



CODE OF CONDUCT

RNA – Rede Nacional de Assistência, S.A

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MESSAGE FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS

The essence of RNA is to care for people and their belongings by offering personalized products and services that ensure well-being, simplify daily life, and minimize risks throughout life. We do this with integrity, ethics, transparency, social responsibility, efficiency, and a commitment to sustainability.

The trust our clients and partners place in us is an invaluable asset that must be preserved through conscious action based on solid and ethical principles. When we act with ethics and responsibility, we demonstrate our genuine commitment to people and reinforce that we are worthy of this trust, an essential element of our long-term success.

To ensure that our activities are always conducted with integrity and ethics, we have revised the RNA Code of Conduct to address society's most pressing concerns and to assume or strengthen our commitments in areas such as Sustainability, Human Rights, Anti-Corruption, the use of Artificial Intelligence, and Operational Resilience. This document reflects our identity and must be known and practiced by everyone.

Each of us is responsible for our actions and for incorporating the principles of the Code of Conduct into all daily activities. While it does not cover every situation we may face, it serves as a vital guide, aligned with our values and purpose, to ensure that we always act in accordance with the highest ethical, legal, and professional standards.

We are grateful for the commitment of everyone who collaborates and interacts with us and who, in some way, represents us, to always do what is right, safeguard our reputation, and conduct our business in the proper manner. More than simply complying with laws, rules, and regulations, we strive to do what is right, what is ethically sound, and to contribute in a way that creates a positive impact on the lives of our employees, suppliers, and business partners.

Everyone's dedication is essential to our success!

INTRODUCTION

Since its foundation, RNA has had the purpose and mission of helping people, and has built its reputation and credibility by adhering strictly to ethical conduct, compliance, and full respect for the law.

These principles are deeply embedded in our organizational culture and guide all our relationships, including those with clients, direct and indirect employees, the Board of Directors, corporate bodies, third parties, beneficiaries, service providers, and all other stakeholders involved in our operations.

In fulfilling its mission, to support and help people in their moments of vulnerability, regardless of context, difficulties, circumstances, race, creed, or belief, RNA embodies its motto: **whatever happens, we are there!**

From this perspective, the adoption of high standards of ethics, compliance, and governance drives RNA to maintain an institutional structure that promotes human rights, sustainability, social responsibility, and the fight against illegal activities, especially corruption, across all our operations.

Accordingly, we have revised this Code of Conduct, which sets out the principles, values, and rules that reflect RNA's integrity, ethics, and professionalism, while addressing the emerging challenges society presents to us. These challenges demand a clear stance from economic agents on issues such as human rights, the future of the planet, and adherence to standards of conduct and ethics.

All employees, including members of the Board of Directors and other governing bodies, must be familiar with and apply the provisions of this Code in their daily activities. Additionally, suppliers, subcontractors, and business partners must conduct their operations in alignment with the same ethical values and principles that guide our company.

In addition to this Code of Conduct, all stakeholders must be aware of the various policies that form the group's compliance program, as well as the internal regulations, communications, established procedures, and respective rules.

CHAPTER I – SCOPE AND OBJECTIVES

Article 1

Scope

1. This Code of Conduct defines the ethical principles that must guide the actions of RNA, through its employees—whether directly or indirectly engaged—as well as its Corporate Bodies.
2. This Code of Conduct also establishes the rules for the use of RNA's information system and other information assets.
3. RNA employees are all individuals who have entered an employment contract, internship agreement, service provision contract, or similar arrangement with the company.
4. These rules form part of the duties of employees toward RNA and must therefore be known and understood by all.
5. Non-compliance with these rules may constitute a violation that could lead to disciplinary proceedings.

Article 2

Objectives

With the drafting of this Code of Conduct, RNA aims to:

1. Establish a set of rules and principles that reflect the image RNA seeks to project one that represents: its nature, marked by strict compliance with the law, good business practices, and the ethics of its sector, with a strong sense of Ethics and Social Responsibility.
2. Ensure that, through the definition of its identity in a clear and concrete document such as this Code of Conduct, its employees are aware of the rules they must follow in their professional conduct, in addition to those arising from law and/or other legal sources.
3. Define the rules for the use of RNA's information system and other information assets.

