



Code of Ethics



*Ethics &
Transparency*

Briso Group 

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1. INTRODUCTION

1.1. MANAGEMENT MESSAGES

The Code of Ethics and Conduct - hereinafter the Code of Ethics - represents Brisa's commitment to creating value in a long-term perspective, based on a sustainable relationship with all stakeholders, based on principles of honesty, integrity and transparency.

The Code of Ethics aims to establish the principles of ethical conduct and behavior, affirming the company's corporate values, in line with Brisa's purpose of transforming the quality of life of communities, connecting people through simple, safe and sustainable mobility.

JOINT MESSAGE FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS AND CHAIRMAN OF THE EXECUTIVE COMMITTEE

Ethics is one of the core values of Brisa Group's culture, based on valuing people and on the principles of integrity, honesty, transparency and sustainability. Its application in every daily activity is done with everyone's adherence and commitment.

It was with this conviction that the Brisa Group wrote and approved its first Code of Ethics in 2001. The principles were recognized and accepted by all, and it was therefore deemed necessary to make them explicit, for greater clarity and transparency, through a Code, ensuring that everyone could understand and apply them in the same way and at any time.

The Code of Ethics enshrined two essential dimensions of ethical performance. The first, on an individual level, focuses on the fundamental guiding criteria for the performance of functions by each person. The second, on a relational level, is aimed at strengthening the foundations for building strong and consistent bonds of respect and trust between the company, its employees and all stakeholders.

In 2021, there was a review of the Code of Ethics, which, while maintaining the same founding principles of integrity, honesty, transparency and sustainability, came to add emerging themes from social and business dynamics, such as the protection of personal data or harassment at work, and to delve deeper into some pre-existing issues. The objective was to ensure that the Code of Ethics is always a living body of principles, applicable to an everchanging business reality.

The 2025 review, now completed, aims to renew the capacity to respond to the challenges resulting from the acceleration of the dynamics of social and economic development in our days, reinforcing the conscious and informed involvement of all those who are part of the Brisa Group as well as those who interact with it - workers, customers, suppliers and partners, society in general - in compliance with the principles with which the company identifies.

At Brisa, we want to translate our values into concrete actions. The Group has appointed an Ethics Ombudsman, Dr. Manuel Almeida Ribeiro, an experienced and independent from the Brisa group professional, who all workers can trust.

THE ETHICS OMBUDSMAN

The Brisa Group's Ethics Ombudsman has the important function of ensuring compliance with the Law and the Code of Ethics, as well as with other regulations in force at the Brisa Group, being responsible for receiving and handling all reports within the scope of the Irregularities Reporting Regulations.

1.2. APPROVAL, REVIEW, PUBLICATION AND DISSEMINATION

The Code of Ethics is approved by Brisa's Board of Directors and is reviewed every two years, without prejudice to extraordinary reviews that may be justified in the light of specific circumstances.

The Code of Ethics should be read together with the Regulations and other policies in force at Brisa, and with reference to the Definitions and Useful Links provided in section 5.

The Code of Ethics is available on all Brisa's official websites and on its intranet. Employees' knowledge of the content of the Code of Ethics is essential and, for this purpose, specific training is provided.

The Code of Ethics is published in Portuguese and English. In the event of any discrepancy in the interpretation between the present text in Portuguese and the translation in another language, the spirit of the original text written in Portuguese shall prevail.

1.3. SCOPE OF APPLICATION

The Code of Ethics applies to Employees of all companies that are part of the Brisa Group, as well as, to the extent applicable, to attorneys-in-fact, agents and service providers acting on behalf of or represent Brisa, who must always act in accordance with the fundamental values established here, in a loyal, impartial, professional manner and in compliance with the applicable regulations and legislation.

2. **BRISA'S ACTION PRINCIPLES**

2.1. LEGALITY, INTEGRITY AND TRANSPARENCY

Employees must conduct their activity according to the highest standards of transparency and honesty, knowing and complying with all the principles of the Code of Ethics as well as the internal, legal and regulatory standards in force, applicable to the activities to which they are assigned.

