FIDELIDADE
SEGUROS DESDE 1808

Reporting of Irregularities Policy

Identification of Responsibilities

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Approval

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Version History

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Summary of review of chapters/schedules of the previous version

Chapter/ schedule reviewed	Summary of changes
4.3	Link update “Relações Profissionais”

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FIDELIDADE
SEGUROS DESDE 1808

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1. Aim and scope of the Reporting of Irregularities Policy

The Fidelidade Group regards the identification of irregularities as important, encouraging all people to act in line with the principles of ethics, accountability and compliance with the law and internal rules. The new legal framework on whistleblower protection, established by Law 93/2021, of 20 December, enhances measures for early identification of deviant conduct, mitigation of financial and/or reputational losses, and improvement of processes and internal controls, to encourage integrity in employees' behaviour and identify opportunities to improve their well-being and performance.

All Fidelidade Group employees are required to observe this Reporting of Irregularities Policy (the "Policy") which relates to the reporting of irregularities using internal channels. These channels should be given priority over external reporting channels, the scope of which is defined in Law.

External reporting channels should only be used in accordance with the Law, which includes, among others, situations where there is no internal reporting channel, where there are reasonable grounds to believe that the breach cannot be effectively discovered or resolved internally or that there is a risk of retaliation, or where an internal report has been submitted and no information has been provided, within the established time limits, regarding the measures planned or adopted following that report.

The main aims of this Policy are:

1. To define the concepts and establish the principles that govern the reporting of irregularities within the scope of the legislation in force;
2. To identify channels for reporting irregularities and define the related procedures;
3. To establish the governance model and the duties and responsibilities of the Corporate and Structural Bodies involved;
4. To establish the training and internal communication mechanisms related to the reporting of irregularities, the procedures and the channels provided;
5. To assist in making all employees fully aware of their personal and professional duties in this area and the need to comply with the established internal procedures.

This Policy applies to all Fidelidade Group companies in Portugal.

2. Legislative and regulatory framework

Law no. 93/2021, of 20 December, established the general rules on the protection of persons reporting breaches, transposing into Portuguese Law Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, on the protection of persons who report breaches of Union law.

This law does not interfere with the application of other legal rules, in particular the rules on the protection of professional secrecy for lawyers, doctors and journalists, confidentiality of legal investigations, the rules applicable to criminal procedure, the right of workers to consult their representative bodies, or the rules of protection associated with the exercise of that right, and the provisions on personal data protection.

The setting up of channels for reporting irregularities also aims to meet the obligations contained in the following legislation:

- Law no. 147/2015, of 9 September, approving the legal framework for the business of insurance and reinsurance (RJASR), which creates the obligation to manage serious irregularities related with the company's administration, system of governance or accounting arrangements that may lead to deterioration of its financial position or serious indications of breach of the duties set out in that law;
- Annex II of Law no. 35/2018, of 20 July, especially Article 7, on information relating to breaches of Regulation (EU) no. 1286/2014 on key information documents for packaged retail and insurance-based investment products (PRIIPs);
- Law no. 83/2017, of 18 August, on Anti-Money Laundering and Counter-Terrorist Financing Measures, in particular regarding the obligation to implement a channel to receive reports of irregularities related with breaches in this area;
- Law no. 109-E/2021, of 9 December, creating the National Anti-Corruption Mechanism and establishing the general rules on the prevention of corruption.

Channels for reporting irregularities (or 'whistleblowing' channels) take into account secrecy and data protection obligations, and therefore, without prejudice to the specific provisions in this area contained in the above legislation, the following must also be taken into consideration:

- Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation);
- Law no. 58/2019, of 8 August, guaranteeing the execution, in the Portuguese legal system, of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

3. Concepts

3.1. Reporting

Reporting means written communication, in good faith, on the basis of factual knowledge or well-founded suspicions, of the practice of irregularities or breaches committed against the reporting person (or 'whistleblower'), a third individual or company, or the company itself, committed by an individual, regardless of whether there is any evidence or supporting documents, relating to the areas covered by this Policy.

3.2. Reporting Person (Whistleblower)

A whistleblower is a natural person who reports or discloses a breach based on information acquired in the context of his/her work-related activities.

