

Anti-Bribery and Anti-Corruption Policy

Assignment of Responsibilities

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Revised chapter/ annex

Summary of changes

Partial review
of the
document

Review of some chapters of the Policy

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1. Purpose and scope of the Policy

Fidelidade Group is committed to adopting mechanisms aimed at preventing corruption to protect its shareholders, clients, employees, and other stakeholders from the effects such practices may have on its operations, thereby contributing, as is its duty, to the sound functioning of the economy and the development of society.

Accordingly, and in order to prevent Fidelidade Group from being involved in any type of activity or operation that may entail acts, indications, or manifestations of bribery or corruption, this Policy sets out, on the one hand, the expected standards of behavior for the Group's employees and, on the other, the principles that govern the processes for preventing such practices, thus reinforcing the Group's commitment to proactively combat and prevent all forms of bribery and corruption.

To this end, this Policy covers:

- the main concepts related to these matters;
- the principles for preventing bribery and corruption practices, as well as employees' duties;
- the roles and responsibilities of the various stakeholders involved in the process of preventing bribery and corruption.

This Policy applies to all companies within the Fidelidade Group in Portugal and their respective employees, except for those that are part of the Luz Saúde Group, regardless of their contractual relationship or hierarchical position, and must be observed by all.

Fidelidade Group companies operating in other jurisdictions incorporate the principles of this Policy into their own Anti-Corruption Policies, with the necessary adaptations in accordance with the legal and regulatory requirements of the respective jurisdiction.

2. Definitions

Bribery is understood as the offering, promising, giving, accepting, or requesting of an advantage as an incentive for an action that is illegal, ethically inappropriate, or a breach of trust.

Corruption is defined as the abuse of power or function to benefit a third party, in exchange for a sum of money or another type of advantage (*).

The crime of corruption always involves the combination of four elements:

- An act or omission;
- The performance of a lawful or unlawful act;
- The exchange of an undue advantage;
- That benefits the individual, or a third party designated by them.

Acts of corruption include:

- The promise, offer, or giving - directly or indirectly - of undue advantages, whether of a pecuniary or non-pecuniary nature, to someone for them to perform or refrain from performing an act in the course of their duties;
- The solicitation or acceptance - directly or indirectly - of undue advantages, whether pecuniary or non-pecuniary, by someone to perform or refrain from performing an act in the course of their duties.

Influence peddling refers to the conduct of a person who, either personally or through an intermediary - with their consent or ratification - solicits or accepts an advantage (pecuniary or non-pecuniary), or the promise of such an advantage, for themselves or a third party, to abuse their real or perceived influence with any public entity;

Facilitation payment means any payment or other compensation promised or offered to a public official to ensure or expedite a procedure that the public official is legally required to carry out.

Fidelidade Group further defines **improper conduct** as behavior that includes, but is not limited to, the following:

- Offering, promising, giving, soliciting, agreeing to receive, or accepting a bribe, including facilitation payments;
- Offering or accepting gifts that may influence pending or completed business transactions;
- Making donations or sponsorships with the aim of obtaining or retaining an unlawful advantage for the company or any of its employees;

- Establishing or maintaining business relationships with stakeholders of the Fidelidade Group, knowing that they do not comply with the principles and rules of the Fidelidade Group's Code of Ethics and Conduct;
- Participating in the evaluation and decision-making processes regarding business, employees' professional situations, or procurement procedures in which there is a risk of conflicts of interest, or engaging in activities that may give rise to such conflicts;
- Providing any kind of monetary or financial support to political parties or related entities.

3. Principles

Any act of corruption is not only illegal but also represents an unacceptable violation of the values and principles of ethics, integrity, and transparency upheld by Fidelidade Group. Therefore, any form of corruption is entirely rejected, regardless of the circumstances.

Fidelidade Group recognizes the importance of conducting its business based on strict compliance with all applicable internal and external laws and regulations, and of ensuring the integrity of its operations.

The Group ensures that its activities are carried out not only in compliance with legal anti-corruption requirements but also in accordance with the best practices in this area, making certain that the values that guide the organization are put into practice by its employees in the performance of their duties.

