

Risk Prevention Plan for Corruption and Related Offenses

September 2025



Document Title	Risk Prevention Plan for Corruption and Related Offenses
Purpose	The Risk Prevention Plan for Corruption and Related Offenses (RPPCRO) establishes the framework through which Start Campus identifies, assesses, and mitigates risks of corruption, fraud, and breaches across all areas of activity. Its purpose is to ensure compliance with Decree-Law 109-E/2021 and the guidance of the National Anti-Corruption Mechanism (MENAC), while embedding a culture of transparency, accountability, and ethical conduct throughout the organization.
Owner	Chief Compliance Officer
Version	3.0
Effective Date	22 of May of 2024
Status	
Confidentiality	Internal

Rev	Date	Reason for change	Author	Approved by	Effective date
01	22/05/2024	N/A	Chief Compliance Officer	Board of Directors	10/05/2024
02	15/05/2025	New Team's Structure	Chief Compliance Officer	Board of Directors	21/05/2025
03	17/09/2025	Risk revision and Team Structure Update	Chief Compliance Officer	Board of Directors	19/09/2025

Table of Contents

1. FOREWORD.....	4
2. DEFINITIONS.....	6
3. START CAMPUS' MISSION AND VALUES	8
4. IDENTIFICATION OF THE RISKS.....	9
a. Risks related to Start Campus' sector of activity.....	9
b. Risks related to Start Campus' organizational structure chart	10
c. Risk analysis.....	10
d. Risk graduation	10
e. Mitigation of the risks of corruption and related offences.....	13
5. ADDITIONAL PREVENTIVE AND CORRECTIVE MEASURES	15
a. Execution, control and review of the PPR.....	15
6. START CAMPUS' CHART AND RISK ANALYSIS.....	17
i. Board of Directors	18
ii. Sole Statutory Auditor	20
iii. Remuneration Committee.....	21
iv. CEO	22
v. Corporate Development.....	24
vi. Sustainability.....	25
vii. Finance.....	28
viii. Commercial Strategy.....	32
ix. Marketing.....	34
x. Sales	36
xi. Compliance.....	38
xii. Legal.....	41
xiii. People.....	44
xiv. Office Support	47
xv. COO	49
xvi. Design & Delivery	51
xvii. Operations.....	53
xviii. Security	55
xix. Energy	58
xx. Connectivity.....	61
xxi. IT & Telco.....	63
xxii. Procurement.....	65
7. ANNEX I – LIST OF CRIMES RELATED TO THE GRPC	68

1. FOREWORD

Start – Sines Transatlantic Renewable Energy Campus, S.A. (hereinafter referred to as “**Start Campus**” or “**Company**”) is focused on the development, construction, and operation of a state-of-the-art AI ready hyperscale 1.2GW data centre campus, integrating liquid cooling technologies into flexible and scalable design, to be entirely powered by 100% renewable energy sources. This strategic undertaking position, based on technological innovation and environmental sustainability, reflects Start Campus long-term commitment to advancing responsible business practices within the global digital infrastructure sector.

In furtherance of its institutional mission and legal obligations, and in strict compliance with the applicable normative framework, Start Campus has formally adopted a Plan for the Prevention of Corruption Risks and Related Offences (hereinafter, the “**Plan**”). This document reflects a critical component of the Company’s internal compliance architecture and has been developed in conformity with the provisions of Decree-Law No. 109-E/2021, of 9 December, which approved the General Regime for the Prevention of Corruption (*Regime Geral de Prevenção da Corrupção*, hereinafter referred to as “RGPC”).

The Plan is intended not merely as a regulatory instrument, but as a substantive expression of Start Campus’s institutional values — namely, a steadfast commitment to legality, ethical conduct, transparency, and integrity across all organic units, business departments, operational domains and in every relationship with stakeholders, whether public or private.

The Plan is conceived as one of the foundational pillars of the Start Campus Group’s overarching compliance framework. It is not a standalone instrument but rather forms part of an integrated system of policies and procedures aimed at ensuring ethical conduct and legal conformity at all levels of the organization. This system includes, inter alia:

- A comprehensive Code of Conduct, applicable to all employees, officers, and representatives.
- An internal whistleblowing channel, established in accordance with applicable legislation, and ensuring confidentiality, protection from retaliation, and effective follow-up.
- A structured training and awareness programme, regularly updated to reflect legal developments and organizational needs.
- The formal appointment of a Compliance Officer, vested with the necessary autonomy, authority, and resources to ensure effective implementation and monitoring of the Plan.

Furthermore, the Plan is complemented by the Start Campus Group Integrity Policy (detailed in the Company’s Code of Conduct), which articulates the Group’s fundamental principles regarding ethical conduct, the rejection of corrupt practices, and the promotion of lawful and responsible behaviour in all business dealings. The Integrity Policy applies equally to all entities within the Start Campus Group, and extends to employees, service providers, business partners, and other relevant stakeholders.

In accordance with the RGPC, the obligations set forth therein — and consequently the implementation of the Plan — are applicable to:

- All legal persons headquartered in Portugal employing 50 or more workers; and

- All branches established within Portuguese territory of legal persons with a registered office abroad, provided that they employ 50 or more workers within the national territory.

The adoption of this Plan is a testament to Start Campus's unwavering dedication to fostering a robust culture of compliance and institutional integrity. It further reflects the organization's recognition that effective corruption prevention is not solely a matter of legal compliance, but a strategic imperative essential to long-term sustainability, corporate reputation, and stakeholder trust.

Through the continuous refinement of its internal governance structures and the institutionalization of best practices in risk management, Start Campus affirms its role as a responsible corporate company, that not only complies with the letter of the law, but embodies its spirit.

2. DEFINITIONS

AdP: Águas de Portugal.

AICEP: Portuguese Investment and Foreign Trade Agency.

APA: Portuguese Environment Authority.

BoD: Board of Directors.

Business Partner(s): means existing or potential customers, suppliers (including contractors and subcontractors), vendors or resellers / distributors of the Company and, in general, all third parties and stakeholders with whom the Company relates from a business point of view.

CCDR: Lisbon and Tagus Valley Regional Coordination and Development Commission.

CEO: Chief Executive Officer.

COO: Chief Operating Officer.

Compliance Officer: means the person designated as such at any given time, under the terms of Decree Law no. 109-E/2021, of 9 December, responsible for ensuring and controlling the application of the Regulatory Compliance Programme, which includes this Risk Prevention Plan, the Code of Conduct and the Whistleblowing Policy.

Corruption and Related Offenses: means at least the following illicit: corruption (active and passive; for lawful or unlawful acts; in the public sector, in the private sector, in political office, in the military, in the sports sector and in international trade); undue receipt or offer of an advantage (in the public sector, in political office and in the sports sector); embezzlement (appropriation, use, by deception; in the public sector and in political office); economic participation in business (in the public sector and in political office); concussion; abuse of power (in the public sector and in political office); prevarication; influence peddling; money laundering; fraud in obtaining a subsidy or grant; embezzlement of a subsidy, grant or subsidized credit; fraud in obtaining credit.

CPAI: Permanent Investor Support Committee.

DGEG: Directorate-General for Energy and Geology.

Employee(s): means the Company's employees, whatever their legal relationship and remuneration, including former employees. It includes but is not limited to members of governing bodies, directors, managers, workers, service providers, volunteers, and, exclusively for purposes of this RPP, trainees.

Facilitation Payments: means the granting of advantages of any kind to an Employee, indirectly or indirectly by Start Campus, Employees or third parties authorized for this purpose.

FP&A: Financial Planning & Analysis.

"Four eyes" principle: means a control mechanism that requires approval, review, or action by at least two qualified individuals to reduce errors, fraud, or bias in decision-making.

Gifts /Offers: means, at a minimum, donations, sponsorships, gratuities, presents, gifts, payments of expenses, entertainment, acts of hospitality or participation in events and any other gifts from or to third parties that directly or indirectly relate to START, Employees or Business Partners.

GDPR: General Data Protection Regulation, approved by Law no. 58/2019, of 8 August.

GRPC: General Regime for the Prevention of Corruption.

HPC: High-performance computing.

HSE: Health, safety, and environmental.

ICNF: Nature Conservation and Forestry Institute.

IFRS: International Financial Reporting Standards.

IoT: Internet of Things.

MENAC: National Anti-Corruption Mechanism.

Money laundering: means the act of converting, transferring, assisting, or facilitating any operation of conversion or transfer of advantages, obtained by oneself or a third party, directly or indirectly, in order to conceal their illicit origin, or to prevent the perpetrator or participant in such offenses from being criminally prosecuted or subjected to a criminal reaction. The following conducts are also considered money laundering i) the concealment or disguise of the true nature, origin, location, disposition, movement or ownership of advantages, or of the rights relating thereto; ii) the acquisition, holding or use of assets, with knowledge, at the time of their acquisition or at the initial moment of holding or use, that they come from a criminal activity or from participation in such an activity; iii) participation in one of the aforementioned acts, the association to commit said act, the attempt and complicity in its commission, as well as the fact of facilitating its execution or advising someone to commit it.

Personal data: means all information that may make it possible to directly or indirectly identify a natural person, when used independently or combined with other information.

SNC: Portuguese Accounting Standardization System.

PUE: Power Usage Effectiveness.

RGPC: General Regime for the Prevention of Corruption, approved by Decree Law no. 109-E/2021, of 9 December.

Regulatory Compliance Programme or RCP: means START's Regulatory Compliance Programme, which includes at least this RPP, the Code of Conduct, the Whistleblowing Policy and the Training Programme.

REN: Portuguese Electricity and Natural Gas Transmission company.

RRP: Risk Prevention Plan.

SINES DC: 1.2 gigawatt data center campus located in Sines, Portugal.

Unethical Behaviour: means any behaviour that is at odds with social common sense or contrary to the purpose of applicable laws and regulations.

"When in doubt, ask" principle means a workplace and compliance guideline that encourages employees to seek clarification instead of making assumptions when they are uncertain about a task, rule, or decision.

WUE: Water Usage Effectiveness.

3. START CAMPUS' MISSION AND VALUES

Start Campus is spearheading the development of SINES DC, a groundbreaking AI ready 1.2 GW data center campus strategically located in Sines, Portugal. As one of the most ambitious digital infrastructure projects in Europe, SINES DC is poised to become Europe's largest and most sustainable data center ecosystem, establishing a new global benchmark in energy efficiency, technological scalability, and environmental responsibility.

More than just a data center, SINES DC represents a paradigm shift in how large-scale digital infrastructure is conceived, built, and operated. At the heart of Start Campus' vision is a commitment to accelerating global digital transformation by delivering AI-ready, cloud-optimized infrastructure that supports the exponential growth of cloud computing HPC, and emerging technologies such as machine learning, blockchain, and the IoT.

Start Campus is redefining sustainability in the digital age. The entire campus will be 100% powered by renewable energy, capitalizing on Portugal's robust green energy resources, and features innovative seawater-based cooling systems that drastically reduce environmental impact. These systems enable an exceptional PUE, with no water consumption, reflecting industry-leading performance in resource efficiency and environmental stewardship.

In addition to technical excellence, Start Campus prioritizes flexibility and client-centric solutions, offering a range of deployment models—powered shell, turnkey, and build-to-suit options—designed to serve the dynamic needs of hyperscale cloud providers, multinational enterprises, and next-generation tech companies.

At its core, Start Campus is guided by foundational values of sustainability, innovation, resilience, and social responsibility. These principles shape not only its infrastructure projects, but also its relationships with employees, local communities, governments, and global partners. Through educational initiatives, job creation, and regional investment, Start Campus is committed to fostering long-term economic development and positioning Portugal as a leading digital hub for Europe and the world.

By aligning advanced technology with ecological integrity and human-centric values, Start Campus is building the infrastructure of tomorrow, smarter, cleaner, and more inclusive.

4. IDENTIFICATION OF THE RISKS

a. Risks related to Start Campus' sector of activity

Start Campus carries out its activity of building hyperscale data centers which require Start Campus' engagement in the development and construction of hyperscale data centers, a complex and highly regulated activity that necessitates ongoing interaction with a wide range of public and private stakeholders. These include authorities and institutions responsible for reviewing and approving infrastructure projects, issuing permits and licenses, conducting environmental and technical assessments, and overseeing compliance with applicable legal and regulatory frameworks. Given the nature of these interactions and the potential influence such entities may have over critical project milestones, they inherently involve a heightened exposure to risks associated with corruption, undue influence, and other related offenses. Accordingly, Start Campus recognizes the importance of implementing robust governance, transparency, and ethical standards to mitigate such risks and ensure full compliance with anti-corruption regulations.

In particular, and of significant relevance to the considerations outlined above, the development and investment plans for the infrastructure necessary to implement Start Campus's projects are subject to review and opinion namely, but not limited to, by the Sines City Council, AICEP and ERSE.

Furthermore, the licensing of the construction and installation works requires a formal Environmental Impact Assessment conducted by APA. Additionally, any proposal involving the development of infrastructure related to the installation and operation of data centers must undergo final evaluation by the DGEG from both an administrative and licensing standpoint. These processes reflect the critical oversight exercised by regulatory authorities in ensuring legal, environmental, and technical compliance throughout the project lifecycle.

Also, in the context of the development of projects Start Campus interacts with other relevant entities, namely, but not limited to:

- o CCDR.
- o REN.
- o Administração do Porto de Sines.
- o Águas de Santo André.
- o AdP.
- o CPAI.
- o ICNF.
- o Officials.
- o ACER, REMIT and EMIR for Market Compliance obligations.

In this context, without prejudice to the specific risk analysis by reference to each organic unit and business departments detailed below, in abstract and related to Start Campus' business sector, the following risks have been identified:

- o Interaction with politically exposed people and holders of other public or political offices.
- o Ascription, solicitation and acceptance of offers.
- o Donations to third parties.

- Situations of conflict of interest, specifically concerning suppliers or other services providers.
- Access to and use privileged, confidential or commercially sensitive information.
- Discretion in contract management.
- Access by employees to Start Campus property or assets
- .
- Involvement with those affected by restrictive measures.
- Intervention in legal proceedings.
- Frequent relations with public organizations or office holders.

b. Risks related to Start Campus' organizational structure chart

In the risk analysis for each Start Campus organic and business units, the following guidelines were considered:

- Existence of relations with external entities, such as public entities, suppliers and clients (national or international).
- Frequency and characteristics of the relationships referred to in the previous point, as well as the nature of the external entities; and
- Frequency, nature and process relating to the acquisition and/or sale of goods and services.

c. Risk analysis

Risk management is a structured and ongoing process aimed at identifying, analysing, and mitigating potential exposures to acts of corruption and related offenses.

The first stage of this process involved identifying abstract and theoretically foreseeable risks, based on a macro-level analysis of the activities carried out by all relevant internal and external entities.

In the second stage, the identified risks were analysed using established risk assessment criteria, specifically, the likelihood of occurrence, potential impact, and overall risk level. This phase was conducted in two parts: first, by evaluating the inherent risk itself, and second, by identifying existing controls as well as additional mitigation measures necessary to reduce the level of exposure.

Finally, the third stage focused on the implementation of effective risk mitigation strategies, including the adoption of additional preventive and corrective measures designed to strengthen the organization's resilience against corruption-related threats.

A detailed account of the identified risks, their analysis, and corresponding mitigation strategies is provided in detail below.

d. Risk graduation

Risk analysis is the result of combining the probability of the risk occurring with the foreseeable impact of the risk occurring, in accordance with the recommendation of the MENAC and Guide no. 1/2023 of September, on the Instruments of the GRPC. The probability of occurrence and the foreseeable impact of each situation considers

the organic units and business departments of Start Campus with potential risk of committing acts of corruption and related offenses, as well as the respective operational and organizational context.