The following persons are considered whistleblowers:

- Employees with an employment contract, regardless of the type (of indefinite term, fixed-term, full or part-time);
- Trainees and Interns;
- Volunteers;
- Former employees;
- Intermediaries, service providers, suppliers, consultants;
- Shareholders and people who sit on the administration or management bodies or the fiscal or supervisory bodies of companies, including non-executive members;

- People who are in a recruitment process or are at any other stage of pre-contractual negotiations for a work-based relationship whether this has begun or is yet to begin.

3.3. Grievance

A grievance is a demonstration of disagreement regarding a position taken by a company in the Group, or of dissatisfaction regarding any act or omission of a company, but which is not an unlawful act that should be reported under this Policy as one of the "Irregularities covered".

The Group companies have specific channels where grievances can be presented.

3.4. External reporting

External reporting means reporting breaches of the rules to the competent authorities, such as the police, judicial or supervisory authorities (the Insurance and Pension Funds Supervisory Authority – ASF).

4. Irregularities covered

4.1. Irregularities covered by Law no. 93/2021

The irregularities to be reported are the breaches covered by Article 2 of Law no. 93/2021, of 20 December, that are the result of acts or omissions, whether intentional or negligent, that have occurred or are reasonably likely to occur, and also attempts to conceal those breaches, in different areas, including the following that are particularly relevant for the Fidelidade Group:

a) Acts or omissions contrary to the rules set out in the European Union acts mentioned in the annex to Directive (EU) 2019/1937 of the European Parliament and of the Council, contrary to the Portuguese rules that execute, transpose or enforce those acts or contrary to any other rules contained in legislative acts that execute or transpose those acts, including those that establish crimes or administrative offences, relating to the following fields:

   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) Protection of the environment;
vi) Consumer protection;
vii) Protection of privacy and personal data, and security of network and information systems;

b) Acts of fraud against companies in the Group;

c) Breach of the rules of competition or corporate tax rules;

d) Acts related with the fight against organised and economic and financial crime.

4.2. Irregularities set out in Article 305 of the RJASR

- Serious irregularities related with the company's administration, system of governance or accounting arrangements that may lead to deterioration of its financial position;
- Serious indications of breach of the duties related with the solvency rules for insurance undertakings.

4.3. Irregularities related with Harassment and Discrimination

Irregularities related with harassment and discrimination must be reported using the channel that already exists for this purpose in the Fidelidade Group. Further information can be found at:

Relações Profissionais

5. Specific procedures for reporting and handling the serious irregularities set out in Article 305 of the RJASR

Any of the irregularities set out in Article 305 of the RJASR and in Annex II of Law no. 35/2018, of 20 July, related with the management bodies of the Fidelidade Group, the system of governance or the accounting arrangements, and also irregularities related with PRIIPs, can be reported via:

- The Whistleblowing Platform available on the Intranet and on the company websites;
- Email to: denuncia.irregularities@fidelidade.pt;

- Letter sent to:
  APARTADO 24139
  LOJA CTT CAMPO DE OURIQUE (LISBOA)
  1251-997 LISBOA.

The Supervisory Board of the company in question has sole responsibility for investigating these irregularities, and appoints one of its members to be responsible for handling whistleblowing reports. At the end of the investigation a reasoned report will be produced listing the measures that have been adopted or explaining why no steps have been taken.

In order to conclude the process and/or guarantee that any corrective measures are entirely effective, while also ensuring that the whistleblower is protected, the person responsible for handling the process will be permanently assisted by the Audit Division, and may also request occasional cooperation from specific organisational units or the other Corporate Bodies.

People who perform key functions and who become aware of any serious irregularity related with the administration, system of governance or accounting arrangements of the insurance or reinsurance company that may lead to deterioration of its financial position, have a duty to report this to the Supervisory Board.

Although whistleblowers are not required to include any evidence when reporting an irregularity, if they do so this will help to increase speed and effectiveness in handling the process.

The initial report of irregularities and the reports produced as a result are stored on the platform, which is a durable medium that allows the information to be reproduced in its entirety and without being changed, for a period of five years, or longer if its storage is justified due to the subject matter of the issue that has been reported or due to ongoing judicial or administrative proceedings.

Every year, a report is sent to the ASF detailing the means made available to whistleblowers and summarising any reports received.

6. Whistleblowing channels

The Fidelidade Group has a specific whistleblowing platform.

This channel is separate from the other internal communication channels, and ensures the completeness, integrity and confidentiality of the identity of the whistleblower and persons concerned, and of all the information relating to the whistleblowing incident, preventing access by non-authorised persons and enabling the information to be stored as provided for by Law.

