



HUAWEI

Plan for Prevention of Risks of Corruption and Related Offences

Huawei Tech. Portugal - Tecnologias de Informação, Lda.

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I.

FRAMEWORK AND SCOPE

The phenomenon of corruption is present in all societies and permeates various historical moments, affecting social development and economic growth, generating situations of discredit and reputational crises in institutions.

In Portugal, this phenomenon has deserved a growing concern by the society.

In this sense, by Resolution of the Council of Ministers no. 37/2021, of April 6, the National Anti-Corruption Strategy 2020-2024 was approved.

Following that Resolution, Decree-Law No. 109-E/2021, of 9 December (DL No. 109-E/2021) enshrines the obligation to adopt a set of measures to prevent corruption by entities with 50 or more employees.

Similarly, the Criminal Code now provides for the possibility for the court to mitigate especially the penalty to be imposed on the legal person if it has adopted and implemented, prior to the commission of the crime, an appropriate regulatory compliance program to prevent the commission of the crime or crimes of the same kind.

Huawei Tech. Portugal - Tecnologias de Informação, Lda. (hereinafter Huawei Portugal) is committed to respecting and creating conditions for compliance with the rules on corruption. In this sense, adopted the present Plan for the Prevention of Risks of Corruption and Related Offences (PPR), in compliance with the provisions of Decree No. 109-E/2021.

In addition to this PPR, Huawei Portugal has (i) a Business Code of Conduct and a Code of Conduct in the Relationship with partners; (ii) an internal training plan on the subject; (iii) a reporting channel and (iv) a regulatory compliance officer, in compliance with the provisions of article 5 of Decree No. 109-E/2021.

This PPR identifies, analyzes and classifies, in relation to the main areas – ICT Business, Consumer Business, Digital Power Business, Cloud Computing Business, Supply Chain, Procurement, Human Resources, Public Relations, Finance, Admin Service, the potential risks of corruption or related offences associated with the daily business activities, systematizes the existing measures to prevent these risks, as well as any corrective measures to reduce the likelihood of occurrence and impact of the risks and situations identified.

List of Acronyms

CCO: Chief Compliance Officer

PO: Process Owner

ICT: Information and Communications Technology

BCG: Business Conduct Guidelines

CT: Compliance Testing

PR: Proactive Review

ABC: Anti-Bribery and Corruption Compliance

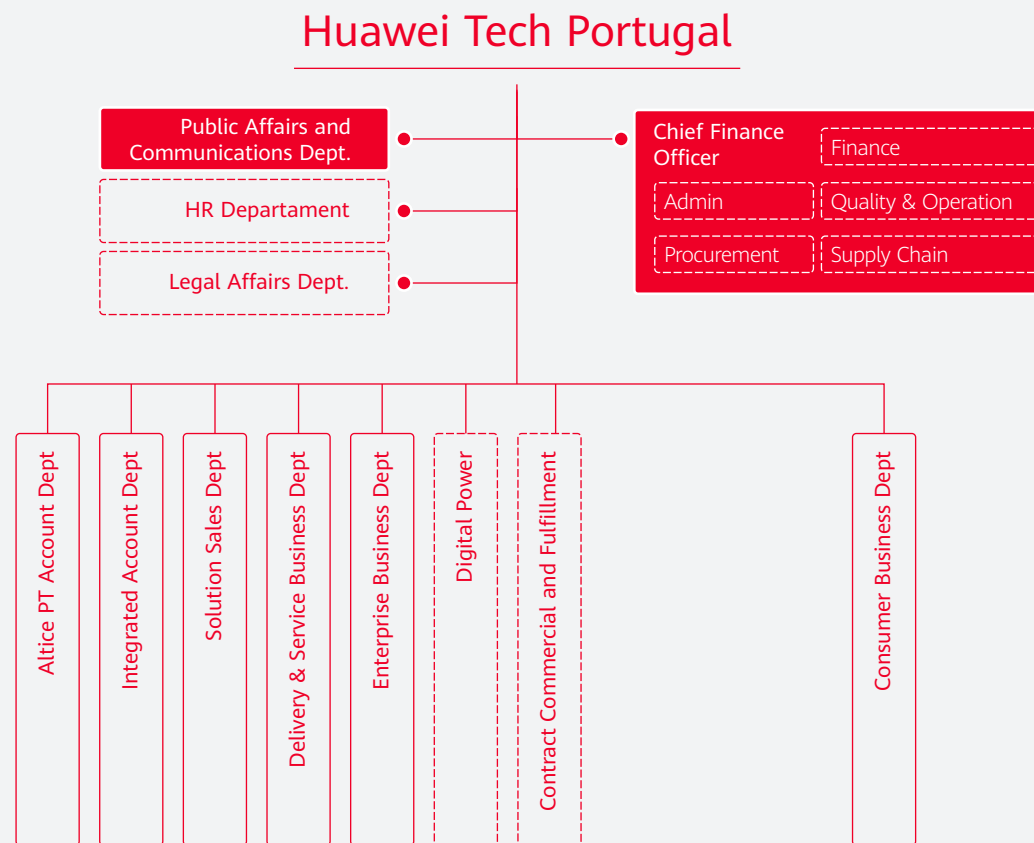
II.