Employees shall not engage in any unlawful, improper or irregular act, while performing their duties. Namely, it is expressly forbidden to perform any acts of:

- Corruption and bribery;
- Influence peddling and undue receipt of advantage;

- Money Laundering and terrorism financing;
- Embezzlement and extortion;
- Any crimes or administrative offences specified by law.

Each Employee must safeguard that their decision-making is disinterested, free of personal interests or contrary to Brisa, in accordance with the applicable internal and legal regulations. In this context, it is not, in particular, acceptable to receive any type of gratuity, remuneration, benefit or advantage of any kind, as well as the adoption of behaviour likely to create in their interlocutors' expectations of favouritism of any kind in their relations with Brisa.

Any violation of the principles and rules of the Code of Ethics constitutes a punishable disciplinary and legal infraction, as presented in Annex I.

Brisa carries out its activity in foreign countries and must comply with the legal and regulatory provisions in force in those jurisdictions, and its Employees must comply, among others, with the provisions of the following regulations: *United States Foreign Corrupt Practices Act* (FCPA) and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

2.2. INDEPENDENCE AND CONFLICT OF INTERESTS

In the exercise of their duties, Employees must promote Brisa's interests, acting in accordance with criteria of independence and impartiality, to the detriment of any personal interests or relationships. Employees should perform their duties free of conflicts of interest, as set forth in the Conflict of Interest Policy.

2.3. RESPECT, COMPLIANCE AND PROMOTION OF HUMAN RIGHTS AND FUNDAMENTAL RIGHTS

Brisa undertakes the firm commitment to respect and ensure human rights as recognised in national, European Union and international legislation.

Everyone shall be assured strict respect for fundamental and universal rights, as set out in the Constitution of the Portuguese Republic, the Universal Declaration of Human Rights, the United Nations Convention against Corruption, the Global Compact United Nations, the International Labour Organisation, labour legislation and legislation on Health and Safety at Work.

Brisa repudiates and promotes the fight against, among others, corruption, slavery, the exploitation of child labour and money laundering and terrorist financing.

2.4. PERSONAL APPRECIATION AND SENSE OF BELONGING

In line with Brisa's values, the organization strives to constantly value its Employees, promoting both training and professional and personal development, the sense of belonging and the balance between professional, personal and family life.

- We seek to ensure the continuous training and self-development of Employees, aiming at excellence and innovation, characteristics of a learning culture.
- It is essential that leaders encourage the development of their Employees, enabling them to perform their duties and promoting professional enrichment to achieve their potential.
- By adhering to Brisa's various principles of action, where proximity and a sense of belonging are fundamental, we seek to reinforce these attitudes among Employees.

All contribution and performance, which is intended to be excellent, must be balanced with a balance between professional, personal and family life.

2.5. DIVERSITY, EQUITY AND INCLUSION

Brisa promotes and values diversity, social inclusion and the balance between personal and professional life, the sense of belonging, stimulating innovation and knowledge.

Brisa's relationship with its Employees and the relationship between them is based on the following principles:

- Equal work opportunities and fair treatment. Decisions must be based exclusively on the qualifications and merit of each Employee;
- Non-discrimination, namely on the grounds of age, disability, ethnicity, ancestry, parentage, marital status, nationality, race, religion, gender, sexual orientation, or gender identity, political or ideological beliefs or trade union membership;
- Prohibition of any form of intimidation, moral or sexual harassment, in any form whatsoever, verbal or physical, direct or indirect, and everyone's conduct must be guided by a scrupulous respect for the physical and moral integrity of all people. Any form of harassment is ethically reprehensible, as it violates fundamental human rights and Brisa's values.

These principles apply to all Employees, at all times, including in recruitment and hiring, evaluation, promotion, compensation and other benefits, transfers and workforce reductions.

2.6. ENVIRONMENT

The Brisa Group recognises the environment as a collective asset and for whose preservation each one has a role to play, focused on managing the impacts of its own activity and related activities, through:

- Response to the challenges of climate change, with a special focus on the reduction and elimination of greenhouse gas emissions, resulting from its own activities and the respective value chain, and also from emissions from the mobility and transport sector, through the implementation of solutions based on renewable energies, energy efficiency measures, as well as the promotion of the necessary infrastructures for the implementation of mobility independent of resources to fossil energy sources;
- Implementation of a regenerative management model for biodiversity and ecosystems;
- Progressive implementation of circular economy models to all activities;

- Rigorous measurement and management of our impacts and risks;
- Promotion of environmental sustainability criteria and requirements throughout our value chain;
- Reconciling business growth with environmental protection, in all geographies where it operates and all phases of the business, from strategic decision-making to investment operations and partnership management.