Accordingly, all illicit actions and/or those that are not aligned with current internal rules—particularly the provisions of the Code of Ethics and Conduct—are strictly prohibited, even under the justification of acting in the best interest of Fidelidade Group or generating economic benefit.

As part of its risk management and internal control systems, Fidelidade Group has implemented a set of mechanisms and procedures designed to prevent, detect, and/or mitigate potential impacts arising from the risks to which it is exposed—including, among others, the risks of bribery and corruption.

These mechanisms and procedures are regularly reviewed and updated to ensure their continuous improvement and ongoing adequacy. They are also reviewed whenever necessary, particularly to strengthen existing preventive measures that have proven to be insufficiently effective.

Fidelidade Group maintains a **zero-tolerance policy toward bribery, corruption, and related offenses**. As such, any form of corruption or bribery, including attempted acts—whether carried out directly within the Group's operations or indirectly through intermediaries—is strictly prohibited.

Fidelidade Group expressly **prohibits**, among others, the following:

- The payment, offering, authorization, receipt, or acceptance of bribes, whether in cash or in kind, without exceptions;
- Employees, business partners, and members of corporate bodies offering or accepting any type of bribe, through any means or channels, to improperly benefit clients, intermediaries, suppliers, or employees;
- Employees, business partners, and members of corporate bodies offering or accepting any

type of bribe from clients, intermediaries, suppliers, or employees for the benefit of themselves, their families, friends, business partners, or third parties;

- The offering or acceptance of gifts, offers, invitations, entertainment, or expenses whenever such actions may influence the outcome of business transactions related to the Group's activities, and whenever they are not considered reasonable, in good faith, and in compliance with the rules, principles, and limits set out in the Code of Ethics and Conduct;
- Any type of direct or indirect contributions and other types of expenses - such as donations and/ or sponsorships, whether monetary or in kind - to political parties, organizations, or individuals involved in politics on behalf of the Group. This includes, but is not limited to, electoral committees, organizations related to political parties, political research institutions, lobbying groups, politically aligned causes, official celebrations, and political candidates;
- Any form of political involvement on behalf of the organization, encompassing all types of institutional political activity, including monetary or in-kind political contributions, direct or indirect support to political parties, candidates, election campaigns, or politically affiliated organizations, as well as lobbying activities, participation in political rallies or demonstrations, institutional affiliation with political parties, support for political causes, and the use of any company resources - such as facilities, equipment, systems, communication channels, or working time - for political purposes.
- This prohibition applies to all Fidelidade Group companies, including international operations, and must be observed in every jurisdiction where the Group operates, with any necessary adaptations to ensure compliance with applicable local laws.
- This provision does not restrict employees' freedom to engage in political activities in a strictly personal capacity, if such actions do not represent Fidelidade Group directly or indirectly occur outside working hours, do not involve the use of any company resources, and are carried out transparently and in accordance with applicable legislation.

Fidelidade Group must ensure that all third parties, suppliers, clients, and other business partners with whom it interacts act with commercial, professional, and legal integrity. To that end, mechanisms must be established to identify potential suspicious transactions and behaviors, preventing the Group from becoming involved in activities related to bribery and corruption offenses.

4. Employee duties

Given the serious consequences associated with bribery and corruption, Fidelidade Group considers it the duty of all its employees, in their daily activities and within the scope of their roles, to be aware of and act in accordance with the internal guidelines and policies on these matters.