INTRODUCTION OF HUAWEI PORTUGAL

Huawei is a leading global provider of information and communications technology (ICT) infrastructure and smart devices. We are committed to bringing digital to every person, home, and organization for a fully connected, intelligent world. In the fields of communications networks, IT, smart devices, cloud services, intelligent automotive solutions, and digital power, we provide customers with competitive, secure, and reliable products, solutions, and services. Through open collaboration with ecosystem partners, we create lasting value for our customers, working to empower people, enrich home life, and inspire innovation in organizations of all shapes and sizes.

Established in Portugal since 2004, Huawei has since earned recognition as a Top Employer for 2023 through its 18-year dedication to nurturing local talent. At the forefront of enabling the country's digital transition, the company continues to support Portugal's national progress through reliable connectivity and green solutions.

HUAWEI PORTUGAL ORGANIZATION CHART



a. Leadership and Oversight on Compliance Management

Country Board of Directors shall take responsibility for compliance management and is specifically responsible for:

- 7 Approve the annual compliance risk map of the country.
- 7 Approve country compliance management objectives, measures, and target achievement assessment results
- 7 Review of country compliance management
- 7 Review of major compliance issues and events

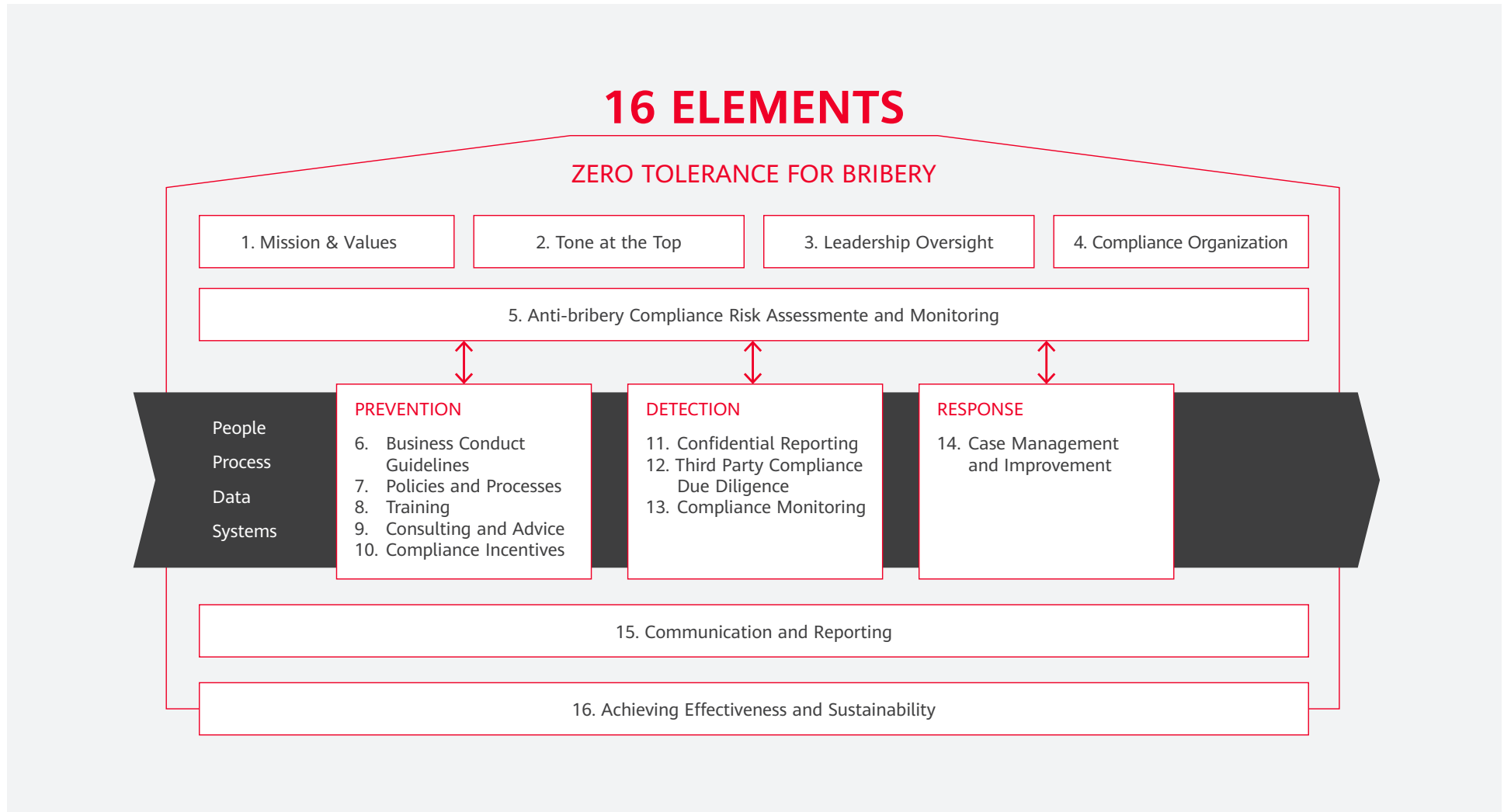
CEO as the primary owner for subsidiary compliance management is specifically responsible for:

- 7 The compliance management of the subsidiary, and the compliance results of all business and employee behavior of the subsidiary.
- 7 Develop compliance governance, including building compliance tone and policies, compliance culture, compliance responsibility system, and compliance appraisal and accountability.

Directors of each business domain as the primary owner for compliance management in the respective business domain is specifically responsible for E2E business compliance management and employee behavior compliance management, and be responsible for the final results.

b. Anti-briber and Corruption System Framework

Huawei is committed to establishing an Anti-bribery and Corruption compliance system (hereinafter referred to as the “ABC system”) that complies with industry best practices through continuous investment of resources. In order to identify, mitigate, and systematize ABC risks, Huawei establish a systematic and unified approach to raise compliance awareness and develop prevention and response measures from four aspects: Compliance and integrity culture, Governance and supervision, Prevention-detection-response, and Communication and system sustainability.



LOGICAL RELATIONSHIP BETWEEN THE 16 ELEMENTS OF HUAWEI'S ABC SYSTEM

4 Modules	Logical Relation	Included Elements
Compliance and Integrity Culture	<p>Module 1 is used as a "tuner". This module determines the concept and principle of system design.</p>	<ol style="list-style-type: none"> 1. Mission Statement and Values 2. High-level tone
Governance and supervision	<p>Module 2 is used to "lay the foundation and set the direction" for the effective operation of the ABC system.</p> <p>Management - Overseeing system operation</p> <p>Compliance Organization - Operation of the Support System</p> <p>Risk Map - Guide the Operation of the Next Module "Prevention-Discovery-Response"</p>	<ol style="list-style-type: none"> 3. Management oversight 4. Compliance organizations <p>5. Compliance risk assessment and monitoring</p>
Prevention -Discovered -coping	<p>Module 3 is the "three core pillars of risk control" of the ABC system, which determines how the ABC system acts on the business.</p> <p>The design and operation of this module should be aligned with risks and integrated into business.</p> <p>Each element in the module should be designed and executed with the ABC risk map as the starting point.</p> <p>This module should cover relevant businesses, including involved processes, data, systems, and personnel.</p>	<ol style="list-style-type: none"> 6. Code of Conduct 7. Policies and Processes 8. Training 9. Advice and recommendations 10. Incentive mechanism 11. Reporting and confidential reporting 12. Third-party due diligence 13. Compliance monitoring 14. Case management and improvement
Communication and system sustainability	<p>The function of module 4 is to ensure the "long-term operation" of the ABC system.</p>	<ol style="list-style-type: none"> 15. Communication and reporting 16. Achieving effectiveness and sustainability

c. Internal Control System

All level management and PO (Process Owner) of Huawei Portugal is the primary responsible person of the internal control matter for the respective scope of operation in charge and they are required to undertaking the responsibility initiatively according to Accountability Rules & Regulations.

The management is highly appreciated the process owner and process controller proactively managing internal control matter especially is exploring and exposing internal control issues for management improvement purposes to mitigate potential risks and losses as well as improving operation efficiency to increase operation result. Process owner and process controller is required to perform internal control conduct at least but not restricted to following area:

1. Establishing effective internal control organization and defining internal control responsible and authority of subordinate for the scope of operation in charge;
2. Cultivating positive internal control atmosphere and emphasizing integrity;
3. Executing accountability action strictly according to Company policy against any violation behavior especially bribery and corruption issues.
4. Exploring and exposing internal control issues via fully utilizing and improving of internal control tools like CT (Compliance Testing) and PR (Proactive Review).
5. Organizing and monitoring top issues improvement program to ensure effective corrective action implementation and execution.

The Company centrally authorizes Internal Audit Dept to carry out audit activities and investigations over economically-related violations, and to help assure internal and external compliance and prevent corruption. Internal Audit initiates audits and investigations over all business areas of the Company, key positions with economic accountabilities and fraud leads, and issue audit and investigation report independently, to set up a cold deterrence system.

