

ASSOCIAÇÃO FRAUNHOFER PORTUGAL RESEARCH - FHP

CODE OF CONDUCT

Porto, 24 of September, 2026

To all employees and stakeholders,

This version of the Fraunhofer Portugal Code of Conduct is an update of the previous version from 2018; it has been revised as part of the reinforcement of the Compliance Programme, in accordance with Decree-Law No. 109-E/2021 of 9 December, which approved the General Framework for the Prevention of Corruption, hereinafter referred to as the RGPC.

As an applied research organization, Fraunhofer Portugal operates within a context of high scientific, institutional, and social responsibility, largely supported by national and international public funding. In this context, integrity, transparency, and professional accountability are essential conditions to ensure the trust of society, partners, and funding entities. Fraunhofer Portugal acts in pursuit of the public interest, the common good, and the advancement of scientific knowledge.

Beyond being a formal legal compliance instrument, this Code of Conduct is intended to promote ethical and professional behaviour across all Fraunhofer Portugal activities.

Adopting high standards of professional integrity, institutional respect, scientific responsibility and responsible resource management is the main way to prevent and combat corruption and related offences. Promoting a culture of professional ethics is therefore essential for safeguarding institutional integrity and mitigating corruption risks.

This Code is part of Fraunhofer Portugal's Compliance Programme, operating alongside the Corruption Risk Prevention Plan (PPR), the Whistleblowing Channel, and ethics and integrity training initiatives.

The Compliance Officer,
Ana Campos
March 2026

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1 Preamble

Fraunhofer Portugal's actions are guided by the principles of legality, integrity, impartiality, independence, transparency, scientific responsibility, the proper management of public resources, respect and dignity in the workplace.

For the purposes of this Code, corruption is defined as any act or omission by an employee who, in the performance of their duties, commits an act aimed at obtaining an undue advantage for themselves or for third parties.

This Code of Conduct applies to all individuals who are part of or contribute to the activities of Fraunhofer Portugal. It establishes the basic principles and standards of behavior that must guide all employees in pursuing the institution's mission and values. In this Code, the term "employees" refers to all individuals who, regardless of the legal nature or duration of their relationship with Fraunhofer Portugal, carry out professional or research activities on its behalf. This includes, namely, members of governing bodies — General Assembly, Supervisory Board, Scientific Council, and Executive Board —, directors of research centers, staff, research fellows, interns, service providers, students, as well as any other persons carrying out activities within the institution under contractual or non-contractual links.

The aim of complying with this Code is to promote a working and research environment based on respect, inclusion and accountability. All employees play a key role in safeguarding the integrity and reputation of Fraunhofer Portugal, contributing to the development of an organisational culture of excellence, transparency and mutual respect.

This Code is part of Fraunhofer Portugal's Regulatory Compliance Program implemented under the General Regime for the Prevention of Corruption, complementing other institutional tools such as the Corruption and Related Offenses Risk Prevention Plan, the Training Plan, and the Internal Whistleblowing Channel.

The Compliance Officer ensures the supervision and proper implementation of this Code, as well as the other instruments comprising the Compliance Program.

2 Respect and Fairness

The success of Fraunhofer Portugal depends on the knowledge, competence and enthusiasm of its employees in applied research. The institute offers all its employees excellent working conditions along with a high degree of autonomy.

2.1 Employment Relations

We aim to offer our employees attractive working conditions. In return, we expect commitment and motivation.

We comply with national and international labour laws and regulations, and we endorse the principles of the UN Global Compact and the International Labour Organization (ILO) standards. To promote work-life balance, we implement modern working practices.

We respect our employees' right to freedom of association, and their right to freely and independently choose their representatives.

We ensure that legally elected representatives can exercise their mandate free from discrimination.

When we ask employees for their views, we encourage them to give us their honest and constructive opinions about their needs and expectations. This helps us to develop the organisation continuously in a collaborative and transparent way.

Expected Conduct

The success of Fraunhofer Portugal depends largely on the actions of its employees, both internally and externally. Therefore, each employee must guide their activity by a spirit of service to the institution, stakeholders and society, in accordance with the principles established in this Code.

Promote dialogue and keep discussions open and objective. Value different points of view

and contribute to a constructive work environment, by offering constructive criticism in a respectful manner.

Consider errors and criticism as opportunities for learning and continuous improvement.

2.2 Professional Development

We offer our employees attractive professional development opportunities and a variety of training opportunities in a safe and stable working environment. We create an environment that enables individuals to fulfil their potential and promotes their consistent growth.

Our initiatives are designed to support the professional development of both individuals and teams, helping employees to grow and develop throughout their careers.

Expected Conduct

Contribute with your knowledge and skills, showing openness to new challenges. Take responsibility for your professional development and actively pursue it, in coordination with your Supervisor.

2.3 Diversity

For Fraunhofer Portugal, diversity is a strategic pillar of HR policy and a key people management priority. Promoting diversity as an organisational strategy helps generate competitive advantages and enhances innovation performance. In addition to gender equality, diversity encompasses dimensions such as age, origin, sexual orientation, religion and disability, to name a few. Fraunhofer Portugal is committed to ensuring fair and dignified treatment for all employees, recognising and valuing individual differences, and promoting their harmonious and constructive integration into the organisational context.

Expected Conduct

Treat all colleagues and institutional partners with respect and consideration. Appreciate different points of view and adopt a positive attitude in your professional interactions.

If you experience or witness situations of discrimination, contact the Centre Director or your Supervisor, as well as the HR Coordinator, in accordance with applicable legislation for preventing and combating workplace harassment.