In this regard, all employees of Fidelidade Group must:

- Be familiar with this document, as well as the Code of Ethics and Conduct, the Corruption and Related Offences Risk Prevention Plan, and the Whistleblowing Policy, all available on the Fidelidade Group companies' intranet. These are the regulations that govern the internal procedures necessary for preventing bribery and corruption risks;
- Pay particular attention to suspicious situations, and comply with the procedures set out in this Policy and in the Code of Ethics and Conduct, especially those related to whistleblowing and reporting of irregularities;
- Participate in training sessions provided by Fidelidade Group aimed at improving the identification of situations that may be related to bribery and corruption practices, as well as the understanding of duties related to their prevention;
- Acknowledge, on an annual basis, that they have read and understood the principles and rules contained in this Policy;
- Always act in good faith and with diligence, refraining from any behavior considered prohibited by Fidelidade Group, namely:
 - Offering, promising, giving, requesting, agreeing to receive, or accepting a bribe, including facilitation payments;
 - Offering or accepting gifts that may influence ongoing or future business transactions;
 - Making donations or sponsorships to obtain or maintain an illicit advantage for the company or any of its employees;
 - Establishing or maintaining business relationships with Fidelidade Group stakeholders, knowing that they do not comply with the principles and rules set out in the Code of Ethics and Conduct;
 - Participating in the evaluation and decision-making processes regarding business transactions, employees' professional situations, or procurement procedures where there is a risk of conflicts of interest, or engaging in activities that may give rise to such conflicts;
 - Making any kind of contribution (direct or indirect), donation, or financial/monetary support, as well as incurring any other type of expense to political parties, related entities, or political campaigns - whether party-based or individual - under any circumstances.

The above prohibitions apply to all forms of bribery and corruption, all negotiations, and all business relations and transactions, including public procurement, in which Fidelidade Group is involved, with the aim of obtaining or retaining any kind of advantage for the Group or for any person or entity.

The institutional involvement of Fidelidade Group in activities representing legitimate interests - referred to as lobbying - can, if not properly framed, represent a significant risk of bribery, corruption, or related offenses, especially when the intent is, directly or indirectly, to influence public decisions that are relevant to the Group.

As such, any lobbying activities involving public entities, regulatory bodies, or political decision-makers must be conducted responsibly and transparently, adhering to the highest standards of ethics, integrity, and accountability, as well as recognized national and international best practices.

Fidelidade Group therefore strictly prohibits the use of lobbying activities to obtain undue advantages or as a mechanism to circumvent legal or regulatory prohibitions related to corruption or related offenses, in accordance with the provisions of the General Regime for the Prevention of Corruption.

Additionally, reinforcing its commitment to transparency with all stakeholders, Fidelidade Group commits to monitoring and disclosing annually, through its Integrated Management Report, clear, accessible, and transparent information regarding lobbying-related expenses, including, where applicable:

- The total amounts spent;
- The identification of the beneficiaries or recipients of those expenses (e.g., sectoral associations, interest groups, among others);
- The geographical location of the lobbying activities carried out;
- A breakdown of expenses by type (e.g., direct lobbying activities, membership fees, participation in initiatives aimed at institutional influence;
- The topics and causes are supported through such activities.

Even in the absence of any lobbying activity or related expenses, Fidelidade Group ensures their explicit reporting, thereby demonstrating its ongoing commitment to ethics, integrity, and transparency.

Employees must follow all principles and duties outlined in Fidelidade Group's Code of Ethics and Conduct regarding institutional representation in lobbying activities, which this Policy complements in the specific domain of bribery and corruption prevention.

5. Procedures for preventing bribery, corruption, and related offenses

To prevent and detect acts of corruption and related offenses, whether committed by or against companies within the Fidelidade Group, a Compliance Program has been adopted and implemented. This Program includes the following key components: the Corruption and Related Offenses Risk Prevention Plan, the Code of Ethics and Conduct, the whistleblowing channel and an annual training and communication program.

5.1. Internal regulations

Fidelidade Group has specific internal regulations in place for the prevention of bribery and corruption risks, namely:

- The Code of Ethics and Conduct
- This Anti-Bribery and Anti-Corruption Policy
- The Corruption and Related Offenses Risk Prevention Plan
- The Compliance Policy
- The Whistleblowing Policy.

5.2. Procedures for managing risks of bribery, corruption, and related offenses

Fidelidade Group has procedures for identifying, assessing, mitigating, and reporting risks of bribery, corruption, and related offenses, based on the Compliance Risk Management framework outlined in the Group's Compliance Policy.