The Whistleblowing Platform is available on the Intranet of the companies in the Fidelidade Group, for the information of all their employees, and also on the respective company websites.

There are also specific postal and email addresses for whistleblowing purposes, with unrestricted access for all the categories of whistleblowers listed in 3.2 above:

- Email address: denuncia.irregularities@fidelidade.pt;
- Postal address: APARTADO 24139
  LOJA CTT CAMPO DE OURIQUE (LISBOA)
  1251-997 LISBOA.

Regardless of the channel used, the whistleblower's identity, and any information from which his/her identity may be directly or indirectly deduced, is confidential and access to it is restricted to the people responsible for receiving or following up on the screening and investigating process.

Any processing of personal data under this Policy is performed in line with the provisions of the General Data Protection Regulation.

7. General Principles

7.1. Independence, autonomy and absence of conflict of duties

The procedures for receiving, handling, investigating, deciding on and storing whistleblowing incidents ensure that they are processed in an independent, autonomous, impartial and confidential manner. Where there is a conflict of interest between the performance of a person's duties and the subject matter of the whistleblowing incident, all such persons will be excluded from the process of registration, analysis, classification, investigation and decision-making.

7.2. Anonymity

The Fidelidade Group encourages whistleblowers to reveal their identity, as this will help to fully clarify the situation and, from the outset, ensure greater credibility and good faith in the process. However, it is possible for the whistleblower to remain anonymous if he/she requests and explains the reasons for this. Anonymous whistleblowers can still hand over documents supporting the facts they are reporting, using one of the means of communication made available to them.

When irregularities are reported via the platform or by email, the person responsible for handling the whistleblowing incident will immediately take steps to confirm the whistleblower's personal identity. If this confirmation is not possible, the reporting will be considered anonymous, in which case no feedback will be given to the whistleblower regarding any steps taken, and there will be no reply on the outcome of the report.

7.3. Whistleblower's good faith

Whistleblowing should be carried out according to the principle of good faith, and should be adequately substantiated.

Persons who file reports in bad faith, frivolously or without any grounds, and who know that what they are reporting is not true or have obtained or accessed information by means of a criminal act, and those who abuse the reporting procedure and platform in order to harm or tarnish the image of the company or its employees, may be subject to disciplinary, civil and criminal liability, as provided for in the Law.

7.4. Confidentiality and Personal Data Protection

The identity of whistleblowers and of any third party concerned remains confidential, at all times, and is only known to those persons who are strictly necessary for the handling of the report. The fact that a non-anonymous whistleblower's identity is confidential does not prevent him/her from being contacted, via the whistleblowing platform on the Intranet or in writing, in order for information to be obtained which will be relevant to ascertaining the facts.

The duty of confidentiality also extends to persons who have received information on the whistleblowing incident, even if they are not responsible for or do not have competence to receive or handle it.

The only situations in which a whistleblower's confidentiality may not be guaranteed are (i) if this is strictly necessary and essential, in the terms of the law, as part of any kind of investigation or judicial proceedings, in cases where personal data proves important in order to comply with a duty to inform or process whistleblowing incidents or (ii) if the whistleblower expressly authorises the disclosure of his/her identity.

If information is disclosed according to (i) above, the whistleblower will first be sent written notice indicating the reasons for disclosing the confidential data in question, unless providing that information jeopardises the related investigations or judicial proceedings.

Personal data which is clearly irrelevant for the handling of the report is not stored, and is immediately erased when it is possible to separate it from the other information provided.

Handling of the process also does not affect full compliance with the applicable legislation on the protection of personal data and all information relating to the whistleblower, person concerned or third parties included in the report, in the terms of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the Portuguese Law executing that Regulation and any other data protection legislation that may subsequently be applicable.

7.5. Duty to report

The Code of Conduct in force at the Fidelidade Group dictates that employees who become aware of or have grounds to suspect the practice of any irregularities that may affect the Fidelidade Group's reputation, regardless of whether they have any evidence or supporting documents, and including cases of fraud or corruption or practices that harm the interests and public image of the Group companies, must report the situation using the means and methods defined internally. These means and methods guarantee confidentiality and protection of the employee's identity and also that there will be no retaliation against whistleblowers who have acted in good faith and without anonymity.

7.6. No retaliation

Any whistleblowing carried out under this Policy may not be grounds for instigating any disciplinary, civil or criminal proceedings or other forbidden discriminatory practices, or any procedure that is harmful to the whistleblower, unless that whistleblowing is deliberately and manifestly unfounded.