In this analysis, the risk matrix considered appropriate by MENAC was used and, in terms of the probability of the risk occurring, 3 different levels of classification were identified considering the existence of preventive measures and the record of their effectiveness, as well as the specific exposure of each business unit by reference to the respective functions and relationship with risk entities, according to the table below:

Probability of risk occurrence ("PO"):

Classification	Description	Levels
1 – Low	Unlikely to occur	$P \leq 1$ occurrence/5 years
2 – Medium	Occasional occurrence	1 occurrence/1 year < $P \leq 1$ occurrence/ 5 years
3 – High	Very likely to occur	$P > 1$ occurrence / 1 year

The foreseeable impact of risk verification reflects the extent of the damage caused by the effects of risk materialization. The impact is analysed in the dimensions of legal compliance and reputation, and is classified into three levels, according to the impact classification table below:

Foreseeable impact of risk verification ("IP"):

1	Low	No impact or very limited impact
2	Medium	With limited impact
3	High	With widespread / transversal impact

Regarding the metric of the foreseeable impact, the aim is to anticipate and prevent the negative consequences of a corruptive situation, distinguishing between:

1. **with no impact:** a situation that may result in a reduction in the efficiency of a procedure or function to which it is associated and requires a review of the procedure or function itself. This is an internal impact with implications for the entity's procedures.
2. **with limited impact:** situation that may result in a reduction in the efficiency of a procedure or function to which it is associated and requires a review of the procedure or function itself and of the respective purposes. This is an internal impact with implications for the entity's procedures.
3. **with widespread / transversal impact:** a situation that may result in a reduction in the efficiency and effectiveness of the procedure or function that is associated with it and can be the subject of media coverage. This is an impact with internal implications at the procedural and production level of the entity or organization, but also with external implications, media coverage of the event, with reputational impacts on Start Campus' credibility.

From the point of view of the consequences, the following factors should be considered, among others:

- o Financial impact - imposition of criminal fines, fines or compensation.

- Reputational impact, with possible inherent financial impact.
- Impact on customer relations.
- Impact on the business, with total or partial loss.

Considering Start Campus' zero tolerance policy regarding acts of corruption and related offences it was considered that the verification of any possible corruptive phenomenon would always have a transversal impact or an impact extended to the whole of Start Campus. Given the different legal frameworks for the sanctions provided for the types of offenses above, the metric for measuring the foreseeable impact of verifying the risk oscillated between level 3, which corresponds to the highest foreseeable impact, and which refers to the most serious crimes, and the high foreseeable impact for the remaining cases.

To determine the level of risk, the highest level should be selected from the set of dimensions under analysis, and which best reflects the consequences described in the absence of preventive and corrective measures. This resulted in three levels of risk classification / grading:

		Probability of occurrence		
		Low (1)	Medium (2)	High (3)
Predictable Impact	High (3)	Medium	High	High
	Medium (2)	Medium	Medium	High
	Low (1)	Low	Medium	Medium

Concerning the metric of the likelihood of risk occurring, the guidelines were considered, which were assessed in terms of the actual activities carried out by each organic units and business departments and, from a macro perspective, the reality of the sector. Without prejudice to considering the specific characteristics of any sub-directorates, the likelihood of the risk occurring is measured by reference to each directorate, insofar as, in a conservative approach, it is understood that, given the sharing of resources within each directorate, the risk should be shared.

In view of the criteria mentioned above, it was considered that, with regard to organic units and business departments with an essentially internal support scope - which essentially aim to support the development of Start Campus' activity - the probability of acts of corruption and related infractions occurring is generally lower, and it is estimated, given the prevention mechanisms already in place, that the probability of the risk occurring is only in exceptional circumstances.

In business units where there are relations with external entities, but these are strongly regulated and audited or where relations with external entities, given their nature and frequency, represent a medium risk, the probability of occurrence of acts of corruption and related infractions is generally medium, varying between level 1 and 2, because it is estimated, respectively, that the event is very unlikely to occur or because it is estimated that the event is unlikely to occur.

In the operational units where there are relations with different external entities and greater volume of activities carried out, it was considered that the probability of occurrence of acts of corruption and related infractions was more complex, with some variations mostly between levels 1 and 2, taking into account, in particular, the frequency and characteristics of the relationships maintained with entities outside Start Campus, as well as the specific nature of these entities, identifying a higher risk whenever the frequency is higher and whenever the relationships and entities in question are, in abstract, potentially more permeable to risk.

Since Start Campus works with public service concessionaires, the list of risks included both crimes committed in the public sector and crimes committed in the private sector.

e. Mitigation of the risks of corruption and related offences

It should be noted that Start Campus has implemented measures to protect the company from the risks of corruption and related offenses, such as:

- o Approval and publication of the Code of Conduct.
- o Approval and publication of the Whistleblowing Channel.
- o In-person training and on e-learning platforms to be conducted in accordance with the corresponding schedule.
- o Establishment of rules regarding offers.
- o The existence of an internal approval structure, with hierarchical intervention and/or service order.
- o Use of public procurement platforms and the base.gov portal.
- o The existence of a structure of internal approvals approved by work order.
- o The existence of procedure manuals and work orders.
- o The centralization of the allocation of donations in the Sustainability and Communication Department and, above a certain value, the requirement for Board approval.
- o Limiting the acceptance and allocation of offers in accordance with the Code of Conduct, Integrity Policy and Gifts Hospitality and Meals Policy.
- o Reserved physical access to critical operations rooms (namely Dispatch and the Cybersecurity Operations Center).
- o The existence of a single independent auditor who carries out audits.
- o The sharing of work teams and the use of the "four eyes" principle: processes are validated by several Employees from various hierarchical levels.
- o The existence and disclosure of internal regulations and policies which also provide for relevant duties in terms of risk prevention.
- o The existence of records of access to documents and systems and the segregation of these to certain functions.
- o The existence of digital archives that allow the preservation of information and documentation resulting from the pursuit of Start Campus' corporate purposes.
- o Considering that Start Campus is an entity that interacts with officials or public/political office holders, as well as private entities, the implementation of the following procedures must be highlighted to be strictly observed in interactions between Start Campus, and its employees, and external entities:

- All contacts between any Employee or collaborator of Start Campus (including management and directors), but also trainees, with external entities, such as officials or public/political office holders, amongst others, must be limited to the formal and institutional context.
- Any formal contact as mentioned above must comply with the appropriate procedures to ensure the transparency and honesty of these interactions.
- Any formal contact as mentioned above properly documented.
- Any formal contact as mentioned above must be preceded by the appropriate institutional and formal approach through the official channels for this purpose, specifically the institutional email: institutional@startcampus.pt.
- Any formal contact as mentioned above should be preceded by an agenda, preferably, circulated before the interaction between the two parties through official channels; the "four eyes" principle should be applied (interactions should preferably take place in the presence of several employees); and
- All interactions and respective outcomes must be properly recorded, preferably circulated through official channels with the external entities and/or persons who intervened, and these records must be archived.

5. ADDITIONAL PREVENTIVE AND CORRECTIVE MEASURES

Considering the analysis of the existing risks at Start Campus, a series of general preventive and corrective measures to be adopted were conceptualized as follows:

- o Wide dissemination of the RCP.
- o Training sessions conducted every 12 months, in accordance with the Training Plan: these sessions include reinforcing the significance of hierarchical authorization models and segregation of duties, as well as emphasizing compliance with filing obligations.
- o Supervision of the implementation of the RCP.
- o Regular assessment of the level of understanding of the RCP.
- o Periodic review of the RCP.
- o Compilation of an annual assessment report on the execution of the RCP; and
- o Evaluation of prior risk analysis procedures concerning third parties representing Start Campus and suppliers.

Given Start Campus' significant exposure to risk in its operations due to frequent interactions with public entities and individuals holding public and political offices, it is imperative to implement specific and additional preventive and corrective measures, outlined as follows:

- o Reinforcement with hierarchical involvement, of the "four eyes" principle, especially when assigning rights to third parties.
- o Presence of at least two Start Campus employees, preferably from different teams, at meetings held with public or political authorities.
- o Reinforcement of integrity due diligence processes concerning third parties entering business relationships with Start Campus or benefiting from assignments made by Start Campus (e.g., donations).
- o Preference for written communication in contacts with external entities, through the official channel or copying the official channel: institutional@startcampus.pt.
- o Documentation of meeting minutes, particularly those involving external entities.
- o Duplication of approval levels for assignments of rights to third parties.
- o Involvement of multiple departments and technicians in Start Campus' project licensing processes.
- o Enhancement and tailored adjustment of training initiatives based on identified risks.
- o Intensification of disclosure and monitoring of the level of understanding and implementation of the RCP.
- o Extraordinary review, if deemed necessary, of the RCP.
- o Preparation of a midterm evaluation report on the implementation of the RCP in situations identified as high or maximum risk.

a. Execution, control and review of the PPR

The implementation and monitoring, as well as the reviewing, of this RPP and, in general, of Start Campus's RCP is overseen by the Compliance Officer.

In particular, the Compliance Officer is responsible for:

- Clarify doubts related to the Regulatory Compliance Program and its interpretation and application, at the e-mail address: compliance@startcampus.pt.
- Ensure that the measures adopted are promptly disclosed to Employees and, where applicable, Business Partners.
- To play the role of interlocutor with the judicial, police, supervisory and inspection authorities, namely by complying with the duty to communicate and ensure the exercise of other communication and collaboration obligations.
- Performing the other duties of compliance officer, under the terms of GRPC.

This RPP will be mandatorily reviewed every 3 years or whenever there is a change in Start Campus' duties or organizational or corporate structure that justifies it.

Together with the reports mentioned above, this RPP is published on the Start Campus' website and made available to Start Campus' employees via the Start Campus' intranet.

For purposes of exercising the powers and duties it holds, the Compliance Officer has the authority to designate another entity or employee for a specific task or assignment, while still maintaining the responsibility to oversee and supervise. Similarly, the Compliance Officer relies on the cooperation of all Start Campus business departments in fulfilling their duties.

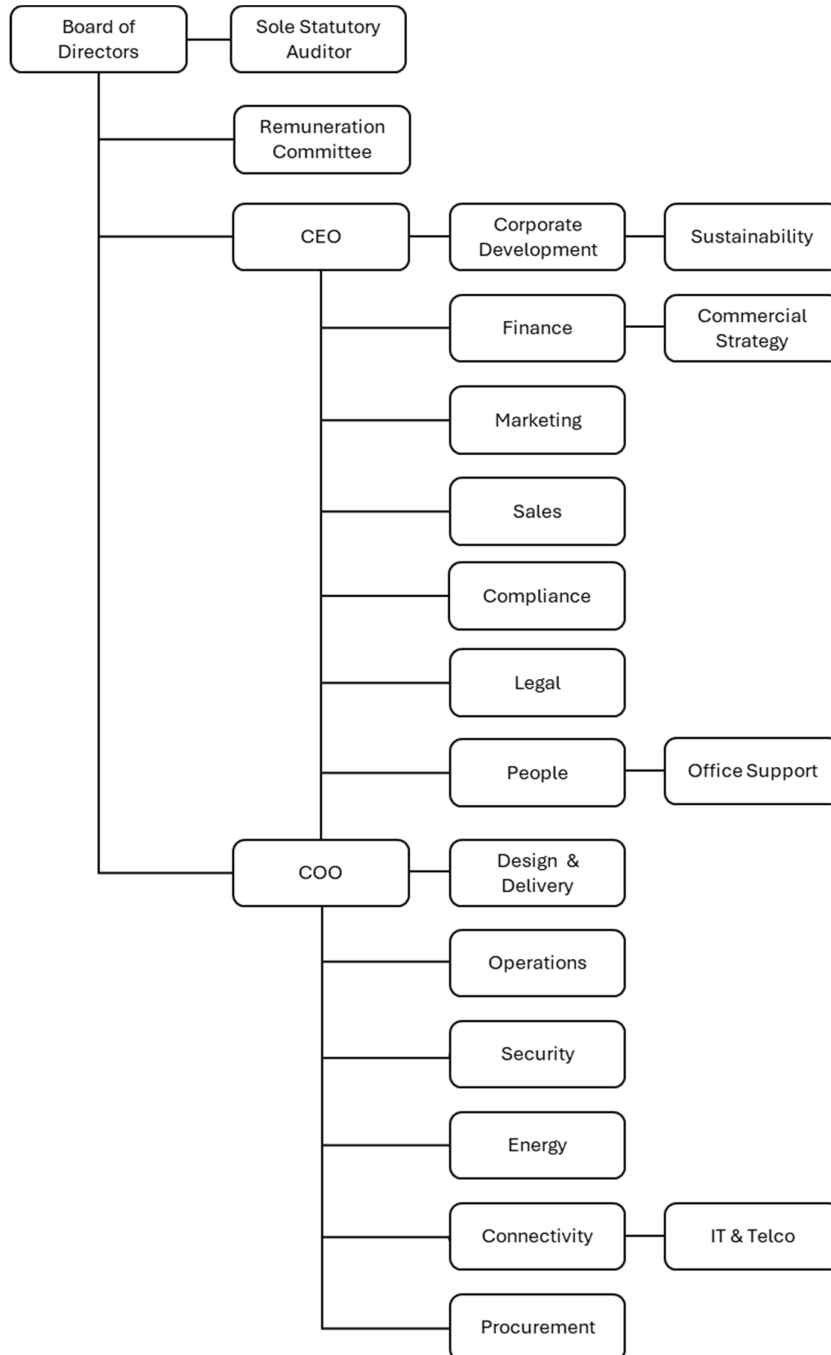
The Compliance Officer carries out its responsibilities independently, on a continual basis, and with decision-making autonomy. Start Campus ensures that the Compliance Officer has access to internal information, as well as the necessary human and technical resources for the effective execution of their duties.

The appointment of the Compliance Officer is made by the Board of Directors, with the possibility of reappointment or revocation of appointment based on Start Campus' specific requirements.

If the performance of the Compliance Officer's duties is compromised by a conflict of interest, the Board of Directors will assume these duties until a replacement is appointed.

6. START CAMPUS' CHART AND RISK ANALYSIS

In relation to its organic units and business departments Start Campus is currently structured as follows:



i. Board of Directors

The Board of Directors (“BoD”) serves as the highest governing body responsible for strategic oversight, fiduciary accountability, and corporate governance.

It oversees the strategic direction, governance, and long-term value creation of Start Campus while ensuring regulatory compliance, operational resilience, financial stewardship, and stakeholder accountability.

Its mission reflects a duty to balance profitability with risk management, regulatory obligations, and sustainability in a rapidly evolving digital infrastructure landscape.

Main functions:

- **Strategic Oversight:** Approve the Company strategy, annual plans, major investments and long-term objectives, day-to-day activity monitoring and company management, ensuring alignment with legal and ethical standards.
- **Corporate Governance:** Define governance frameworks, approve and monitor internal regulations, and ensure proper segregation of duties between the Board, committees, and management.
- **Risk Oversight:** Monitor and evaluate financial performance, capital allocation, risk-adjusted returns and business, regulatory, and reputational risks, including corruption and compliance risks, ensuring adequate internal controls.
- **Ethics and Integrity:** Safeguard shareholder interests while balancing stakeholder needs. Promote transparency and integrity in disclosures to regulators, investors, and the public. And foster a corporate culture of transparency and integrity, approve the Code of Conduct, and ensure whistleblowing mechanisms are in place.
- **Stakeholder Engagement:** Ensure accountability to shareholders, regulators, employees, and society, maintaining trust and long-term sustainability.
- **Appoint Key Executives:** Select, appoint, and periodically assess the performance of the CEO and other senior executives to ensure strong leadership and accountability.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Strategic Oversight	Manipulation and/or omission of information that prejudices the strategy, annual plans, major investments, or long-term objectives of the company.	1	1		Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program. Maintenance of internal documents describing in detail the activity carried out at each moment by each business unit. Reinforcement on the "four eyes" principle: ensuring that at least two directors are present at meetings held with external entities. Reinforcement of an independent review of strategic projects and disclosure of conflicts of interest.
Corporate Governance	Benefiting projects that may bring undue indirect benefit or little objective benefit to society and, therefore, constitute corruption or undue offer/receipt of advantages.	1	3		Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program. Signing a general declaration of no conflicts of interest upon appointment. Ensuring concrete analysis of conflicts of interest relating to each project with significant impact (in terms of value or media/social impact).