CHAPTER II – GENERAL PRINCIPLES

Article 3

Fundamental Principles

RNA operates with a commitment to compliance with the law, business ethics, and respect for stakeholders, including clients, employees, partners, shareholders, and the communities in which it operates. Within this context, RNA's decisions and practices must always be guided by the following principles:

- **Legality** – We act in accordance with applicable legal provisions, continuously striving to update and improve our knowledge of legal instruments relevant to our activities.
- **Good Faith** – We act correctly, fairly, honestly, and with integrity.
- **Efficiency** – We use our knowledge and resources efficiently, always seeking to balance cost-effectiveness, sustainability, and service excellence without compromising quality.
- **Transparency** – We conduct our activities truthfully and transparently, providing clear and accurate information within legally permitted limits, ensuring that all requested information is presented completely and comprehensibly.
- **Integrity** – We manage situations with integrity, rejecting any form of reward or compensation for our decisions. Personal benefits or disadvantages must not influence our actions. Whenever a situation arises that could compromise our impartiality, we are obliged to notify the organizational structure.
- **Sustainability** – We adopt sustainable practices across all our activities, promoting environmental preservation, social responsibility, and resource efficiency. Sustainability is embedded in our operations, products, and community relationships.

Article 4

Sustainability

1. RNA employees must act with the utmost respect for Human Dignity, the environment, and heritage preservation, demonstrating civic-minded and socially conscious behaviour and promoting corporate citizenship.
2. RNA aims to go beyond legal requirements to meet the expectations of clients and partners, generating positive societal impacts. Recognizing the insurance sector's role in the transition to a sustainable economy, we align our activities with best practices in people management, investment, product development, resource efficiency, provider selection, and digital innovation.
3. Our commitment is to minimize environmental, social, and governance impacts.
4. All employees must follow this guideline, actively committing to its implementation and positive impact.

Article 5

Duty of Compliance

The rules set forth in this Code of Conduct must be strictly followed by all employees. Each employee is responsible for knowing and complying with the Code of Conduct, internal policies and regulations, and the laws and regulations applicable to their activities. All employees must participate in training sessions regarding the Code of Conduct and the specific rules it contains.

Article 6

Violations of the Code of Conduct

1. Any violation of the principles, duties, and rules established in this Code of Conduct and Ethics, as well as the internal policies and regulations that complement it, may result in disciplinary measures against the employee.

2. In the case of third-party entities, other sanctions may be applied. All measures will be taken in accordance with applicable local regulations, without prejudice to any civil, administrative, or criminal liability that may arise.

Article 7

Reporting Irregularities

1. RNA encourages everyone, especially employees, to report any practices or actions that they believe are contrary to the law, this Code, or other internal regulations.
2. Reports may be made personally or anonymously, in writing, through our whistleblowing channel (available on the Group's websites), and will be handled with strict confidentiality, in accordance with applicable laws and internal regulations.
3. No retaliation will be tolerated against whistleblowers, facilitators, or third parties, including legal entities associated with the whistleblower, who may suffer retaliation in the workplace.

Article 8

Work Environment (Diversity, Equity, and Inclusion)

1. We ensure equal opportunities for all employees, guaranteeing fair processes based on merit and free from any form of discrimination.
2. Decisions related to recruitment, training, evaluation, promotion, and remuneration are based solely on competencies and performance, without any influence from personal characteristics such as age, nationality, ethnic origin, gender, sexual orientation, gender identity or expression, religion, political or ideological beliefs, socioeconomic status, marital status, or disability.
3. We value gender diversity in management and promote a transparent work environment, encouraging continuous professional development.

4. We reject any violation of human rights, including forced labour, child labour, or abusive practices, and require the same commitment from our suppliers and partners.
5. We maintain a safe and respectful environment, free from harassment, bullying, or retaliation, and continuously strive to improve to ensure the well-being of employees. We prioritize work-life balance, fostering a positive organizational climate based on transparency and mutual respect.
6. Additionally, we provide fair working conditions, with adequate, organized, and hygienic infrastructure, ensuring a safe, healthy, and collaborative environment. All employees must act responsibly, avoiding behaviours that compromise health, safety, or well-being in the workplace.
7. Finally, we promote guidance on sustainable practices, encouraging our employees to contribute to environmental protection and minimize the impact of professional activities.

Article 9

Prohibition of Discrimination and Harassment

1. RNA rejects any form of harassment, whether moral, sexual, or work-related, regardless of how it manifests. This includes unwelcome sexual advances or comments, inappropriate statements, defamation, and behaviours that expose, ridicule, offend, or show hostility toward an individual or group. Furthermore, we condemn any conduct intended to embarrass, intimidate, or destabilize employees, creating a hostile, uncomfortable, or humiliating work environment.
2. RNA repudiates and does not tolerate any form of discrimination, regardless of age, nationality, ethnic origin, sex, sexual orientation, gender identity or expression, religion, political or ideological beliefs, economic and social condition, marital status, or disability.