In the context of whistleblowing in good faith, the Fidelidade Group, in compliance with the law and with the non-discriminatory practices already adopted in this area, provides protection for whistleblowers and for any family member or colleague who has provided assistance in preparing the whistleblowing report. The following practices are not permitted:

- Suspension or dismissal;
- Demotion or withholding of promotion;
- Change of duties;
- Reduction, withholding or suspension of salaries;
- Imposition of penalties and disciplinary measures;
- Negative performance assessments or employment references;
- Harm to the whistleblower's reputation, particularly in social media;
- Coercion, intimidation, harassment or ostracism, among others.

In the case of reporting of irregularities covered by Article 305 of the RJASR, the following specific rules are also applicable:

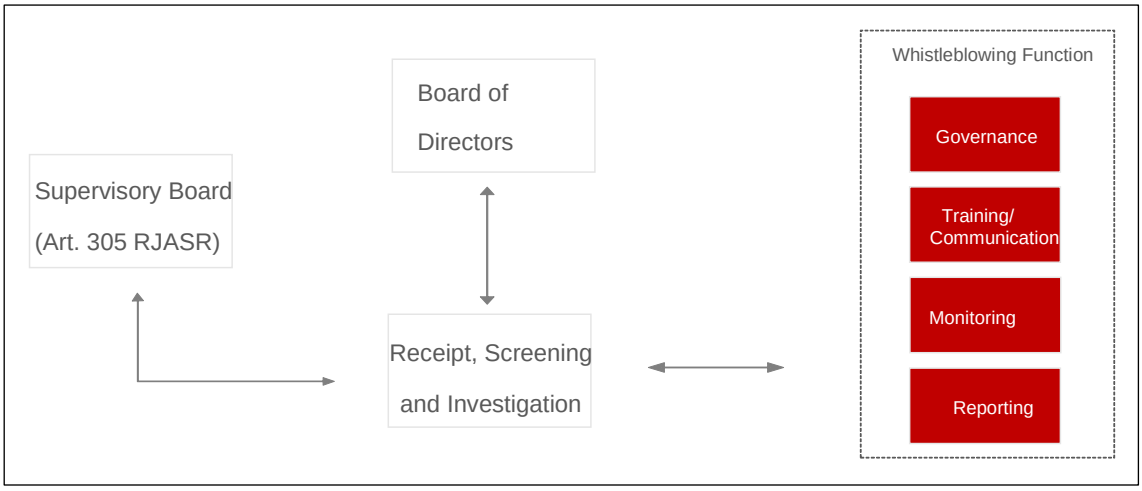
- It is not acceptable for the whistleblowing to affect the work-related position of the whistleblower, in particular in his/her evaluation, unless the whistleblower requests this him/herself or where the aim is to give a positive evaluation, provided the whistleblower expressly consents to this.
- The whistleblower may also request that his/her evaluation and decisions regarding any professional development are taken away from his/her superior in the hierarchy, even if not a direct superior, if this person is implicated in the irregularities reported. In this case another impartial assessor will be appointed.

8. Duties of the Organisation in relation to the whistleblower and persons concerned

The Fidelidade Group keeps the whistleblower's identity confidential, as well as all information gathered relating to the whistleblowing incident and also the identity of the people who helped the whistleblower to obtain information on the irregularity.

The person(s) concerned is/are also guaranteed the same confidentiality with regard to their identity, and no penalty may be imposed on them before the investigation process is concluded and any related legal proceedings have begun.

9. Governance Model: Duties and Responsibilities



	Governance Functions	Operational Functions
Chairman of the Board of Directors	▪ Highest responsible body; ▪ Approves the governance model, the Policy, codes, guidelines and internal procedures and any revisions.	N.A.

	Governance Functions	Operational Functions
Supervisory Board	N.A.	▪ Analyses and, within the scope of its powers defined in the articles of association, acts on serious irregularities related with the company's administration, system of governance or accounting arrangements that may lead to deterioration of its financial position (Article 305 of the Legal Framework on the Taking-Up and Pursuit of the Business of Insurance and Reinsurance).

	Governance Functions	Operational Functions
Whistleblowing Function Audit Division (DAU)	▪ Ensures the overall compliance and conformity of the exercise of the function, including data protection; ▪ Monitors and Controls compliance with time limits and the system's operating quality; ▪ Updates the governance model, the Policy, codes,	N.A.

	guidelines and internal procedures; ▪ Organises the updating of and/or improvements to the platform supporting the function; ▪ Ensures periodic reporting to the Chairman of the Board; ▪ Produces the annual report; ▪ Ensures regulatory reporting; ▪ Organises articulation with the other Structural Bodies and with the Chairman of the Board, whenever necessary.	