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>Drafting action plans prior to the decision-making process.</p> <p>Implementation of the gifts, hospitality and meals policy and respective form.</p> <p>Reinforcement on the "four eyes" principle: ensuring that at least two directors are present at meetings held with external entities and, especially, where rights are assigned to third parties.</p> <p>Monitoring the implementation of the RCP.</p>
Risk Oversight	Risk of insufficient monitoring or ignoring or suppressing critical risk reports presented by management	1	2		<p>Mandatory risk reporting to Board.</p> <p>Risk committee oversight.</p>
Ethics and Integrity	Risk of misrepresentation in disclosures, tolerance of unethical practices, involving people who have conflicts of interest in the projects or failure to protect whistleblowers.	1	2		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Conflicts of Interest Policy and respective form (Section 11 of the Code of Conduct and Attachment B).</p> <p>Signing a general declaration of no conflicts of interest upon appointment.</p> <p>Ensuring concrete analysis of conflicts of interest relating to each project with significant impact (in terms of value or media/social impact).</p> <p>Reinforcement on the "four eyes" principle: ensuring that at least two directors are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Implementation of KYC procedures and case-specific due diligence measures.</p>
Stakeholder Engagement	<p>Risk of biased or misleading communication with shareholders, regulators, employees, or the public, undermining trust and credibility.</p> <p>Failure to ensure effective compliance and anti-corruption frameworks</p>	1	3		<p>Maintenance of a clear communication strategy.</p> <p>Reinforcement on the "four eyes" principle: ensuring that at least two directors are present at meetings held with external entities and, especially, where rights are assigned to third parties.</p> <p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program.</p> <p>Annual approval of compliance policies.</p>
Stakeholder Engagement	Use privileged information for own benefit or of a third party.	1	2		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Confidentiality Policy (Section 6 of the Code of Conduct and Attachment B).</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Implementation of computerised procedures that are traceable and reliable (confidential): implementation of a computerised program that flags strange interactions.</p> <p>The existence of an access registration of all documents and confidential information.</p> <p>Monitoring the implementation of the RPP.</p>
Appoint Key Executives	Risk of favouritism, nepotism, or undue influence in the selection and evaluation of senior executives.	2	2		<p>Structured nomination and evaluation process.</p> <p>Independent Remuneration & Nomination Committee.</p> <p>Performance-based assessment criteria.</p>

ii. Sole Statutory Auditor

The Sole Statutory Auditor provides independent and objective assurance on the integrity of Start Campus financial statements, internal controls, and compliance with applicable laws and regulations. By safeguarding transparency, accountability, reliability, and integrity of financial information, safeguarding shareholders’ interests and reinforcing stakeholders’ trust. Independence, objectivity, and professional ethics are essential to the execution of this role.

Main functions:

- **Financial Oversight:** Audit annual financial statements in accordance with applicable standards (IFRS/GAAP, local law).
- **Internal Controls Assessment:** Ensure compliance with tax, corporate, and regulatory obligations to detect and prevent fraud, corruption, and other irregularities.
- **Reporting:** Issue an independent audit opinion on financial integrity to the Board of Directors and shareholders regarding the reliability of financial reporting and compliance.
- **Risk Monitoring:** Assess effectiveness of internal controls over financial reporting, procurement, and treasury.
- **Ethics and Integrity:** Monitor adherence to anti-corruption, anti-money laundering, and ESG disclosure requirements.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Financial Oversight	Risk of manipulation of financial statements, false reporting, or concealment of corrupt practices.	1	3		Independent audit procedures in line with IFRS/GAAP. External peer reviews.
Internal Controls Assessment	Overlooking non-compliance with tax, corporate or regulatory obligation allowing fraud, bribery, or irregularities to go undetected.	1	3		Issuing recommendations and follow-up on remediation. Compliance audit checklist. Cross-check with regulatory filings.
Reporting	Failure to report weaknesses in internal controls	1	3		Audit workpaper documentation. Quality assurance reviews. Board review of management letters.
Risk Monitoring	Risk of failure to detect corruption or fraud in sensitive areas such as procurement, treasury, or financial reporting.	1	3		Risk-based audit planning. External peer reviews.
Ethics and Integrity	Accepting undue influence, gifts, or relationships with management. Providing biased advice that favours management’s interests	1	3		Code of Ethics for auditors. Strict conflict of interest policy. Advisory independence charter. Board-only reporting line.

iii. Remuneration Committee

The Remuneration Committee is the governance body responsible for ensuring that the company's remuneration framework promotes sustainable performance, attracts and retains top talent, aligns executive incentives with strategic objectives, and complies with governance, regulatory, and ESG standards.

Main Functions:

- **Remuneration Policy Design & Oversight:** Develop and regularly review the company's remuneration framework for executives and key employees, maintain dialogue with shareholders on remuneration policy.
- **Executive Compensation Approval:** Approve CEO, executive management, and key role compensation packages, Ensure fair, transparent, and performance-based incentive structures, Link bonuses, and incentives to measurable KPIs.
- **Governance & Compliance:** Guarantee adherence to applicable laws, governance codes, and ESG guidelines (e.g., gender pay equality, clawback policies).
- **Transparency & Disclosure:** Ensure remuneration information is accurate, complete, and publicly transparent.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Remuneration Policy Design & Oversight	Designing policies that disproportionately benefit certain executives	1	2		Shareholder approval for policy changes. Annual governance review. Reinforcement on the "four eyes" principle with hierarchy involvement.
Executive Compensation Approval	Granting excessive or unjustified pay/bonuses due to conflicts of interest	1	2		Committee independence. Conflict-of-interest declarations. Board oversight. Reinforcement on the "four eyes" principle with hierarchy involvement.
Governance & Compliance	Ignoring pay equity, diversity, or ESG requirements in remuneration policy	1	3		Gender pay gap monitorization. Reinforcement on the "four eyes" principle with hierarchy involvement.
Transparency & Disclosure	Misrepresentation or concealment of executive remuneration in disclosures	1	2		Clear disclosure policy. Executive Committee review of remuneration reports. Reinforcement on the "four eyes" principle with hierarchy involvement.

iv. CEO

The Chief Executive Officer (“CEO”) is the highest-ranking officer and serves as the primary decision-maker. Leads Start Campus with strategic vision, operational discipline, and a commitment to excellence, ensuring sustainable growth, market leadership, and stakeholder trust in the data center industry, aligning strategic initiatives to deliver lasting value for clients, shareholders, employees, and partners.

Main Functions:

- **Strategic Leadership & Vision:** Define the company’s long-term vision, mission, and strategic priorities, ensuring alignment with market opportunities, technological trends, and sustainability imperatives, lead the execution of corporate strategy across all business departments and corporate functions, lead enterprise-level risk management initiatives, ensuring resilience across operational, security, financial, and reputational areas.
- **Governance & Compliance:** Ensure adherence to corporate governance best practices and ethical business conduct, foster a transparent and accountable decision-making culture.
- **Operational Oversight:** Operational oversight of directly supervised business departments.
- **Stakeholder & Market Engagement:** Act as the primary representative of Start Campus to investors, clients, regulators, and industry bodies, promote the company’s brand as a trusted leader in high-availability, sustainable infrastructure.
- **Financial & Operational Oversight:** Monitor financial, operational, and commercial KPIs; ensure corrective action where needed.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Strategic Leadership & Vision	Unethical decision-making or failure to escalate reported misconduct or policy violations.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Board oversight of strategic investment decisions.
Governance & Compliance	Ignoring or suppressing major risk reports to avoid reputational damage	1	3		Implement a Risk Committee. Mandatory reporting of top risks to the Board. Escalation protocols for critical risks. Reinforcement of hierarchy.
Operational Oversight	Manipulating initiatives or resource allocation to favour certain BDs, vendors, or partners without merit.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Strategy approval by Board. Documented KPIs. Separation of decision-making from execution.
Operational Oversight	Intervening in procurement or contracting processes outside of delegation of authority for personal gain.	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Clear delegation of authority policy; procurement governance with multi-signature approval.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					Board oversight of strategic decisions.
Stakeholder & Market Engagement	Non-transparent negotiation of acquisitions or partnerships; accepting kickbacks from counterparties.	1	3		Specific training, every 12 months, on the RPP. Ensure decisions will follow the pre-approval process. Projects are approved by several decision-makers and structures at different hierarchical levels. Relevant decisions transparent to the Board members. Use of tendering good practices. Implement supplier code of conduct. Deal approval by independent Board members.
Stakeholder & Market Engagement	Misrepresentation in public or investor communications to mislead stakeholders.	1	2		Implement communication approval workflow. Marketing/Legal/Compliance review of announcements Training Media Interaction.
Stakeholder & Market Engagement	Providing preferential treatment or confidential information to certain investors or clients in exchange for benefits.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. NDA requirements and equal disclosure policy for all investors. Meeting minutes for key meetings, according to the Start Campus' Code of Conduct.
Financial & Operational Oversight	Manipulating KPI reporting or financial results to meet targets or secure bonuses.	1	3		Independent performance data validation. Separation of reporting from approval functions.

v. Corporate Development

The Corporate Development department is responsible for driving Start Campus long-term growth by designing and executing strategies that expand market opportunities, secure financing, and strengthen development programs. Through disciplined planning, financial stewardship, and transparent engagement with stakeholders, Corporate Development ensures the company’s expansion is sustainable, competitive, and aligned with its strategic vision.

Main Functions:

- **Strategic Growth Planning:** Design and implement strategies to support business expansion and diversification, work with the CEO, COO, and Department leaders to align growth initiatives with corporate strategy.
- **Financing & Capital Raising:** Identify and execute financing opportunities (equity, debt, partnerships) for data center projects, negotiate financing terms that safeguard company interests.
- **Program Development & Oversight:** Review and revise development programs to adapt to market changes, monitor KPIs for strategic initiatives and report progress to senior leadership
- **Stakeholder Engagement:** Represent the company in institutional forums and investor dialogues.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Strategic Growth Planning	Non-transparent agreements with partners.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Due diligence on partners. Board oversight and approval of strategic partnerships.
Strategic Growth Planning	Bias or conflicts of interest in selecting markets/projects to prioritize.	1	2		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct. Reinforcement and implementation of the Conflicts of Interest Policy (Section 11 of the Code of Conduct) and respective form regarding the approval/registration of conflicts of interest and/or accumulation of functions. Documented project selection criteria.
Financing & Capital Raising	Favouritism or corruption in negotiating financing terms with banks/investors	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Multi-party negotiation team. Board oversight and approval of financing terms.
Program Development & Oversight	Manipulation of KPIs to favour certain programs for personal benefit.	1	2		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct and Integrity Policy (Section 4.1 of the Code of Conduct). Transparent approval process of KPI and periodic reporting.
Stakeholder Engagement	Offering or accepting undue advantages to secure approvals or influence decisions.	1	2		Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the Gifts, Hospitality and Meals Policy. Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					contracting area and agreements.

vi. Sustainability

This department is responsible for the implementation of Environmental, Social and Governance actions that outline the basis for Start Campus, to deliver the most sustainable data center ecosystem, whilst mitigating climate change. The department's strategy is sustained by rigorous monitoring, reporting and mitigation targets, from the onset of the design phase, passing through construction and operations, all the way into the decommissioning phases.

The sustainability strategy at Start Campus can be divided into four pillars: Actions for the Planet, the community, the industry and Start Campus. Governing the strategy is an interconnected discipline between design, construction, operations and governance.

Main functions:

- o **Sustainable Design & Innovation:** Integrate sustainability principles from design through commissioning, promote the use of sustainable materials, circular economy principles, and technological innovation:
- o **Environmental & Climate Stewardship:** Emissions tracking covering Emissions Scopes 1,2,3 and 4, Ecological Restoration and Conservation, Nature-based Carbon Offset, Circular Economy.
- o **Sustainable Procurement & Supply Chain:** Sustainable procurement policies for suppliers, contractors, and partners, ensure supplier compliance with environmental and social responsibility standards.
- o **Regulatory & ESG Compliance:** Environmental Management Systems and GRI Standards Compliance Standards, EU Compliance (including but not limited to: EU Taxonomy, Energy Efficiency Directive. Corporate Sustainability Reporting Directive).
- o **Community & Social Responsibility:** Social and Local Community Responsibility Actions. Local Stakeholder and International Industry Engagement.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Sustainable Design & Innovation	Kickbacks from suppliers for including certain products in the design.	1	1		Monitor the activity of suppliers. Maintenance of internal documents describing in detail the activity carried out at each moment by each supplier. Reinforcement on the "four eyes" principle: ensuring that at least two people are present at meetings held with external suppliers.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Environmental & Climate Stewardship	Generating any influence over local officials for environmental clearance.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically on the Code of Conduct.</p> <p>Sign a general declaration of no conflicts of interest.</p> <p>Reinforcement on the "four eyes" principle: ensuring that reports are reviewed and assessed by different business departments.</p> <p>Involvement of legal & compliance departments in the report's reviews.</p> <p>Ensure Sustainability Committee oversight.</p> <p>Enable whistleblowing channels.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by the sustainability departments.</p> <p>Regular audits on the conduct and transparency on the Sustainability departments' activity.</p>
Environmental & Climate Stewardship	Falsifying waste disposal & recycling records.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically on the Code of Conduct.</p> <p>Sign a general declaration of no conflicts of interest.</p> <p>Reinforcement on the "four eyes" principle: ensuring that reports are reviewed and assessed by different business departments.</p> <p>Involvement of legal & compliance departments in the report's reviews.</p> <p>Ensure Sustainability Committee oversight.</p> <p>Enable whistleblowing channels.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by the sustainability departments.</p> <p>Regular audits on the conduct and transparency on the Sustainability departments' activity.</p>
Sustainable Procurement & Supply Chain	Overpriced contracts, compromised sustainability outcomes and reputational damage.	1	2		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program.</p> <p>Sign a general declaration of no conflicts of interest upon appointment.</p> <p>Draft action plans prior to the decision-making process.</p> <p>Reinforcement on the "four eyes" principle: ensuring that at least two people are present at meetings held with suppliers.</p> <p>Ensure Media Response Plan.</p>
Regulatory & ESG Compliance	Misleading ESG reports, loss of certifications, regulatory penalties.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically on the Code of Conduct.</p> <p>Sign a general declaration of no conflicts of interest.</p> <p>Reinforcement on the "four eyes" principle: ensuring that reports are reviewed and assessed by different business departments.</p> <p>Involvement of legal & compliance departments in the report's reviews.</p> <p>Ensure Sustainability Committee oversight.</p> <p>Enable whistleblowing channels.</p>
Regulatory & ESG Compliance	Misleading EIA Reports for APA approval of Environmental License.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically on the Code of Conduct.</p> <p>Sign a general declaration of no conflicts of interest.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>Reinforcement on the "four eyes" principle: ensuring that reports are reviewed and assessed by different business departments.</p> <p>Involvement of legal & compliance departments in the report's reviews.</p> <p>Ensure Sustainability Committee oversight.</p> <p>Enable whistleblowing channels.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by the sustainability departments.</p> <p>Regular audits on conduct and transparency on the Sustainability departments' activity.</p>
Community & Social Responsibility	Use privileged information for own benefit or of a third party.	1	2		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Confidentiality Policy (Section 6 of the Code of Conduct and Attachment B).</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Implement computerized procedures that are traceable and reliable (confidential): implementation of a computerized program that flags strange interactions.</p> <p>Existence of access registration of all documents and confidential information.</p>

vii. Finance

This department ensures the financial integrity, sustainability, and strategic alignment of the Company's operations. It safeguards financial resources, ensures compliance with Portuguese and international standards, and provides reliable insights to management and stakeholders.