2.4 Leadership and Organisational Management Responsibility

Executive Board Members, Research Centre Directors, and all Supervisors carry heightened responsibility at Fraunhofer Portugal. It is their duty to contribute to organisational success, ensure people management, and promote proper working conditions and a healthy professional environment. They must also serve as role models in performing their duties.

Fraunhofer Portugal supports its leaders in fulfilling these responsibilities by providing opportunities to develop leadership skills. Fraunhofer Portugal's management principles guide the organization's leadership vision.

Expected Conduct

Demonstrate respect for the principles and values established in this Code through your actions, and act as a role model in your duties. Represent Fraunhofer Portugal with integrity, professionalism and responsibility when interacting with external entities on an institutional level.

Promote compliance with institutional values and goals within your team. Cooperate constructively with employee representatives, where legally constituted representative bodies exist, and comply with the provisions agreed jointly.

Pursue scientific excellence and strong organisational performance responsibly, ensuring the application of ethics, integrity and responsible conduct in research, as set out in the European Code of Conduct for Research Integrity.

Encourage and support the professional development of your team members by promoting training and qualifications. Provide adequate working conditions and consider employees' legitimate interests, particularly regarding the predictability and stability of employment

relationships.

Promote an organisational culture based on transparency, trust, mutual respect and constructive criticism. Hold regular team meetings to follow up on employees' professional development.

Recognize leadership as an integral part of your role and commit to continuously developing your capabilities through regular leadership training.

2.5 Occupational Health, Safety, and Well-being in the Workplace

Protecting employee safety, health, and well-being is a top priority for Fraunhofer Portugal. Organisational culture and operational procedures are designed to prevent workplace health and safety risks.

Within risk prevention, high standards are established regarding occupational safety, workplace environment quality, and responsible behavior by all employees.

Expected Conduct

For Research Centre Directors and Supervisors:

Promote a safe and healthy work environment, paying particular attention to elements that could affect the health, safety and well-being of employees. Ensure that the necessary protective procedures, resources and mechanisms are available and being used correctly. Address concerns or risk signals raised by employees proactively.

For employees:

Comply with occupational health and safety standards and procedures, and use the protective measures provided correctly. Participate in occupational health and safety training and collaborate with colleagues to promote a safe working environment.

In case of incidents or risk situations:

Report the occurrence immediately to Fraunhofer Portugal's Health & Safety Officers and

HR. The organisation is committed to taking prompt and effective measures to protect employees and prevent recurrence.

3 Relations with Stakeholders

We adopt a respectful and ethical approach in our relationships with stakeholders and strictly comply with all legal requirements relating to fair competition law. We remain independent and neutral in relation to the interests of individuals or groups in any political, economic or social context.

3.1 Managing Conflicts of Interest

A conflict of interest, whether actual or potential, exists when an employee has a personal or private interest that could influence, or appear to influence, their ability to perform their professional duties impartially, objectively and transparently.

This includes any advantage, benefit or expectation of benefit for oneself, one's family members, one's social circle, other employees, entities in which one holds an interest or participation.

Employees must prevent and avoid such situations, particularly when participating in decision-making processes involving family members, commercial partners, or close personal relationships.

Internal processes are designed to prevent conflicts between private and professional interests. Clear guidelines are provided to help identify and prevent potential conflicts in a timely manner.

This obligation extends, in particular, to relationships with entities associated with Fraunhofer Portugal, including start-ups or companies in which employees, persons directly related to them, or the institution itself hold a direct or indirect interest, as well as to the handling of privileged information.

Fraunhofer Portugal remains independent of interest groups and rejects any illegitimate attempts to influence its activities.

Under Article 13 of the General Regime for the Prevention of Corruption (RGPC), mandatory declarations of absence of conflicts of interest (see the relevant template in the annex) and communication duties apply, particularly in relation to public procurement and project management.

Expected Conduct

Keep professional and personal interests strictly separate. Personal civic and political activities must not compromise Fraunhofer Portugal's impartiality, independence or reputation, and must be kept separate from professional duties.

If you experience a conflict of interest or an attempt at improper influence, notify the Compliance Officer, as well as the Centre Director, Supervisor or HR, where appropriate.

Any side activities or private investments in start-ups or companies that interact with Fraunhofer Portugal must be disclosed internally in advance.

3.2 Prevention of Corruption

Fraunhofer Portugal has a zero-tolerance policy towards all forms of corruption. Employees are expressly forbidden from accepting or offering any undue advantages, such as gifts, hospitality, invitations or benefits, which are intended to influence decisions improperly or secure illegitimate advantages.

Employees must also refrain from accepting third-party gifts that exceed the level of basic social courtesy or have only symbolic value. Invitations that fall within legitimate institutional practices may be accepted, if they do not compromise independence or integrity.

All employees receive adequate training in corruption prevention.

Expected Conduct

Critically evaluate any gifts, invitations or benefits that exceed a symbolic value. Ensure that any benefits offered or accepted are legal and do not constitute an attempt at obtaining an illegitimate advantage or corruption.

Any gifts or invitations that are not in line with usual practice, raise doubts or have a value of €25 or higher must be reported to the Compliance Officer and recorded in the internal gifts/hospitality form. Inappropriate items must be refused or returned.

This does not apply to legitimate institutional invitations (e.g. conferences, seminars or working meetings).

If you are in any doubt, contact the Compliance Officer.

3.3 Fair Competition and Public Procurement

Fraunhofer Portugal operates based on scientific quality and excellence, conducting its activities in accordance with the principles of competition, integrity, and transparency.

As a contracting authority, it strictly complies with the Portuguese Public Procurement Code (CCP), ensuring compliance with the principles of legality, equal treatment, transparency, proportionality and responsible financial management.

Given its public funding, Fraunhofer Portugal carries heightened accountability for efficient, careful and transparent resource management, guaranteeing that they are allocated to institutional purposes and in the public interest.

