POLICY FOR THE PREVENTION, COMMUNICATION, AND RESOLUTION OF CONFLICTS OF INTEREST

RNA – Rede Nacional de Assistência, S.A
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Taxpayer Number: 509 113 010 | Registered at the Lisbon C.R.C under the same number
Share Capital 1.200.000.00€

RELATED DOCUMENTATION

This policy complements the provisions set out in the RNA Seguros Code of Conduct, the RNA - Rede Nacional de Assistência Code of Conduct, and the Internal Policy concerning the Continuous Selection and Evaluation of the Suitability of Members of Statutory Bodies and Holders of Key Functions at RNA Seguros.

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FRAMEWORK

According to the regulatory framework applicable to insurance companies, they must ensure that they have a governance system that guarantees sound and prudent management of their activities.

To this end, it must be based on an adequate and transparent organizational structure, with clearly defined and segregated responsibilities, an effective system for information transmission, and procedures that prevent or control the risk of conflicts of interest occurring.

It is therefore imperative that rules and principles exist to ensure that insurance companies act with impartiality, loyalty, and independence in their relations with Clients and Third Parties, particularly in decision-making processes.

Accordingly, RNA hereby approves this Policy for the Prevention, Communication, and Resolution of Conflicts of Interest.

RESPONSIBILITIES

The Compliance Function is responsible for:

- Developing the Policy for the Prevention, Communication, and Resolution of Conflicts of Interest, ensuring its effectiveness in preventing the occurrence of conflict-of-interest risks;
- Reviewing and updating the policy whenever it is inadequate with respect to the regulatory framework, policies, or risk management strategy;
- Responding to questions related to this policy;
- Raising awareness within the organization about conflict-of-interest issues through training sessions, internal communications, and reflection activities, promoting a true culture of responsibility among all employees for the prevention, identification, and mitigation of situations involving conflicts of interest;
- Identifying improvement opportunities in internal control systems or audits if found ineffective;

- Training and sensitizing the organization about what may be understood as a conflict of interest and the respective prevention and resolution, with special focus on senior management bodies.

The Board of Directors is responsible for:

- Implementing an effective process for the identification and management of conflicts of interest to prevent, identify, and mitigate situations that may constitute conflicts of interest;
- Defining a governance model that addresses the prevention, identification, and mitigation of situations that may constitute conflicts of interest potentially negatively influencing the sound and prudent management of the companies within the RNA group.

RECIPIENTS

This policy applies to RNA SEGUROS, S.A., RNA - Rede Nacional de Assistência, S.A., in its capacity as sole shareholder of the insurance company, to members of the social bodies of the RNA Group, to members responsible for key functions, autonomous functions, or functions required by law or regulation within the insurance activity scope, to senior directors, and to all employees of the RNA Group, regardless of contractual relationship.

EXAMPLES OF SITUATIONS THAT MAY CONSTITUTE "CONFLICTS OF INTEREST"

A conflict of interest is any situation in which an employee's private and personal interest conflicts with the collective interest of the company, compromising their impartiality and neutrality in their actions, namely:

- Granting inappropriate advantages or offers and/or with the purpose of influencing a decision or position;

- Accepting inappropriate advantages or offers and/or with the purpose of influencing a decision or position.

PROCEDURE IN CASE OF OCCURRENCE OF SITUATIONS THAT MAY CONSTITUTE CONFLICTS OF INTEREST

Notification:

- If any Employee, Client, or Provider becomes aware of a situation that may constitute a conflict of interest, or is the subject of such a situation, they must immediately report it to the Compliance Function via the email:

compliance@rnaseguros.com

- This communication must include a description of the situation that potentially constitutes a conflict of interest, identification of those involved, the transaction/business/decision/operation/contract in question, and, if applicable, supporting documentation.

Analysis:

- The Compliance Function must assess the situation and inform the Board of Directors within a maximum period of 5 business days by preparing a report expressing its understanding of the situation and whether it constitutes an actual conflict of interest, and, if so, recommend possible mitigation measures.

Conclusion:

- The Board of Directors, supported but not bound by the recommendation of the Compliance Function, decides within 5 business days whether the reported situation should be treated as a conflict of interest.
- These communications must be centralized in a register to monitor the relevance, number, and effectiveness of mitigation actions.

Resolution:

- If it is determined that an actual conflict of interest exists, the decision is communicated to the involved parties, and the person or department involved may be requested to refuse or abstain from decision-making;
- Responsibilities or decisions related to the conflict are transferred to another department and/or person(s);
- Additional supervisory channels are implemented for activities and decisions made by the parties involved in the conflict;
- Training and awareness-raising are strengthened regarding the importance of identifying and reporting potential conflict of interest situations.

GENERAL PRINCIPLES FOR THE PREVENTION OF CONFLICTS OF INTEREST

The RNA Group commits to complying with the general principles for preventing conflict of interest situations by adopting measures such as:

- Separation of functions and areas that may conflict;
- Application of access restrictions to information to ensure protection of confidential information;
- Adopting remuneration policies that promote compliance with current regulations and avoid conflicts of interest.

APPROVAL, ENTRY INTO FORCE AND AMENDMENTS

This policy is approved by the Board of Directors and comes into force the day following its approval. It may only be amended by resolution of the said body.

PUBLICATION

This policy will be published on the website of RNA - Rede Nacional de Assistência, S.A.