The department is structured into seven core functions: Accounting, Treasury, Tax, Financial Planning & Analysis (FP&A), Financing, Commercial Pricing, and Finance Corporate (Structuring, Business Analysis, Power Pricing & Monitoring). Together, these functions ensure accurate reporting, robust compliance, disciplined cash and debt management, effective capital raising, transparent customer pricing, and forward-looking strategic support.

Main functions:

- **Accounting:** Ensure accurate and timely statutory reporting in compliance with IFRS, Portuguese SNC, and other applicable standards, maintain the integrity of the books through monthly and annual closings, reconciliations, and consolidations, support internal and external audits, ensuring transparency and adherence to governance frameworks, maintain robust internal financial controls to safeguard assets and ensure data integrity.
- **Treasury Management:** Manage cash flow and liquidity, ensure sufficient resources for operations and investments, oversee banking relationships and optimize short-term cash management, monitor compliance with financing covenants and treasury policies, implement risk mitigation strategies for foreign exchange and interest rates.
- **Tax Management:** Ensure compliance with national and international tax obligations (CIT, VAT, Stamp Duty, Withholding Taxes), prepare and review all tax filings to avoid penalties and safeguard reputation, manage transfer pricing policies and documentation for intercompany transactions, monitor legislative changes and assess their impact on the company's tax position, develop and implement proactive tax planning strategies to optimize the company's effective tax rate while ensuring compliance.
- **Financial Planning & Analysis (FP&A):** Collect, consolidate, and analyse financial data from all organic units and business departments, prepare and monitor the annual budget, aligning it with strategic objectives, deliver rolling forecasts and scenario analysis to support decision-making, track financial and operational KPIs, reporting insights to management and the Board.
- **Financing:** Lead capital raising processes to fund company growth (equity, debt, structured finance), develop financing strategies to optimize cost of capital and preserve flexibility, maintain strong relationships with lenders, investors, and rating agencies, ensure compliance with financing agreements and support negotiations for new facilities.
- **Commercial Pricing:** Define and maintain pricing models for customer contracts (power, space, services), ensure pricing decisions align with return objectives and market competitiveness, conduct sensitivity analysis on pricing scenarios and customer deals, partner with commercial teams to validate pricing assumptions and support negotiations.
- **Structuring Management:** Design and implement joint ventures, partnerships, and corporate reorganizations, negotiate and structure shareholder agreements, capital contributions, and governance frameworks, optimize corporate structures for financing, tax efficiency, and strategic alignment.
- **Business Analysis:** Lead financial analysis for strategic projects, investments, and M&A opportunities, develop investment cases and assess returns vs. risk, provide scenario modelling to support corporate decision-making, and benchmark industry trends to support long-term positioning.
- **Energy Pricing Oversight:** Oversee the procurement of electricity, including long-term PPAs, market hedging, and supplier negotiations, ensure the accurate allocation of power costs to customers, aligning pricing models with actual consumption, monitor and reconcile power usage against contracted volumes

to minimize imbalance charges, perform scenario analysis of energy market volatility and assess its impact on profitability, liquidity, and financing, ensure compliance with ERSE requirements and EU energy reporting obligations, provide transparent reporting on power costs, risks, and opportunities to management and the Board.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Accounting	Manipulation, falsification, and/or omission of financial information that misrepresents Start Campus' financial position (e.g., concealing income from illegal activities).	1	3		<p>Implement internal controls procedure and segregation of duties.</p> <p>Exercise regular internal and external audits.</p> <p>Implement mandatory financial disclosures and documentation trails for all transactions.</p> <p>Implement secure and centralized financial systems with restricted access.</p> <p>Monitor financial records and exception reporting.</p> <p>Exercise whistleblower channels for reporting suspicious financial activity.</p> <p>Regular review and reconciliation of accounts by independent teams.</p> <p>Conduct regular training and awareness programs for employees on applicable laws, regulations, and industry standards.</p> <p>Foster a corporate culture that encourages ethical behaviour and accountability at all organizational levels.</p>
Treasury Management	Bribery and Money Laundering.	1	3		<p>Implement strict anti-bribery and anti-corruption policies, including a clear prohibition of facilitation payments.</p> <p>Due diligence on third parties, agents, and intermediaries involved in business transactions.</p> <p>Create documentation track and archive on all company's payments.</p> <p>Implement a pre-approval process for all government-related transactions.</p> <p>Implement regular audits and reviews of payments and procurement activities.</p> <p>Oversight by compliance and legal departments on all regulatory interactions.</p> <p>Train leadership and staff on the importance of risk awareness and the processes for reporting and escalating potential risks promptly.</p> <p>Implement specific training on the Regulatory Compliance Program.</p>
Tax Management	Inaccurate Tax Reporting or Failure to Comply with Tax Regulations.	1	3		<p>Implement a tax compliance framework aligned with local and international tax laws.</p> <p>Ensure tax reporting is reviewed and approved by qualified tax professionals.</p> <p>Maintain accurate, up-to-date financial records and documentation.</p> <p>Regularly monitor changes in tax laws and regulations affecting the business.</p> <p>Conduct internal audits and periodic tax compliance reviews.</p> <p>Use reliable accounting and tax reporting systems with built-in controls.</p> <p>Provide ongoing tax compliance training to finance and accounting staff.</p> <p>Engage external tax advisors for complex or high-risk matters.</p> <p>Document all tax positions and retain supporting evidence.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					Ensure timely submission of all tax filings and payments.
Financial Planning & Analysis	Failure to report financial issues to Shareholders, Senior Management Team and Tax Authorities.	1	3		<p>Establish designated points of contact within senior management and compliance team members to ensure timely and accurate communication of issues.</p> <p>Implement confidential and secure reporting mechanisms, such as whistleblower hotlines, to encourage the reporting of concerns without fear of retaliation.</p> <p>Maintain comprehensive documentation of reported issues, investigations, and resolutions to support accountability and regulatory reporting.</p> <p>Foster a culture of openness where compliance concerns are valued and addressed promptly, reinforcing ethical standards across the organization.</p> <p>Implement specific training on the Regulatory Compliance Program.</p>
Financing	Unauthorized appropriation or misappropriation of Start Campus' funds for personal gain or for the benefit of a third party.	1	3		<p>Implement strong internal controls and segregation of duties for financial transactions.</p> <p>Conduct regular and surprise internal audits.</p> <p>Require dual authorization for payments and fund transfers.</p> <p>Monitor bank accounts and financial statements frequently for anomalies.</p> <p>Use secure and traceable payment systems.</p> <p>Maintain clear policies on expense approvals and reimbursement processes.</p> <p>Enforce whistleblower mechanisms for confidential reporting of suspicious activities.</p> <p>Conduct background checks and vetting of employees with financial access.</p> <p>Provide ethics and fraud awareness training to all employees.</p>
Commercial Pricing	Failure to identify and manage conflicts of interest.	1	2		<p>Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding approval/registration of conflicts of interest and/or accumulation of functions.</p> <p>Reinforcement of hierarchical intervention.</p>
Structuring Management	Failure to identify and manage conflicts of interest.	1	2		<p>Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding approval/registration of conflicts of interest and/or accumulation of functions.</p> <p>Reinforcement of hierarchical intervention.</p>
Business Analysis	Unauthorized appropriation or misappropriation of Start Campus' funds for personal gain or for the benefit of a third party.	1	3		<p>Implement strong internal controls and segregation of duties for financial transactions.</p> <p>Conduct regular and surprise internal audits.</p> <p>Require dual authorization for payments and fund transfers.</p> <p>Monitor bank accounts and financial statements frequently for anomalies.</p> <p>Use secure and traceable payment systems.</p> <p>Maintain clear policies on expense approvals and reimbursement processes.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>Enforce whistleblower mechanisms for confidential reporting of suspicious activities.</p> <p>Conduct background checks and vetting of employees with financial access.</p> <p>Provide ethics and fraud awareness training to all employees.</p>
Power Pricing & Monitoring	Bribery and Money Laundering.	1	3		<p>Implement strict anti-bribery and anti-corruption policies, including a clear prohibition of facilitation payments.</p> <p>Due diligence on third parties, agents, and intermediaries involved in business transactions.</p> <p>Create documentation track and archive on all company's payments.</p> <p>Implement a pre-approval process for all government-related transactions.</p> <p>Implement regular audits and reviews of payments and procurement activities.</p> <p>Oversight by compliance and legal departments on all regulatory interactions.</p> <p>Train leadership and staff on the importance of risk awareness and the processes for reporting and escalating potential risks promptly.</p> <p>Implement specific training on the Regulatory Compliance Program.</p>

viii. Commercial Strategy

The Commercial Strategy Department is responsible for the company's strategic plan, ensuring that it is reflected in a bankable company business plan, driving Start Campus sustainable revenue growth and business expansion. Through market intelligence, client-centric solutions, and disciplined strategic finance, the Commercial Strategy department ensures the company achieves its long-term objectives while maintaining transparency, governance, and stakeholder trust.

Main Functions:

- **Strategic Market Development:** Identify and prioritize new markets, clients, and growth opportunities.; Develop long-term strategic plans to capture demand from hyperscalers, enterprises, and telecom operators.
- **Commercial Execution:** Translate strategy into sales initiatives, pricing models, and go-to-market approaches, support Sales with tools, insights, and structures to accelerate closing of key deals.
- **Revenue Growth & Expansion:** Design commercial models for new services, geographies, or customer segments, lead evaluation of expansion opportunities in collaboration with Corporate Development.
- **Strategic Finance & Business Cases:** Prepare Start Campus' business plan, financial models and investment cases, ensure commercial decisions are financially sound and aligned with shareholder expectations.
- **Market & Competitive Intelligence:** Provide insights into the CEO, COO, and Sales to inform decision-making.
- **Governance & Risk Oversight:** Align commercial initiatives with ethical conduct and compliance requirements; ensure transparency in commercial approvals, pricing, and incentives.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Strategic Market Development	Favouring markets or partners with personal/undisclosed ties.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Sign conflict of interest declarations. Execution of due diligence reports. Board oversight of market-entry strategies
Commercial Execution	Manipulation of pricing or business cases to favour specific clients or deals.	1	2		Documented pricing policies. Reinforcement on the "four eyes" principle with hierarchy involvement. Multi-level deal approval.
Commercial Execution	Non-transparent negotiation of alliances or contracts (kickbacks, side agreements).	1	2		Intervention of the legal department in negotiations. Board approval for the designed strategies.
Revenue Growth & Expansion	Inflated projections to secure Board approval or funding.	1	2		Peer review process for the review of financial models. Documented assumptions.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Revenue Growth & Expansion	Providing preferential treatment or confidential information to certain investors or clients in exchange for benefits	1	2		Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements. Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct.
Strategic Finance & Business Cases	Biased financial modelling to support preferred projects.	1	2		Peer review process for the review of financial models. Documented assumptions.
Market & Competitive Intelligence	Misuse of confidential competitor information.	1	2		Disclosure and specific training, at the initial moment of hiring and every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the specific training in data protection and RGPD.
Governance & Risk Oversight	Failure to manage conflicts of interest.	1	2		Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding approval/registration of conflicts of interest and/or accumulation of functions. Reinforcement of hierarchical intervention.

ix. Marketing

This department is responsible for the position of Start Campus as a global leader in sustainable, AI-ready digital infrastructure. Its work spans brand visibility, lead generation, sales enablement, internal and external communications, and PR, ensuring a consistent and compelling message to every audience.

By delivering high-impact campaigns, strategic content, and industry thought leadership, Start Campus' Marketing department attracts customers and investors, enables the Sales department to close opportunities, and strengthens trust with partners. Through proactive engagement with media, stakeholders, and its people, it directly drives growth, reputation, and the long-term success of the Start Campus business.

Main functions:

- o **Brand Strategy & Positioning:** Define and maintain the company's brand identity, values, and market positioning, develop brand guidelines for consistent use across all communication channels, protect and enhance the company's reputation in alignment with corporate governance and ESG commitments.
- o **Marketing Planning & Campaigns:** Develop and execute annual marketing plans aligned with business objectives, Plan and deliver multi-channel campaigns (digital, events, PR) to generate awareness and leads.
- o **Digital Marketing & Content:** Manage corporate website, social media, and digital advertising channels.
- o **Event Management & PR:** Organize and participate in trade shows, conferences, and client events, manage media relations, press releases, and corporate announcements.
- o **Internal Communications:** Support internal communication programs to strengthen corporate culture.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Brand Strategy & Positioning	Failure to manage reputational risk and/or risks of misleading information disseminated throughout Start Campus' communication channels (e.g. media, conferences).	1	2		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program (including the Code of Conduct and key principles), and internal procedures and best practices regarding marketing. Reinforcement of hierarchical intervention and dependence on/approval by various decision-making levels and departments. Ensure an internal gatekeeper on internal communication. Implement a trainee program for the management team allowed to speak in public. Ensure a media response plan.
Marketing Planning & Campaigns	Failure to identify and manage conflicts of interest.	1	2		Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding approval/registration of conflicts of interest and/or accumulation of functions. Reinforcement of hierarchical intervention.
Digital Marketing & Content	Failure to encourage ethical behaviour and decision-making across the organization.	1	2		Develop and enforce Code of Conduct that clearly outlines expected behaviours and decision-making principles for all employees. Provide regular ethics training and workshops to reinforce the importance of integrity, transparency, and accountability. Promote a culture of open communication where ethical concerns are

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>encouraged, discussed, and addressed promptly.</p> <p>Implement Whistleblowing channels.</p>
Event Management & PR	Bribery of any external stakeholders (e.g. universities, associations, media/press etc.), as well as unethical lapses (e.g. false promises of engagement/funding), for their own benefit or of third party.	1	3		<p>Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the marketing contracts / protocols area.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different departments or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers.</p> <p>Circulate a written agenda prior to any interaction.</p> <p>Ensure records of interactions with the external entities.</p>
Event Management & PR	Promising or offering advantages with the intention of withheld information for own benefit or of third party.	1	3		<p>Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the marketing contracts / protocols area.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different departments or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers.</p> <p>Circulate a written agenda prior to any interaction.</p> <p>Ensure records of interactions with the external entities.</p> <p>Ensure Media Response Plan</p>
Internal Communications	Use privileged information for personal gain or on behalf of a third party.	1	3		<p>Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the marketing contracts / protocols area.</p> <p>Implementation of computerized procedures that are traceable and reliable (confidential): implementation of a computerized program that flags strange interactions.</p> <p>Existence of access registration of all documents and confidential information.</p> <p>Ensure Media Response Plan.</p>

x. Sales

This department is tasked with driving the commercial success of the Data Center segment by developing and executing strategic initiatives, optimizing profitability, and delivering tailored technical solutions to clients. It acts as the central hub for commercial strategy, growth planning, and customer-focused innovation.