Expected Conduct

When purchasing goods, services or works, ensure that effective competition, non-discrimination and cost-effectiveness are upheld.

Ensure that selection processes are competitive and document the selection of the most economically advantageous tender.

Avoid any practices that may distort competition or compromise the impartiality of the procurement process.

Employees involved in procurement, evaluation or relevant decision-making processes must submit conflict of interest declarations whenever required by law or internal rules.

3.4 Selection of Stakeholders, clients and suppliers

Partners, clients, and suppliers are chosen using objective, transparent criteria free from personal interest. Suitability, credibility, and reliability are prioritized. Partners and suppliers are expected to comply with legal norms and ethical standards. Partners and suppliers are expected to promote lawful and responsible conduct among their employees and must not expect or request any improper conduct from Fraunhofer Portugal. The delivery of high-quality services is an essential requirement for suppliers.

Expected Conduct

Ensure that clients, suppliers and institutional partners understand and adhere to the principles of this Code and comply with applicable laws and contractual obligations.

If there is any doubt regarding the integrity or compliance of a potential partner, consult your Centre Director or Supervisor before establishing a contractual relationship.

3.5 Donations and Sponsorships

Fraunhofer Portugal manages its financial resources in accordance with the principles of efficiency, economy and integrity and, as such, does not grant donations or sponsorships to third parties.

As a non-profit organization, Fraunhofer Portugal may accept donations in accordance with applicable laws, provided that they do not involve any form of consideration, undue advantage or influence over its activities.

All donations are transparently recorded and aligned with the institution's mission and statutory purposes. Their acceptance must not compromise Fraunhofer Portugal's

independence, impartiality or integrity, nor influence, directly or indirectly, the strategic direction of its research activities.

4 Quality, Professionalism and Cooperation

We understand our clients and anticipate the challenges they will face in the future. Together, we develop integrated solutions that support their long-term success.

4.1 Integrity and responsible conduct in research

We adhere to ethical principles and good research practices, ensuring reliability, honesty, rigor and transparency throughout all stages of the scientific process. We take responsibility for the integrity and quality of our work.

Scientific misconduct undermines the credibility not only of the individual researcher, but also of Fraunhofer Portugal and the scientific community as a whole. Safeguarding research integrity is therefore essential to maintaining public trust in science.

Expected Conduct

Act in accordance with ethical principles and good research practices in all professional activities. Ensure the rigor, accuracy and reproducibility of research results, and maintain appropriate documentation, retention and archiving relevant data.

In scientific publications, ensure that authorship and contributions are assigned transparently and accurately reflect each individual's contribution, rejecting honorary authorship practices.

Take responsibility for scientific supervision, including that of doctoral and postgraduate students, fostering integrity, rigor and accountability among early-career researchers. Use the mechanisms provided under this Code, including the whistleblowing channel, to report and address cases of scientific misconduct, in line with the principles of research integrity and good research practice adopted by the organization and reflected in the European Code of Conduct for Research Integrity.

4.2 Project Management

Research projects are the core activity of Fraunhofer Portugal. In this context, professional project management plays a critical role.

To ensure success, it is essential to have clearly defined objectives and responsibilities, fulfil commitments and manage projects efficiently in terms of deadlines, costs and processes. This requires appropriate documentation and transparent communication.

Research projects that are funded by national or international public funds carry with them an increased responsibility to use resources rigorously, efficiently and transparently, and to comply with the rules and requirements of the relevant funding programmes.

Expected Conduct

Be familiar with and comply with the procedures and guidelines established for project management. Seek support from the *Research Management* team whenever necessary. Ensure that projects are conducted in line with their objectives and requirements, and that appropriate technical, scientific and financial documentation is maintained.

Ensure that the services provided are consistent with the organization's mission.

4.3 Information Security, Data Protection and Confidentiality

The information that we process and generate often requires a high level of protection. This includes personal data, business information, research methods, and scientific results that have been entrusted to us.

Fraunhofer Portugal ensures that such information is used only in accordance with applicable laws, contractual obligations, and internal policies, and is safeguarded against unauthorised access. We safeguard our own confidential business information and respect the confidential and proprietary information entrusted to us by our clients.

Expected Conduct

Always ensure that you handle data and information confidentially and privately.

Depending on their classification, specific protection measures may apply to the creation, storage, retention and sharing of documents, and these must be strictly observed.

When disclosing internal or confidential information, apply the principle of only disclosing information to those who need to know.

Take care to ensure the security of computers, smartphones, digital storage media and paper documents, both in the workplace and while travelling. Personal data may only be processed in accordance with applicable data protection laws and Fraunhofer Portugal's internal policies.

Documents should be exchanged using the services provided by Fraunhofer Portugal. Public cloud storage services may only be used following an assessment of their suitability and with authorisation from the Centre Director, Supervisor or IT Coordinator.

4.4 Communication

Fraunhofer Portugal actively promotes science communication and fosters dialogue between research, its target audiences and society as a whole.

Its communication activities align with the institution's strategy, strengthening the Fraunhofer brand through a coordinated, consistent and rigorous approach. These activities support the clear and credible dissemination of scientific knowledge, contributing to a coherent institutional image both internally and externally.

Expected Conduct

If you need guidance on how to respond to media inquiries, consult the Centre Directors or the Marketing and Communications Department.

For media publications or communication projects, ensure that all relevant partners involved have granted the necessary approvals.

Bear in mind that statements made in internal settings, particularly in larger groups, may

become public.

Always comply with Fraunhofer Portugal's guidelines and policies, including its corporate visual identity standards.

