



**RISK PREVENTION PLAN
FOR CORRUPTION AND
RELATED OFFENSES**

**LIGA
PORTUGAL**
CRIA TALENTO

RISK PREVENTION PLAN FOR CORRUPTION AND RELATED OFFENSES

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INDEX

INTRODUCTION	4
1. PRESENTATION OF LIGA PORTUGAL	4
CONTEXT OF LIGA PORTUGAL.....	4
MAIN PURPOSES.....	4
ENTITIES RELATED TO LIGA PORTUGAL	5
VALUES, MISSION AND VISION	5
2. ORGANIZATION	6
COMPOSITION AND OPERATION	7
COMPOSITION OF THE GOVERNING BODIES	7
PERSON IN CHARGE	8
3. ANTI-CORRUPTION MANAGEMENT SYSTEM	8
4. CORRUPTION RISK MANAGEMENT	8
4.1.RISK ASSESSMENT METHODOLOGY	9
4.2.RISK MITIGATION MEASURES / CONTROLS	10
5.CORRUPTION RISK ASSESSMENT	12
6.ASSOCIATED DOCUMENTED INFORMATION	13

INTRODUCTION

This Risk Prevention Plan for Corruption and Related Offenses (PPR) is drafted in compliance with Decree-Law No. 109-E/2021, of December 9, which establishes the National Anti-Corruption Mechanism (MENAC) and approves the General Corruption Prevention Regime (RGPC).

1. PRESENTATION OF LIGA PORTUGAL

CONTEXT OF LIGA PORTUGAL

Under the terms of its Statutes, Liga Portugal «is a non-profit association governed by private law, which is governed by the provisions of its Statutes and Regulations and other applicable legislation».

Its main objectives are to organize and regulate professional competitions, promote the management of matters related to the organization and practice of professional football and its competitions, and exercise disciplinary control and supervision functions over its members as established by law and its Statutes and Regulations.

The Statutes set forth, among other matters, the objectives pursued by Liga Portugal, the rights and duties of its members, its governing bodies, and their respective competencies.

Changes in external and internal matters relevant to the context of the organization and for the continued compliance with applicable standards are annually evaluated and described in the Management Report of the implemented management systems (Quality, Information Security, and Anti-Corruption).

MAIN OBJECTIVES

The main objectives of Liga Portugal, as established by law and its statutes, are:

- a) To organize and regulate competitions of a professional nature under the terms of the applicable legislation;
- b) To promote the defense of the common interests of its members and manage matters related to the organization and practice of professional football and its competitions;
- c) To exercise disciplinary control and supervision functions over its members as established by law, the statutes, and regulations;
- d) To exercise organizational, management, and disciplinary competencies concerning professional football competitions, in accordance with applicable legislation;

RISK PREVENTION PLAN FOR CORRUPTION AND RELATED OFFENSES

- e) Promote training in matters related to the organization, management and integrity of professional competitions and the organization of events and activities related to them.

The General Regulations of Liga Portugal, in accordance with the Statutes, establish the disciplinary mechanisms for activities through its internal bodies, as well as the reciprocal relationship between Liga Portugal and its members, and between the members themselves.

ENTITIES RELATED TO LIGA PORTUGAL

SABSEG Desporto Seguro is a limited liability company in which Liga Portugal holds 30% of the share capital, with the remaining shares owned by SABSEG SA.

The Fundação do Futebol - Liga Portugal is a private, non-profit foundation established by Liga Portugal. It shares staff and management with Liga Portugal and is subject to Liga Portugal's Code of Transparency and Anti-Corruption.

Regarding the relationship with the Portuguese Football Federation, under the law, Liga Portugal exercises the Federation's powers over professional competitions, specifically:

- Organizing and regulating professional competitions, adhering to the technical rules defined by the relevant national and international federative bodies;
- Exercising control and supervision functions over its members as established by law or by statutes and regulations;
- Defining the sporting, financial, and organizational criteria for access to professional competitions, as well as monitoring their implementation by participating entities;
- Exercising the Federation's competencies in matters of organization, management, discipline, and arbitration for professional competitions, in accordance with the law.

VALUES, MISSION AND VISION

MISSION

Liga Portugal's mission is to ensure the excellence of the organization of professional competitions while fully respecting the economic and financial sustainability of the institution and its members.

VISION

RISK PREVENTION PLAN FOR CORRUPTION AND RELATED OFFENSES

To position itself as one of the most important leagues in Europe, continuously pursuing international best practices, and enhancing the economic and sporting value of Portuguese professional football.

VALUES

Liga Portugal upholds the values of Credibility, Aggregation, Talent, and Spectacle in organizing three major competitions each season, underpinned by the excellence of the football played.

A talent platform that projects and exports some of the best performers in the sport worldwide, involving 36 professional teams.

The Mission, Vision, and Values articulate the essence of the organization's aspirations, defining its positioning in the world. They indicate the organization's stance towards its stakeholders, outlining its goals and how it plans to achieve them.

Credibility – In all aspects, both in competitions and in business management.