Main functions:

- **Sales Strategy & Execution:** Lead the development and execution of the Data Center commercial strategy, define and enhance the value proposition to maximize revenue and profitability, align offerings with market demands and customer needs.
- **Business Development & Client Acquisition:** Identify and target new clients; build a healthy pipeline of qualified opportunities, collaborate with cross-functional teams to support business development, identify market opportunities and trends to inform long-term growth plans, develop and implement strategic initiatives to expand market share.
- **Proposal & Bid Management:** Provide tailored technical solutions to clients and prospects, support sales teams in solution design and technical pre-sales activities, translate complex customer requirements into deliverable offerings that drive revenue growth, prepare proposals and RFP responses that are competitive and compliant, lead customer contract negotiations, coordinating commercial, technical & legal teams.
- **Account Management & Retention:** Maintain long-term strategic relationships with key clients, ensure service levels, contracts, and customer satisfaction are achieved.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Sales Strategy & Execution	False advertising or misleading marketing practices.	1	1		Carrying out, every 12 months, specific training on how to avoid false advertising and misleading marketing practices and its consequences, as well as the Code of Conduct. Disclosure information that may affect the client's purchase.
Business Development & Client Acquisition	Business relations with third parties exposed entities or operating in countries included on sanctions and embargo lists.	1	3		Disclosure and specific training on the Regulatory Compliance Program, and due procedure. Reinforcement of hierarchy involvement. Reinforcement of KYC standards procedures and case-specific due diligence measures.
Business Development & Client Acquisition	Promising or offering advantages with the intention of withholding information for own benefit or for a third party.	1	3		Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct). The requirement to fill in the form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered. Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.
Business Development & Client	Providing or accepting inappropriate gifts from clients/prospects and/or	1	3		Reinforcement and implementation of the Gifts, Hospitality and Meals Policy and respective form. Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Acquisition	excessive entertainment.				<p>Gifts, Hospitality and Meals Policy.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p>
Business Development & Client Acquisition	Offering bribes or improper incentives to secure contracts.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the code of Conduct, and procedures, including Anti-bribery training.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement of the "four eyes" principle.</p> <p>Reinforcement of hierarchy involvement.</p>
Proposal & Bid Management	Manipulation of tender/bid information, collusion with competitors.	1	2		<p>Bid management process with separation of duties.</p> <p>Implementation of due compliance checks, KYC procedures and case-specific due diligence measures.</p>
Proposal & Bid Management	Side agreements or hidden concessions not approved by management.	1	3		<p>Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement on the "four eyes" principle, if possible, presence of at least two employees at meetings, preferably from different teams: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Duplication of approval levels for assignments of rights to third parties.</p> <p>Standard contract templates.</p> <p>Legal review required for all Contracts, NDA, Lol, MSA, including accepted exceptions.</p>
Account Management & Retention	Favouritism or granting unauthorized benefits to specific clients.	1	3		<p>Reinforcement on the "four eyes" principle, if possible, presence of at least two employees at meetings, preferably from different teams: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Duplication of approval levels for assignments of rights to third parties.</p> <p>Formal Board approval for discounts or related incentives.</p>
Account Management & Retention	Misuse of customer data, leading to breaches.	1	2		<p>Disclosure and specific training, at the initial moment of hiring and every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the specific training in data protection and RGPD.</p>

xi. Compliance

This department, led by the Chief Compliance Officer, is responsible for ensuring that the company operates within the framework of all applicable laws, regulations, industry standards, and internal policies, while upholding the highest ethical standards. Its primary objective is to protect the organization from business and reputational risks by fostering a culture of ethical conduct, integrity, and transparency. This function involves staying abreast of updated regulatory requirements and assessing their impact on the business. It includes the development and enforcement of policies and procedures designed to guide employee behaviour and operational decision-making in a compliant manner. It also stays abreast of regulatory developments, assessing their impact on the business, and acts as the primary interface with regulators and external auditors, ensuring that the company maintains credibility and trust with all stakeholders.

Main functions:

- **Regulatory Monitoring:** Ensuring the company complies with applicable laws, regulations, and industry standards.
- **Compliance Policies Management:** Develop, implement, and update internal policies, ensuring that the policies reflect current laws, industry regulations, and best practices, and encouraging ethical behaviour and decision-making across the organization.
- **Training & Awareness:** Promote continuous training and awareness initiatives across the company to strengthen ethical culture and prevent misconduct.
- **Monitoring & Auditing:** Identifying business, regulatory, and reputational risks, as well as monitoring regulatory developments, business activities and advising on potential impacts.
- **Reporting:** Reporting compliance issues to senior management and regulatory bodies when necessary, and manage whistleblowing channels, investigate allegations of misconduct, and recommend corrective actions.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Regulatory Monitoring	Non-compliance with laws, regulations and industry standards related to the company.	1	3		Implement a comprehensive compliance management tracker to monitor and ensure company's adherence to all relevant legal and regulatory requirements. Conduct regular training and awareness programs for employees on applicable laws, regulations, and industry standards. Establish a dedicated compliance team responsible for oversight, policy updates, and internal audits. Identify and rectify compliance gaps proactively. Maintain up-to-date documentation of all compliance-related policies, procedures, and regulatory changes. Foster a corporate culture that encourages ethical behaviour and accountability at all organizational levels. Engage with legal advisors and industry experts to stay informed of evolving regulatory landscapes and best practices.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Compliance Policies Management	Failure to align company's policies with relevant laws, industry regulations, and recognized best practices.	1	2		<p>Ensure policy review schedule to regularly assess and update company policies in alignment with evolving legal and regulatory requirements.</p> <p>Monitor changes in laws, industry regulations, and emerging best practices.</p> <p>Integrate feedback loops from operational teams to ensure policies are practical, relevant, and effectively implemented.</p> <p>Conduct periodic internal audits and gap analyses to verify that policies remain compliant and aligned with organizational objectives.</p> <p>Implement specific training on the Regulatory Compliance Program.</p>
Training & Awareness	Risk of misconduct due to lack of awareness of anti-corruption obligations or tolerance of unethical behaviour.	1	2		<p>Develop and enforce Code of Conduct that clearly outlines expected behaviours and decision-making principles for all employees.</p> <p>Provide regular ethics training and workshops to reinforce the importance of integrity, transparency, and accountability.</p> <p>Promote a culture of open communication where ethical concerns are encouraged, discussed, and addressed promptly.</p> <p>Implement Whistleblowing channels.</p>
Monitoring & Auditing	Failure to identify business, regulatory, and reputational risks. Failure to identify and manage conflicts of interest	1	3		<p>Implement structured Risk Committee.</p> <p>Engage cross-functional teams to gather diverse perspectives on emerging risks across different areas of the organization.</p> <p>Maintain open communication channels with stakeholders, including customers, regulators, and industry bodies, to identify and address reputational concerns early.</p> <p>Develop and regularly update a comprehensive risk register documenting identified risks and mitigation strategies.</p> <p>Train leadership and staff on the importance of risk awareness and the processes for reporting and escalating potential risks promptly.</p> <p>Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding approval/registration of conflicts of interest and/or accumulation of functions.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Reporting	Failure to report compliance issues to senior management and regulatory bodies when necessary.	1	3		<p>Establish designated points of contact within senior management and compliance team members to ensure timely and accurate communication of issues.</p> <p>Implement confidential and secure reporting mechanisms, such as whistleblower hotlines, to encourage the reporting of concerns without fear of retaliation.</p> <p>Maintain comprehensive documentation of reported issues, investigations, and resolutions to support accountability and regulatory reporting.</p> <p>Foster a culture of openness where compliance concerns are valued and addressed promptly, reinforcing ethical standards across the organization.</p> <p>Implement specific training on the Regulatory Compliance Program.</p>

xii. Legal

The Legal department, led by the General Counsel, is responsible for ensuring that the Company conducts its business activities in full compliance with applicable laws, regulations, and internal policies, while managing and overseeing all legal aspects of the Company's operations, including the preparation, drafting, and maintenance of a wide array of legal documents, in order to ensure that all contractual and formal instruments meet the highest standards of legal accuracy, enforceability, and clarity.

Main functions:

- **Contract Management:** Preparing, drafting, reviewing and negotiating legal documents essential to the company's operations to ensure clarity, enforceability, and protection of company interests. Develop tailored legal frameworks for complex transactions and/or partnerships.
- **Regulatory Compliance:** Monitoring and ensuring adherence to national and international legislation (energy, environment, tax, corporate, labour, and data protection) and align commercial initiatives with ethical conduct and compliance requirements, supporting the Compliance department.
- **Corporate Governance:** Supporting the Board of Directors and shareholders with resolutions, minutes, and company secretarial duties. As well as advise Company's internal teams on legal risk and corporate strategy.
- **Risk Management:** Identifying legal and compliance risks and advise on mitigation strategies, to ensure favourable and enforceable contract terms for the company. Also, promoting a culture of legal integrity, governance, and risk resilience.
- **Litigation and Dispute Resolution:** Represent the Company in judicial, arbitrations proceedings and negotiations with third parties.
- **Ethics and Integrity:** Ensuring the company operates according to the highest standards of transparency, anti-bribery, and anti-corruption compliance.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Contract Management	Risk of bribery and corruption, including corruptive contracting practices. Lack or insufficient oversight of legal matters within the company, internal / external (e.g. contracts).	1	3		<p>Specific training on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Fill in the form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Enforce a strict disciplinary policy for violations.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted; Nominate specific individuals or departments to</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>interact with regulatory bodies.</p> <p>Maintenance of a significant archive.</p>
Regulatory Compliance	Failure to comply with applicable laws and regulations, as well as permits and licenses, and/or inadequate monitoring of regulatory changes.	1	3		<p>Existence of an internal approval governance structure, with hierarchical intervention and/or work orders.</p> <p>Existence of internal procedures for awarding of work.</p>
Corporate Governance	Risk of conflicts of interest, abuse of position, or undue improper influence on legal decisions, including gaining preferential treatment through inappropriate means.	1	3		<p>Specific training on the Regulatory Compliance Program, specifically the Code of Conduct, Conflicts of Interest (Section 11 of the Code of Conduct) and respective form (Attachment B.) and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Fill in the Conflict of interest/Accumulation of functions form (Attachment B.) as well as the Gift, Hospitality and Meals form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Enforce a strict disciplinary policy for violations.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted; Designate specific individuals or departments to interact with external legal or regulatory bodies.</p>
Litigation and Dispute Resolution	Misleading courts, regulators, official entities or any other third parties while acting as the company's representative.	1	3		<p>Reinforcement of hierarchy involvement.</p> <p>Conduct regular audits of communications and submissions to third parties.</p> <p>Enforce a strict disciplinary policy for violations.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted; Designate specific individuals or departments to interact with regulatory bodies.</p>
Risk Management	Failure to identify and manage conflicts of interest or misreporting, omission, or manipulation of risk assessments to benefit certain stakeholders.	1	2		<p>Disclosure and specific training on the Regulatory Compliance Program, specifically on the Code of Conduct and Conflicts of Interest Policy (Section 11 of the Code of Conduct).</p> <p>Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding approval/registration of conflicts of interest and/or accumulation of functions.</p> <p>Reinforcement of hierarchical intervention.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Ethics and Integrity	Failure to properly report and document meetings.	1	2		Disclosure and specific training on the Regulatory Compliance Program. Mandatory reports with the list of all reported violations and its respective treatment and mitigation measures.

xiii. People

This department is responsible for attracting, developing, and retaining the talent that powers Start Campus growth by fostering a culture of integrity, collaboration, and excellence, while ensuring fair, transparent, and compliant management of payroll and administrative processes. Through transparent policies, continuous learning, and a strong commitment to diversity and well-being, the People Department ensures that employees are engaged, empowered, and aligned with the Company’s values and strategic objectives.

Main Functions:

- **Recruitment & Selection:** Recruit top talent to meet current and future business needs.
- **Performance Evaluation:** Manage performance evaluation processes aligned with corporate goals, and potential transfers and promotions.
- **Compensation and Benefits:** Design fair and transparent compensation and benefits structures.
- **HR Policies Management:** Ensure HR policies comply with labour law, GDPR (employee data), and corporate governance standards.
- **Hiring Process:** Maintain fair, transparent, and merit-based hiring processes, and manage onboarding and offboarding processes.
- **Payroll & Tax and Labor Compliance:** Ensure accurate and timely payroll processing in compliance with tax and labour laws, compliance with the tax and legal obligations of the company’s employees.
- **Culture & Values:** Support organizational culture, values, and wellbeing initiatives.
- **Training Programmes:** Implement training programs for technical, compliance, and leadership skills.
- **Employees Insurance:** Manages compulsory insurance for employees.
- **HR Risks Management:** Monitor HR-related risks such as turnover, absenteeism, or compliance gaps.
- **Code of Conduct:** Oversee ethics and Code of Conduct training for all employees.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Recruitment & Selection	Illicit favouritism, or conflicts of interest in recruitment.	1	2		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct. Reinforcement and implementation of the Conflicts of Interest Policy (Section 11 of the Code of Conduct) and respective form regarding the approval/registration of conflicts of interest and/or accumulation of functions. Transparent recruitment policy, with use of selection panels. Corporate social media recruitment announcements. Implement the use of recruitment assessments. Whistleblowing channel follow-up.
Performance Evaluation	Manipulation of promotions or performance reviews for personal gain.	1	2		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct and Integrity Policy (Section 4.1 of the Code of Conduct). Standardized evaluation system, with well-defined evaluation criteria and periodicity.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					Audit of performance rating. Multi-level approval for promotions. Remuneration Committee oversight.
Compensation & Benefits	Acceptance of illicit benefits in exchange for granting undue advantages to employees in their progression.	1	2		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct and Integrity Policy (Section 4.1 of the Code of Conduct). Standardized evaluation system, with well-defined evaluation criteria and periodicity. Audit of performance rating. Multi-level approval for promotions. Remuneration Committee oversight.
HR Policies Management	Undue access to records and information by non-accredited entities.	3	3		Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the Confidentiality Policy (Section 6 of the Code of Conduct). Ensure GDPR training. Enforcement of role-based, need-to-know access to HR data. Implementation of access logs information.
Hiring Process	Issuing false contracts.	1	2		Approval process for new labour contracts by the Executive Committee and CFO. Reinforcement of hierarchical intervention.
Payroll & Tax and Labor Compliance	Acceptance of favours and/or illicit favours in the form of undue advantages to employees in their remuneration. Unjustified salary increases, bonuses, or benefits granted. Weak controls over payroll processes, including regarding benefits.	1	2		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct and Integrity Policy (Section 4.1 of the Code of Conduct). Remuneration Committee oversight. Reinforcement of monitoring payment procedures. Enforcement of role-based, need-to-know access to HR data. Use of Market salary benchmarks.
Training Programs	Training & Development.	1	1		Procurement policy for training vendors. Training Budget approval workflow.
HR Data Management	Misuse of personal employee data (GDPR violations). Unauthorized access or manipulation of employee records with benefit for the own or third party.	1	3		Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the Confidentiality Policy (Section 6 of the Code of Conduct). Ensure GDPR training. Reinforcement on the "four eyes" principle. Enforcement of role-based, need-to-know access to HR data. Reinforcement of hierarchy involvement. Consent of Personnel data management.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					Reinforcement and implementation of the Whistleblowing Policy (including the procedures for dealing with irregularities).
Employee Relations	Failure to address conflicts of interest within the workforce.	2	2		<p>Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct.</p> <p>Reinforcement and implementation of the Conflicts of Interest Policy (Section 11 of the Code of Conduct) and respective form regarding the approval/registration of conflicts of interest and/or accumulation of functions.</p> <p>Reinforcement of hierarchical intervention.</p> <p>Reinforcement and implementation of the Whistleblowing Policy (including the procedures for dealing with irregularities).</p>
Culture & Values	Failure to address and prevent discrimination or harassment in the workplace.	1	2		<p>Disclosure of the Code of Conduct (anti-discrimination and anti-harassment policy).</p> <p>Specific training, every 12 months, on harassment and discrimination.</p> <p>Monitoring implementation of the Code of Conduct.</p>
HR Risks Management	Irregular settlements, inflated severance packages, or concealment of misconduct.	1	1		<p>Standardized offboarding checklist.</p> <p>External legal review of settlements.</p> <p>Reinforcement of hierarchical intervention.</p>
Code of Conduct	<p>Ignoring or downplaying reported violations</p> <p>Retaliation against whistleblowers or suppression of grievance.</p>	1	2		<p>Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct.</p> <p>Implementation of the Whistleblowing Policy (including the procedures for dealing with irregularities).</p> <p>Reports every 12 months with the list of all reported violations and its respective treatment and mitigation measures.</p>

xiv. Office Support

This department assists every administrative and clerical service that assists in the efficient operation of the office.