The business manager can carry out risk management and monitoring according to their risk control needs, or conduct a risk assessment, or perform a proactive review project to assess the control effectiveness for a new business or process.



III.

RISKS OF CORRUPTION AND RELATED INFRACTIONS

a. Corruption offences and related offences

Under the provisions of Decree No. 109-E/2021, corruption and related offences are understood as the following crimes: active corruption, passive corruption, improper receipt and offer of advantage, embezzlement, economic participation in business, concussion, abuse of power, prevarication, influence peddling, laundering, fraud in obtaining and misappropriation of subsidy, subsidy or credit.

Legal type	Description	Legal type
Active corruption	<p>Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises to a public employee or a third party, at their instigation or with their knowledge, a pecuniary or non-pecuniary advantage in return for an act or omission in the exercise of their functions, even if the act or omission does not involve a violation of their official duties.</p> <p>Punishable by imprisonment for up to 5 years or a fine of up to 360 days (€1,800 - €180,000) for natural persons.</p> <p>In the case of a legal person, a fine of up to 600 days (€60,000 - €6,000,000) may be imposed.</p>	Penal Code Art. 374
Offer of undue advantage	<p>Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or promises to a public employee, or to a third party indicated or known to them, a pecuniary or non-pecuniary advantage which is not due to them, in the exercise of their functions or because of them.</p> <p>Punishable by imprisonment for up to 3 years or a fine of up to 360 days (€1,800 - €180,000) for natural persons.</p> <p>A legal person may be sentenced to a fine of up to 360 days (between €36,000 and €3,600,000).</p>	Penal Code Art. 372



Legal type	Description	Legal type
Active corruption affecting international trade	<p>Anyone who, by themselves or with their consent or ratification, through an intermediary, gives or promises to a national, foreign or international public employee, or to a national or foreign political officeholder, or to a third party with their knowledge, a material or non-material advantage that is not due to them, in order to obtain or retain a business, a contract or any other improper advantage in international trade.</p> <p>Punishable by 1 to 8 years imprisonment for natural persons.</p> <p>A legal person can be fined to a fine of between €96,000 and €9,600,000 for up to 960 days.</p>	<p>Law no. 20/2008 of 21 April (Criminal Liability for crimes of corruption in International Trade and Private Activity)</p> <p>Art. 7</p>
Passive corruption in the private sector	<p>Anyone who [private sector employee], by themselves or with their consent or ratification by an intermediary, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage or the promise thereof, without being entitled to it, for an act or omission that constitutes a violation of their professional duties.</p> <p>Punishable by imprisonment for up to 8 years or a fine of up to 600 days (€3,000 - €300,000) for natural persons.</p> <p>The legal person may be sentenced to a fine of up to 960 days (between €96,000 and €9,600,000).</p>	<p>Law no. 20/2008 of 21 April (Criminal Liability for crimes of corruption in International Trade and Private Activity)</p> <p>Art. 8</p>
Active corruption in the private sector	<p>Anyone who, by themselves or with their consent or ratification, through an intermediary, gives or promises to an employee of the private sector, or to a third party with their knowledge, a pecuniary or non-pecuniary advantage that is not due to them, for the performance of an act or omission that constitutes a violation of their professional duties.</p> <p>Punishable by imprisonment for up to 5 years or a fine of up to 600 days (€3,000 - €300,000) for natural persons.</p> <p>The legal person may be sentenced to a fine of up to 600 days (between €60,000 and €6,000,000).</p>	<p>Law no. 20/2008 of 21 April (Criminal liability for crimes of corruption in international trade and private activity)</p> <p>Art. 9</p>



Legal type	Description	Legal type
Influence peddling	<p>Anyone who, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a material or non-material advantage, or the promise thereof, in order to abuse their real or supposed influence over a public entity; or Anyone who, by themselves or through an intermediary, with their consent or ratification, grants or promises a material or non-material advantage to the above-mentioned persons.</p> <p>Punishable by imprisonment for up to 5 years or a fine of up to 240 days (EUR 1,200 - EUR 120,000) for natural persons.</p> <p>A legal person may be sentenced to a fine of up to 600 days (between €60,000 and €6,000,000).</p>	<p>Penal Code Article 335</p>
Money Laundering	<p>Anyone who, directly or indirectly, converts, transfers, assists or facilitates the conversion or transfer of advantages obtained by themselves or by a third party with the purpose of disguising their illicit origin or avoiding prosecution for the crime (s) committed.</p> <p>Punishable by up to 16 years imprisonment for natural persons.</p> <p>The legal person may be sentenced to a fine of up to 1920 days, ranging from €192,000 to €19,200,000.</p>	<p>Penal Code Article 368-A</p>
Fraud in obtaining a subsidy or grant	<p>Anyone who obtains a subsidy or grant:</p> <ul style="list-style-type: none"> a. Providing inaccurate or incomplete information to the competent authorities or bodies about themselves or a third party and about important facts for the granting of the subsidy or grant; b. Omitting information on important facts for the granting of the subsidy or grant; c. Using a document that justifies the right to the subsidy or grant or important facts for its granting, obtained through inaccurate or incomplete information. <p>Punishable by 1 to 8 years imprisonment for natural persons.</p> <p>In the case of a legal person, a fine of up to 960 days, between €96,000 and €9,600,000 or even dissolution may be imposed.</p>	<p>DL no. 28/84, of 20 January (Anti-economic offences against public health) Art. 36</p>