Remember that as a Fraunhofer Portugal employee, you are an ambassador of the Fraunhofer brand and play an important role in shaping its image, perception and reputation, in all your actions and decisions.

4.5 Imports, Exports and Knowledge and Technology Transfer

Export control regulations impose restrictions on international trade activities, including the cross-border supply and acquisition of goods, the provision of services, and the sharing of knowledge, data and technology with third parties.

Fraunhofer Portugal fully complies with all applicable regulations governing the import and export of goods, services, technology, data and information.

The aim of customs regulations is to protect the economy, monitor import and export activities, and enforce legally established prohibitions and restrictions on trade with third countries.

Expected Conduct

If you are involved in sending, receiving or procuring goods, technology, data or software from abroad as part of your professional activities, you should consult the person responsible for customs and export control matters in advance to obtain the necessary guidance and information.

When travelling for business purposes, hosting visitors from abroad or engaging in any other activities involving the sharing of information, data, knowledge or technology with foreign entities, ensure that you comply with all applicable legislation and internal requirements relating to confidentiality, intellectual property and technology transfer.

5 Sustainability and Social Responsibility

Through our research, we contribute to the sustainable development of an environmentally balanced, economically prosperous and socially just world. We embrace this responsibility.

5.1 Scientific Integrity & Ethics

We recognise our duty to exercise freedom of research responsibly, and to manage the risks associated with scientific activities. We therefore promote the responsible conduct of research and actively participate in political and societal discussions related to our fields of expertise.

Expected Conduct

Consider the interconnections between technological, social, economic and environmental systems within your area of research, as well as their potential long-term impacts. When carrying out your work, address ethical issues responsibly by assessing the risks of the potential misuse of research results, while also considering their potential opportunities and benefits.

Help raise awareness of the risks associated with the misuse of research results within your area of work, and promote a culture of dialogue and ethical reflection. This can be achieved through the exchange of principles and values across different professional disciplines and cultural contexts.

In emerging fields of research where the legal framework is not yet fully established, contribute to the responsible interpretation and development of applicable standards and guidelines.

5.2 Environmental Responsibility

We comply with applicable environmental protection requirements and contribute to the sustainable development of society, the economy and the environment. We do so through the responsible implementation of new technologies and through our research activities.

Expected Conduct

When performing your duties, ensure compliance with environmental protection requirements and act responsibly, taking into account the impact of your actions on future generations.

Contribute to the continuous improvement of Fraunhofer Portugal's environmental performance by identifying and proposing measures that promote sustainability.

5.3 Public Utility Status

We are a private, non-profit, public utility organisation dedicated to promoting applied research and knowledge transfer to society and the economy.

Our activities are guided by public interest and our institutional mission, ensuring that available resources are used in a responsible, transparent manner that is consistent with the objectives underpinning our public utility status.

Expected Conduct

Ensure that your activities are aligned with Fraunhofer Portugal's mission and public utility purposes.

Pay particular attention to the nature of the services provided and how they are delivered, ensuring compliance with applicable legal requirements and the principles associated with our public utility status.

5.4 Responsibility in the Management of Financial Resources

As a recipient of predominantly public funding, Fraunhofer Portugal is subject to strict legal requirements regarding financial management, as well as a prohibition on any form of favoured treatment.

Researchers, project managers, and members of the Executive Board are particularly

responsible for ensuring that the resources entrusted to them are used lawfully, efficiently, transparently, and in accordance with the objectives of the received funding.

We uphold the principles of economy, efficiency and transparency in the management of resources, exercising rigour and accountability.

Expected Conduct

Ensure that the funds entrusted to you are used efficiently and in accordance with the principle of economy.

Understand and comply with the conditions and requirements governing the use of these resources, including those set by funding bodies and Fraunhofer Portugal's internal policies.

6 Compliance

6.1 Standards of Conduct

Employees must act in accordance with this Code of Conduct, applicable laws, internal regulations, institutional policies and the ethical principles of Fraunhofer Portugal.

Under the General Regime for the Prevention of Corruption (RGPC), all employees also have a duty to contribute to the prevention, detection and reporting of situations that may constitute corruption or related offences, as well as to comply with the internal control and integrity mechanisms implemented by the organization.

In this context, Fraunhofer Portugal has established a Compliance Programme, which comprises the following instruments:

- this Code of Conduct;
- the Corruption Risk Prevention Plan and Related Offences Prevention Plan (PPR);
- the internal whistleblowing channel;
- the ethics and integrity training and awareness plan.

Fraunhofer Portugal also appoints a Compliance Officer, responsible for overseeing the implementation and monitoring of these measures, promoting a culture of organisational integrity, and supporting the prevention and detection of corruption risks and related offences.

All employees are expected to cooperate, within the scope of their responsibilities, and contribute to the proper implementation of the compliance instruments adopted by the organization.

In particular, employees must:

a) Treat the employer, supervisors, colleagues and all other persons with whom they interact in the course of their work with respect, loyalty, integrity and courtesy.

b) Attend work regularly and punctually.

- c) Perform their duties with diligence, care, competence and professionalism.
- d) Participate in training activities promoted by Fraunhofer Portugal, including training on ethics, integrity, corruption prevention and compliance matters.
- e) Comply with Fraunhofer Portugal's instructions regarding work performance, discipline, and occupational health and safety, provided that such instructions do not conflict with their rights or legal guarantees.
- f) Act loyally towards Fraunhofer Portugal, refraining from engaging in competing activities, whether on their own behalf or on behalf of third parties, and from disclosing confidential information relating to the organization or its activities.
- g) Ensure the proper use and preservation of the equipment and assets entrusted to them for the performance of their duties.
- h) Contribute to initiatives aimed at improving the efficiency, quality and performance of Fraunhofer Portugal's activities.
- i) Cooperate in promoting occupational health and safety, including with those responsible for this area.
- j) Comply with all applicable occupational health and safety requirements.