Employees must carry out their activities respecting the objectives of the Environmental Policy adopted by Brisa.

2.7. ENERGY AND CLIMATE

We aim to contribute to the fight against climate change by reducing our emissions and supporting the process of moving towards a carbon-free economy, through research into innovative technological solutions and the development of partnerships and synergies to accelerate and drive the transition to a zero-carbon economy.

We promote solutions based on renewable energies, which contribute to energy efficiency, as well as the development of the necessary infrastructures for the implementation for mobility independent of the use of fossil energy sources. We measure direct and indirect emissions from the execution of our activities.

Employees must carry out their activities respecting the decarbonization objectives adopted by Brisa.

3. **RULES OF CONDUCT**

3.1. USE OF INFORMATION

3.1.1. *Intellectual and Industrial Property*

The ownership of the intellectual and industrial property rights, including rights to information, resulting from the work of the Employees in the performance of their duties, belongs to Brisa. All Employees must strive to protect and defend these rights, whether they are patents, copyrights, trademarks, designs, trade secrets or any other information. Likewise, Employees must respect the intellectual and industrial property rights and trade secrets of third parties, and must therefore refrain from using them illicitly, for their own benefit, Brisa or that of a third party.

3.1.2. *Privacy and Personal Data Protection*

Privacy and personal data protection are fundamental human rights, essential for the dignity, autonomy and informed self-determination of individuals. Respect for the confidentiality of personal data is essential to ensure mutual trust and the integrity of operations and of all those who entrust us with their information, working continuously to improve practices and ensure that privacy is always ensured.

Brisa is committed to ensuring that all personal data, regardless of its origin or purpose, is treated securely, ethically and in accordance with applicable laws and regulations. To this end, practices are adopted to ensure the adequate, transparent, and responsible treatment of all personal data that is collected, used or stored.

3.1.3. Information Security

The confidentiality, integrity and availability of information are fundamental pillars that must be safeguarded. Those who have access to information must act according to its classification, nature and sensitivity.

Employees, as users of digital platforms and systems, must respect internal regulations and applicable legislation, and promote the principles of transparency and responsibility in their use. These principles should be based on appropriate practices and behaviors, regardless of how information is accessed, used, and made available.

3.1.4. Artificial Intelligence

Artificial Intelligence (AI) can provide advantages in the company's processes. However, the use of this technology may entail material risks, namely regarding data confidentiality and security, vulnerability to cyber-attacks, as well as issues of responsibility and ethics in decision-making. Responses or solutions generated by AI tools cannot be accepted uncritically and must be subject to regular human scrutiny and validation.

The use of AI programs does not exempt Employees from professional responsibility in the event of an error, failure or accident, and they are responsible for their use of AI tools.

3.1.5. Confidentiality

The disclosure of Brisa's information is likely to cause substantial or irreparable damage to Brisa. Employees must therefore adopt all necessary measures to avoid unauthorised access by third parties to information concerning Brisa and its activities.

Employees must maintain confidentiality about any and all information regarding Brisa's activity that comes to their knowledge, directly or indirectly, in the exercise of their duties, or because of them, including all information relating to its Stakeholders, and are prohibited from using it for personal benefit or that of third parties.

3.2. USE OF BRISA'S ASSETS

3.2.1. Duty of Parsimony

Brisa's Employees should make careful use of the assets entrusted to them in the course of their duties, avoiding waste. Similarly, they must not use, directly or indirectly, any of Brisa's assets for personal benefit or for the benefit of third parties.

3.2.2. Duty to Weigh Up

Brisa's Employees should refrain from invoking their professional status in situations unrelated to Brisa, whenever such invocation is not duly authorized or is contrary to Brisa's interests. In the performance of their duties and outside of them, they must act in a way that does not compromise Brisa's public image, and they must not speak on behalf of Brisa when not authorized or qualified to do so.