Legal type	Description	Legal type
Fraud in obtaining credit	<p>Anyone who, when submitting an application for the granting, maintaining or modifying of the conditions of a credit intended for an establishment or a company:</p> <ul style="list-style-type: none"> a. Provides inaccurate or incomplete information in writing which is intended to accredit themselves or is important for the decision on the application; or b. Uses inaccurate or incomplete documents relating to the economic situation, in particular balance sheets, profit and loss accounts, general descriptions of assets or expert reports. c. Conceals deteriorations in the economic situation that have occurred in relation to the situation described at the time of the credit application and that are important for the decision on the application. <p>Punishable by imprisonment for up to 5 years or a fine of up to 200 days (€1,000 - €100,000) for natural persons.</p> <p>A legal person may be sentenced to a fine of up to 600 days, between €60,000 and €6,000,000, or even be dissolved.</p>	DL no. 28/84, of 20 January (Anti-economic offences against public health) Art. 38
Diversion of a subsidy, grant or subsidized credit	<p>Anyone who uses benefits obtained as a subsidy, grant or subsidized credit for purposes other than those for which they are legally intended or those provided for in the credit line determined by the legally competent authority.</p> <p>Punishable by imprisonment for up to six years or a fine of up to 200 days (€1,000 - €100,000).</p> <p>The legal person may be sentenced to pay a fine of up to 720 days, between €72,000 and €7,200,000, or even be dissolved.</p>	DL No. 28/84, of 20 January (Anti-economic infractions and against public health) Article 37

b. Definition of degrees of risks

The definition of the degrees of risk is based on two variables: (i) the probability of occurrence of situations involving risk and (ii) the foreseeable impact of the infringements to which it may give rise (or the seriousness of the consequence).

The probability of occurrence of situations involving risk may be classified as follows, considering their degree of recurrence during the year or the experience of the organization or other organizations of the same nature in similar situations:

- 7 **High:** frequent occurrence;
- 7 **Medium:** likely to occur within a year;
- 7 **Low:** unlikely to occur within a year;

In turn, the foreseeable impact of the infringements to which it may give rise can be classified as follows, considering the estimation of its financial impact, at the reputational level, at the level of the strategic objectives of the organization and, also, the ability to recover, partial or total:

- 7 **High:** the identified risk situation may cause wide impact and serious consequences on financial losses and reputation damage with negative impact at group level;
- 7 **Middle:** the identified risk situation may entail moderate impact and consequences on financial losses and reputational damage, with negative impact at region level;
- 7 **Low:** the identified risk situation may entail limited impact and consequences on financial losses and reputational damage, with negative impact at country level;





From the combination of these two variables results the following matrix of the degrees of risk:

Degree of risk		Probability of Occurrence (PO)		
		High	Medium	Low
Impact forecast (IP)	High	High	High	Medium
	Medium	High	Medium	Low
	Low	Medium	Low	Low

Finally, and in view of this risk classification, the level of residual risk is measured, which corresponds to the one that persists after considering all mitigating measures (preventive and corrective) that are defined in order to mitigate the risks identified for each area of activity.

Notwithstanding the above, it should be noted that the classification of degrees of risk presented herein, as well as the risk factors and schemes listed below, aim to represent an assessment that is made from an abstract point of view, taking into consideration the existing risk context and experience of the country and sector in which Huawei Portugal operates. Thus, it does not amount to an actual representation of existing or actual situations of risks within the context of the company's business.

