



## **WHISTLEBLOWING POLICY**

**RNA – Rede Nacional de Assistência, S.A**

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Share Capital 1.200.000.00€

## **SCOPE AND OBJECTIVE**

RNA recognizes the importance of having a system that ensures the adequate protection of whistleblowers, and the need to foster a culture of integrity and transparency by strengthening mechanisms for protecting and detecting unlawful practices and violations of legal and regulatory standards applicable to insurance activity.

In this context, RNA establishes, through the Whistleblowing Policy, the principles and procedures that ensure the existence of secure, effective, and confidential channels for reporting violations or irregular behaviour, in compliance with the legal framework established by Law 83/2017, Law 93/2021, and Law 109-E/2021.

This policy applies to members of statutory bodies, shareholders, employees at any hierarchical level, consultants, service providers, suppliers, business partners, and clients of RNA.

RNA is committed to handling all whistleblowing reports with confidentiality, integrity, and transparency, in strict compliance with Law No. 93/2021 and Regulation (EU) 2016/679.

## **DEFINITIONS**

For the purposes of this document, the following definitions apply:

- **Irregularities:** Any fact or situation that reveals the occurrence, whether ongoing or foreseeable, full, or partial, of a violation of legal or regulatory duties or internal governance rules applicable to RNA, regardless of the cause, context, or the individuals involved. Any attempt to conceal such facts or non-compliance is also considered an irregularity.
- **Whistleblowing Report:** A written communication made in good faith, based on known facts or well-founded suspicions, regarding the commission of irregularities or violations that affect the whistleblower, third parties (individuals or legal entities), or RNA.
- **Whistleblower:** An individual who, with substantiated knowledge of the facts, reports or discloses a violation or irregularity. This status may be held by members

of statutory bodies, shareholders, employees at any hierarchical level, consultants, service providers, suppliers, business partners, and clients.

- **Complaint:** A complaint is the expression of disagreement or dissatisfaction regarding a decision, act, or omission by RNA that does not constitute an unlawful act. Complaints must be submitted through the specific channels available for this purpose.
- **External Whistleblowing:** The submission of information regarding violations of regulations to the competent authorities, such as police, judicial bodies, or supervisory entities, namely, the Insurance and Pension Funds Supervisory Authority (ASF).
- **Member of a Statutory Body:** A member of the Board of Directors, Supervisory Board, statutory auditor, or the Chairperson and Secretary of the General Assembly.
- **Director or Manager:** A member of the first or second level of the management structure.
- **Employee:** For the purposes of this document, an Employee is anyone who has an employment relationship with RNA, even if indirect, such as through multiple employers, temporary work, etc.
- **Service Provider:** A supplier of services under a service contract entered with RNA.
- **Policyholder:** The individual who subscribes to the insurance contract under which a corrupt act or omission is committed.
- **Insurance Intermediary:** The distributor of the insurance contract under which a corrupt act or omission is committed.
- **Third Party:** Any entity involved in the insurance policy subscription process or claims settlement.

## **PRINCIPLES**

In addition to the principles established in RNA's Code of Conduct, which should be referred to for the fundamental principles guiding employee behaviour, this document

reinforces and expands the company's commitment regarding the communication of irregularities and offenses.

- **Zero Tolerance**

RNA conducts its activities in strict compliance with the law, applicable regulations, internal rules, and industry best practices. In this context, it adopts an absolute zero-tolerance stance toward any kind of irregularity, regardless of its form, nature, value, or the individuals involved.

- **Duty to Act**

RNA is committed to actively pursuing the clarification of facts whenever a situation arises that may constitute a suspected irregularity or offense. It will adopt all legal, judicial, and appropriate measures to ensure accountability.

- **Commitment to Training**

RNA ensures the implementation of adequate training initiatives across its entire organizational structure, aiming to raise awareness about the importance of reporting irregularities or offenses and to guide appropriate conduct in the face of potential suspicions.

- **Confidentiality and Impartiality**

The procedures for receiving, analysing, investigating, deciding upon, and archiving reports of irregularities at RNA guarantee independent, autonomous, impartial, and confidential handling. Any individuals with a conflict of interest in relation to the reported matter are excluded from the entire process, including registration, evaluation, classification, investigation, and decision-making.

## **REPORTING**

This Policy aims to establish a reporting system that enables any entity to report situations that may constitute suspected irregularities or offenses.

All RNA employees, regardless of their hierarchical level, have the duty to report any irregularities they are aware of or have well-founded suspicions about. Irregularities may be related to the management, governance system, or accounting organization of the company, especially when they could lead to the deterioration of its financial situation, harm its reputation, or represent strong indications of offenses.

Such conduct includes, in particular, acts of fraud, corruption, and any other harmful, illegal, or criminal practices.

Additionally, individuals holding key functions are required to report to the supervisory body any serious irregularity they become aware of, particularly those related to the management, governance system, or accounting organization of the insurance or reinsurance company, whenever such situations may compromise its financial soundness.