Article 10

Protection of Assets and Business Data

1. RNA's assets, whether tangible (real estate, equipment, materials) or intangible (business information, intellectual property, information technologies), are essential to operations and must be protected against misuse, loss, damage, or unauthorized disclosure.
2. All employees are responsible for ensuring the integrity and security of these assets, using them exclusively for professional purposes and in accordance with internal policies and applicable laws.
3. The use of company resources, such as phones, emails, internet, computers, and information technology systems, must be ethical, efficient, and secure, always respecting internal guidelines.
4. Business information, including any data obtained during the performance of an employee's duties, is confidential and must be protected against unauthorized access. Sharing this information is only permitted with authorized individuals who have a legitimate need to know. This obligation remains in effect even after the end of the employment relationship.
5. The company's intellectual property (including ideas, methodologies, products, strategies, and algorithms) must be safeguarded and, when necessary, protected through trademark, patent, and copyright registrations. Any attempt to forge, alter, or omit records is strictly prohibited. Additionally, documents, electronic files, and emails must be retained for the period required by applicable law and, in the case of audits or legal proceedings, preserved until the process concludes.

Article 11

Protection and Responsible Use of Personal Data

1. At RNA, we process the personal data of our clients, employees, and partners in a lawful, ethical, and transparent manner, in accordance with regulatory standards.

2. Data is collected only for specific, legitimate, and clearly defined purposes, and may not be used in ways that are incompatible with the purposes for which it was originally obtained.
3. Measures are taken to ensure the accuracy, integrity, and updating of information, promoting the correction or deletion of inaccurate or incomplete data whenever necessary.
4. Additionally, we apply security guidelines to protect this information from unauthorized access, misuse, or improper disclosure.
5. Our employees must ensure the responsible processing of personal data, respecting applicable internal and legal regulations, and contributing to the preservation of privacy and trust in the company's relationships.

Article 12

Conflicts of Interest

1. A conflict of interest is considered any situation in which personal interests, whether private or individual, conflict with the interests of the company, compromising the employee's impartiality, independence, and ability to make decisions aligned with the organization's best interest.
2. Such conflicts may arise from personal, financial, commercial, political, or any other kind of relationships, whether current or past.
3. Employees must act with transparency and responsibility, promptly disclosing any potential conflict of interest.
4. Furthermore, they must refuse and avoid both giving and accepting advantages, benefits, or offers that may be considered inappropriate or intended to influence decisions or compromise professional integrity and ethics. Maintaining impartiality and fairness in decision-making is essential to ensure trust, credibility, and compliance with the company's principles.

Article 13

Combating Corruption and Related Offenses

1. RNA adopts a zero-tolerance policy regarding corruption and any related offenses, reaffirming its commitment to ethics, integrity, and transparency.
2. All employees must refrain from any illegal practices, ensuring compliance with applicable laws and the company's principles.
3. The following are strictly prohibited:
 - a) Offering, promising, granting, requesting, agreeing to receive, or accepting any form of bribe, including facilitation payments;
 - b) Offering or accepting gifts, donations, or sponsorships that may influence business decisions or result in undue advantage;
 - c) Establishing or maintaining business relationships with any party that does not observe the same ethical principles and compliance standards.
4. These prohibitions apply to all forms of bribery and corruption, covering all of RNA's business transactions.
5. Non-compliance with these guidelines will be dealt with strictly and may result in disciplinary and legal sanctions.

Article 14

Insider Information Abuse

1. Insider information refers to any relevant data not known to the public that, if disclosed, could significantly impact the value of the company's securities.
2. Examples include:
 - a) Financial results, especially if unexpected;
 - b) Changes in dividend distribution policy;
 - c) Launch of new products or services with innovative features;
 - d) Changes in the shareholder structure, capital, or management bodies;
 - e) Mergers, acquisitions, or the sale of significant assets or group companies.

3. In addition to the general prohibition on the misuse of insider information, employees with access to such information must observe the following restrictions:
 - a) Do not use the information for purposes unrelated to their professional duties;
 - b) Do not trade in securities or financial instruments, either personally or on behalf of others, based on this information;
 - c) Do not advise or influence others to carry out transactions involving securities affected by the information in question;
 - d) Do not directly or indirectly order the subscription, purchase, sale, or exchange of securities related to such information.
4. Strict compliance with these guidelines is essential to ensure the company's transparency, integrity, and compliance with applicable laws, preventing unlawful practices and protecting market trust.

Article 15

Competition

RNA and its employees are committed to fair competition, acting ethically and transparently, respecting antitrust regulations, and rejecting any unfair or unlawful practices.