Main functions:

- **Management of Petty Cash:** Control, record and replenish a small fund of readily available cash to cover minor, incidental, and immediate expenses.
- **Travels & Events Registration:** Management of approved staff travel and event registration.
- **Office Supplies Management:** Ensure administrative assistance in all aspects related to the office.
- **Management of correspondence:** Emails, mail, phone calls.
- **Board Meeting Assistance:** Administrative assistance in the preparation of Board Meetings.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Management of Petty Cash	Non-compliance with the best operational practices such as acquisition or misappropriation of Start Campus' assets for the benefit of or third parties.	1	2		<p>Specific training on the Regulatory Compliance Program, specifically the Code of Conduct (Attachments A of the Code of Conduct).</p> <p>Enforce a strict disciplinary policy for violations.</p> <p>Existence of access registration for all documents and confidential information.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted; Designate specific individuals or departments to interact with external legal or regulatory bodies.</p>
Travels & Events Registration	Promising offering or advantages with the intention of withheld information benefit for or of third party.	1	2		<p>Specific training on the Regulatory Compliance Program, specifically the Code of Conduct, Conflicts of Interest (Section 11 of the Code of Conduct) and respective form (Attachment B.) and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Fill in the Conflict of interest/Accumulation of functions form (Attachment B.) as well as the Gift, Hospitality and Meals form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Enforce a strict disciplinary policy for violations.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted; Designate specific individuals or departments to interact with external legal or regulatory bodies.
Provision of Supplier Support	Promising offering or advantages with the intention of withheld information benefit for or of third party.	1	3		<p>Specific training on the Regulatory Compliance Program, specifically the Code of Conduct, Conflicts of Interest (Section 11 of the Code of Conduct) and respective form (Attachment B.) and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Fill in the Conflict of interest/Accumulation of functions form (Attachment B.) as well as the Gift, Hospitality and Meals form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Enforce a strict disciplinary policy for violations.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted; Designate specific individuals or departments to interact with external legal or regulatory bodies.</p>
Management of Correspondence	Use privileged information for own benefit or of a third party.	2	2		<p>Specific training on the Regulatory Compliance Program, specifically the Code of Conduct, Conflicts of Interest (Section 11 of the Code of Conduct) and respective form (Attachment B.) and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Fill in the Conflict of interest/Accumulation of functions form (Attachment B.) as well as the Gift, Hospitality and Meals form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Enforce a strict disciplinary policy for violations.</p>
Board Meeting Assistance	Use privileged information for own benefit or of a third party. Disclose confidential information shared during the meeting preparation.	2	2		<p>Specific training on the Regulatory Compliance Program, specifically the Code of Conduct, Conflicts of Interest (Section 11 of the Code of Conduct) and respective form (Attachment B.) and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>Fill in the Conflict of interest/Accumulation of functions form (Attachment B.) as well as the Gift, Hospitality and Meals form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Training regarding maintaining confidentiality on all information and files received, as well as calendar details of the participants.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					Enforce a strict disciplinary policy for violations.

xv. COO

The Chief Operating Officer (COO) is responsible for ensuring the company’s strategic objectives are achieved through coordinated, efficient, and compliant operations across all business departments, driving consistent standards, operational scalability, and sustainable growth while safeguarding service availability and customer trust.

Main functions:

- o **Executive & Stakeholder Engagement:** Act as the CEO’s primary deputy for operational matters, providing strategic updates to the board and shareholders, representing the operational portfolio in investor relations, client engagements, and strategic partnerships.
- o **Enterprise-Wide Operational Leadership:** Works directly with the senior management team to plan, review, and revise the company’s development programs; provide strategic leadership and coordination across all operational business departments to ensure the seamless delivery of highly available, secure, and scalable connectivity, as well as the efficient design, construction, and operation of data center services,
- o **Operations Governance:** Drive cross-BU collaboration to maximize synergies between infrastructure, security, energy, connectivity, IT and procurement.
- o **Design & Delivery Oversight:** Approve and monitor all new building, expansion, and fit-out projects to meet Tier certification requirements and business growth targets.
- o **Data Center Operations & Security Oversight:** Ensure continuous uptime in line with SLA commitments and Tier targets, oversee critical environment operations, preventive maintenance programs, and emergency response readiness
- o **Energy Strategy & Sustainability Oversight:** Oversee the strategic planning, negotiation, and management of energy procurement and operations to ensure reliable, cost-effective, and sustainable energy solutions that support business continuity and growth.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Executive & Stakeholder Engagement	Failure to identify and manage conflicts of interest.	1	2		Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding approval/registration of conflicts of interest and/or accumulation of functions. Reinforcement of hierarchical intervention.
Enterprise-Wide Operational Leadership	Unethical decision making or failure to escalate unethical behaviour.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					Reinforcement of hierarchy involvement. Implement whistleblowing channels.
Enterprise-Wide Operational Leadership	Inadequate escalation of any reported misconduct or breaches.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Reinforcement of hierarchy involvement. Implement whistleblowing channels.
Operations Governance	Favouritism or conflicts of interest in supplier selection.	1	2		Segregation of duties in selection. Sign conflict of interest declarations. Rotation of evaluation committee members. Internal audit review of procurement files. Random supplier due diligence audits.
Operations Governance	Bid rigging / collusion with vendors.	1	2		Transparent tender announcements. Multiple bidder requirement. Training on supplier Code of Conduct. Implement whistleblowing channels.
Design & Delivery Oversight	Preferential awarding of contracts.	1	2		Approval by multi-disciplinary committee. Involvement of legal & compliance in reviews. Implement a competitive tendering process. Document evaluation criteria.
Data Center Operations & Security Oversight	Failure to, or incitation to, comply with all applicable regulations, permits and licenses.	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Projects approval by several decision-makers and structures at different hierarchical levels.
Energy Strategy & Sustainability Oversight	Non-transparent contract negotiations.	1	2		Approval by multi-disciplinary committee. Involvement of legal & compliance in reviews.

xvi. Design & Delivery

This department is responsible for planning, designing, and delivering Start Campus’ data center facilities to the highest standards of quality, resilience, and sustainability. By integrating robust engineering practices, regulatory compliance, and risk management from concept to commissioning, it ensures that each project meets operational, commercial, and environmental objectives, supporting the company’s growth and client trust.

Main functions:

- **Project Planning & Design:** Coordinate with DC Operations, Energy, IT/Telco, and Security teams to ensure operational readiness from the design phase.
- **Construction Management:** Manage the end-to-end construction lifecycle of new data center buildings, including greenfield, brownfield, and expansion projects, oversee contractors, subcontractors, and suppliers to ensure adherence to quality, safety, and timeline requirements, participate on regular site inspections and progress reviews to identify and mitigate issues early.
- **Regulatory Compliance & Permitting:** Coordinate with authorities, regulatory bodies, and auditors during inspections in construction sites.
- **Risk & Quality Management:** Conduct risk assessments covering schedule, cost, safety, and compliance risks for projects in design and construction phase, implement quality assurance programs and acceptance criteria for all construction phases.
- **Stakeholder & Client Coordination:** Support the Sales Team on customer requirements during design and delivery phases in collocation builds.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Regulatory Compliance & Permitting	Non-compliance with building codes, regulations, environmental regulations, permits and licenses.	1	2		Existence of an internal approval structure, with hierarchical intervention and/or work orders. Existence of procedure manuals and work orders. Existence of internal procedures for awarding extra/complementary work. Wide disclosure of internal procedures and specific training, every 12 months.
Construction Management	Unauthorized access to unapproved personnel on site through bribing.	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Implement the gifts, hospitality and meals policy and respective form. Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracts or agreements. Reinforcement of the “four eyes” principle Maintenance of internal documents describing in detail the activity carried out at each moment by each organic units or business departments. Regular audits on the conduct and transparency of all operations. Reinforcement of hierarchy involvement.
Construction Management	Bribery and corruption of personnel on site (from the company or contractors, and/or	1	3		Disclosure and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
	involving people who have conflicts of interest).				<p>and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>The requirement to fill in the form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>The existence of access registration of all documents and confidential information.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted.</p> <p>Implement whistleblowing channels.</p>
Construction Management	Failure to manage conflicts of interest.	1	2		<p>Sign a general declaration of no conflicts of interest upon appointment.</p> <p>Ensure concrete analysis of conflicts of interest relating to each project with significant impact (in terms of value or media/social impact).</p> <p>Draft action plans prior to the decision-making process.</p> <p>Implement gifts, hospitality and meals policy and respective form.</p> <p>Reinforcement on the "four eyes" principle: ensuring that at least two people, preferably from different departments or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p>
Construction Management	Accepting offers and invitations to events.	1	2		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Establish a clear gifts and hospitality policy, outlining what is acceptable and under what conditions.</p> <p>Require prior approval for attendance at events sponsored by third parties, particularly where business interests are involved.</p> <p>Set value thresholds for offers that can be accepted without escalation or reporting.</p> <p>Enable whistleblowing channels.</p> <p>Implement a "when in doubt, ask" policy—promoting consultation with compliance or legal teams for ambiguous situations.</p>
Risk & Quality Management	Failure to address safety concerns and/or non-compliance with health and safety regulations.	1	3		<p>Reinforcement of hierarchy involvement.</p> <p>Reinforcement of training on the appropriate procedures.</p> <p>Report on a weekly and monthly basis, safety performance of every project.</p> <p>Carrying out, every 12 months, safety performance checks.</p>

xvii. Operations

This department is responsible for ensuring the continuous, secure, and efficient operation of Start Campus’ data center facilities, delivering maximum uptime, optimal performance, and exceptional service to our clients. Through rigorous maintenance, proactive risk management, and compliance with the highest industry standards, we safeguard critical infrastructure while driving operational excellence, sustainability, and customer trust.

Main functions:

- **Critical Infrastructure Management:** Operate, monitor, and maintain all mechanical, electrical, and plumbing (MEP) systems, including power distribution, UPS, generators, cooling, and fire suppression, maintain operational redundancy in line with the client contract specifications, perform preventive, predictive, and corrective maintenance to avoid downtime
- **Facility Operations Monitoring:** Use BMS (Building Management Systems) and EPMS (Electrical Power Monitoring Systems) to monitor infrastructure health in real time, Implement and follow Standard Operating Procedures (SOPs), Methods of Procedure (MOPs), and Emergency Operating Procedures (EOPs).
- **Risk & Safety Management:** Conduct regular risk assessments for operational hazards, including electrical safety, confined space, and fire risks, implement health, safety, and environmental (HSE) protocols; ensure contractors follow safety and security procedures.
- **Customer Support & Service Delivery:** Facilitate client site access, remote hands services, and operational support, maintain SLAs and KPIs for service delivery, provide operational input for client onboarding and solution design.
- **Compliance & Governance:** Ensure adherence to relevant regulatory requirements and client mandatory certifications; prepare for and support audits (internal, client, regulatory), maintain accurate logs, maintenance records, and compliance documentation.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Critical Infrastructure Management	Inadequate protection of facilities.	1	3		Implementation of additional security procedures. Carrying out security checks on the facilities, every 12 months, and ad-hoc inspections.
Facility Operations Monitoring	Misrepresentation in reporting facility performance.	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Reinforcement of training on the appropriate procedures. Existence of an internal approval structure, with hierarchical intervention. Implement regular audits.
Facility Operations Monitoring	Failure to maintain the highest standards of ethical conduct and transparency in operations, e.g. deliberately run operations poorly to cause harm (to the	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Additional surveillance tools to monitor any incident that occurs.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
	company or certain clients).				Implement Business Continuity Plan.
Risk & Safety Management	Accepting offers and invitations to events.	1	2		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Establish a clear gifts and hospitality policy, outlining what is acceptable and under what conditions.</p> <p>Require prior approval for attendance at events sponsored by third parties, particularly where business interests are involved.</p> <p>Set value thresholds for offers that can be accepted without escalation or reporting.</p> <p>Enable whistleblowing channel.</p> <p>Implement a “when in doubt, ask” principle—promoting consultation with compliance or legal teams for ambiguous situations.</p>
Customer Support & Service Delivery	Unauthorized access to unapproved personnel on site through bribing.	1	3		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Implementation of the gifts, hospitality and meals policy and respective form.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracts or agreements.</p> <p>Reinforcement of the “four eyes” principle</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by each organic units or business departments.</p> <p>Regular audits on the conduct and transparency of all operations.</p> <p>Reinforcement of hierarchy involvement.</p>
Compliance & Governance	Failure to comply with regulations, protocols, permits and licenses during the operational phase.	1	2		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Existence of an internal approval structure, with hierarchical intervention.</p> <p>Implement regular audits.</p>
Compliance & Governance	Risk of improper access to personal information / breach of confidentiality.	1	2		<p>Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices.</p> <p>Enforce confidentiality agreements and include data protection clauses in employee and third-party contracts.</p> <p>Conduct regular audits and data privacy assessments to identify and address vulnerabilities.</p> <p>Implement authentication mechanisms, such as multi-factor authentication (MFA), for systems accessing sensitive data.</p> <p>Implement robust access controls, ensuring that personal data is only accessible to authorized personnel based on role and necessity.</p> <p>Use data encryption both at rest and in transit to protect personal and confidential information from unauthorized access.</p> <p>Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices.</p>

xviii. Security

This department is responsible for overseeing and implementing all aspects of Physical Security, Cybersecurity, and Information Security across the Sines site during both construction and operational phases and the Amoreiras office. It ensures comprehensive and consistent development, deployment, and governance of security measures to protect people, assets, systems, and data.

Main functions:

- **Security Compliance:** Critical role in supporting audits and driving compliance with key regulatory frameworks, including, but not limited to, ISO 27001, GDPR, and upcoming SOC2 and NIS2 requirements.
- **Cybersecurity:** Coordinating with managed service providers for cybersecurity operations,
- **Physical Security:** Managing physical access and surveillance infrastructure,
- **Security Policy:** Defining and enforcing organizational security policies and awareness programs.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Security Compliance	Non-compliance with security regulations (local, national, international and industry-specific).	1	2		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Existence of an internal approval structure, with hierarchical intervention. Existence of procedure manuals and work orders. Existence of access control policies.
Cybersecurity	Misuse of security technologies or unethical monitoring practices.	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Existence of an internal approval structure, with hierarchical intervention. Existence of procedure manuals and work orders. Existence of access control policies.
Cybersecurity	Lack or poor security incident monitoring and reporting.	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches. Additional surveillance tools to monitor any incident that occurs. Implement Business Continuity Plan.
Cybersecurity	Risk of improper access to personal information / breach of confidentiality.	1	3		Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices. Enforce confidentiality agreements and include data protection clauses in employee and third-party contracts. Conduct regular audits and data privacy assessments to identify and address vulnerabilities. Implement authentication mechanisms, such as multi-factor authentication

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>(MFA), for systems accessing sensitive data.</p> <p>Implement robust access controls, ensuring that personal data is only accessible to authorized personnel based on role and necessity.</p> <p>Use data encryption both at rest and in transit to protect personal and confidential information from unauthorized access.</p> <p>Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices.</p>
Cybersecurity	Omission, manipulation, or adulteration of information refers to the intentional distortion, suppression, or falsification of data with the purpose of influencing decisions in a way that benefits or harms specific individuals, groups, or interests. This practice undermines transparency, objectivity, and trust in decision-making processes.	1	3		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Implement internal controls to ensure accuracy, completeness, and integrity of information.</p> <p>Establish clear data governance policies, including standards for data quality, classification, and accountability.</p> <p>Promote a culture of transparency and ethical behaviour, reinforced by regular training and leadership commitment.</p> <p>Introduce mandatory disclosure protocols for critical information in decision-making processes.</p> <p>Conduct regular audits and independent reviews to detect anomalies, inconsistencies, or patterns of manipulation.</p> <p>Enforce segregation of duties to avoid conflicts of interest and ensure checks and balances.</p> <p>Deploy data tracking and version control tools to monitor changes and detect unauthorized alterations.</p> <p>Enable whistleblowing channel.</p> <p>Apply disciplinary measures for breaches related to information integrity, clearly defined in internal policies.</p>
Physical Security	Abuse of access privileges or involvement in unauthorized access, including corruption risk if such access privileges are given in exchange of an advantage.	1	3		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Implement gifts, hospitality and meals policy and respective form.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the security contracts or agreements.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by each organic units or business departments.</p> <p>Regular audits on the conduct and transparency of all operations.</p>
Security Policy	Accepting offers and invitations to events.	1	2		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Establish a clear gifts and hospitality policy, outlining what is acceptable and under what conditions.</p> <p>Require prior approval for attendance at events sponsored by third parties, particularly where business interests are involved.</p> <p>Set value thresholds for offers that can be accepted without escalation or reporting.</p> <p>Implement a “when in doubt, ask” policy—promoting consultation with</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					compliance or legal teams for ambiguous situations.

xix. Energy

This department is responsible for defining and executing Start Campus’ long-term Energy strategy by ensuring secure, cost-effective, and sustainable energy solutions through innovative procurement, storage, and generation models, to support the company’s growth and environmental commitments.

