</li> <li>e) Any natural person or legal person used to represent OGMA in customs processes.</li> </ol> <p>[p.10] Finally, OGMA will require written contracts for all the hiring of Intervening Third Parties and other business partners. Only in given and limited circumstances that involve the acquisition of goods and services from a supplier, the written contract may be in the form of Purchase Order.</p> <p>[p.11] 9. Red Flags</p> <p>While all proposed payments related to business operations, contracts or related shall be assessed based on specific facts, special attention should be given to Red Flags related to bribery and corruption. Red Flags are considered to exist whenever any particular fact or circumstance suggest that an operation, relationship or hiring involves a probable risk of bribery or corruption.</p> <p>When a Red Flag is identified, you must carefully consider the measures that need to be taken in order to minimize or eliminate the risk of bribery or corruption that such particular relationship may present, including the eventual extinction of such relationship.</p> <p>If there is knowledge or suspicion of the existence of any of these facts or circumstances, these should be notified through the existing channels for that purpose or to the Legal Department. Thus, examples of non compliance with this Policy, or that represent risk areas associated with corruption are:</p> <p>[...]</p> <ol style="list-style-type: none"> <li>j) The Intervening Third Party refuses to certify the compliance with anti-corruption practices or opposes to the statements, warranties, agreements, anti-corruption due diligence procedures related to contracts with OGMA;</li> <li>k) The Intervening Third Party is related to current or previous cases of corruption or other legal violations;</li> </ol>

<b>Question</b>
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company publicly commits to take an active role in preventing bribery and corruption in all of its joint ventures.
<b>Evidence</b>
No evidence found.

## 8. Offsets

<b>Question</b>
<b>8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company addresses the corruption risks associated with offset contracting, and there is no evidence that a dedicated body, department or team is responsible for monitoring the company's offset activities.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the company's offset programme.
<b>Evidence</b>
No evidence found.

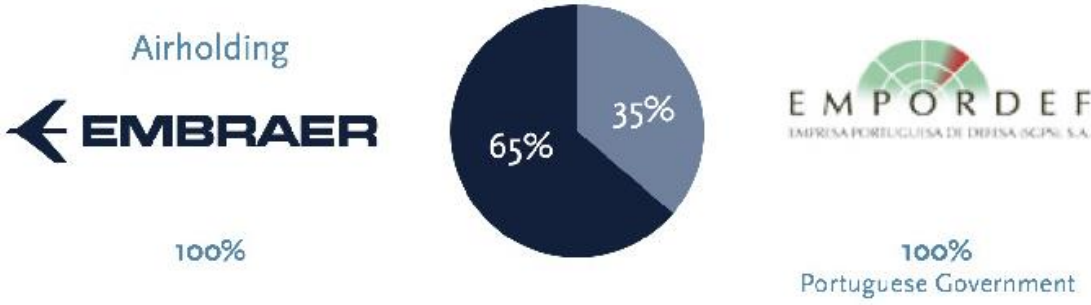


<b>Question</b>
<b>8.4 Does the company publish details about the beneficiaries of its indirect offset projects?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of its offset obligations or contracts.
<b>Evidence</b>
No evidence found.

## 9. High Risk Markets

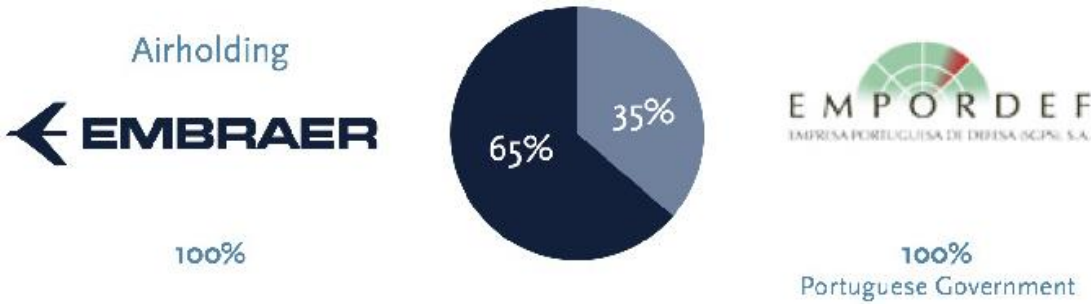
<b>Question</b>
<b>9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company acknowledges the corruption risks associated with operating in different markets, and there is evidence that it has a risk assessment process in place to account for these risks, with risk management procedures in place.</p> <p>However, the company receives a score of '1' because there is no evidence to suggest that the results of these assessments have an impact on business decisions or trigger the implementation of additional controls.</p>
<b>Evidence</b>
<p><b>[1] Code of Ethics and Conduct (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>  [p.9] OGMA Enhanced Compliance Program is based on fundamental issues such as responsible leadership, organization and managerial structure, permanent mapping and risk management, appropriate policies and internal control standards, internal communication and continuous training, as well as monitoring, auditing and reporting channels, the last of which is intended for the assessment of potential deviance from expected conduct or established procedures ("Essential Elements of Compliance").</p> <p><b>[2] Anticorruption Policy (Document)</b>  Accessed 16/10/2019  <a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>  [p.11] 9. Red Flags</p> <p>[...]</p> <p>If there is knowledge or suspicion of the existence of any of these facts or circumstances, these should be notified through the existing channels for that purpose or to the Legal Department. Thus, examples of non compliance with this Policy, or that represent risk areas associated with corruption are:</p> <p>a) Operations involving countries known for corrupt payments;</p>