In interactions with competing companies, it is essential to avoid any type of discussion, agreement, or understanding regarding services, products, prices, clients, or markets that could undermine free competition.

In fulfilling the duty of loyalty in relationships with competitors, any misleading, aggressive, or disparaging commercial or advertising practices are expressly prohibited. Likewise, behaviours that violate good faith or that may be considered unfair or contrary to applicable laws are forbidden.

Article 16

Prevention of Money Laundering and Terrorist Financing

RNA conducts its internal control operations rigorously, adopting preventive measures to identify, mitigate, and avoid any risk associated with money laundering and terrorist financing.

It is the responsibility of all employees, in the exercise of their duties and daily activities, to follow the relevant guidelines on this matter.

The goal is to prevent the use of RNA's products and services for money laundering or terrorist financing, ensuring legal compliance and the integrity of its procedures.

Article 17

Combating Fraud

RNA promotes an anti-fraud culture, within which all employees are responsible for identifying and mitigating fraud risks, acting with integrity, transparency, and diligence in detecting suspicious activities.

It is essential that any indication or suspicion of fraud be promptly reported, ensuring that the company can take appropriate measures to prevent and combat it.

In addition, we reaffirm our commitment to actively cooperate with authorities and regulatory bodies to strengthen the integrity and security of the insurance sector.

Article 18

Copyright

Users are prohibited from making unauthorized copies of software owned by the organization, except in cases expressly permitted by law, the rights holder, or management.

Additionally, copying software or any materials protected by copyright from other sources without the proper authorization is not allowed.

Users are fully responsible for any consequences arising from non-compliance with intellectual property laws.

Article 19

Confidentiality Obligation

RNA employees, even after the termination of their relationship with the company, must maintain absolute confidentiality regarding any information obtained during their duties.

The disclosure of data or information related to RNA's activities, as well as those of its clients, shareholders, employees, and suppliers, is prohibited, except in cases provided by law or with prior authorization from management.

Article 20

Customer Relations

RNA conducts interactions with clients in an ethical, professional, and transparent manner, always prioritizing their best interests and offering solutions aligned with their needs. We develop products and services that contribute to social and environmental sustainability, recommending the most appropriate options based on the reality and needs of each client.

Furthermore, we ensure the provision of clear, accurate, and fact-based information, making sure that all relevant aspects of the offers are fully understood.

We do not engage in discriminatory practices, ensuring fair conditions for all policyholders.

This includes the non-refusal of contracts, the absence of undue premium increases, and the non-application of different exclusions or deductibles based on disability or aggravated physical or mental health risks, ensuring equity in relation to policyholders in comparable situations.

Claims management and complaints must be handled with diligence, agility, and impartiality, ensuring efficient and ethical service.

When interacting with clients in special situations of vulnerability, we adapt our services, communication, and actions to ensure they receive support appropriate to their condition and are treated fairly.

Moreover, all advertising and marketing practices must be guided by rigor, transparency, and fairness, ensuring that the company's promotional and institutional communication is clear, honest, and aligned with client expectations and applicable regulations.

In customer relations, it is essential to ensure compliance with statutory obligations as well as commitments established in contracts and agreements, ensuring their full adherence.

Article 21

Relations with Suppliers and Partners

RNA selects suppliers and partners who adopt practices aligned with ESG (Environmental, Social, and Governance) principles.

We require these stakeholders to follow guidelines and policies consistent with our Code of Conduct.

Employees involved in the selection of suppliers and partners must:

- a)** Conduct the selection in a fair, objective, transparent, and impartial manner, using well-defined technical and financial criteria.
- b)** Refuse any request or offer of incentives, commissions, Favors, or advantages that may be considered inappropriate or illegal.

Article 22

Relations with Authorities

In relations with authorities, associations, and regulatory bodies, in addition to strictly complying with all legal and regulatory standards, the recipients of this Code must act with diligence, promptness, accuracy, and courtesy, clearly, precisely, and faithfully conveying the institutional positions established on the issues at hand.

In case of doubts regarding the institutional position on any topic, these should be clarified internally within RNA's decision-making structure.

After resolution, the company's official position must be formally communicated to the competent authority, overriding any personal opinion previously expressed.

Article 23

Relations with the Media

To continually contribute to reinforcing an image of rigor and institutional integrity in the sector, contact with the media should be exclusively carried out by management or by those designated by them.

Outside of this scope, it is prohibited for any employees to provide information or confirm/deny any news.

In relations with the media, RNA is committed to strictly respecting the principles of truth and transparency, in line with the principles of legality and confidentiality.

