



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

**LIGA
PORTUGAL
CRIA TALENTO**

TRANSPARENCY AND ANTI-CORRUPTION CODE OF CONDUCT

EFFECTIVE DATE	ID HOLDERS
10/05/2021	DSGI/CT

REVIEW No.	REVIEW DATE	DESCRIPTION OF THE AMENDMENT
1	02/07/2021	Release of a new declaration in case of amendments to the conflict-of-interest situation
2	29/10/2021	Update of the footer, description of the target group - point 1 and text changes; point 5 - doubts
3	11/02/2022	Redrafting of points 2 and 6; point 5.1 removed
4	03/05/2023	Comprehensive redrafting (Ethics)
5	10/07/2023	Clarification for the recipients regarding Chapter I, points 2 and 9, amendment of points 2(c) and (d) of Chapter II, amendment of point 3 of the same Chapter, Autonomization and updating of the expenses point, inclusion of point III - Questionnaire and remunerations of Chapter IV
6	08/07/2024	Update to Point 3 – Independence and conflict of interest - declaration of honor commitment; Clarification on point 7 – vulnerable group of people.

DRAW UP BY	APPROVED BY
Transparency Commission	Governing Body

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MESSAGE FROM THE PRESIDENT

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

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

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

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

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

PEDRO PROENÇA
PRESIDENT



I – OBJECTIVES AND SCOPE OF APPLICATION OF THE TRANSPARENCY AND ANTI-CORRUPTION CODE

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

The Transparency and Anti-Corruption Code of Conduct of Liga Portugal (hereinafter referred to as Code) includes the principles governing the activity within the organization of professional competitions organized by Liga Portugal and a set of rules to be observed by the Members of the Statutory Bodies, Executive Directors, Commissions, Employees (employees and service providers under control or on behalf of the organization) and Delegates of Liga Portugal, as well as by all those who are part of the bodies and functional structure of Liga Portugal's corporate group (hereinafter, designated as Recipients).

On the other hand, this code is also aimed at third parties contracts or acting on behalf of Liga Portugal, in cases where the latter can be held responsible for their acts or omissions (in which case they are also included in the definition of Recipients).

The Code was established with the fundamental objective of:

- a) sharing the principles and rules of ethics and transparency that govern Liga Portugal's activity and guide the behaviour of its Recipients, as well as promoting the adoption of ethical and conduct commitments towards our Partners;
- b) encouraging behaviours that sustain and promote the integrity and institutional image of the Liga Portugal whose values are Credibility, Unity, Talent and Spectacle.

II – MISSION, VISION AND VALUES

MISSION

Liga Portugal's mission is to guarantee the excellence of its professional competitions, while fully complying with the economic and financial sustainability of the institution and its members.

VISION

To establish itself as one of the most important Leagues in Europe, being permanently on the path of international good practices, giving economic and sporting value to Portuguese professional football.

VALUES

Liga Portugal stands out for its values of Credibility, Unity, Talent and Spectacle in the organisation of its three major competitions sustained by the excellence of the football that is played.

A talent hub that develops and exports some of the best performers of the sport worldwide, in which 36 professional teams participate.

The Mission, Vision and Values express the essence of the organisation's goals, defining its position in the World. These are the means by which the organisation positions itself towards its *stakeholders*, showing where it wants to go and how it is going to get there.

Credibility - In all aspects, both in its competitions and in how the business is run.

Unity - Creating the conditions to uphold the best interests of football.

Talent - Both in its competitions and its players, and in the industry as a whole.

Spectacle - Bringing together the elements to make competitions increasingly entertaining both inside and outside the stadiums.

Since its creation in 2018, the Fundação do Futebol - Liga Portugal has strengthened the values of tolerance, aggregation, respect, education and commitment in professional football by taking advantage of the competitions of Liga Portugal for social responsibility, promoting the following areas of action: Social Inclusion, Protection of Values, Environmental Sustainability, Major Humanitarian Causes, Science and Technology at the Service of Football.

III – COMPLIANCE WITH THE LAW AND REGULATION

To ensure compliance with all applicable laws and regulations in Portugal or with the activity developed by Liga Portugal abroad.

IV – INTEGRITY AND TRANSPARENCY

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

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

It is forbidden for Code Recipients to:

- a) place and promote, directly or through an intermediary, sports bets related to the competitions organised by Liga Portugal;
- b) have direct or indirect ownership of shares in, or a professional relationship with, a sports betting company.
- c) Direct or indirect ownership of a shareholding in, or a professional relationship with, a sports society participating in competitions organized by Liga Portugal, except in situations where, by the nature or characteristics of the position or role, such a position does not create a conflict of interest or incompatibility;
- d) Acting as an intermediary or have ownership of a social participation in, or a professional relationship with a company that intermediates football players/coaches.