<b>Question</b>
<b>9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes a list of its subsidiaries.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>9.3 Does the company disclose its beneficial ownership and control structure?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
The company discloses information on its beneficial ownership structure on its website. However, the company receives a '1' because there is no evidence that it also discloses its ownership in an open data format.
<b>Evidence</b>
<p><b>[3] Company Profile (Webpage)</b>                  Accessed 17/10/2019  <a href="http://www.ogma.pt/index.php?page=profile_en">http://www.ogma.pt/index.php?page=profile_en</a>                  At that time, a major drive was initiated to make the company efficient on a world scale, to expand into even more markets than those already explored. In three years the turnover was doubled and this led, in 2005, to the present position with the government of Portugal retaining 35% of the shares and private ownership, with EMBRAER owning the remaining 65% of the company share capital.</p>  <p>The diagram illustrates the ownership structure of EMBRAER. On the left, 'Airholding' is shown as the parent entity, owning 100% of EMBRAER. In the center, a pie chart shows EMBRAER's ownership split: 65% held by Airholding and 35% held by EMPORDEF. On the right, EMPORDEF is shown as being 100% owned by the Portuguese Government.</p>

<b>Question</b>
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company publishes any data on its defence sales or customers.
<b>Evidence</b>
No evidence found.

## 10. State-Owned Enterprises (SOEs)

<b>Question</b>
<b>10.1 Does the SOE publish a breakdown of its shareholder voting rights?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of its shareholder voting rights. Although the company publishes information on its shareholders, it cannot be assumed that these percentages automatically translate to voting rights.
<b>Evidence</b>
<p><b>[3] Company Profile (Webpage)</b>                  Accessed 17/10/2019  <a href="http://www.ogma.pt/index.php?page=profile_en">http://www.ogma.pt/index.php?page=profile_en</a>                  At that time, a major drive was initiated to make the company efficient on a world scale, to expand into even more markets than those already explored. In three years the turnover was doubled and this led, in 2005, to the present position with the government of Portugal retaining 35% of the shares and private ownership, with EMBRAER owning the remaining 65% of the company share capital.</p>  <p>The diagram illustrates the ownership structure of the company. On the left, the EMBRAER logo is shown with 'Airholding' above it and '100%' below it. In the center, a pie chart is divided into two segments: a larger dark blue segment representing 65% and a smaller light blue segment representing 35%. On the right, the logo for EMPORDEF (EMPRESA PORTUGUESA DE DEFESA, S.G.P.S., S.A.) is shown with '100%' and 'Portuguese Government' below it.</p>

<b>Question</b>
<b>10.2 Are the SOE's commercial and public policy objectives publicly available?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any information on its commercial or public policy objectives.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any information about its board members or the composition, nomination and appointment process.
<b>Evidence</b>
No evidence found.



<b>Question</b>
10.4 Is the SOE's audit committee composed of a majority of independent directors?
<b>Score</b>
0
<b>Comments</b>
There is no evidence that the company has an audit committee.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details about its management of asset transactions.
<b>Evidence</b>
No evidence found.

## List of Evidence & Sources

No.	Type <i>(Webpage or Document)</i>	Name	Download Date	Link
01	Document	<b>Code of Ethics and Conduct</b>	16/10/2019	<a href="http://www.ogma.pt/pdf/cetic_en.pdf">http://www.ogma.pt/pdf/cetic_en.pdf</a>
02	Document	<b>Anticorruption Policy</b>	16/10/2019	<a href="http://www.ogma.pt/pdf/antic_en.pdf">http://www.ogma.pt/pdf/antic_en.pdf</a>
03	Webpage	<b>Company Profile</b>	17/10/2019	<a href="http://www.ogma.pt/index.php?page=profile_en">http://www.ogma.pt/index.php?page=profile_en</a>
04	Webpage	<b>Helpline – Channel for Harmful Practices</b>	04/12/2019	<a href="http://www.ogma.pt/index.php?page=chp_en">http://www.ogma.pt/index.php?page=chp_en</a>
05	Webpage	<b>Helpline</b>	04/12/2019	<a href="https://canalconfidencial.com.br/ogmahelpline/">https://canalconfidencial.com.br/ogmahelpline/</a>