Fraunhofer Portugal promotes an organisational culture based on open communication, mutual respect and continuous improvement. If in doubt or in need of guidance, employees may seek advice from the Compliance Officer, the Head of the Legal Department, or their respective supervisors.

6.2 Non-compliance and Sanctions

Non-compliance with the duties and standards of conduct set out in this Code constitutes a breach of the obligations binding on all Fraunhofer Portugal employees when carrying out their duties.

Failure to comply with these obligations may result in disciplinary action under applicable labour legislation, as well as civil or criminal liability where the facts constitute offences related to corruption or related misconduct.

Fraunhofer Portugal adopts a zero-tolerance policy towards deliberate breaches of the

applicable rules and this Code. Such conduct may be subject to sanctions in accordance with the law.

Where applicable, non-compliance may also lead to the termination or review of contractual or institutional relationships.

The applicable disciplinary and criminal sanctions are set out in Section 8 of this Code.

6.3 Reporting Breaches

If an employee identifies signs of a potential breach during their professional activities, they should seek to address the matter directly, including through dialogue with the relevant person, where appropriate.

If this is not possible or appropriate, or if there is knowledge of or reasonable suspicion of a breach, the matter must be reported through Fraunhofer Portugal's internal whistleblowing channel in accordance with this Code.

Fraunhofer Portugal promotes an organisational culture based on open communication, mutual respect, and the prevention of misconduct. This does not affect the use of the whistleblowing channel where applicable.

6.3.1 Whistleblowing Channel

This section sets out the rules governing the reporting, handling and follow-up of reports, in accordance with Law No. 93/2021.

Fraunhofer Portugal provides an internal whistleblowing channel for reporting actual or suspected breaches.

Employees who become aware of, or reasonably suspect, a breach of this Code of Conduct, the Corruption Risk and Related Offences Prevention Plan, or a breach of European Union or Portuguese law, should report the matter through the Fraunhofer Portugal internal whistleblowing channel ("Speak Up"), available on the Intranet and at:

<https://speakup-fraunhoferportugal.integrityline.com/>

The whistleblowing channel may be used to report acts or omissions relating to:

- public procurement;
- financial services, products and markets;
- anti-money laundering and counter-terrorist financing;
- public health;
- personal data protection and privacy;
- security of network and information systems;
- acts affecting the financial interests of the European Union;
- competition law and State aid rules;
- violent crime, particularly serious or highly organized crime;
- conflicts of interest;
- breaches of standards of conduct;
- responsible conduct in research.

Reports may be submitted either confidentially or anonymously.

Reports may relate to breaches that have already occurred, are ongoing, are reasonably likely to occur, or are being concealed.

The whistleblowing channel is available to employees, service providers, suppliers, commercial partners, volunteers, interns, research fellows, students and all other individuals who interact with Fraunhofer Portugal in the context of their professional activities.

The whistleblowing channel is not intended for addressing human resources matters, employment-related issues, individual complaints or personal grievances. These matters should be addressed via the Human Resources Department or the relevant supervisor.

The internal whistleblowing channel ensures:

- a) the secure and traceable submission and handling of reports;
- b) the confidentiality of the whistleblower's identity or, where applicable, the anonymity of the report;
- c) the confidentiality of the identity of any persons referred to in the report;
- d) the integrity, retention and protection of the information communicated throughout the entire process.

Whistleblowers have the right to remain anonymous. Where their identity is disclosed, it will be protected in accordance with applicable data protection and whistleblower protection legislation.

Whistleblower protection applies whenever a report is made in good faith and there are reasonable grounds to believe that the information reported was true at the time of reporting.

All reports will be carefully assessed and handled in accordance with applicable legal, regulatory and procedural requirements.

Whistleblowers are protected against any form of retaliation.

6.3.2 Whistleblowing Management Team

Fraunhofer Portugal has appointed a team responsible for receiving, assessing and handling reports, as well as for communicating with whistleblowers:

- Human Resources Coordinator;
- one member of the Scientific Council – FhP-AICOS;
- one member of the Scientific Council – FhP-AWAM.

6.3.3 Assessment of Reports

Those responsible for handling reports will acknowledge receipt within **seven days** at the most.

Within **three months**, the whistleblower will be informed of the measures taken or planned in response to the report.

Reports are assessed impartially and confidentially, and the identity of the whistleblower and any other individuals involved is protected in accordance with applicable legislation.

Where necessary, a report may be referred to other internal or external parties, but only to the extent required for its assessment and handling. Whenever possible, shared information will be anonymised.

All persons involved in the process must ensure that there are no conflicts of interest and must comply with their confidentiality obligations.

Following its assessment, a report may result in one of the following:

a) **closure of the case** where the report is manifestly unfounded or implausible;

(b) initiation of **internal proceedings** where disciplinary, administrative or other internal irregularities are identified;

(c) **referral to the relevant authorities**, including the Public Prosecutor's Office, if there are indications that a criminal offence may have been committed;

Any measures adopted must be proportionate to the nature and seriousness of the established facts, while respecting the applicable rights, guarantees and legal obligations of the persons involved, including the presumption of innocence and the right to defence.

7 Publication Review

7.1 Code Review

This Code of Conduct shall be reviewed at least every three years, or whenever relevant changes to Fraunhofer Portugal's organisational structure or activities justify such review.

7.2 Publication

Following its approval, the most recent version of the Code of Conduct shall be published on the Fraunhofer Portugal Intranet and website, ensuring that it is accessible to and known by all employees and other relevant stakeholders.

8 Annexes

The following list is provided for information purposes only and does not replace consultation of the applicable legislation.