The process of identifying and assessing bribery and corruption risks relies on qualitative evaluations of the likelihood and impact of these risks.

As a result of this assessment, preventive and corrective measures are identified and implemented in situations with higher risk.

All these procedures, as well as periodic reporting, are outlined in the corruption and related offenses Risk Prevention Plan.

5.3. Reporting irregularities

Any act of bribery or corruption - or suspicion thereof - whether completed or attempted, must be reported immediately through the channels and means internally defined in the Whistleblowing Policy, ensuring confidentiality and identity protection, as well as protection against retaliation for those reporting in good faith and non-anonymously.

The following situations, among others and without limitation, are considered indicators of corruption that require mandatory reporting:

- Requests from third parties to prepare false documentation;
- Requests from third parties to conceal their identity, except in cases protected by data privacy or professional secrecy;
- Public information about a third party or their country of operation indicating a high incidence of corruption;
- Requests for cash payments;
- Requests for donations to political parties;
- Requests for payments through banks located in tax havens;
- Unexplained high travel and hospitality expenses;
- Specific recommendations from third parties linked to political parties or authorities regarding certain clients or suppliers.

Lack of information, proof, or supporting documentation does not exempt employees from their duty to report any irregularities they become aware of.

5.4. Training and awareness

Fidelidade Group ensures annual training via its e-learning platform or other suitable means on risk management systems, including financial crimes, fraud, corruption, and bribery, as well as internal controls.

The Group will provide training to its employees as necessary to implement and maintain this, Policy.

Additionally, all Group employees must formally acknowledge annually that they have read and understood this Policy's principles and rules. This annual acknowledgment reinforces individual commitment to integrity, ethics, and compliance with internal regulations, as well as continuous awareness of bribery and corruption risks.

6. Disciplinary responsibilities

The legal, financial, and reputational risks associated with corruption practices are extremely serious and have significant impacts on Fidelidade Group.

Non-compliance with the principles set forth in the internal regulations on this matter constitutes a breach of employee duties, which may result in disciplinary sanctions, including dismissal of just cause.

The application of disciplinary sanctions does not preclude the Group's potential reporting of facts that may constitute criminal or administrative offenses.

7. Roles and responsibilities

The management of bribery and corruption risks is based on a governance model of three lines of defense:

1st Line of Defense: All employees.

2nd Line of Defense: Compliance Division and Risk Management Division.

3rd Line of Defense: Internal Audit Department

The responsibilities of each party are as follows:

Executive Committee

Responsible for adopting and implementing the Compliance Program and for establishing and updating the Group's risk tolerance level, approving the Anti-Bribery and Anti-Corruption Policy and the respective Corruption and Related Offenses Risk Prevention Plan.

Responsible for Regulatory Compliance

Responsible for implementing the Compliance Program.

Compliance Division

Supports the Compliance Division in performing their duties.

The various departments and management bodies of the companies within the Fidelidade Group

Responsible, together with the Compliance Division, for identifying and assessing bribery and corruption risks related to their activities, implementing adequate mitigation measures, and corrective actions to address internal control system deficiencies.

All Employees

Employees are responsible for reporting in good faith any known or suspected acts of bribery or corruption in the course of their professional duties, respecting the Group's established channels and procedures.

Risk Management Division

Through the Operational Risk Management Department, responsible for managing operational risk and the internal control system of the Group. Procedures include:

- Documenting and characterizing existing control activities linked to risks identified in business processes;
- Decentralized recording of events and resulting losses (including near-misses), as well as risk self-assessments and control activities.

Internal Audit Division

Responsible for evaluating the internal control system and the processes, procedures, and controls implemented.

8. Review and update

This Policy will be reviewed every three years or whenever deemed appropriate, particularly when:

- There are changes or modifications in any aspects of this document (scope, procedures, frequency, etc.);
- Applicable regulations (legal, regulatory, or internal) change or are updated.

The Responsible for Regulatory Compliance, supported by the Compliance Division, is responsible for reviewing and updating this Policy, which must be approved by the Executive Committee.