3.3. SAFETY

3.3.1. Road Safety

Employees, especially those whose activities are directly linked to the strategic area of highways, must promote road safety by all means, including the quality of infrastructure, the rigor in highway operations, and promoting citizenship awareness campaigns and responsible driving behavior.

3.3.2. Occupational Safety and Health

Brisa is committed to developing a safe and healthy work environment for all employees, considering the specificities of each activity, strictly following all rules and practices related to safety, health, and well-being.

Occupational safety and health rules must be applied by all Brisa employees, who must ensure that these are safeguarded before any activity is carried out, acting as promoters of these guidelines both internally and with entities with which Brisa interacts.

Employees are required to know and comply with applicable safety, health, and well-being standards at work.

3.4. EXTERNAL RELATIONSHIPS

The development of Brisa's activities involves daily and constant interaction with external entities.

The principles of this Code of Ethics apply not only internally but also to Brisa's external relationships.

Brisa must permanently ensure the interests of all stakeholders, treating them equally without any discrimination.

3.4.1. Customer

Excellence in service quality and client relationships must be a central concern for Brisa employees

In their interactions with clients, Brisa employees must treat everyone equally, without any discrimination, with respect, courtesy, and professionalism, particularly in customer service, handling complaints, and providing all necessary information for informed and conscious decision-making. Employees must also ensure the confidentiality of all client-related information they may access in their activities, with their data being treated in accordance with current personal data protection legislation.

In case of doubt about how to handle client data, employees should contact the Data Protection Officer.

3.4.2. Competitors

Fair competition is a fundamental premise of Brisa's activities, and in their interactions with competitors, they should be treated as Brisa expects to be treated. Thus, employees must refrain from making any comments or taking actions that could tarnish the image and reputation of competitors, and they must not disclose confidential information they have about them.

3.4.3. Public Entities

Brisa is committed to combating corruption and promoting transparency and impartiality in public administration procedures and decision-making processes, both in its relationship with the company and in its relationship with its competitors.

Therefore, Brisa and its employees are prohibited from financing political parties by any means in the performance of their duties. It is also prohibited to make monetary or other contributions to any public agents or entities, whether state, municipal, or other administrative organizations, in exchange for any advantages or preferential treatment for themselves, Brisa, or third parties.

3.4.4. Suppliers

Brisa applies its ethical conduct measures and practices in its relationships with suppliers, based on competitive and transparent processes that ensure non-discriminatory treatment, also evaluating their ethical, environmental, and professional behavior, as well as that of their employees, in light of the principles of this Code of Ethics.

Sustainability is a fundamental value for Brisa. In particular, Brisa promotes sustainability in the selection and relationships with its suppliers, always guided by reciprocity and integrity throughout the value chain, having adopted a Supplier Code of Conduct and a Purchasing Policy that ensures compliance and adherence by all its suppliers.

3.4.5. Communities

Brisa's purpose is to transform the quality of life of the communities it serves through the development of accessibility and the provision of simple, safe, and sustainable mobility services.

Thus, Brisa employees must contribute to achieving this purpose by ensuring the proper functioning of infrastructure and the development and implementation of mobility solutions.

3.4.6. *Social Partners and Public Opinion*

The relationship with the media is an important part of Brisa's communication program. Integrating companies that pursue the public interest within its perimeter, Brisa has special legal and regulatory obligations regarding how to disclose significant events to stakeholders and the general public.

In all communication, advertising, or marketing actions, employees must comply with the principles of truthfulness, completeness, objectivity, and transparency.

Brisa is made up of people, and the actions of its employees have a direct and profound impact on its reputation. Therefore, employees must always refrain from engaging in acts that could negatively impact Brisa, such as sharing or disseminating confidential information or information related to Brisa's activities or issuing opinions and comments improperly invoking powers of representation.

According to company policy and current legislation, Brisa employees are prohibited from directly or indirectly advising or conducting any type of transaction on Brisa securities based on privileged information.

Brisa employees must ensure the absolute confidentiality of all market-relevant information. This information should only be disclosed in accordance with applicable legislation and regulations, transparently, completely, and promptly, so that Brisa's activities can be known, analyzed, and scrutinized by all shareholders, investors, and other market agents on equal terms.