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c. Matrix of Risk Identification, Assessment and Preventive Measures

Area	Activities (exposed to RCRO)	Risk Factor Cause Level	Scheme	PO Possibility of Occurrence	IP Impact Forecast	R-risk	Prevention Measures and Internal Controls	RR residential risk	Responsible for the Measures
ICT Business	<ol style="list-style-type: none"> Marketing Management Customer Relationship Management Direct Sales Channel Sales Delivery and Service 	<ol style="list-style-type: none"> Insufficient monitoring the procedures of KYC during the contractual relationships; Influence peddling; Negotiating/Contracting with private third parties (conflicts of interest); Access to commercially sensitive information / privileged or confidential information; Use and/or disclosure of information privileged for own or third-party benefit; Offering or accepting favors in exchange for the granting of Advantages and/or benefits Lack of exemption and impartiality in the selection criteria; Acquisition of goods/services with improper price; Favoring unduly of third party; Absence of report with the intention of favor the concealment of certain irregularities. 	<ol style="list-style-type: none"> High value entertainment or hospitality with customers; Provide private or luxuries activities during Exhibitions and Visits Event or cover the expenses of customers' family; 3. Invite customers, partners, or public officials who have a conflict of interest to attend culture and sports activities; Gift tickets for cultural and sports events to family members of customers and partners; Partner/third party sales; Un-transparent Customer-designated procurement; Low amount Self-procurement 	M	M	M	Statement of Anti-bribery and Corruption Commitment Business Code of Conduct; Anti-bribery Policy; Gift and hospitality policy; Regulations on Entertainment Expenses; Customer-facing Sponsorship management regulation; Regulations on Managing the Joint Market Fund (JMF) for Enterprise Business; Regulations on Managing the Market Development Fund (MDF) for Enterprise Business; Code of Conduct for Partners; Third-Party Due Diligence; Regulations on Respecting and Protecting Third-party Trade Secrets; Whistle-Blowing Policy; Internal Control & Audit Management; Annual Training Plan.	L	Carrier Business Key Account Directors, Manage Sales and Solution Director, Deliver and Service Director, Enterprise Business Director

Area	Activities (exposed to RCRO)	Risk Factor Cause Level	Scheme	PO Possibility of Occurrence	IP Impact Forecast	R-risk	Prevention Measures and Internal Controls	RR residential risk	Responsible for the Measures
Consumer business	<ol style="list-style-type: none"> 1. GTM 2. Marketing 3. Channel business 4. Retail and online businesses 5. Services 6. Internet business 	<ol style="list-style-type: none"> 1. Negotiating/Contracting with private third parties (conflicts of interest); 2. Access to commercially sensitive information / privileged or confidential information; 3. Offering or accepting favors in exchange for the granting of Advantages and/or benefits; 4. Lack of exemption and impartiality in the selection criteria; 	<ol style="list-style-type: none"> 1. High value entertainment or hospitality with customers; 2. Provide private or luxuries activities during Exhibitions and Visits Event or cover the expenses of customers' family; 3. Partner/third party incentive; 	M	L	L	<p>Statement of Anti-bribery and Corruption Commitment;</p> <p>Business Code of Conduct;</p> <p>Anti-bribery Policy;</p> <p>Gift and hospitality policy;</p> <p>Regulations on Entertainment Expenses;</p> <p>Consumer BG Sponsorship Business Guidelines;</p> <p>Channel Joint Marketing Activity Management Process;</p> <p>Code of Conduct for Partners;</p> <p>Third-Party Due Diligence;</p> <p>Regulations on Respecting and Protecting Third-party Trade Secrets;</p> <p>Whistle-Blowing Policy;</p> <p>Internal Control & Audit Management;</p> <p>Annual Training Plan.</p>	L	Consumer Business Director

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Area	Activities (exposed to RCRO)	Risk Factor Cause Level	Scheme	PO Possibility of Occurrence	IP Impact Forecast	R-risk	Prevention Measures and Internal Controls	RR residential risk	Responsible for the Measures
Digital Power Business	<ol style="list-style-type: none"> 1. Marketing Management 2. Customer Relationship Management 3. Direct Sales 4. Channel Sales 5. Delivery and Service 6. Partner relationship management 	<ol style="list-style-type: none"> 1. Insufficient monitoring the procedures of KYC during the contractual relationships; 2. Influence peddling; 3. Negotiating/Contracting with private third parties (conflicts of interest); 4. Access to commercially sensitive information / privileged or confidential information; 5. Use and/or disclosure of information privileged for own or third-party benefit; 6. Offering or accepting favors in exchange for the granting of Advantages and/or benefits 7. Lack of exemption and impartiality in the selection criteria; 8. Acquisition of goods/services with improper price; 9. Favoring unduly of third party; 10. Absence of report with the intention of favor the concealment of certain irregularities. 	<ol style="list-style-type: none"> 1. High value entertainment or hospitality with customers; 2. Provide private or luxuries activities during Exhibitions and Visits Event or cover the expenses of customers' family; 3. Partner improper sales and incentive; 4. Untransparent Customer-designated procurement 	M	L	L	<p>Statement of Anti-bribery and Corruption Commitment</p> <p>Business Code of Conduct;</p> <p>Anti-bribery Policy;</p> <p>Gift and hospitality policy;</p> <p>Regulations on Entertainment Expenses;</p> <p>Guide to Partner Selection and Conflict Handling of Digital Power Business;</p> <p>Regulations on MDF of Digital Power Partners;</p> <p>Regulations on JMF of Digital Power Partners;</p> <p>Quick Reference Guide on Compliance with Trade Secrets During Visits and Conferences (MCR);</p> <p>Code of Conduct for Partners;</p> <p>Third-Party Due Diligence;</p> <p>Whistle-Blowing Policy;</p> <p>Internal Control & Audit Management;</p> <p>Annual Training Plan.</p>	L	Digital Power Business Director