V – INDEPENDENCE AND CONFLICT OF INTEREST

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

They must also:

- a) guide their conduct according to the responsibilities assigned to them, always with impartiality, competence, discipline and transparency, avoiding unnecessary expenses;
- b) use the power delegated to them in a non-abusive manner, directed towards the goals of the Liga Portugal and never to obtain personal gains;
- c) respect the values and principles mentioned in this Code, both in internal and external relations;
- d) report any irregularities that may jeopardize the development of businesses or the good name of Liga Portugal;
- e) respect their commitments to other employees and hierarchical superiors, striving to safeguard their reputation and credibility and always acting in accordance with the law.

Before taking office or when applying for a position in Liga Portugal, or after the beginning of functions (in case of change), the Recipient must complete a Questionnaire, which will be submitted for review to the Ethics and Integrity Commission of Liga Portugal, in accordance with the provisions of Chapter III of this Code.

In addition to the aforementioned Questionnaire, the Recipients sign a declaration, under a pledge of honor, attesting that they are aware of the Code and that they are not in any situation of incompatibility provided for therein.

The occurrence of situations of incompatibility or conflict of interest must be immediately communicated to the Ethics and Integrity Committee under the terms provided in Chapter XIV.

VI – OFFERS AND HOSPITALITY

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

The recipients of the Code must not accept, for their own benefit, goods, services or any advantages, with an individual value of more than €150,00 from the sports societies participating in professional competitions, from suppliers or natural or legal entities that have had or intend to have commercial relations with Liga Portugal.

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

Whenever the estimated unit value of the gift is over €150,00, it must be reported to the Transparency Commission by filling in the declaration of acceptance of the gift to that effect.

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

VII - EXPENSES

Liga Portugal has an internal procedure that establishes and clarifies in which form and state expenses, such as travel/accommodation/food may be incurred by its employees and service providers.

Whenever travel is required in a work/professional context, the respective trip and expenses must be approved by the immediate supervisor or Executive Director. Liga Portugal does not pay for travel and related expenses (accommodation, meals, among others) for other individuals, except in cases of a contractual agreement or with proper superior authorization. When events are held, Liga Portugal covers the expenses associated with the participants, as provided for in the event's guidelines. Travel is booked in economy class, in accordance with existing regulations.

The value of attendance fees for each meeting and/or reimbursement of expenses incurred by the members of the statutory bodies and, if applicable, the other members of Liga Portugal's organizational structures, is set annually, in accordance with the Statutes of Liga Portugal.

VIII - BRIBERY, INFLUENCE PEDDLING

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

Liga Portugal must be informed immediately, via email or through the whistleblowing platform available on its official website, of any attempt by any person or third party to corrupt, bribe or traffic influence.

IX – DURESS, EQUALITY AND NON-DISCRIMINATION

Liga Portugal promotes equal opportunities and diversity as essential values, and does not practice any direct or indirect discrimination.

Any behaviour that may constitute duress, either moral or sexual harassment, or bullying, in any form, will not be tolerated.

Any discriminatory behaviour, namely on the basis of race, ethnicity, religion, gender, sexual orientation, ancestry, age, language, geographical representation, disability, political or ideological beliefs, economic situation or social context, will not be tolerated.

In order to foster a fair and inclusive work environment, Liga Portugal promotes the inclusion and support of vulnerable individuals, such as those facing financial hardship (child poverty and social exclusion), disabilities, serious illnesses, and employees who are victims of harassment or gender-based violence.

X – WORKPLACE HARASSMENT – CODE OF GOOD CONDUCT

The Labour Code (CT) defines harassment as unwanted behaviour, namely that based on a discriminatory factor, committed when accessing employment or in employment, work or occupational training, with the purpose or effect of disturbing or constraining the person, affecting his/her dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment. To this, the CT adds sexual harassment: "unwanted behaviour of a sexual nature, in verbal, non-verbal or physical form, with the purpose or effect referred to for harassment in general".

In this sense, in compliance with the Labour Law, Liga Portugal/ Fundação do Futebol adopts this code of good conduct for the prevention and fight against harassment in the workplace.