## **COVERED IRREGULARITIES**

**Irregularities covered under Law 93/2021 of December 20, including:**

- a)** Acts or omissions contrary to the rules in the acts of the European Union listed in the annex to Directive (EU) 2019/1937 of the European Parliament and the Council, or to national rules that implement, transpose, or comply with such acts, or other rules contained in legislative acts implementing or transposing them. These include acts that may constitute crimes or administrative offenses, particularly in the areas of:
  - i.** Public procurement;
  - ii.** Financial services, products and markets, and prevention of money laundering and terrorist financing;
  - iii.** Product safety and compliance;
  - iv.** Transport safety
  - v.** Environmental protection;
  - vi.** Radiation protection and nuclear safety;

- vii. Food and feed safety, animal health and animal welfare;
  - viii. Public health;
  - ix. Consumer protection;
  - x. Protection of privacy and personal data, and security of networks and information systems.
- b)** Acts or omissions that harm the financial interests of the European Union, as defined in Article 325 of the Treaty on the Functioning of the European Union (TFEU) and in the applicable EU measures.
- c)** Acts or omissions contrary to the rules of the internal market, as defined in Article 26(2) of the TFEU, including rules on competition, state aid, and corporate taxation.
- d)** Violent crime, especially highly violent and organized crime, as well as the crimes set out in Article 1(1) of Law No. 5/2002 of January 11, which establishes measures to combat organized and economic-financial crime.
- e)** Any act or omission that violates the spirit or intent of the rules and standards described in points a) to c) above.

**Other irregularities**, such as harassment or discrimination practices, as rejected in RNA's Code of Conduct.

### **WHISTLEBLOWING CHANNELS**

As part of its commitment to compliance and transparency, RNA has implemented secure and efficient channels to facilitate the reporting of irregularities and offenses under its Whistleblowing Policy.

Accordingly, any employee, client, supplier, third party, or other individual who becomes aware of a situation that could constitute an irregularity or offense should report it through the following channels:

Online Reporting Channel (Whistleblower Portal):

<https://rna.workky.com/portal-denuncias/efetuar-denuncia>

This channel ensures a secure, integral, and confidential handling of the report, while also guaranteeing speed and accessibility in the process.

Although RNA encourages identified reporting, in line with the principle of good faith and to enhance the credibility of the report, this channel also allows full anonymity of the whistleblower.

The report can also be sent to the company's email or postal address:

Postal Address:

RNA

*Compliance* Department

Alameda Fernão Lopes, 16, 6th floor, Miraflores 1495-190 Algés

Whenever possible, it is recommended to include supporting evidence, to allow for a quicker and more effective assessment of the reported situation.

The use of external whistleblowing channels should only occur under the conditions provided by law, namely when there is no internal whistleblowing channel available, when there are reasonable grounds to believe that the violation cannot be effectively addressed internally, or when there is a risk of retaliation.

External channels may also be used if an internal report was made and no follow-up measures were communicated within the legal timeframes.

### **MECHANISM FOR RECEIPT, HANDLING, AND RESOLUTION**

RNA has implemented a structured and systematized mechanism for the receipt, analysis, and resolution of reports of irregularities and offenses, aiming to ensure that all submissions are appropriately handled, resulting in a reasoned report indicating the measures to be taken or, alternatively, justifying why no action will be taken.

This mechanism guarantees the accurate recording of each report, including the date of receipt, the communication channel used, the content of the report, and, when applicable, the status of the process and any measures taken.

The handling of reports follows these procedures:

- a) Receipt and Registration:** All reports are recorded, indicating the date of receipt, the communication method used, the subject of the report, and other relevant information, ensuring traceability and transparency throughout the process.
- b) Timeliness:** RNA commits to sending an acknowledgment of receipt to the whistleblower, whenever identified, within a maximum of seven working days.
- c) Responsibility for Handling:** The supervisory body is designated as responsible for coordinating the report handling process and may, whenever necessary, request structured collaboration from internal departments or governing bodies to appropriately conclude the procedure or ensure the effectiveness of corrective actions.
- d) Deadline for Conclusion:** The investigation must be concluded within a maximum of three months from the date the report is received, and a reasoned report on the facts and decisions made must be issued.

Acknowledgment of Receipt to the Whistleblower Will Include:

- Information on the protections afforded to the whistleblower, including those under data protection regulations;
- A summary of the phases and terms of the report-handling process, along with the identification and contact details of the person responsible for the preliminary analysis of the report;
- Information on the policy for notifying the whistleblower of the outcome of the process.

Reports received may not, under any circumstances, serve as the basis for disciplinary, civil, or criminal proceedings against the whistleblower, except in cases where the reports are proven to be deliberately false or clearly unfounded.



During the process, fact verification may be carried out through the collection or request of elements necessary to confirm the truth of the report, always ensuring respect for the procedural rights of all involved parties.

All documentation related to the handling of reports will be preserved, either in physical format or a durable medium that allows full and unaltered reproduction, for a minimum period of five years. In the case of reports concerning money laundering, the retention period is seven years, and may be extended when judicial or administrative proceedings justify it.