8.1 Disciplinary Sanctions

In accordance with Article 328 of the Portuguese Labour Code, the following disciplinary sanctions may be imposed:

Sanction	Description	Legal Limits
Verbal Warning	Warning issued to an employee for a minor disciplinary offence.	No statutory limits.
Written Warning	Formal warning issued in writing and recorded in the employee's personnel file.	No statutory limits.
Financial Penalty	Financial penalty imposed on an employee for a disciplinary offence.	May not exceed one third of the employee's daily remuneration for each offence and is limited to an amount corresponding to 30 days of base salary per calendar year.
Loss of Annual Leave Days	Deduction of annual leave days.	Must not reduce the employee's annual leave entitlement below 20 working days.
Suspension from Work with Loss of Pay and Seniority	Temporary suspension from duties, with suspension of remuneration and accrual of seniority.	Up to 30 days per offence and 90 days per calendar year.
Dismissal without Severance Pay or Compensation	Termination of the employment contract for serious misconduct constituting just cause.	No entitlement to severance pay or compensation.

8.2 Corruption Crimes and Related Offenses

In accordance with the Portuguese Criminal Code, approved by Decree-Law No. 48/95 of 15 March, as amended, in particular the following articles:

Crime**Description and applicable penalties¹****Passive Corruption
(art.º 373)**

1 - O funcionário que, no exercício das suas funções ou por causa delas, por si, ou por interposta pessoa, com o seu consentimento ou ratificação, solicitar ou aceitar, para si ou para terceiro, vantagem patrimonial ou não patrimonial, que não lhe seja devida, é punido com pena de prisão até cinco anos ou com pena de multa até 600 dias.

2 - Quem, por si ou por interposta pessoa, com o seu consentimento ou ratificação, der ou prometer a funcionário, ou a terceiro por indicação ou conhecimento daquele, vantagem patrimonial ou não patrimonial, que não lhe seja devida, no exercício das suas funções ou por causa delas, é punido com pena de prisão até três anos ou com pena de multa até 360 dias.

3 - Excluem-se dos números anteriores as condutas socialmente adequadas e conformes aos usos e costumes.

**Active Corruption
(art.º 374)**

1 - Quem, por si ou por interposta pessoa, com o seu consentimento ou ratificação, der ou prometer a funcionário, ou a terceiro por indicação ou com conhecimento daquele, vantagem patrimonial ou não patrimonial com o fim indicado no n.º 1 do artigo 373.º, é punido com pena de prisão de um a cinco anos.

2 - Se o fim for o indicado no n.º 2 do artigo 373.º, o agente é punido com pena de prisão até três anos ou com pena de multa até 360 dias.

3 - A tentativa é punível.

**Undue Receipt or Offering
of an Advantage
(art.º 372)**

1 - O funcionário que, no exercício das suas funções ou por causa delas, por si, ou por interposta pessoa, com o seu consentimento ou ratificação, solicitar ou aceitar, para si ou para terceiro, vantagem patrimonial ou não patrimonial, que não lhe seja devida, é punido com pena de prisão até cinco anos ou com pena de multa até 600 dias.

2 - Quem, por si ou por interposta pessoa, com o seu consentimento ou ratificação, der ou prometer a funcionário, ou a terceiro por indicação ou conhecimento daquele, vantagem patrimonial ou não patrimonial, que não lhe seja devida, no exercício das suas funções ou por causa delas, é punido com pena de prisão até três anos ou com pena de multa até 360 dias.

3 - Excluem-se dos números anteriores as condutas socialmente adequadas e conformes aos usos e costumes.

**Misappropriation
(art.º 375)**

1 - O funcionário que ilegítimamente se apropriar, em proveito próprio ou de outra pessoa, de dinheiro ou qualquer coisa móvel ou imóvel ou animal, públicos ou particulares, que lhe tenha sido entregue, esteja na sua posse ou lhe seja acessível em razão das suas funções, é punido com pena de prisão de 1 a 8 anos, se pena mais grave lhe não couber por força de outra disposição legal.

2 - Se os valores ou objectos referidos no número anterior forem de diminuto valor, nos termos da alínea c) do artigo 202.º, o agente é punido com pena de prisão até 3 anos ou com pena de multa.

3 - Se o funcionário der de empréstimo, empenhar ou, de qualquer forma, onerar valores ou objectos referidos no n.º 1, é punido com pena de prisão até 3 anos ou com pena de multa, se pena mais grave lhe não couber por força de outra disposição legal.

**Misuse of Assets
(art.º 376)**

1 - O funcionário que fizer uso ou permitir que outra pessoa faça uso, para fins alheios àqueles a que se destinem, de coisa imóvel, de veículos, de outras coisas móveis ou de animais de valor apreciável, públicos ou particulares, que lhe forem entregues, estiverem na sua posse ou lhe forem acessíveis em razão das suas funções, é punido com pena de prisão até 1 ano ou com pena de multa até 120 dias.

2 - Se o funcionário, sem que especiais razões de interesse público o justifiquem, der a dinheiro público destino para uso público diferente daquele a que está legalmente afectado, é punido com pena de prisão até 1 ano ou com pena de multa até 120 dias.

¹ For reasons of legal accuracy, the content of the legal provisions reproduced in this section has not been translated. The original Portuguese version shall prevail and should be consulted for the exact wording of the applicable legal provisions.

Economic Interest in a Business Transaction

(art.º 377)

1 - O funcionário que, com intenção de obter, para si ou para terceiro, participação económica ilícita, lesar em negócio jurídico os interesses patrimoniais que, no todo ou em parte, lhe cumpre, em razão da sua função, administrar, fiscalizar, defender ou realizar, é punido com pena de prisão até 5 anos.