Main functions:

- **Develop the company’s Energy Strategy:** Develop and present Start Campus’ energy strategy (working closely with CEO, management team, shareholders and key advisors), development of a PPA strategy
- **Secure Energy Reliability & Availability:** Implementation of Start Campus’ Renewable Energy production strategy, overseeing the negotiation, implementation, and management of PPAs to secure reliable and cost-effective sources of energy for START.
- **Secure Energy Efficiency & Sustainability:** Energy procurement, storage strategies, backup strategies, energy sales, amongst others.
- **Regulatory & Standards Compliance:** Management of the Start Campus Energy supply company within the national and international regulatory framework.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Develop the company's Energy Strategy	Omission/manipulation/adulteration of information with the aim of conditioning decisions (their own or those of others) to the benefit or detriment of specific interests.	1	3		Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically on Code of Ethics and Code of Conduct. Implement Information Security Policy. Implement Security & Privacy processes. Critical Access Monitoring and Critical Access Circularisation ISO 27001 Certification - Information Security Internal training every 12 months actions/programmes on i) ethical principles; ii) security and privacy. Enable whistleblowing channel. Apply disciplinary measures for breaches related to information integrity, clearly defined in internal policies.
Develop the company's Energy Strategy	Engaging in anticompetitive practices or violating fair competition laws in energy markets.	1	3		Existence of an internal approval structure, with hierarchical intervention and/or work orders. Existence of procedure manuals and work orders. Existence of internal procedures for awarding extra/complementary work. Wide disclosure of internal procedures and specific training, every 12 months.
Develop the company's Energy Strategy	Failure to identify and manage conflicts of interest.	1	2		Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct. Reinforcement and implementation of the Conflicts of Interest (Section 11 of the Code of Conduct) and respective form regarding the approval/registration of conflicts of interest and/or accumulation of functions. Reinforcement of hierarchical intervention.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Secure Energy Reliability & Availability	Coordination of operations, projects development and contracting or Energy procurement processes for own benefit or of third party and/or briber in project development (e.g. in contract awards) (e.g. to obtain PPAs).	2	2		<p>Reinforcement of the implementation of processes for written recording (and publicizing) decision-making and processes adopted.</p> <p>Adoption of market mechanisms with defined protocols.</p> <p>Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different departments or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p>
Secure Energy Efficiency & Sustainability	Appropriation of an amount that was not owed to Start Campus or which should be returned.	2	2		<p>Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different departments or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p>
Secure Energy Efficiency & Sustainability	Accepting offers and invitations to events.	1	2		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Establish a clear gifts and hospitality policy, outlining what is acceptable and under what conditions.</p> <p>Require prior approval for attendance at events sponsored by third parties, particularly where business interests are involved.</p> <p>Set value thresholds for offers that can be accepted without escalation or reporting.</p> <p>Implement a "when in doubt, ask" policy—promoting consultation with compliance or legal teams for ambiguous situations.</p>
Secure Energy Efficiency & Sustainability	Accepting or offering goods & services in exchange for granting advantages and/or favours in the conduct of internal decision-making processes.	1	3		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement on the "four eyes" principle, if possible, with hierarchy involvement: ensuring that at least two people, preferably from different departments or hierarchies, are present at meetings held with external entities and where rights are assigned to third parties.</p> <p>Provide regular ethics training and workshops to reinforce the importance of integrity, transparency, and accountability.</p> <p>Implement Whistleblowing channels.</p>
Regulatory & Standards Compliance	Non-compliance with Market Compliance and Reporting obligations, environmental regulations, permits and licenses.	2	3		<p>Existence of an internal approval structure, with hierarchical intervention and/or work orders.</p> <p>Existence of procedure manuals and work orders.</p> <p>Existence of internal procedures for awarding extra/complementary work.</p> <p>Follow Regulation and review Market Compliance.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>Obligations regularly.</p> <p>Create and update reporting activity with the Regulators.</p> <p>Create and comply with regulatory framework. Review framework periodically to ensure accuracy.</p> <p>Use third party compliance tools to capture and track regulatory obligations.</p>
Regulatory & Standards Compliance	Risk of improper access to personal information / breach of confidentiality.	1	3		<p>Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices.</p> <p>Enforce confidentiality agreements and include data protection clauses in employee and third-party contracts.</p> <p>Conduct regular audits and data privacy assessments to identify and address vulnerabilities.</p> <p>Implement authentication mechanisms, such as multi-factor authentication (MFA), for systems accessing sensitive data.</p> <p>Implement robust access controls, ensuring that personal data is only accessible to authorized personnel based on role and necessity.</p> <p>Use data encryption both at rest and in transit to protect personal and confidential information from unauthorized access.</p> <p>Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices.</p>
Regulatory & Standards Compliance	Misrepresentation in energy consumption reporting.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct.</p> <p>Additional monitoring tools.</p> <p>Carrying out, every 12 months, specific training on how to report.</p> <p>Implementation of automated and computerized procedures that are traceable or/and that flags significant irregularities.</p>
Regulatory & Standards Compliance	Unauthorized use of non-public information related to energy projects for trading or communication purposes.	1	2		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the Code of Conduct (including Confidentiality policy) in case there are changes.</p> <p>Reinforcement of the principle of minimum information - according to which each employee only has access to the information strictly necessary to carry out his/her duties. Confidentiality clauses in the contracting and signing of Nondisclosure agreements were justified.</p> <p>Subjection of all documents and confidential information to access registration and its subsequent report to the Compliance Officer for monitoring purposes.</p>

xx. Connectivity

This department is responsible for designing, operating, and evolving the network infrastructure that connects Start Campus to global digital ecosystems. It manages physical and virtual connectivity, oversees relationships with network providers, and ensures secure, resilient, and scalable connectivity for customers. By actively curating this partner ecosystem, Start Campus lower barriers for new entrants, accelerate time-to-market for services, and ensure resilient, carrier-neutral connectivity options.

Main functions:

- **Network Fabric Evolution:** architect, operate, and continuously evolve the end-to-end network fabric that links Start Campus to other facilities, and the wider digital world.
- **NSP Relationship Management:** managing all relationships with national and international Network Service Providers (NSPs), acting as a single point of coordination for commercial, technical, and operational matters.
- **Infrastructure & Security:** remit spans fiber and wireless infrastructure design, dark-fiber and wavelength procurement, diverse carrier and internet-exchange peering, cloud on-ramps, secure physical & virtual cross-connects, SDN-driven automation, route diversity and capacity planning, and rigorous security-compliance governance.
- **Customer-Provider Engagement:** facilitates direct engagement between Start Campus data-center customers and network providers, enabling clients to leverage their local market knowledge, regulatory insight, and deep-rooted industry relationships.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Network Fabric Evolution	Bribery in connectivity vendor selection and contracting promising or offering advantages for own benefit or of third party.	1	3		<p>Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>The requirement to fill in the form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement of the "four eyes" principle, if possible, the presence of at least two employees at meetings, preferably from different teams: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by each business department.</p> <p>Implement whistleblowing channels.</p>
NSP Relationship Management	Unethical behaviour in vendor or provider relationships (e.g. favouritism).	1	2		<p>Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically the Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>The requirement to fill in the form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement of the "four eyes" principle, if possible, the presence of at least two employees at meetings, preferably from different teams: ensuring that at least two people, preferably from different teams or hierarchies, are present at meetings.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by each business department.</p>
Infrastructure & Security	Misuse of security technologies or unethical monitoring practices.	1	2		<p>Reinforcement of hierarchical intervention.</p> <p>Existence of procedure manuals and work orders and implementation of the respective training plan.</p> <p>Existence of internal procedures for awarding extra/complementary work.</p> <p>Existence of access control policies.</p> <p>Wide disclosure and specific training, every 12 months, on the Regulatory Compliance Program.</p> <p>Ensure user accounts operate under the principle of least privilege.</p>
NSP Relationship Management	Abuse of access privileges or involvement in unauthorized access, including corruption risk if such access privileges are given in exchange of an advantage.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the code of Conduct.</p> <p>Implementation of the gifts, hospitality and meals policy and respective form.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement of the "four eyes" principle.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by each business unit.</p> <p>Carrying out regular checks on the conduct and transparency of all operations.</p> <p>Reinforcement of hierarchy involvement.</p>
Customer-Provider Engagement	Abuse of privileged access to alter, delete, or extract sensitive data.	1	2		<p>Role-based access control; MFA; logging & alerting for admin actions.</p> <p>Regular privileged access reviews; independent log monitoring.</p>
Customer-Provider Engagement	Misappropriation or unauthorized resale of IT assets.	1	2		<p>Asset tagging & tracking; disposal via approved, documented process.</p> <p>Asset register audits; reconcile physical vs. system records.</p>

xxi. IT & Telco

The IT and Telco department is responsible for designing, deliver, and operate secure, reliable, and scalable information technology and communications solutions that enable START’s business departments to achieve their strategic goals. Through innovation, governance, and collaboration, it’s ensured that IT and telecommunications services are aligned with corporate priorities, compliant with applicable standards and regulations, optimized for cost and performance, and continuously improved to meet the evolving needs of our clients, partners, and employees.

Main functions:

- **Technology Roadmap & Standards:** Defines enterprise architecture, technology standards, and technology roadmaps; provides governance, risk, and compliance oversight; and partners with the dedicated Information-Security function to align programs (e.g., ISO 27001, GDPR) with the organization’s broader technology strategy.
- **Cloud & On-Premises Infrastructure Management:** Plan, implement, and operate Start Campus’ core information technology stack – including on-premises and cloud infrastructure, networks, servers, operating systems, business applications, user devices, and collaboration platforms such as Microsoft 365.
- **Asset Lifecycle Management:** Manages the full lifecycle of IT assets – including procurement, licensing, vendor and SLA management, and cost optimization – to keep solutions aligned with strategic goals.
- **Service Desk & Support:** Provides Service Desk and on-site support, covering onboarding, troubleshooting, and end-user enablement.
- **Network & Connectivity Operations:** Engineer and maintain corporate networks, telecommunications, Wi-Fi, VPN, and Internet connectivity to ensure secure, high-performance communications.
- **Data Governance & Analytics:** Develops, integrates, and supports business software solutions and data-analytics platforms, fostering data governance, warehousing, reporting, and AI-enabled insights IT Systems Maintenance.
- **Technology Change Management:** Drives project and change management, innovation initiatives, and continuous-improvement activities that support the needs and growth of all business departments.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Technology Roadmap & Standards	Influencing tech adoption decisions for personal/vendor benefit.	1	3		Technology review committee with cross-BU representation. Roadmap decision audit; conflict-of-interest checks.
Technology Roadmap & Standards	Favouritism or conflicts of interest in vendor/software selection	1	2		Segregated duties in procurement; vendor pre-qualification; transparent scoring criteria. Internal audit of procurement files; vendor due diligence checks.
Technology Roadmap & Standards	Acceptance of kickbacks in exchange for favourable contract terms.	1	3		Mandatory conflict-of-interest declarations; procurement oversight committee. SLA performance audits; market price benchmarking.
Cloud & On-Prem	Misuse of security technologies or unethical monitoring	1	1		Reinforcement of hierarchical intervention.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Infrastructure Management	practices.				<p>Existence of procedure manuals and work orders and implementation of the respective training plan.</p> <p>Existence of internal procedures for awarding extra/complementary work.</p> <p>Existence of access control policies.</p> <p>Wide disclosure and specific training, every 12 months, on the Regulatory Compliance Program.</p> <p>Ensure user accounts operate under the principle of least privilege.</p>
Cloud & On-Prem Infrastructure Management	Lack or poor security incident monitoring and reporting.	1	3		<p>Additional security measures.</p> <p>Additional surveillance tools to monitor any incident that occurs.</p> <p>Increase on the security personnel.</p> <p>Carrying out, every 12 months, specific training on how to monitor and report every situation that occurs.</p>
Asset Lifecycle Management	Misappropriation or unauthorized resale of IT assets.	1	2		<p>Asset tagging & tracking; disposal via approved, documented process.</p> <p>Asset register audits; reconcile physical vs. system records.</p>
Service Desk & Support	Misuse of support function for unauthorized system access or asset allocation.	1	2		<p>Access requests via ticketing system with approval workflows.</p> <p>Random ticket audits; segregation of duties in access provisioning.</p>
Network & Connectivity Operations	Awarding telecom contracts to preferred providers without fair process.	1	3		<p>Competitive bidding; approval by independent procurement panel.</p> <p>Contract review; cost benchmarking vs. market.</p>
Data Governance & Analytics	Abuse of privileged access to alter, delete, or extract sensitive data.	1	3		<p>Role-based access control; MFA; logging & alerting for admin actions.</p> <p>Regular privileged access reviews; independent log monitoring.</p>
Data Governance & Analytics	Manipulation of reporting or data sets to favour certain stakeholders.	1	3		<p>Data governance policies; separation of reporting preparation and review.</p> <p>Independent data verification; anomaly detection.</p>
Technology Change Management	Abuse of access privileges or involvement in unauthorized access, including corruption risk if such access privileges are given in exchange of an advantage.	1	3		<p>Disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically the code of Conduct.</p> <p>Implementation of the gifts, hospitality and meals policy and respective form.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p> <p>Reinforcement of the "four eyes" principle.</p> <p>Maintenance of internal documents describing in detail the activity carried out at each moment by each business unit.</p> <p>Carrying out regular checks on the conduct and transparency of all operations.</p> <p>Reinforcement of hierarchy involvement.</p>
Technology Change Management	Manipulation of development priorities or project scope for personal/vendor gain.	1	3		<p>Change-control boards; documented project justifications.</p> <p>Project audit trail review; stakeholder feedback.</p>

xxii. Procurement

This department is responsible for overseeing the complete procurement lifecycle within START. This includes acquiring materials, equipment, and services while ensuring quality, cost-effectiveness, and compliance. The department also manages supplier relationships, contract execution, and vendor performance to support the organization’s operational and strategic goals.

Main functions:

- **Procurement Oversight:** Manages procurement activities for suppliers, services, materials, and equipment.
- **Vendor Negotiation:** Negotiates with vendors to secure competitive prices, favourable terms, and timely delivery.
- **Strategic Procurement:** Implements procurement strategies to enhance cost efficiency and supply chain reliability.
- **Supplier Management:** Oversees supplier management, including selection, qualification, and relationship development.
- **Regulatory Compliance:** Ensures compliance with internal procurement policies and relevant legal or regulatory requirements.