Aggregation – To create the conditions to defend the best interests of football.

Talent – Both in the competitions and participants, and in the industry as a whole.

Spectacle – Combining elements to make competitions increasingly spectacular both inside and outside the stadiums.

2. ORGANIZATION

The present Corruption Risk Prevention Plan, alongside the Transparency and Anti-Corruption Code and other internal procedures, reaffirms the overarching principles of ethics, integrity, and transparency that must be adhered to by the entire internal structure of Liga Portugal.

COMPOSITION AND OPERATION



COMPOSITION OF THE GOVERNING BODIES

President of the League

Pedro Proença de Oliveira Alves Garcia

Board of the General Meeting

President: José Fernando Gomes Mendes

Vice-President: Rui Pedro Neves da Costa Azevedo

Secretary: André Duarte de Matos Faria

Secretary: António Francisco Gaspar Lança Schwalbach

Fiscal Council:

President: Carlos Manuel Baptista Branco

Vice-President: Paulo Fernando Pereira Pimenta Machado

Member: António Fernando Mesquita Barbeitos

Substitute: Francisco Xavier de Sá Braamcamp Sobral Sottomayor

Jurisdictional Council

President: Américo Joaquim Pires Esteves

Member: João Fernando Fernandes de Magalhães

Member: João Orlando Vieira de Carvalho

Member: Pedro João Alves Carneiro Marques

Member: Ana Rita de Souza Gomes Alfaro

Member: João Manuel do Nascimento Faria Gayo

Member: Andreia Lisete Miranda da Silva

Substitute: Filipe António Carvalho de Sousa Basto

Substitute: Natacha Carvalho Soares

Substitute: Matilde Bettencourt Reinhardt da Costa Dias

Substitute: João Paulo Queiroga Perdigão

RISK PREVENTION PLAN FOR CORRUPTION AND RELATED OFFENSES

PERSON IN CHARGE

The present Corruption Risk Prevention Plan, in conjunction with the Transparency and Anti-Corruption Code and other internal procedures, reinforces the fundamental principles of ethics, integrity, and transparency that must be upheld throughout the structure of Liga Portugal.

The appointed individual responsible for compliance is the Executive Director of the Integrated Management System Department, who is provided with internal information and the necessary human and technical resources to effectively perform their duties.

3. ANTI-CORRUPTION MANAGEMENT SYSTEM

In addition to other frameworks and with the aim of preventing corruption within the organization, Liga Portugal has implemented and been certified in the Anti-Corruption Management System standard (SGAC), NP ISO 37001:2018, since 2021. In 2023, it also obtained certification in the international Good Governance in Sport standard, awarded by the Sports Integrity Global Alliance.

In this context, Liga Portugal has approved the following documents, available on its website:

- Integrated Management Policy;
- Transparency and Anti-Corruption Code;
- Reporting channel.

Furthermore, Liga Portugal has defined and implemented other specific procedures, including the appointment of a Transparency Committee responsible for managing and operationalizing the SGAC, and has defined the composition of the Governance Body of the system.

These initiatives provide us with confidence that corruption risks are being identified and assessed, and that appropriate mitigating measures are being implemented as necessary.

4. CORRUPTION RISK MANAGEMENT

Managing corruption risk is a cross-functional activity within Liga Portugal, constituting one of its major concerns. It has been identified as an essential requirement for its regular operation and crucial in the relationships established with various stakeholders.

For the purposes of this Plan, corruption and related offenses are understood to include crimes such as corruption, undue receipt or offering of advantages, embezzlement, economic participation in

RISK PREVENTION PLAN FOR CORRUPTION AND RELATED OFFENSES

business, extortion, abuse of power, malfeasance, influence peddling, money laundering, or fraud in obtaining or diverting subsidies, grants, or credit, as defined in the Penal Code.

4.1. RISK ASSESSMENT METHODOLOGY

The methodology used in managing corruption risks includes the identification, analysis, and evaluation of corruption risks, as well as the definition of controls for risk treatment and mitigation.

IDENTIFICATION:

Risk assessment is conducted across all areas of activity through operational meetings.

CLASSIFICATION:

The classification of corruption risks is based on their potential frequency and impact.

RISK = FREQUENCY OF OCCURRENCE X POTENTIAL IMPACT

FREQUENCY RATING		
FREQUENCY	1- LOW	<= 1 time month
	2- MEDIUM	<= 1 time week
	3- HIGH	> 1 time week

POTENTIAL IMPACT: LOW, MEDIUM, HIGH

IMPACT RATING			
TYPE	1- Low	2- MEDIUM	3- HIGH
CONTRACTUAL	No known monetary value	Application of fine	Fine of more than 2% of the LEAGUE's annual budget
REPUTATION	Image damage with business partners	News in newspapers, radio or TV	News with prominence abroad
REGULATION	Notification	Fine with no relevant value < €10,000	Fine of a relevant amount > 10 000€
FRAUD/EMBEZZLEMENT	< 1 000 €	< 10 000€	> 10 000€

CORRUPTION RISK CLASSIFICATION:

RISK CLASSIFICATION				
		IMPACT		
		1 - LOW	2- MEDIUM	3 - HIGH
FREQUENCY	1- LOW	1 - Low	2 - Bass	3 - Medium
	2- AVERAGE	2 - Low	4 - Medium	6 - High
	3- DISCHARGE	3 - Low	6 - High	9 - High

4.2. RISK MITIGATION MEASURES / CONTROLS

The implemented control measures are divided into two main groups: financial controls and non-financial controls.