The handling of these situations is conducted with independence, autonomy, and priority, ensuring the confidentiality of the reports received, as well as the protection of personal data of both the whistleblower and the alleged offender, in accordance with applicable legislation, particularly Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation GDPR) and Law No. 58/2019 of 8 August, which enforces the GDPR within national law.

## **WHISTLEBLOWER PROTECTIONS**

RNA reaffirms its unwavering commitment to protecting the rights and guarantees of whistleblowers, fostering a safe, trustworthy, and retaliation-free environment for the reporting of irregularities and infractions, under the following principles:

### **1. Confidentiality**

The identity of the whistleblower, as well as any information that could directly or indirectly lead to their identification, is treated as strictly confidential. Access to this data is restricted to individuals specifically designated to receive and handle the reports.

The duty of confidentiality extends to any person, even if not formally authorized, who has gained access to the report. The whistleblower's identity may only be disclosed if legally required or by court order. When possible, the whistleblower will be notified in advance in writing, unless doing so would compromise ongoing investigations or legal proceedings.

The identity of the whistleblower will not be disclosed to those implicated in the report or to any third party unrelated to the investigation or the final substantiated report, unless the whistleblower explicitly consents or the disclosure is required for subsequent legal proceedings.

If the report includes trade secret-protected information, such information will be used solely to investigate the reported facts, and all parties involved are bound by confidentiality obligations.

## **2. Personal Data Protection**

The processing of personal data related to whistleblowing strictly adheres to the General Data Protection Regulation (GDPR) and relevant national laws, specifically Law No. 58/2019 and Law No. 59/2019.

Only data strictly necessary for the analysis of the report will be processed. Any clearly irrelevant data will be immediately deleted. If reports are recorded verbally, they will be stored on durable and retrievable media, in accordance with legal requirements.

## **3. Prohibition of Retaliation**

RNA explicitly prohibits any form of retaliation against whistleblowers. Retaliation is defined as any act or omission, whether direct or indirect, within a professional context, motivated by the whistleblowing, that causes or may cause unjustified harm, either material or immaterial, to the whistleblower.

Threats or attempts at retaliation are also considered retaliatory acts, and those responsible will be civilly liable for any damages. Whistleblowers may also request preventive measures to avoid or mitigate such damages.

Presumption of retaliation: Any harmful actions taken within two years of the report are presumed to be retaliatory. These may include changes to working conditions, contract suspensions, unjustified negative evaluations, dismissal, non-renewal, or non-conversion of a contract, among others.

Additionally:

- RNA ensures that the whistleblower's professional situation will not be harmed due to the report, including performance evaluations, unless requested by the whistleblower or for positive recognition, with explicit consent;
- The whistleblower has the right to request that their professional evaluation or career decisions be removed from the authority of their supervisor (direct or indirect) if that person is involved in the reported issue. In such cases, an independent and impartial evaluator will be appointed.

#### **4. Support Measures**

Whistleblowers are entitled to legal protection under general law and may, where applicable, benefit from witness protection measures in criminal proceedings.

Competent authorities will provide necessary support to protect the whistleblower against retaliation and may issue certification of protected whistleblower status upon request.

Additionally, the supervisory body will ensure that the whistleblower receives required updates, including: Confirmation of receipt, status updates on the handling of the report, and information on measures taken or planned in response, always in compliance with confidentiality and data protection principles.

### **RESPONSIBILITIES**

At RNA, all employees have a responsibility to ensure that any actual or suspected irregularity or infraction is properly reported. By doing so, they contribute to maintaining the integrity and compliance of the company's operations. In this context, employees serve as the first line of defence, playing a vital role in the early detection of potential non-compliance.

Top Management, including the Board of Directors, Directors, and other key function holders, must ensure that all substantiated suspicions of irregularities are promptly reported and rigorously addressed.

In particular, the Supervisory Board is responsible for handling reports related to serious irregularities involving the company's administration, corporate governance system, or accounting organization, especially when such issues may compromise the company's financial stability or indicate serious violations of the legal framework governing insurance activities.

The Board of Directors, with support from the Legal and Compliance Department, is responsible for defining policies, guidelines, and service instructions, as well as for coordinating measures to prevent losses and repair potential damages. These functions constitute the second line of defence.

Meanwhile, Internal Audit ensures the third line of defence, being responsible for verifying the effectiveness of the implemented control mechanisms, as well as for the continuous evaluation of the internal control system's operation. Whenever necessary, Internal Audit must issue recommendations to correct identified deficiencies and improve existing processes.

### **DISCLOSURE**

RNA's Whistleblowing Policy will be permanently accessible on the website: [www.rna.com.pt](http://www.rna.com.pt)

### **REVIEW AND UPDATE**

This policy must be reviewed by the Legal and Compliance Department at least once a year, or whenever strategic changes occur within the company, or when regulatory or legislative updates affecting RNA take place.

After review, the policy must be submitted for approval by the Board of Directors.

### **Version Control**

| <b>Version</b> | <b>Date</b> | <b>Description</b>          |
|----------------|-------------|-----------------------------|
| 1              | May 5, 2025 | First Version of the Policy |