	Governance Functions	Operational Functions
Receipt, Screening and Investigation Audit Division (DAU)	N.A.	▪ Ensures appropriate screening and classification of reports received in line with the eligibility criteria; ▪ Ensures that cases received by post are registered on the platform; ▪ Forwards cases to the Structural Bodies responsible for investigating them when these have not been directly forwarded as a result of classification of the matter on the whistleblowing platform;

		▪ Investigates potential irregularities, with access to all the means available within the organisation (systems, platforms, applications, hearing of witnesses, consulting claims processes, articulation with other Structural Bodies to gather necessary information); ▪ Analyses all information gathered; ▪ Produces a final report following investigation; ▪ Replies to the whistleblower; ▪ Proposes internal improvement measures.

10. Screening, admissibility and registering

All reports are screened, classified and validated, to confirm whether they are eligible and of merit in the terms of the Law, and to assess their proper classification and whether or not they are anonymous.

If the whistleblower classifies the incident incorrectly, it will be reclassified and sent to the investigative body that should deal with it.

11. Time limits for replying and storage

A whistleblower who is not anonymous is informed, within 7 days, regarding receipt of the reporting and the requirements, competent authorities, method and admissibility of external reporting, in the terms of the Law.

The notice of receipt will include:

a) The protection guarantees provided to the whistleblower, including those due by application of the personal data protection rules;
b) A summary of the stages and terms for handling the whistleblowing incident, and the name and contact details of the person in charge of its preliminary analysis;
c) The rules on informing the whistleblower of the progress and conclusion of the handling process, in the terms set out in the Law.

Confirmation of receipt of the reporting does not mean that it will continue to the investigation stage, as it may be filed, in which case the whistleblower will be informed of this.

Within a maximum of 90 days counting from when the whistleblowing report is received, a whistleblower who is not anonymous is informed of the measures that are planned or that have been adopted to follow up on that report, together with the grounds for these.

The initial report of irregularities and the reports produced as a result are stored on paper and on another durable medium that allows the information to be reproduced in its entirety and without being changed, for a period of five years. The same time period applies to irregularities covered by Article 305 of the RJASR, counting from the last act in the process, unless their storage for a longer period is justified due to a judicial or administrative measure.

When the whistleblowing concerns matters related to Money Laundering and Terrorist Financing, the storage period for the initial reports sent and the reports produced as a result will be 7 years, unless another time period is applicable, in the light of any judicial proceedings or other relevant grounds.

12. Investigation and concluding report

The Structural Bodies with competence to investigate the facts surrounding the whistleblowing report have unrestricted access to all internal means and tools for accessing information, and must produce and register the facts and circumstances investigated,

including the evidence produced, in order to draw up a concluding report on the merit of the whistleblowing and the measures to be adopted. Whistleblowers who are not anonymous are informed of the progress of the proceedings, unless providing such information could lead to a serious risk of the investigation and analysis being disrupted.

13. Reply to the whistleblower

At the end of the investigation process and after the concluding report has been produced, whistleblowers who are not anonymous will be sent a reply, within the time limit established by Law, which will include the following information and related grounds:

- Whether or not the report is considered to have merit;
- The conclusions on the report sent;
- The measures taken to follow up on the report and the related grounds.

14. Training and Communication

The Fidelidade Group has up-to-date information on its intranet on the subject of whistleblowing, from a legal and regulatory perspective, and on internal procedures and the support tool.

Training will be given to all employees, in order to establish a culture of responsibility and professional, personal and business ethics.

15. Publication of the Policy

The Reporting of Irregularities Policy is published in full and permanently available on the Intranet of the companies in the Fidelidade Group, for the information of all their employees, and also on the respective company websites.

16. Review and Update of the Policy

The Reporting of Irregularities Policy will be reviewed at least once a year or at shorter intervals whenever this proves appropriate and particularly if any of the following occur:

- A change or modification to the specific aspects included in this document: scope, procedures, frequency or other relevant aspects;
- A change or modification to the applicable rules (legal, regulatory or internal);
- A change to the organisational structure of the Fidelidade Group.

The Audit Division is responsible for reviewing and updating this Policy.