2 - O funcionário que, por qualquer forma, receber, para si ou para terceiro, vantagem patrimonial por efeito de acto jurídico civil relativo a interesses de que tinha, por força das suas funções, no momento do acto, total ou parcialmente, a disposição, administração ou fiscalização, ainda que sem os lesar, é punido com pena de prisão até 6 meses ou com pena de multa até 60 dias.

3 - A pena prevista no número anterior é também aplicável ao funcionário que receber, para si ou para terceiro, por qualquer forma, vantagem patrimonial por efeito de cobrança, arrecadação, liquidação ou pagamento que, por força das suas funções, total ou parcialmente, esteja encarregado de ordenar ou fazer, posto que não se verifique prejuízo para a Fazenda Pública ou para os interesses que lhe estão confiados.

Extortion by a Public Official

(art.º 379)

1 - O funcionário que, no exercício das suas funções ou de poderes de facto delas decorrentes, por si ou por interposta pessoa com o seu consentimento ou ratificação, receber, para si, para o Estado ou para terceiro, mediante indução em erro ou aproveitamento de erro da vítima, vantagem patrimonial que lhe não seja devida, ou seja superior à devida, nomeadamente contribuição, taxa, emolumento, multa ou coima, é punido com pena de prisão até 2 anos ou com pena de multa até 240 dias, se pena mais grave lhe não couber por força de outra disposição legal.

2 - Se o facto for praticado por meio de violência ou ameaça com mal importante, o agente é punido com pena de prisão de 1 a 8 anos, se pena mais grave lhe não couber por força de outra disposição legal.

Abuse of Power

(art.º 382)

O funcionário que, fora dos casos previstos nos artigos anteriores, abusar de poderes ou violar deveres inerentes às suas funções, com intenção de obter, para si ou para terceiro, benefício ilegítimo ou causar prejuízo a outra pessoa, é punido com pena de prisão até 3 anos ou com pena de multa, se pena mais grave lhe não couber por força de outra disposição legal.

Trading in influence
(art.º 335)

1 - Quem, por si ou por interposta pessoa, com o seu consentimento ou ratificação, solicitar ou aceitar, para si ou para terceiro, vantagem patrimonial ou não patrimonial, ou a sua promessa, para abusar da sua influência, real ou suposta, junto de qualquer entidade pública, nacional ou estrangeira, é punido:

a) Com pena de prisão de 1 a 5 anos, se pena mais grave lhe não couber por força de outra disposição legal, se o fim for o de obter uma qualquer decisão ilícita favorável;

b) Com pena de prisão até 3 anos ou com pena de multa, se pena mais grave lhe não couber por força de outra disposição legal, se o fim for o de obter uma qualquer decisão lícita favorável.

2 - Quem, por si ou por interposta pessoa, com o seu consentimento ou ratificação, der ou prometer vantagem patrimonial ou não patrimonial às pessoas referidas no número anterior:

a) Para os fins previstos na alínea a), é punido com pena de prisão até 3 anos ou com pena de multa;

b) Para os fins previstos na alínea b), é punido com pena de prisão até 2 anos ou com pena de multa até 240 dias.

3 - A tentativa é punível.

**Money Laundering
(art.º 368-A)**

1- ..consideram-se vantagens os bens provenientes da prática, sob qualquer forma de comparticipação, de factos ilícitos típicos puníveis com pena de prisão de duração mínima superior a seis meses ou de duração máxima superior a cinco anos ou, independentemente das penas aplicáveis, de factos ilícitos típicos de:

...

k) Tráfico de influência, recebimento indevido de vantagem, corrupção, peculato, participação económica em negócio, administração danosa em unidade económica do setor público, fraude na obtenção ou desvio de subsídio, subvenção ou crédito, ou corrupção com prejuízo do comércio internacional ou no setor privado;

3- Quem converter, transferir, auxiliar ou facilitar alguma operação de conversão ou transferência de vantagens, obtidas por si ou por terceiro, direta ou indiretamente, com o fim de dissimular a sua origem ilícita, ou de evitar que o autor ou participante dessas infrações seja criminalmente perseguido ou submetido a uma reação criminal, é punido com pena de prisão até 12 anos.

In accordance with Decree-Law No. 28/84 of 20 January, as amended, in particular the following articles:

Crime

Description and applicable penalties

**Fraud in Obtaining a
Subsidy or Grant
(art.º 36)**

1 - Quem obtiver subsídio ou subvenção:

a) Fornecendo às autoridades ou entidades competentes informações inexatas ou incompletas sobre si ou terceiros e relativas a factos importantes para a concessão do subsídio ou subvenção;

b) Omitindo, contra o disposto no regime legal da subvenção ou do subsídio, informações sobre factos importantes para a sua concessão;

c) Utilizando documento justificativo do direito à subvenção ou subsídio ou de factos importantes para a sua concessão, obtido através de informações inexatas ou incompletas;

será punido com prisão de 1 a 5 anos e multa de 50 a 150 dias.

2 - Nos casos particularmente graves, a pena será de prisão de 2 a 8 anos.

3 - Se os factos previstos neste artigo forem praticados em nome e no interesse de uma pessoa colectiva ou sociedade, exclusiva ou predominantemente constituídas para a sua prática, o tribunal, além da pena pecuniária, ordenará a sua dissolução.

4 - A sentença será publicada.

5 - Para os efeitos do disposto no n.º 2, consideram-se particularmente graves os casos em que o agente:

a) Obtém para si ou para terceiros uma subvenção ou subsídio de montante consideravelmente elevado ou utiliza documentos falsos;

b) Pratica o facto com abuso das suas funções ou poderes;

c) Obtém auxílio do titular de um cargo ou emprego público que abusa das suas funções ou poderes.