The following is hereby established:

CODE OF GOOD CONDUCT TO PREVENT AND COMBAT WORKPLACE HARASSMENT

ARTICLE 1 (PROHIBITION OF HARASSMENT)

1. Harassment, namely under any of the forms described in the following paragraphs, towards the Organisation, its workers, service providers and agents, in the workplace or outside the workplace for work-related reasons or using work tools, is strictly forbidden.
2. Harassment is defined as unwanted conduct, including discrimination, experienced either on the occasion of access to or at the place of employment, occupation or training, with the purpose or effect of disturbing or putting a person under duress, affecting his or her dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.
3. Any unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effects referred to in the preceding paragraph constitutes sexual harassment or harassment with a sexual connotation.
4. Discriminatory bullying is where unwanted and hostile behaviour is based on a discriminatory factor, namely on the grounds of ascendance, gender, race, place of origin, political or ideological beliefs.
5. Non-discriminatory moral harassment is that in which the unwanted behaviour is not based on a discriminatory factor, but which, due to its connotation or insidiousness, has the same effects and aims to remove the worker from the company.

ARTICLE 2 (PROCEDURES)

1. Liga Portugal/Fundação do Futebol, any of its employees, service providers or agents who witness a situation of harassment in the workplace or outside the workplace for work purposes or using work tools must report it to their supervisor or the Executive Board.
2. Whistleblowing and witnessing situations of harassment in the workplace shall not render the whistleblower or witness liable to disciplinary, legal or administrative action, except in the case of slanderous whistleblowing or false testimony.
3. The disciplinary authority within the Organisation has a duty to initiate disciplinary action against any person or persons found to be committing harassment, failing which he or she shall be guilty of a serious misdemeanour and shall be subject to disciplinary proceedings.
4. Those subject to disciplinary action for harassment have the right to adversarial procedure.

ARTICLE 3

(CONSEQUENCES AND SANCTIONS)

1. Harassment constitutes a very serious misdemeanour, without prejudice to any criminal liability provided for by law.
2. Harassment gives the victim the right to compensation for both pecuniary and non-pecuniary damage.
3. Dismissal or other sanction applied as a punishment for an alleged offence shall be deemed wrongful if it occurs up to one year after the complaint or other exercise of rights in respect of the harassment.
4. An employee who is a victim of harassment may terminate his contract with just cause and the right to compensation.
5. The employer is liable for damages arising from harassment.
6. Responsibility for payment of damages arising from occupational illness resulting from harassment lies with social security, which is subject to the worker's rights referred to in the previous numbers.

XI – CODE OF CONDUCT ON SOCIAL MEDIA

Aware of what the new methods and trends of communication represent in our society and the impact they have on the competitions organised by Liga Portugal, the recipients of the Code must use social media and traditional means of communication in an ethically responsible manner, contributing to reinforce the image of cohesion and dignity of Portuguese football.

The recipients of this Code must maintain decorum in their social behaviour, namely by refraining from commenting and publishing opinions, photographs and videos, on social media, related to the exercise of their functions and the professional football competitions that may be considered derogatory or that may cause harm to Liga Portugal, its members or other Portuguese football institutions.

Given the huge exposure of its activity, Liga Portugal has a rigorous communication policy, guided by standards of ethics, integrity and transparency towards the media. Acts in such a way as to ensure equal access to information, with full compliance with applicable legal and regulatory standards, avoiding mistakes and the concealment of relevant information.

In order to ensure compliance with the aforementioned principles and within the exclusive scope of matters related to Liga Portugal's activities concerning the Code's Recipients, there is a duty to seek prior written consent from Liga Portugal to participate in any type of interview or to issue opinion articles or comments to the media or on social networks, whenever the matters relate to the performance of their duties at Liga Portugal or to professional football competitions, except in cases where, by the nature or characteristics of the position or role, such consent is not required.

XII – CONFIDENTIALITY AND INSIDER INFORMATION

To preserve the integrity, availability and confidentiality of Liga Portugal's information, treating it with special responsibility, with a view to ensuring its security and protection.

Anyone who has access to inside information, in any capacity, is expressly forbidden, even after cessation of his or her functions, from passing it on, using it or facilitating its use for his or her own benefit or for that of third parties. There are exceptions to the situations in which there is a legal or professional right or duty to disclose and those in which the written consent of Liga Portugal has been obtained.

They must also exercise confidentiality and discretion regarding the information that comes to their knowledge during the exercise of their functions and respect the internal rules instituted concerning the confidentiality of information.

All personal data collected shall be treated in a lawful and careful manner in order to protect privacy in strict compliance with applicable legal regulations.

XIII – INTELLECTUAL PROPERTY

It is the responsibility of all recipients of the Code to ensure strict respect for the intellectual and industrial property rights of Liga Portugal and our business partners.

