Match Profiler
software engineering

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"One man's magic is another man's engineering."
Robert A. Heinlein

Corruption and Related Offenses Risk Prevention Plan

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1. INTRODUCTION

General Objectives

The present Corruption and Related Offenses Risk Prevention Plan aims to identify and manage corruption risks and related infractions within Match Profiler. It also aims to plan and develop control activities and mitigation measures for identified risks, including preventive and corrective measures to reduce the likelihood and impact of these risks, and to monitor their execution.

Scope of Application

The PPR applies to all interactions among workers themselves, but also to relationships with third parties, whether public or private. This includes organs, services, public bodies or entities, and/or providers of public services and their employees or agents.

Definitions, Acronyms and Abbreviations

In the following tables, all definitions, acronyms, and abbreviations used in the document are identified, as well as the terms necessary for understanding it.

no documento, bem como os termos necessários ao seu entendimento.

DEFINITIONS	
Corruption	Illegal act in which a person offers, delivers, solicits, or accepts any type of offer, benefit, or promise, with the intention of obtaining for themselves or for a third party an illicit advantage involving an abuse of position.
Risk	Probability of a situation occurring with potential negative impact.
Threat	An event that can trigger an incident, resulting in material or immaterial damage to its assets.
Confidentiality	A feature that prevents unauthorized disclosure of assets. Considers all information assets..
Integrity	A characteristic that prevents unauthorized modification or destruction of assets. Integrity is linked to the functional reliability of information systems.

ACRONYMS AND ABBREVIATIONS	
RGPC	General Regime for Corruption Prevention
PPR	Corruption and Related Offenses Risk Prevention Plan

2. GENERAL FRAMEWORK

On December 9, 2021, Decree-Law No. 109-E/2021 ("Decree-Law") was published in the Official Gazette, creating the National Anti-Corruption Mechanism ("MENAC") and approving the General Regime for Corruption Prevention ("RGPC"). This Decree-Law follows the approval of the National Anti-Corruption Strategy and aims to prevent, detect, suppress, and sanction acts of corruption and related offenses.

In this context, a Corruption and Related Offenses Risk Management Plan has been developed for Match Profiler, as entities covered by the RGPC (50 or more employees) must implement a compliance program, which should include a Corruption and Related Offenses Risk Prevention Plan ("PPR" or "Plan"), a code of ethics and conduct, a whistleblowing channel, and a training plan.

It is further determined that the Corruption and Related Offenses Risk Prevention Plan (PPRCIC) must include:

- Identification of corruption risks and related offenses in each area;
- Identification of measures taken to prevent risks;
- Identification of those responsible for managing the risk management plan;
- Provision for the preparation of an annual execution report.

3. INTRODUCTION

Match Profiler, aware of the need to fulfill the obligations set forth in the RGPC and to promote a culture of transparency, has chosen to adopt a risk management system based on a Management Risk Prevention Plan (PPRG), which naturally includes those related to corruption and related offenses.

In this regard, Match Profiler has undertaken the recognition and evaluation of risks in each area of activity, through internal and external sources, also assessing the likelihood of occurrence and the impact of the risk, the preventive and corrective measures suitable for mitigation and/or contingency planning, as well as identifying those responsible for their development and proposing action.

The PPR thus covers the entire organization and activities carried out in the company Match Profiler, and its objectives are:

a) Identification, analysis, and classification of risks and situations that may expose Match Profiler to acts of corruption and related offenses, including risks associated with the performance of duties by members of the Management and Board of Directors, considering the sector's reality and the geographical areas in which it operates;

b) Preventive and corrective measures aimed at reducing the likelihood of occurrence and the impact of the identified risks and situations.

c) Increase awareness among employees;

4. METHODOLOGY, ACTIVITY IDENTIFICATION AND RISK

The methodology for identifying, analyzing, and classifying risks and situations that may expose Match Profiler to acts of corruption and related offenses, aligned with the requirements listed in Decree-Law No. 109-E/2021 of December 9, considered:

a) The areas of activity within the company where the risk of engaging in acts of corruption and related offenses is observed;

b) The likelihood of occurrence of situations that pose a risk and their foreseeable impact, in order to allow for the gradation of risks;

c) Preventive and corrective measures aimed at reducing the likelihood of occurrence and the impact of the identified risks and situations;

d) In situations of high or maximum risk, the most comprehensive preventive measures, with their execution being given priority;

e) The designation of the overall responsible person for the execution, control, and review of the PPR.

