ANTI-CORRUPTION AND RELATED OFFENSES PREVENTION POLICY

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INTRODUCTION

Corruption, as well as related offenses, continues to be a reality that significantly affects companies, including insurance providers, in the performance of their activities, despite the ongoing efforts made by organizations to prevent and combat it.

Corruption manifests in various forms, such as bribery, influence peddling, embezzlement, and unlawful favouritism. It can cause significant harm to both companies and society. Its negative effects include the diversion of public and private resources, the weakening of trust in institutions, and increased costs of goods and services. Furthermore, it undermines economic and social development, reinforces inequalities, and damages the credibility of both the business sector and the State.

The prevention of corruption is a collective responsibility and must be promoted across society, including by companies, governments, and citizens, given its broad impacts.

From a business perspective, engaging in corrupt practices can compromise market integrity, affect business sustainability, damage reputation, and negatively impact consumers and investors.

As a service provider operating within the insurance sector, RNA commits, through this Policy, to adopt a zero-tolerance stance toward corruption and related offenses, regardless of their origin, nature, or value. In addition, it defines the principles, controls, systems, and mechanisms essential to prevent, detect, and combat such practices.

This Policy is in accordance with Decree-Law No. 109-E/2021 and considers the specific corruption-related risks faced by RNA, aligning with best practices and applicable regulatory guidelines.

SCOPE AND PURPOSE

This policy applies to all cases of suspected or confirmed corruption and related offenses involving members of statutory bodies, shareholders, employees at any hierarchical level, consultants, service providers, suppliers, business partners, and clients.

The purpose of this document is to establish guidelines to prevent and hinder the occurrence of corruption and related offenses at all hierarchical levels within RNA, as well as among its external service providers and clients, through the implementation of effective mechanisms for prevention, investigation, detection, monitoring, and control.

DEFINITIONS

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

Corruption and Related Offenses: Crimes of corruption, improper receipt and offer of advantage, embezzlement, economic participation in business, extortion, abuse of power, misconduct in public office, influence peddling, money laundering, or fraud in obtaining or misappropriating subsidies, grants, or credit, as defined in the Portuguese Penal Code, Decree-Law No. 48/95.

Corruption: The practice of illegal or unethical behaviour by agents, whether public or private, who abuse their power or position to gain personal benefits or to favour particular interests.

Bribery: The offering, promising, requesting, accepting, or giving of an undue advantage—whether in the form of money, goods, favours, or any other benefit—with the intent to improperly influence illegal actions, ethically inappropriate conduct, or breaches of trust.

Influence Peddling: The illegal practice of using one's position, status, or privileged relationships to influence the decisions of public or private agents for personal gain or the benefit of others, in exchange for undue advantages.

Abuse of Power: The use of a position or role to obtain undue advantages, harm others, or act in an arbitrary and unjustified manner.

PROHIBITED CONDUCT:

a) Offering, promising, granting, soliciting, agreeing to receive, or accepting any form of bribery, including facilitation payments;

b) Offering or accepting gifts, donations, or sponsorships that could influence business decisions or result in an undue advantage;

c) Establishing or maintaining business relationships with any party that does not adhere to the same ethical principles and compliance rules outlined in the Code of Ethical Conduct;

d) Intervening in business decisions, career management, or procurement of goods and services where there is a risk of conflict of interest, or engaging in activities that may give rise to such conflicts.

Statutory Body Member: A member of the Board of Directors, Supervisory Board, statutory auditor, or the President and Secretary of the General Assembly.

Director or Manager: A member of the 1st or 2nd level management team.

Employee: For the purposes of this document, “Employee” refers to anyone with an employment relationship with RNA, even if indirect (e.g., multiple employers, temporary work, etc.).

Service Provider: A supplier of services under a service provision contract with RNA.
Policyholder: The subscriber of the insurance contract under which the corrupt act or omission is committed.

Insurance Intermediary: The distributor of the insurance contract under which the corrupt act or omission is committed.

Third Party: Any entity involved in the insurance subscription process or claims handling.

PRINCIPLES

In addition to the principles enshrined in the RNA Code of Conduct, to which reference is made regarding the fundamental principles that must guide employee conduct, as well as matters related to conflict of interest, confidentiality duty, anti-fraud culture, and the prevention of corruption and related offenses, this document also seeks to extend its commitment to the following principles:

- **Zero Tolerance**

RNA repudiates all activities or practices that may be considered corruption and related offenses, whether attempted or consummated, and adopts a stance of absolute intolerance towards such practices regardless of any circumstances, including the perpetrators, nature, or value involved.

- **Duty to Act**

RNA commits to acting towards the effective investigation and clarification of the truth whenever a situation that may constitute suspicion of corruption and related offenses is identified, adopting all legal and judicial measures available to ensure proper accountability.

- **Commitment to Training**

RNA ensures the provision of appropriate training for its entire structure, aiming to develop the necessary awareness to identify and prevent potential corruption situations and to guide proper conduct in the face of suspicions.