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
Procurement Oversight	Bid rigging collusion among suppliers for own benefit or of a third party.	1	2		<p>Disclosure and specific training, every 12 months, on the Regulatory Compliance Program, specifically Code of Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>The requirement to fill in the form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Inclusion of anti-corruption and anti-bribery clauses in the contracting area and agreements. Reinforcement of procedures for dealing with external entities: implementation of written registers: if possible, circulate a written agenda prior to any interaction and, most importantly, always ensure that a record of what results from the interaction is kept on file, and preferably publicized, namely by sharing it through official channels with the external entity with whom you interacted.</p> <p>Purchases subject to internal procurement procedures and regulations and best market practices, such as the Code of Public Contracts.</p> <p>Reinforcement of hierarchical intervention and dependence on/approval by various decision-making levels and departments.</p>
Vendor Negotiation	Fraudulent invoicing or overbilling for own benefit, Start Campus’ or a third party.	1	3		<p>Disclosure and specific training, every 12 months, specifically regarding the Code of Conduct and due procedures complying with the best market practices.</p> <p>Conducting ad hoc audits.</p> <p>Mandatory reports every 12 months with the evolution of expenditure by entity throughout the year and, if possible, compared with previous years.</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					Implement whistleblowing channels.
Strategic Procurement	Unfair procurement practices favouring certain vendors.	2	2		<p>Existence of an internal approval structure, with hierarchical intervention and/or work orders.</p> <p>Existence of procedure manuals and work orders.</p> <p>Existence of internal procedures for awarding extra/complementary work.</p> <p>Wide disclosure of internal procedures and specific training, every 12 months, on this RPP and fair procurement practices.</p> <p>Maintenance of internal documents written in detail describing the activity carried out at each moment by each business unit, specifically the process regarding the vendors' choice and proposals.</p> <p>Dependence on/approval by various decision-making levels.</p> <p>Reinforcement of hierarchy involvement.</p> <p>Implement whistleblowing channels.</p>
Supplier Management	Failure to conduct proper due diligence on suppliers.	1	2		<p>Disclosure, and specific training every 12 months, on the Regulatory Compliance Program, and due procedure on procurement.</p> <p>Reinforcement of hierarchy involvement.</p> <p>Reinforcement of due diligence on suppliers complying with the best market practices.</p>
Regulatory Compliance	Conflicts of interest.	1	2		<p>Sign a general declaration of no conflicts of interest upon appointment.</p> <p>Ensure concrete analysis of conflicts of interest relating to each project with significant impact (in terms of value or media/social impact).</p> <p>Draft action plans prior to the decision-making process.</p> <p>Implement gifts, hospitality and meals policy and respective form.</p> <p>Reinforcement of the "four eyes" principle: ensuring that at least two people, preferably from different departments or hierarchies, are present at meetings held with external entities and, especially, where rights are assigned to third parties.</p>
Regulatory Compliance	Accepting offers and invitations to events.	1	2		<p>Wide disclosure, and, every 12 months, specific training on the Regulatory Compliance Program, specifically concerning training on how to handle misconducts or/and breaches.</p> <p>Establish a clear gifts and hospitality policy, outlining what is acceptable and under what conditions.</p> <p>Require prior approval for attendance at events sponsored by third parties, particularly where business interests are involved.</p> <p>Set value thresholds for offers that can be accepted without escalation or reporting.</p> <p>Enable whistleblowing channels.</p> <p>Implement a "when in doubt, ask" policy—promoting consultation with compliance or legal teams for ambiguous situations.</p>
Regulatory Compliance	Risk of improper access to personal information / breach of confidentiality.	1	2		<p>Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices.</p> <p>Enforce confidentiality agreements and include data protection clauses in employee and third-party contracts.</p> <p>Conduct regular audits and data privacy assessments to identify and address</p>

Functions	Risks	Risk analysis and classification			Preventive measures
		PO	IP	GR	
					<p>vulnerabilities.</p> <p>Implement authentication mechanisms, such as multi-factor authentication (MFA), for systems accessing sensitive data.</p> <p>Implement robust access controls, ensuring that personal data is only accessible to authorized personnel based on role and necessity.</p> <p>Use data encryption both at rest and in transit to protect personal and confidential information from unauthorized access.</p> <p>Conduct regular data protection training to raise employee awareness of privacy obligations and proper data handling practices.</p>
Regulatory Compliance	Failure to comply with POAs in place, and/or seeking approval for expenses without the right layer of approval (e.g. Board).	1	2		<p>Conduct and the Gift, Hospitality and Meals Policy and respective form (Attachments A and A.1 of the Code of Conduct).</p> <p>The requirement to fill in the form (Attachment A.1 of the Code of Conduct) properly, honestly, and transparently in any situation where an advantage has been received or offered.</p> <p>Inclusion of anti-corruption, anti-bribery and confidentiality clauses in the contracting area and agreements.</p>

7. ANNEX I – LIST OF CRIMES RELATED TO THE GRPC

PORTUGUESE LAW	
Influence Peddling – Article 335 of the Penal Code	<p>1 - Whoever, for themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or a third party, a material or non-material advantage, or its promise, to abuse their real or supposed influence with any public entity, national or foreign, shall be punished:</p> <p>a) With imprisonment from 1 to 5 years, if a more severe penalty is not applicable under another legal provision, if the purpose is to obtain any unlawful favorable decision;</p> <p>b) With imprisonment up to 3 years or a fine, if a more severe penalty is not applicable under another legal provision, if the purpose is to obtain any lawful favorable decision.</p> <p>2 - Whoever, for themselves or through an intermediary, with their consent or ratification, gives or promises a material or non-material advantage to the persons referred to in the previous paragraph:</p> <p>a) For the purposes set out in (a), shall be punished with imprisonment up to 3 years or a fine;</p> <p>b) For the purposes set out in (b), shall be punished with imprisonment up to 2 years or a fine up to 240 days.</p> <p>3 - Attempt is punishable.</p> <p>4 - Article 374-B applies correspondingly.</p>
Bribery – Article 363 of the Penal Code	<p>Whoever convinces or attempts to convince another person, through a gift or promise of a material or non-material advantage, to commit the acts provided for in Articles 359 or 360, without these being committed, shall be punished with imprisonment up to 2 years or a fine up to 240 days, if a more severe penalty is not applicable under another legal provision.</p>
Personal Favoritism – Article 367 of the Penal Code	<p>1 - Whoever, wholly or partially, prevents, frustrates, or evades the evidentiary or preventive activity of a competent authority, with the intention or awareness of preventing another person who has committed a crime from being subjected to a penalty or security measure, shall be punished with imprisonment up to 3 years or a fine.</p> <p>2 - The same penalty applies to anyone who assists another person with the intention or awareness of wholly or partially preventing, frustrating, or evading the execution of a penalty or security measure imposed on them.</p> <p>3 - The penalty imposed under the previous paragraphs cannot exceed that provided by law for the act committed by the person in whose benefit the action was taken.</p> <p>4 - Attempt is punishable.</p> <p>5 - Not punishable:</p> <p>a) The agent who, by the act, seeks at the same time to avoid a penalty or security measure being applied or executed against themselves;</p> <p>b) The spouse, adoptive parents or children, relatives or in-laws up to the 2nd degree, or a person, of the same or opposite sex, living in a relationship analogous to that of spouses with the person in whose benefit the act was committed.</p>

<p>Undue Receipt of Advantage – Article 372 of the Penal Code</p>	<p>1 - A public official who, in the exercise of their functions or because of them, for themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or a third party, a material or non-material advantage not due to them, shall be punished with imprisonment up to five years or a fine up to 600 days.</p> <p>2 - Whoever, for themselves or through an intermediary, with their consent or ratification, gives or promises to a public official, or to a third party indicated or known by them, a material or non-material advantage not due to them, in the exercise of their functions or because of them, shall be punished with imprisonment up to three years or a fine up to 360 days.</p> <p>3 - Socially adequate conduct and conduct in accordance with social customs are excluded from the above.</p>
<p>Active Corruption – Article 374 of the Penal Code</p>	<p>1 - Whoever, for themselves or through an intermediary, with their consent or ratification, gives or promises to a public official, or to a third party indicated or known by them, a material or non-material advantage for the purpose indicated in Article 373(1), shall be punished with imprisonment from 1 to 5 years..</p> <p>2 - If the purpose is as indicated in Article 373(2), the agent shall be punished with imprisonment up to three years or a fine up to 360 days.</p> <p>3 - Attempt is punishable.</p>
<p>Money Laundering – Article 368-A of the Penal Code</p>	<p>1 - For the purposes of the following paragraphs, “advantages” are assets derived from the commission, in any form of participation, of criminal acts punishable by a minimum prison sentence of more than six months or a maximum of more than five years, or, regardless of the applicable penalties, from the following criminal acts:</p> <p>a) Pimping, sexual abuse of children or dependent minors, or child pornography;</p> <p>b) Computer fraud and communications fraud, extortion, abuse of guarantee cards or payment cards, counterfeiting of currency or equivalent securities, depreciation of the value of coins or equivalent securities, passing counterfeit currency or equivalent securities, or acquisition of counterfeit currency or equivalent securities for circulation;</p> <p>c) Computer forgery, counterfeiting of cards or other payment devices, use of counterfeit cards or payment devices, acquisition of counterfeit cards or payment devices, preparatory acts of counterfeiting, acquisition of cards or payment devices obtained through computer crime, damage to computer programs or data, computer sabotage, illegal access, illegal interception, or illegal reproduction of protected programs;</p> <p>d) Criminal association;</p> <p>e) Terrorist offenses, offenses related to a terrorist group, offenses related to terrorist activities, and terrorist financing;</p> <p>f) Drug trafficking and psychotropic substances;</p> <p>g) Arms trafficking;</p> <p>h) Human trafficking, aiding illegal immigration, or trafficking in human organs or tissues;</p>

	<p><i>i) Environmental crimes, pollution, activities dangerous to the environment, or danger to animals or plants;</i></p> <p><i>j) Smuggling, circulation smuggling, smuggling of conditionally circulated goods on vessels, tax fraud, or social security fraud;</i></p> <p><i>k) Influence peddling, undue receipt of advantage, corruption, embezzlement, economic participation in business, harmful administration in a public sector economic unit, fraud in obtaining or diverting subsidies, grants, or credit, or corruption detrimental to international trade or the private sector;</i></p> <p><i>l) Insider trading or market manipulation;</i></p> <p><i>m) Violation of patent, utility model, or semiconductor product topography exclusivity, violation of exclusive rights relating to designs or models, counterfeiting, imitation, and illegal use of trademarks, sale or concealment of products, or fraud on goods.</i></p> <p><i>2 - Assets obtained through the previous paragraph are also considered advantages.</i></p> <p><i>3 - Whoever converts, transfers, assists, or facilitates any operation of conversion or transfer of advantages, obtained by themselves or a third party, directly or indirectly, with the aim of concealing their illicit origin, or of preventing the perpetrator or participant in these offenses from being criminally prosecuted or subjected to a criminal reaction, shall be punished with imprisonment up to 12 years.</i></p> <p><i>4 - The same penalty applies to anyone who conceals or disguises the true nature, origin, location, disposition, movement, or ownership of the advantages, or the rights relating thereto.</i></p> <p><i>5 - The same penalty applies to anyone who, not being the perpetrator of the underlying offense, acquires, holds, or uses the advantages, knowing, at the time of acquisition or initial possession or use, their illicit origin.</i></p> <p><i>6 - Punishment for the crimes in paragraphs 3 to 5 applies even if the place of commission of the underlying offense or the identity of its perpetrators is unknown, or if such acts were committed outside national territory, unless they are lawful under the law of the place where they were committed and Portuguese law does not apply under Article 5.</i></p> <p><i>7 - The act is punishable even if the criminal proceedings for the underlying offense depend on a complaint and none has been filed.</i></p> <p><i>8 - The penalty in paragraphs 3 to 5 is increased by one third if the agent acts habitually or is one of the entities referred to in Article 3 or 4 of Law 83/2017, of August 18, and the offense was committed in the exercise of their professional activities.</i></p> <p><i>9 - If full compensation for the damage caused to the victim by the underlying offense is made, without unlawful harm to a third party, before the start of the trial hearing at first instance, the penalty is specially mitigated.</i></p> <p><i>10 - If the requirements of the previous paragraph are met, the penalty may be specially mitigated if the compensation is partial.</i></p> <p><i>11 - The penalty may be particularly mitigated if the agent actively assists in gathering decisive evidence for the identification or capture</i></p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>of those responsible for committing the illegal acts from which the advantages derive.</p> <p>12 - The penalty imposed under the previous paragraphs cannot exceed the maximum penalty among those provided for the most serious of the illegal acts from which the advantages derive.</p>
<p>Active Corruption Detrimental to International Trade – Article 7 of Law 20/2008, of April 21</p>	<p>Whoever, for themselves or, with their consent or ratification, through an intermediary, gives or promises to a public official, national, foreign, or of an international organization, or to a political officeholder, national or foreign, or to a third party with their knowledge, a material or non-material advantage not due to them, to obtain or retain a business, contract, or other undue advantage in international trade, shall be punished with imprisonment from one to eight years.</p>
<p>Passive Corruption – Article 8 of Law 20/2008, of April 21</p>	<p>1 - A private sector worker who, for themselves or, with their consent or ratification, through an intermediary, requests or accepts, for themselves or a third party, a material or non-material advantage, or its promise, not due to them, for any act or omission constituting a breach of their functional duties, shall be punished with imprisonment up to two years or a fine.</p> <p>2 - If the act or omission referred to above is likely to cause a distortion of competition or financial loss to third parties, the agent shall be punished with imprisonment up to five years or a fine up to 600 days.</p>
<p>Active Corruption – Article 9 of Law 20/2008, of April 21</p>	<p>1 - Whoever, for themselves or, with their consent or ratification, through an intermediary, gives or promises to the person referred to in the previous article, or to a third party with their knowledge, a material or non-material advantage not due to them, to pursue the purpose indicated therein, shall be punished with imprisonment up to one year or a fine.</p> <p>2 - If the conduct referred to in the previous paragraph aims to obtain or is likely to cause a distortion of competition or financial loss to third parties, the perpetrator shall be punished with imprisonment of up to three years or a fine.</p>
<p>Illegal Financing of Political Parties – Articles 8 and 29 of Law 19/2003, of June 20</p>	<p>1- Political parties may not receive anonymous donations nor receive donations or loans, in cash or in kind, from national or foreign legal persons, with the exception of the provisions of the following paragraph.</p> <p>2 - Political parties may take out loans from credit institutions and financial companies under the conditions set out in Article 3(1)(f).</p> <p>3 - It is specifically prohibited for political parties to:</p> <p>a) Acquire goods or services at prices below market value;</p> <p>b) Receive payments for goods or services provided by them at prices manifestly above market value;</p> <p>c) Receber ou aceitar quaisquer contribuições ou donativos indiretos que se traduzam no pagamento por terceiros de despesas que àqueles aproveitem.</p> <p>1 - Political parties that fail to comply with the obligations imposed in Chapter II shall be punished with a minimum fine of 10 times the value of the IAS (Index of Social Support) and a maximum fine of 400 times the value of the IAS, in addition to the forfeiture to the State of illegally received amounts.</p>

	<p>2 - Party leaders who personally participate in the infraction referred to in the previous paragraph shall be punished to a minimum fine of 5 times the value of the IAS and a maximum fine of 200 times the value of the IAS.</p> <p>3 - Individuals who violate the provisions of Articles 4 and 5 shall be subject to a minimum fine of 5 times the value of the IAS and a maximum fine of 200 times the value of the IAS.</p> <p>4 - Legal persons who violate the provisions regarding Chapter II shall be punished with a minimum fine equal to twice the amount of the prohibited donation and a maximum of five times that amount.</p> <p>5 - Legal persons who violate the provisions of Article 8-A shall be punished with a minimum fine of 10 times the value of the IAS and a maximum of 200 times the value of the IAS.</p> <p>6 - Administrators of legal persons who personally participate in the infractions referred to in paragraphs 4 and 5 are subject to a minimum fine of 5 times the value of the IAS and a maximum of 200 times the value of the IAS</p> <p>7 - Failure to submit the accounts within the period provided in Article 26(1) results in the suspension of the payment of the state subsidy to which the party is entitled until the date of such submission.</p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------