4. **FINAL PROVISIONS**

4.1. COMMUNICATION OF IRREGULARITIES

Employees must report to the Ethics Ombudsman, through the [Irregularities Reporting Platform](#), under the terms provided in the Regulation, any violations of the norms of this Code of Ethics, as well as any infractions of national, European Union, or international legislation (if applicable).

All information transmitted in the context of a complaint process will be analyzed confidentially and processed under the terms of the Regulation.

4.2. DISCIPLINARY ACTION

Violation by employees of the ethical principles and conduct set out in this Code of Ethics, regulated in the company's policies, constitutes a disciplinary offense punishable under the provisions of the Labor Code, without prejudice to any civil, criminal, or administrative liability that may arise.

4.3. OTHER PROVISIONS

This Code of Ethics follows the principle of subsidiarity, meaning its observance does not prevent the simultaneous application of specific conduct rules of other professional groups.

In cases where a Brisa employee simultaneously violates the principles set out in this instrument and other professional deontology norms to which they are legally bound, this Code of Ethics will only apply when the practices to which the employee is obliged are less demanding than those provided herein, provided that this does not conflict with the employee's professional status, in cases where it has the force of law.

Whenever employees have any doubts related to the interpretation of this Code of Ethics, they have the duty to report orally to the Ethics Ombudsman or in writing to compliance@brisa.pt before any action or omission.

5. DEFINITIONS & USEFUL LINKS

In this Code of Ethics, words with capital letters have the meaning given to them in this chapter, unless the context indicates a different meaning. Terms and expressions defined in the singular or plural may be used, respectively, in the plural or singular, with the corresponding natural alteration of their meaning.

The definitions below are not exhaustive, being merely indicative and not prejudicing the applicability of relevant mandatory norms.

HARASSMENT

As set forth in the Harassment Prevention Policy.

BRISA

Brisa Auto-Estradas de Portugal, S.A. e all companies in which it has management control.

MONEY LAUNDERING

Converting, transferring, aiding or facilitating any conversion or transfer operation of advantages, obtained by oneself or a third party, directly or indirectly, for the purpose of concealing their illicit origin, or to prevent the perpetrator or participant in such offences from being criminally prosecuted or subjected to a criminal response.

EMBEZZLEMENT

By means of an error or deception about facts that he or she has astutely provoked, inducing another person to perform acts that cause him or her, or another person, patrimonial harm, with the intention of obtaining, for himself or herself or for a third party, illegitimate enrichment.

COMPETITORS

According to the presumption laid down in Article 254(2) of the Companies Code, i.e., a company carrying out any activity included in Brisa's corporate purpose, if it is being carried out by Brisa or its exercise has been decided by the shareholders.

EMPLOYEES

All those who have an employment relationship with Brisa or members of Brisa's corporate bodies.

CUSTOMERS	Purchasers of goods and services provided by Brisa as well as anyone who directly uses any service provided by Brisa.
CODE OF ETHICS	The Code of Ethics and Conduct.
CORRUPTION AND RELATED OFFENCES	As set out in the Corruption Prevention Policy.
SUPPLIERS	Any legal or natural person who, without having any employment relationship, provides any services or supplies any goods or services to Brisa.
PRIVILEGED INFORMATION	All information not made public which, being accurate and relating to any of Brisa's activities, has the potential, if made public, to materially influence its market price or the investment or divestment decisions of third parties.
ETHICS OMBUDSMAN	A person appointed to perform the functions described and under the terms set out in the Regulations.
IMPROPER RECEIPT OF ADVANTAGE	Giving or promising an official or a third party, by him/herself or through an intermediary, with his/her consent or ratification, on his/her instructions or with his/her knowledge, a material or non-material advantage not due to him/her, in the course of or in connection with the performance of his/her duties.
REGULATIONS	Regulations on Reporting Irregularities in force at Brisa.
STAKEHOLDERS	Shareholders, investors, competitors, suppliers, customers, organizations, individuals and entities, private or public, including central or local government bodies, that have a relevant interest in the activities developed by Brisa or that may influence or be influenced by them.
SUBORNO	Convincing or attempting to convince another person, by means of a gift or promise of a patrimonial or non-patrimonial advantage, to commit the facts that are part of the objective type of the crimes of false testimony or statement (Article 359 of the Criminal Code) or false witness, expertise, interpretation or translation (Article 360 of the Criminal Code), without these being committed.
INFLUENCE PEDDLING	Solicit or accept, by themselves or through an intermediary, with their consent or ratification for themselves or for a third party, a patrimonial or non-patrimonial advantage, or their promise, to benefit from their influence, real or supposed, with any public entity.