- **Compliance and Transparency**

RNA guarantees that all interactions with public and private agents will be conducted ethically, transparently, and in accordance with applicable legislation.

REPORTING

This policy aims to establish an internal and external reporting system through which any entity can report or denounce a situation that may constitute suspicion of corruption and related offenses.

Additionally, RNA will identify, analyse, and classify risks and situations that may expose it to acts of corruption and related offenses. Based on this assessment, preventive and corrective measures will be adopted to reduce both the likelihood of occurrence and the impact of these risks.

All information provided in the context of reporting suspicions of corruption and related offenses will be treated with the utmost confidentiality.

These data may be collected, used, stored, disclosed, transferred, and processed by RNA to comply with legal requirements, conduct proper investigations, and monitor compliance with internal policies and the company's Code of Conduct.

COMMUNICATION CHANNELS

As part of the commitment to promoting innovation and transparency in the Corruption and Related Offenses Prevention Policy, RNA has developed agile and secure channels to facilitate communication and reporting of irregularities, non-compliance, and suspected fraudulent and corrupt activities.

Thus, any employee, client, third party, supplier, or any person who becomes aware of a situation that may constitute corruption or related offenses should report it via the following email:

compliance@rnaseguros.com

Reports can also be made through the Whistleblower Channel available on RNA's website, which ensures that reports are handled securely, with integrity and confidentiality, as well as being fast and accessible.

TREATMENT MECHANISM

RNA has implemented a Treatment Mechanism for situations that may constitute acts of corruption or related offenses, in a structured and systematized manner, covering the registration, analysis, and decision-making process for each case.

This process may include fact-finding, with the request or collection of necessary elements to verify the accuracy of the information. These situations are always handled with priority and urgency, aiming at the swift clarification of facts and the adoption of appropriate measures.

RESPONSIBILITIES

All RNA employees are responsible for ensuring that any suspected situation of corruption or related offense is properly identified, reported, and addressed. They represent the company's first line of defence.

Senior Management, including the Board of Directors, Directors, and Heads of Business and Network Management areas, must ensure that all suspicions of corruption and related offenses are properly reported and handled. The Board of Directors, with the support of the Legal and Compliance Department, is responsible for defining policies, guidelines, and service instructions, as well as coordinating actions to prevent losses or recover suffered damages. This structure represents the second line of defence.

DISCLOSURE

RNA's Policy for the Prevention of Corruption and Related Offenses must be communicated to all employees through internal service announcements and must remain permanently accessible on the website www.rna.com.pt.

PREVENTION OF CORRUPTION AND RELATED OFFENSES – PREVENTIVE MANAGEMENT

RNA is committed to preventing and combating corruption and related offenses through the adoption of the following preventive measures:

- Promoting a culture of integrity, ensuring that legality and ethics prevail in all company activities;
- Dissemination and employee commitment to the rules and principles established in the Code of Conduct;
- Approval and wide dissemination of this Policy for the Prevention of Corruption and Related Offenses;
- Implementation of control mechanisms, including technical, technological, and human resources for monitoring and prevention;
- Involvement of area leaders in defining risk scenarios, enabling the creation of effective systems for alert and early detection of irregularities;

- Training and awareness programs, including formal and informal training, team, and board meetings, as well as awareness campaigns through internal newsletters, communications on social media and the company website, and the inclusion of the topic in strategic meeting agendas;
- Creation and maintenance of records on conduct that may constitute acts of corruption or related offenses, with clear rules for review and access.

The guidelines adopted by RNA for the prevention of corruption and related offenses include the application of rigorous due diligence on clients, suppliers, and business partners, to identify risks of involvement in illicit practices; the creation and maintenance of databases with behavioural models to detect signs of corruption and facilitate the identification of suspicious activities through monitoring alerts.

COMBATING CORRUPTION AND RELATED OFFENSES – DETECTIVE MANAGEMENT

RNA reaffirms its commitment to combating corruption and related offenses by promoting investigative and inquiry procedures whenever there is suspicion of involvement in illicit activities. The company will adopt practical measures, including disciplinary, administrative, regulatory, and legal actions, as applicable in each case.

In cases of suspected crimes, RNA commits to promptly notify the competent authorities, collaborate with investigations, and ensure compliance with current legislation.

Additionally, RNA will maintain detailed records of behaviours that may indicate corrupt practices or related offenses, following specific and strict rules for handling and protecting this data, in accordance with privacy and security regulations.

OTHER ENTITIES

RNA reiterates its commitment to adopting cooperation mechanisms with other companies in the insurance market, regulatory entities, and law enforcement and justice bodies, ensuring full compliance with competition laws and personal data protection standards.

REVIEW AND UPDATE

This policy must be reviewed by the Legal and Compliance Department at least every two years, or whenever strategic changes occur within the company, as well as regulatory or legislative updates that impact RNA.

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

Version	Date	Description
1	April 2, 2025	First version of the Policy