Area	Activities (exposed to RCRO)	Risk Factor Cause Level	Scheme	PO Possibility of Occurrence	IP Impact Forecast	R-risk	Prevention Measures and Internal Controls	RR residential risk	Responsible for the Measures
Cloud computing	<ol style="list-style-type: none"> 1. Marketing 2. Consultation and sales 3. Delivery and services 4. Cloud service operations 5. Partner management 6. Customer relationship management 	<ol style="list-style-type: none"> 1. Negotiating/Contracting with private third parties (conflicts of interest); 2. Access to commercially sensitive information / privileged or confidential information; 3. Use and/or disclosure of information privileged for own or third-party benefit; 4. Favoring unduly of third party; 	<ol style="list-style-type: none"> 1. High value entertainment or hospitality with customers; 2. Provide private or luxuries activities during Exhibitions and Visits Event or cover the expenses of customers' family; 	L	L	L	<p>Statement of Anti-bribery and Corruption Commitment</p> <p>Business Code of Conduct;</p> <p>Anti-bribery Policy;</p> <p>Gift and hospitality policy;</p> <p>Regulations on Entertainment Expenses;</p> <p>Code of Conduct for Partners;</p> <p>Third-Party Due Diligence;</p> <p>Regulations on Respecting and Protecting Third-party Trade Secrets;</p> <p>Whistle-Blowing Policy;</p> <p>Internal Control & Audit Management;</p> <p>Annual Training Plan.</p>	L	Could computing business director

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Area	Activities (exposed to RCRO)	Risk Factor Cause Level	Scheme	PO Possibility of Occurrence	IP Impact Forecast	R-risk	Prevention Measures and Internal Controls	RR residential risk	Responsible for the Measures
Supply chain	<ol style="list-style-type: none"> Order shipment Logistics Reverse logistics 	<ol style="list-style-type: none"> offering or accepting favors in exchange for the granting of Advantages and/or benefits; Favoring unduly of third party; 	<ol style="list-style-type: none"> High value entertainment or hospitality with custom government official; 	L	L	L	Manage Logistics Resource Continuity and Risk Process; Code of Conduct for Partners; Third-Party Due Diligence; Whistle-Blowing Policy; Annual Training Plan.	L	Supply Chain Manager
Procurement	<ol style="list-style-type: none"> Supplier qualification and selection Supplier procurement to payment (PTP) 	<ol style="list-style-type: none"> Negotiating/Contracting with private third parties (conflicts of interest); Use and/or disclosure of information privileged for own or third-party benefit; offering or accepting favors in exchange for the granting of Advantages and/or benefits; Lack of exemption and impartiality in the selection criteria; Acquisition of goods/services with improper price; Favoring unduly of third party; Absence of report with the intention of favor the concealment of certain irregularities. 	<ol style="list-style-type: none"> Employee receiving high value entertainment or hospitality; Untransparent customer-designated procurement; 	L	L	L	Statement of Anti-bribery and Corruption Commitment Business Code of Conduct; Anti-bribery Policy; Gift and hospitality policy; Work Instructions on Accepting Marketing and Communication Procurement; Regulations on Managing Independent Consultant Service; Code of Conduct for Partners; Third-Party Due Diligence; Regulations on Respecting and Protecting Third-party Trade Secrets; Whistle-Blowing Policy; Internal Control & Audit Management; Annual Training Plan.	L	Procurement Manager

Area	Activities (exposed to RCRO)	Risk Factor Cause Level	Scheme	PO Possibility of Occurrence	IP Impact Forecast	R-risk	Prevention Measures and Internal Controls	RR residential risk	Responsible for the Measures
Human resources	<ol style="list-style-type: none"> 1. Recruitment 2. Onboarding 3. Compensation & benefits 4. Visa 5. Contract termination 6. Employee personal data protection 7. Non-staff workers 	<ol style="list-style-type: none"> 1. Undue employee advantage (conflict of interest); 2. Favoring unduly of third party; 3. Absence of report with the intention of favor the concealment of certain irregularities. 	Low amount Self-procurement	L	L	L	Statement of Anti-bribery and Corruption Commitment Business Code of Conduct; Anti-bribery Policy; Gift and hospitality policy; Huawei Regulations for Non-staff Workers; Regulations on Workforce Management; Code of Conduct for Partners; Third-Party Due Diligence; Regulations on Respecting and Protecting Third-party Trade Secrets; Whistle-Blowing Policy; Internal Control & Audit Management; Annual Training Plan.	L	Human Resource Manager