USEFUL LINKS

- [Constitution of the Portuguese Republic](#)
- [Universal Declaration of Human Rights](#)
- [Labour Code](#)
- [Penal Code](#)
- [United Nations Convention against Corruption](#)
- [United Nations Global Compact](#)
- [OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions](#)
- [Law n.º 83/2017 of 18 August approving the Measures to Combat Money Laundering and Terrorism Financing](#)
- [Irregularities Reporting Regulation](#)
- [Whistleblower Platform](#)
- [Corruption Prevention Policy](#)
- [Plan for the Prevention of Corruption Risks and Related Infractions](#)
[Brisa Group – Ethics and Transparency](#)

São Domingos de Rana, January 28th, 2025

António Pires de Lima, *President of Executive Committee*

6. ANNEX I

Acts	Sactions
Disciplinary Infraction	Reprimand (Art. 328 of the Labor Code)
	Registered Reprimand (Art. 328 of the Labor Code)
	Monetary Sanction (Art. 328 of the Labor Code)
	Loss of Vacation Days (Art. 328 of the Labor Code)
	Suspension from Work with Loss of Pay and Seniority (Art. 328 of the Labor Code)
	Dismissal without Compensation (Art. 328 of the Labor Code)
False Expertise	Imprisonment up to 3 years or fine (Art. 9, No. 1 of Law No. 20/2008 of April 21)
Active Corruption	Imprisonment up to 3 years or fine (Art. 9, No. 1 of Law No. 20/2008 of April 21)
Aggravated Active Corruption	Imprisonment up to 5 years or fine up to 600 days (Art. 9, No. 2 of Law No. 20/2008 of April 21)
Passive Corruption	Imprisonment up to 5 years or fine up to 600 days (Art. 8, No. 1 of Law No. 20/2008 of April 21)
Aggravated Passive Corruption	Imprisonment from 1 to 8 years (Art. 8, No. 2 of Law No. 20/2008 of April 21)
Influence Peddling	Imprisonment from 1 to 5 years or up to 3 years or fine if the intended purpose is lawful (Art. 335, No. 1 of the Penal Code)
	Imprisonment up to 3 years (Art. 335, No. 2 of the Penal Code)
Money Laundering	Imprisonment up to 12 years (Art. 368-A of the Penal Code)
Bribery	Imprisonment up to 2 years or fine up to 240 days (Art. 363 of the Penal Code)
Harassment	Very serious administrative offense (Art. 29 of the Labor Code)
Discrimination	Very serious administrative offense (Art. 24 of the Labor Code)
Use of Personal Data Incompatibly with the Purpose of Collection	Imprisonment up to 1 year or fine up to 120 days (Art. 46 of Law No. 58/2019)
Access to Personal Data without Justification or Authorization	Imprisonment up to 1 year or fine up to 120 days (Art. 47 of Law No. 58/2019)
Copying, Deleting, Destroying, Damaging, Concealing, Modifying to Render Unusable, Removing, Transferring for Consideration or Free of Charge Personal Data	Imprisonment up to 1 year or fine up to 120 days (Art. 48 and 49 of Law No. 58/2019)

Inserting or Facilitating the Insertion of False Personal Data to Obtain Undue Advantage for Oneself or Another	Imprisonment up to 2 years or fine up to 240 days (Art. 50 of Law No. 58/2019)
Violating Professional Secrecy without Just Cause, Revealing or Disclosing Personal Data	Imprisonment up to 1 year or fine up to 120 days (Art. 51, No. 1 of Law No. 58/2019)
Violation of Professional Secrecy Aggravated if for Obtaining Financial or Other Advantage	Imprisonment up to 2 years or fine up to 240 days (Art. 51, No. 2 of Law No. 58/2019)
Fraud in Obtaining or Misappropriation of Subsidy	Imprisonment up to 8 years or fine (Art. 36 of Decree-Law No. 28/84)