6 - Quem praticar os factos descritos nas alíneas a) e b) do n.º 1 com negligência será punido com prisão até 2 anos ou multa até 100 dias.

7 - O agente será isento de pena se:

a) Espontaneamente impedir a concessão da subvenção ou do subsídio;

b) No caso de não serem concedidos sem o seu concurso, ele se tiver esforçado espontânea e seriamente para impedir a sua concessão.

8 - Consideram-se importantes para a concessão de um subsídio ou subvenção os factos:

a) Declarados importantes pela lei ou entidade que concede o subsídio ou a subvenção;

b) De que dependa legalmente a autorização, concessão, reembolso, renovação ou manutenção de uma subvenção, subsídio ou vantagem daí resultante.

Credit Fraud**(art.º 38)**

- 1 - Quem ao apresentar uma proposta de concessão, manutenção ou modificação das condições de um crédito destinado a um estabelecimento ou empresa:
- a) Prestar informações escritas inexatas ou incompletas destinadas a acreditar-lo ou importantes para a decisão sobre o pedido;
 - b) Utilizar documentos relativos à situação económica inexatos ou incompletos, nomeadamente balanços, contas de ganhos e perdas, descrições gerais do património ou peritagens;
 - c) Ocultar as deteriorações da situação económica entretanto verificadas em relação à situação descrita aquando do pedido de crédito e que sejam importantes para a decisão sobre o pedido;
- será punido com prisão até 3 anos e multa até 150 dias.
- 2 - Se o agente, actuando pela forma descrita no número anterior, obtiver crédito de valor consideravelmente elevado, a pena poderá elevar-se até 5 anos de prisão e até 200 dias de multa.
- 3 - No caso do número anterior, se o crime tiver sido cometido em nome e no interesse de pessoa colectiva ou sociedade, o tribunal poderá ordenar a dissolução destas.
- 4 - O agente será isento de pena:
- a) Se espontaneamente impedir que o credor entregue a prestação pretendida;
 - b) Se, no caso de a prestação não ter sido entregue sem o seu concurso, se tiver esforçado com anterioridade séria e espontaneamente para impedir a entrega.
- 5 - A sentença será publicada.

Misuse of a Grant, Subsidy or Subsidized Credit**(art.º 37)**

- 1 - Quem utilizar prestações obtidas a título de subvenção ou subsídio para fins diferentes daqueles a que legalmente se destinam será punido com prisão até 2 anos ou multa não inferior a 100 dias.
- 2 - Com a mesma pena será punido quem utilizar prestação obtida a título de crédito bonificado para um fim diferente do previsto na linha de crédito determinada pela entidade legalmente competente.
- 3 - A pena será a de prisão de 6 meses a 6 anos e multa até 200 dias quando os valores ou danos causados forem consideravelmente elevados.
- 4 - Se os factos previstos neste artigo forem praticados reiteradamente em nome e no interesse de uma pessoa colectiva ou sociedade e o dano não tiver sido espontaneamente reparado, o tribunal ordenará a sua dissolução.
- 5 - A sentença será publicada.

Misuse of European Union Funds**(art.º 37-A)**

- 1 - Quem utilizar um benefício obtido legalmente, que resulte de receitas da União Europeia distintas das que sejam provenientes dos recursos próprios do imposto sobre o valor acrescentado, para fim diferente daquele a que se destina e que envolva prejuízo ou vantagem em montante superior a 100 000 (euro), é punido com pena de prisão até 5 anos.
- 2 - Quando os factos previstos no número anterior envolvam prejuízo ou vantagem em montante igual ou superior a 10 000 (euro) e inferior ou igual a 100 000 (euro), o agente é punido com pena de prisão até 2 anos ou pena de multa até 240 dias.
- 3 - Nas mesmas penas incorre quem praticar as condutas previstas nos números anteriores por omissão contrária aos deveres do cargo.
-

Nos termos da Lei n.º 20/2008, de 21 de abril, na sua redação atual, designadamente os artigos:

Crime

**Active Corruption in
International Business
Transactions**

(art.º 7)

Quem por si ou, mediante o seu consentimento ou ratificação, por interposta pessoa der ou prometer a funcionário, nacional, estrangeiro ou de organização internacional, ou a titular de cargo político, nacional ou estrangeiro, ou a terceiro com conhecimento daqueles, vantagem patrimonial ou não patrimonial, que lhe não seja devida, para obter ou conservar um negócio, um contrato ou outra vantagem indevida no comércio internacional, é punido com pena de prisão de um a oito anos.

**Corrupção passiva no sector
privado**

(art.º 8)

1 - O trabalhador do sector privado que, por si ou, mediante o seu consentimento ou ratificação, por interposta pessoa, solicitar ou aceitar, para si ou para terceiro, sem que lhe seja devida, vantagem patrimonial ou não patrimonial, ou a sua promessa, para um qualquer ato ou omissão que constitua uma violação dos seus deveres funcionais é punido com pena de prisão até cinco anos ou com pena de multa até 600 dias.

2 - Se o ato ou omissão previsto no número anterior for idóneo a causar uma distorção da concorrência ou um prejuízo patrimonial para terceiros, o agente é punido com pena de prisão de um a oito anos.

8.3 Declaration of Absence of Conflict of Interests Model

Name:

Position/Role:

Department/Project:

I hereby declare that I have read the Code of Conduct and that, as of this date, I am not aware of any conflict of interest that could affect the performance of my duties at Associação Fraunhofer Portugal.

I declare on my honour that the information provided above is true and accurate. I further undertake to update this declaration whenever any change occurs that requires it.

Signature:

Date,

___/___/___