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Public relations	<ol style="list-style-type: none"> Social contribution programs and sponsorships Corporate communication management 	<ol style="list-style-type: none"> Relationship with public officials and/or politically exposed persons; Negotiating/Contracting with private third parties (conflicts of interest); Access to commercially sensitive information / privileged or confidential information; offering or accepting favors in exchange for the granting of Advantages and/or benefits; 	<ol style="list-style-type: none"> High value entertainment or hospitality with journalist or other external stakeholders; Provide private or luxuries activities during Exhibitions and Visits Event or cover the expenses of external stakeholders' family; Invite customers, partners, or public officials who have a conflict of interest to attend culture and sports activities; Gift tickets for cultural and sports events to family members of external stakeholders; sponsorship Donations for public welfare Low amount Self-procurement. 	M	L	L	Statement of Anti-bribery and Corruption Commitment Business Code of Conduct; Anti-bribery Policy; Gift and hospitality policy; Sponsorship Management Regulations in the Public Relations Domain V2.0; Receive Government Officials and Relevant Parties; Manage Media Affairs (Media Tour Process); Code of Conduct for Partners; Third-Party Due Diligence; Regulations on Respecting and Protecting Third-party Trade Secrets; Whistle-Blowing Policy; Internal Control & Audit Management; Annual Training Plan.	L	Public Relation Manager



Area	Activities (exposed to RCRO)	Risk Factor Cause Level	Scheme	PO Possibility of Occurrence	IP Impact Forecast	R-risk	Prevention Measures and Internal Controls	RR residential risk	Responsible for the Measures
Finance	<ol style="list-style-type: none"> 1. Manage Treasury 2. Manage Accounting and Reporting 3. Manage Sales Financing 4. Manage Tax 5. Manage Subsidiaries 6. Manage Planning, Budgeting, and Forecasting 7. Manage Pricing 8. Manage Risks and Internal Controls 	<ol style="list-style-type: none"> 1. offering or accepting favors in exchange for the granting of Advantages and/or benefits; 2. Absence of report with the intention of favor the concealment of certain irregularities. 3. Less accounting controls. 	<ol style="list-style-type: none"> 1. High value entertainment or hospitality with customers; 2. Invite customers, partners, or public officials who have a conflict of interest to attend culture and sports activities; 3. Gift tickets for cultural and sports events to family members of external stakeholders; 4. Low amount Self-procurement. 	L	L	L	Statement of Anti-bribery and Corruption Commitment Business Code of Conduct; Anti-bribery Policy; Gift and hospitality policy; Financial Compliance Guidelines; Guidelines for Know Your Customer Information Disclosure Regarding Treasury Management and Sales Financing; Code of Conduct for Partners; Third-Party Due Diligence; Regulations on Respecting and Protecting Third-party Trade Secrets; Whistle-Blowing Policy; Internal Control & Audit Management; Annual Training Plan.	L	Chief Finance Officer

IV.

IMPLEMENTATION, MONITORING AND EVALUATION

Huawei Tech. Portugal - Tecnologias de Informação, Lda. maintains a system of internal control and monitoring of the business and operations carried out, which is well adjusted to the risks of corruption and conflicts of interest specific to the activity carried out by it.

The management bodies of Huawei Tech. Portugal - Tecnologias de Informação, Lda. are responsible for promoting the implementation of appropriate procedures and control systems for monitoring compliance with this PPR and any other complementary rules approved and implemented by the company for the prevention of corruption.

The ABC compliance core team is responsible for executing, controlling and reviewing the PPR.

In carrying out the task's incumbent upon him, the CCO, as the highest responsible for the area of Compliance, acts with complete autonomy, being able to freely access any information relating to the life and activity of the company, as well as conduct the necessary diligences, in particular with a view to the identification of any risks, contingencies or breaches of compliance and,

as well as the implementation of appropriate measures to remedy them.

The company, in carrying out its PPR, shall draw up:

- i. in October, an interim report on identified high or maximum risk situations of corruption or related offences;
- ii. in the month of April of the year following implementation, an annual evaluation report, containing the quantification of the degree of implementation of the preventive and corrective measures identified, as well as the forecast of their full implementation.

The PPR will be reviewed every three years or whenever a risk review is warranted.

The company advertises the PPR and the aforementioned reports to its employees via the intranet and on its official website.





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Plan for Prevention of Risks of Corruption and Related Offences

Huawei Tech. Portugal - Tecnologias de Informação, Lda.
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