The PPR applies to all employees of Match Profiler, and its principles are extendable to external consultants, service providers, suppliers, and agents or any third parties with whom contractual/commercial relationships are maintained.

5. PROBABILITY OF OCCURRENCE

The assessment and classification of risks result from the combination of the probability of occurrence of situations posing a risk with the severity of their predicted impact, which leads to a risk level following a scale with four levels (very low, low, medium, high, and very high). Based on these levels, different response strategies will be defined.

PROBABILITY		
Value	Level	Description
1	Very Low	There is no historical record of occurrence (P=0)
2	Low	It may occur / has occurred at least once in the company's history and no more than once per year (1 < P ≤ 1x per year)
3	High	It may occur / has occurred more than once per year and up to once per month / occasional situation, non-recurring (1x per year < P ≤ 1x per month)
4	Very High	It may occur / has occurred more than once per month / recurring situation (1x per month < P)

6. RISK ASSESSMENT

Partial Risk Calculation

Partial risk is calculated by combining the level of impact with the level of probability of occurrence, using the following formula:

Partial Risk = Probability x Impact [1-16]

PARTIAL RISK LEVEL

Probability				
4	4	8	12	16
3	3	6	9	12
2	2	4	6	8
1	1	2	3	4
	1	**2**	**3**	**4**

Impact

Control Measures

After assessing the risks, appropriate control measures should be defined.

Currently, Match Profiler has the following control measures:

- Code of Conduct - describes the guidelines to be followed by all employees and collaborators;

- Anti-Corruption Policy - It is included in the Code of Conduct and presents all unacceptable practices regarding corruption and related offenses;

- Whistleblowing Channel - Allows for the communication and reporting of acts or omissions that may constitute offenses, crimes, or administrative violations;

- Conflict of Interest Policy - Included in the Code of Conduct, it identifies all situations potentially generating conflicts of interest;

- Training - Conducting training sessions for employees on the prevention of corruption and related offenses.

The control measures can be classified as follows:

CONTROL MEASURES		
Value	Level	Description
1	Low	Non-existent or ineffective
2	Medium	There are measures with room for improvement
3	High	Existence of effective measures

Calculation of Real Risk

The risk calculation is done by combining the impact level with the probability of occurrence level, using the following formula:

$$\text{Real Risk} = \frac{\text{Partial Risk (Probability x Impact)}}{\text{Control Measures}}$$

The real risk level can be classified as:

Value of Real Risk	Description
≤ 4	Acceptable Risk
5 − 9	The manager must analyze whether to accept the risk or take measures
≥ 10	If it's deemed unacceptable, it's mandatory to determine actions

Monitoring, Evaluation and Supervision of the PPR

Monitoring of the Plan is ensured through periodic review and testing of its implementation and effectiveness of the respective preventive measures.

In accordance with the provisions of subparagraphs a) and b) of paragraph 4 of article 6 of Decree-Law No. 109-E/2021 of December 9, the execution of the PPR is subject to the following controls:

- The preparation, in the month of October, of an interim evaluation report for situations identified with high or maximum risk;

- The preparation, in the month of April of the following year, of the annual evaluation report, which must include, among other things, the quantification of the degree of

implementation of the preventive and corrective measures identified, as well as the forecast for their full implementation.

The PPR is reviewed every three years or whenever there is a change that justifies its revision.

7. CONCLUSION

During the period under review, there is no evidence of violations of the mechanisms for prevention, detection, and response to cases of irregular or illicit conduct.

No complaints, grievances, or reports regarding acts of corruption, fraud, or related offenses have been directly brought to Match Profiler's attention concerning any of its employees, members of its social bodies, or any other entities.

As a result of internal analysis, the plan is being adhered to, and there are no actual or potential situations conducive to acts of corruption and/or related offenses.