Article 24

Artificial Intelligence

At RNA, we believe in the potential of Artificial Intelligence to strengthen our competitive advantage and enhance the customer experience.

We use AI responsibly, in compliance with legislation, and guided by principles of security, transparency, responsibility, reliability, and commitment to the future.

We are committed to developing secure, fair, and transparent technological solutions, ensuring human oversight to mitigate risks, biases, or inaccuracies, while always protecting the rights of our customers and other stakeholders.

Article 25**Prohibited Activities in the Scope of Information Security**

It is prohibited to use information assets in a manner that unnecessarily occupies capacity, weakens the performance of the information system, or represents a security threat. The following are also prohibited:

1. Downloading image or video files that do not serve a commercial purpose, sending mass mailings, playing games, etc.
2. Installing software on local computers without the explicit permission of the Information Systems Manager;
3. Using Java applications, ActiveX controls, and other mobile code, except when authorized by the Information Systems Manager;
4. Using encryption tools on local computers, except in cases outlined in the Information Classification Policy;
5. Downloading program code from external media;
6. Installing or using peripheral devices such as modems, memory cards, or other data storage and reading devices (e.g., USB flash drives) without the explicit permission of the Information Systems Manager;
7. Equipment, information, or software, regardless of its form or storage medium, may not be removed from the premises without prior written authorization from the Information Systems Manager;
8. The Internet may only be accessed through the organization's local network with adequate infrastructure and firewall protection. Direct access to the Internet through modems, mobile Internet, wireless networks, or other devices for direct access to the Internet is prohibited. The user is responsible for all possible consequences arising from the unauthorized or inappropriate use of Internet services or content.

Article 26

Best Security Practices

Users must apply best security practices when selecting and using passwords:

1. Passwords should not be disclosed to others, including system administrators and managers;
2. Passwords should not be written down, except by a secure method approved by the Security Manager;
3. Passwords generated by users should not be distributed through any channels (oral, written, or electronic distribution, etc.);
4. Passwords should be changed if there are indications that they or the system may have been compromised – in this case, a security incident should be reported;
5. Passwords for PCs must be changed and must comply with the following rules:
 - Use at least twelve characters
 - Use at least one numeric character
 - Use at least one uppercase letter and at least one lowercase letter
 - Use at least one special character
 - It must not be a dictionary word, dialect word, or jargon from any language, or any of these words written backward
 - It should not be based on personal data (e.g., date of birth, address, family member's name, etc.)
 - The last three passwords should not be reused.

Article 27

Clean Desk and Clear Screen Policy

1. Clean Desk Policy: If the authorized person is not at their workstation, all paper documents, as well as data storage media labelled as sensitive, must be removed from the desk or other places such as printers, fax machines, photocopiers, etc.,

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to prevent unauthorized access. Such documents and storage media must be stored securely in accordance with the information classification policy.

2. **Clear Screen Policy:** If the authorized person is not at their workstation, all sensitive information must be removed from the screen, and access to all systems for which the person has authorization must be denied. In the case of short absences (up to 30 minutes), the clear screen policy is implemented by logging out of all systems or locking the screen with a password. If the person is absent for a long period (more than 30 minutes), the clear screen policy is implemented by logging out of all systems and shutting down the workstation.
3. **Protection of Shared Facilities and Equipment:** Documents containing sensitive information must be immediately removed from printers, fax machines, and photocopiers.
4. The mail send/receive area is located at the office entrance, reception, and is protected by video surveillance.
5. The shared fax machine coexists with the multifunction printer located in the service counter area and is protected by video surveillance.
6. Unauthorized use of the two shared multifunction printers for copying, located in the service counter area and the internal circulation area, is prevented using PIN numbers.

Article 28

Operational Resilience and Management of ICT Risks

RNA is committed to maintaining operational resilience and effective management of risks related to information and communication technology (ICT).

Management is directly involved in overseeing ICT risks and decision-making related to them. We implement robust ICT risk management frameworks, including security policies, controls, and incident response procedures.

Additionally, we regularly assess and monitor risks associated with ICT service providers, ensuring the continuity and security of our operations.

Article 29**Adherence and Compliance**

RNA is committed to disseminating this Code of Conduct and ensuring that it is known to all employees working for the company. Therefore, each employee will be provided with a copy of the Code, and they must acknowledge their understanding and adherence to its principles.

This Code is complemented by various policies that are part of the Compliance Program, including those related to: Sustainability, Privacy and Personal Data Protection, Fraud Prevention, Management of Third-Party Entities, Human Resources Management and Selection, Supplier Management and Selection, among others.

Article 30**Entry into Force**

1. This Code of Conduct enters into force on April 1, 2025.