List of financial controls:

Segregation of duties (the same person cannot propose and approve a payment);

Authorisation levels for payment approval (higher transactions require approval from a higher hierarchical level);

Verification of Adjudication and Services, ensuring that the recipient of payment has provided approved work or services according to relevant authorization mechanisms;

At least two signatures are required for payment approvals;

Relevant supporting documentation must be attached to payment approvals;

Significant financial transactions undergo periodic review by management;

Regular audits are conducted independently, with regular rotation of auditing personnel or organizations;

List of non-financial controls:

Use of contractors, subcontractors, suppliers and consultants who have been subject to prior qualification in which the possibility of their participation in corruption cases is assessed; this process is likely to include due diligence;

RISK PREVENTION PLAN FOR CORRUPTION AND RELATED OFFENSES

Assessment of the need and legitimacy of the services to be provided to the organization by a business partner, understood as such, under the terms of the ISO 37001:2018 Standard, any external entity with which the organization has, or plans to establish, some form of business relationship.

Assessment of whether the services were adequately provided;

Assessment of whether any payments to be made to the business partner are reasonable and proportionate in respect of those services.

(b)the award of contracts, where possible and reasonable, only after a fair and, where appropriate, transparent market consultation involving at least three tenderers;

Obligation of at least two persons to evaluate tenders and approve the award of a contract;

Implementation of segregation of duties so that the personnel who authorize the award of the contract (directors, managers, workers, temporary workers and volunteers of the organization) are different from those who requested the opening of the purchase order and belong to a department or function other than those who manage the contract or validate the work carried out;

Obligation of at least two persons to sign contracts and documents amending the contractual provisions or validating the work carried out or the supply of the goods or services covered by the contract;

Adoption of more demanding management supervision in transactions that potentially pose a high risk of corruption;

Protection of the integrity of the tenders received and other sensitive price-related information by limiting access to only those persons who objectively need access to them because they have to organise, decide or audit the process;

Provision of tools and templates to assist staff (how-to guides, whitelists and blacklists, approval chains, checklists, forms, computerised workflows).

5. CORRUPTION RISK ASSESSMENT

As a result of the application of the control measures described above, defined and implemented by the League, the risks identified in the context of its activity are assessed as follows:

AREA OF ACTIVITY	ASSIGNMENT	RISK LEVEL
Cross-cutting risks	• Access to Insider Information	Low
	• Attempt to obtain advantages	Low
	• Purchase of products/services	Low
New headquarters - Arena Liga Portugal	• Access to Insider Information	Medium
	• Attempt to obtain advantages	Medium
	• Purchase of products/services	Low
Human resources	• Employee recruitment	Low
	• Purchase of products/services	Low
	• Compensation processing	Low
Technology	• Purchase of products/services	Low
	• Access to insider information	Low
	• Sports agents	Low
Major Events – League Cup Final, among others	• Choice of venue (event)	Low
	• Access to insider information	Low
	• Purchase of products/services	Low
	• Licensing of sports activity	Low
Marketing, Commercial and Partners	• Sponsorship Contracts	Low
	• Advertising	Low
	• Liga Portugal group partners and companies – Image associated with Liga Portugal	Low
	• Foundation Activities	Low
	• Request for support	Low
Financial	• Attempt to obtain advantages	Low
	• Purchase of products/services	Low
Legal	• Registration of sports agent contracts	Low
DAOJ	• Commission of Instructors (CI) – Access to privileged information	Medium
	• CI – Influence on the decision of instructors	Medium

RISK PREVENTION PLAN FOR CORRUPTION AND RELATED OFFENSES

AREA OF ACTIVITY	ASSIGNMENT	RISK LEVEL
	• Jurisdictional Council (CJ) - Access to privileged information	Low
	• CJ - Influence on the decision of the rapporteurs	Low
Competitions	• Report of the delegates	Medium
	• Appointment of delegates	Medium
	• Evaluation of delegates	Low
	• Location of referees	Low
Economic Control and Licensing	• Stadium inspections	Low
	• Fund	Low
	• Registration/Licensing of clubs in Competitions	Low

Liga Portugal will periodically reassess the risks of corruption, according to the defined procedures.

6. ASSOCIATED DOCUMENTED INFORMATION

- NP ISO 37001:2018
- Transparency and Anti-Corruption Code
- Statutes and Regulations applicable to Liga Portugal
- Law No. 93/2021, of December 20
- Decree-Law No. 109-E/2021, of 9 December

PEDRO PROENÇA
PRESIDENT



www.ligaportugal.pt