XIV – QUESTIONNAIRE TO ASSESS SUITABILITY AND ELIGIBILITY REQUIREMENTS

Given the need to prevent situations that may generate incompatibilities, conflicts of interest, or affect the reputation and image of professional football, Liga Portugal considers it essential to implement *Compliance* policies and mechanisms for prior scrutiny of the suitability of the Recipients of this Code.

Liga Portugal stresses the importance of ensuring excellence, transparency and integrity control in its organization. It is therefore advisable to strengthen the scrutiny to which the members of its bodies, positions, other employees and service providers must be subjected, in the context of a candidacy or recruitment process that precedes their election, appointment or contract, but which at the same time promotes a process of self-revelation on a systematic and permanent basis.

Considering that it is fundamental that Liga Portugal is guided by the highest standards of ethics and integrity, an additional control mechanism is adopted, aimed at strengthening the process of verifying the conditions of impartiality, objectivity and probity required for the exercise of the functions in the bodies and other positions of Liga Portugal and its Business Group.

This mechanism does not replace or anticipate the fulfilment of the declaration obligations foreseen in the Statutes, in this Code and in the regulatory framework of Liga Portugal, which aim to ensure the declaration of interests and impediments of the holders of offices and functions. The questionnaire that forms the basis of this mechanism is therefore a document that ensures that it is known by the respective stakeholders and that it is destroyed when there is no longer any reason for it to exist, either because the candidate is not elected or appointed, or because the holder of the office ceases to hold it.

In this regard, and in accordance with Law No. 14/2024 of January 19, a Questionnaire has been established, which is available on the official website of Liga Portugal. This Questionnaire is intended for the assessment of the suitability and eligibility requirements for holders (or candidates for holders) of statutory bodies, the Executive Board, Committees, Working Staff, and Delegates of Liga Portugal, as well as for all those who are part of (or wish to be part of) the bodies and functional structure of Liga Portugal's affiliates or business group.

The Questionnaire consists of the registration, in a specific book, preferably dematerialised, by means of an electronic tool that guarantees the authenticity of the participants and the integrity and inviolability of the documents it contains, organised by an independent commission created for this purpose, of all the personal and/or professional information or situations that may give rise to incompatibilities, conflicts of interest or affect the good name and image of professional football in relation to the aforementioned persons.

Recipients must complete the Questionnaire, as well as the attached Declaration, or confirm the accuracy of the information previously provided, annually, at a time to be determined by Liga Portugal, to ensure its proper and efficient handling.

The Questionnaire must also be completed by the Recipients:

- a) at the time of its implementation;
- b) whenever any changes are made to its structure/content;
- c) prior to taking up a position or applying for a role at Liga Portugal;
- d) in any circumstance, within 5 (five) days after a change in the information provided in a previous Questionnaire.

The questionnaire should be submitted using the electronic platform provided for this purpose, or completed, duly signed and sent by e-mail to cei@ligaportugal.pt:

Failure to comply with the obligation to submit the Questionnaire as specified, as well as any falsifications, omissions, or inaccuracies resulting from its completion, may result in the applicable legal, statutory, disciplinary, and/or regulatory consequences.

XV- COMMUNICATION

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

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

WHO AND HOW TO CONTACT

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

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

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

NON RETALIATION

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

CONSEQUENCES

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

Violation of this Code, failure to communicate, or non-compliance with the provisions in the management system policies and documents may lead to disciplinary, criminal, civil, and statutory proceedings as applicable, depending on the severity and specifics of the case. Reference should be made, in particular, to the criminal and disciplinary sanctions provided for, respectively, in Law No. 14/2024 of January 19 and in the Disciplinary Regulation of Liga Portugal.

Inconsistencies with the Code by a business partner or supplier result in efforts to address the omission and an assessment of the preventive measures implemented to ensure that such behavior does not recur.

DOUBTS

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

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

1st What are the consequences of my behaviour for me, for Liga Portugal, or for any other person or entity involved?

2nd What Principles of the Code may be applicable to the situation in question?

3rd Am I being fair and honest in the way I am dealing with this situation?

4th Am I fulfilling my responsibilities and acting in a professional manner, despite the troubles that my conduct may cause me?

5th If my actions or decisions were reported to the media, would my reputation or that of Liga Portugal be affected?

6th Have I complied with the regulations and the present Code?

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

XVI - EFFECTIVE DATE AND DISCLOSURE

This Code may be revised at any time and will be published to all interested parties on the official website of Liga Portugal on the date of its approval, entering into force on the following working day.



www.ligaportugal.pt