




SANCTIONS POLICY

RNA – Rede Nacional de Assistência, S.A

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Scope and Purpose

International sanctions constitute restrictive measures imposed on natural or legal persons, jurisdictions and organisations with the objective of maintaining or establishing international security, protecting human rights, and preventing acts that may infringe European Union law.

Restrictive measures are implemented by countries or international organisations, which maintain lists of persons, groups or entities subject to such measures, and may take the form of diplomatic measures, restrictions on admission and movement, restrictions on commercial relations, or financial restrictions, such as the freezing of funds and economic resources.

RNA conducts its activities in accordance with the principles of legality, transparency, integrity and accountability, assuming a clear commitment to respecting European Union law and preventing practices that may undermine compliance with legal and regulatory obligations.

In this context, recognising the relevance of restrictive measures and sanctions as an essential instrument for international security, the protection of the European legal order and respect for human rights, RNA ensures their observance and compliance.

Taking into account the nature of its activities, RNA has carried out a risk analysis, considering in particular the different types of operations carried out, the financial flows involved, as well as the associated beneficiaries and jurisdictions, with the aim of identifying those that entail a higher exposure to the risk of non-compliance with European Union law at the time the payment is executed.

Based on this assessment, RNA has adopted a targeted and proportionate control model in order to ensure an adequate and effective level of prevention to mitigate the risk of non-compliance with sanctions or restrictive measures, through the adoption of consistent preventive mechanisms aligned with the best practices in the sector.

Regulatory Framework

This Policy is established within the framework of compliance with international sanctions regimes adopted by the European Union, the United Nations and other

competent authorities; applicable national legislation concerning sanctions and the liability of legal persons; contractual obligations assumed by the Insurer, including sanctions clauses provided for in policies and reinsurance contracts; and the guidance and expectations of supervisory authorities applicable to the insurance sector.

Definitions

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

- International sanctions: restrictive measures imposed by international, European or national authorities, including, among others, payment prohibitions, the freezing of funds or restrictions applicable to certain persons, entities, countries or territories.
- Sanctions screening (“screening”): an automatic and/or manual verification process aimed at identifying whether a natural or legal person appears on applicable sanctions lists.
- Beneficiary: the natural or legal person in whose favour the payment is made.
- Match (“match” or “hit”): a potential correspondence between the beneficiary’s data and an entry on a sanctions list.
- False positive: a correspondence which, after analysis, is concluded not to relate to a sanctioned person or entity.

General Principles

Sanctions screening in the processes covered by this Policy is based on a set of fundamental principles.

RNA retains responsibility for compliance with international sanctions, regardless of whether payments are executed directly or through subcontracted entities.

The control mechanisms adopted are defined in proportion to the identified risk, seeking to ensure an appropriate balance between preventive effectiveness and operational efficiency.

The procedures implemented must allow for the generation of evidence and ensure the traceability of decisions taken, making it possible to demonstrate, ex post, that the

controls were carried out and that the sanctions lists consultation procedure was followed.

The analysis and decision regarding potential matches are ensured by functions independent from the operational areas, guaranteeing an appropriate segregation of duties.

Processes Covered

Under this Policy, payments associated with processes where a higher exposure to risk is identified are subject to sanctions screening, namely direct payments to beneficiaries affiliated with group policies and to international entities located outside the European Union. Payments which, due to their nature or context, present a link to beneficiaries, countries or territories subject to restrictive measures are also included.

Screening Process

1. Timing of Screening

Sanctions screening is carried out prior to the execution of the payment, based on the information available regarding the beneficiary.

2. Modality

Screening is performed through:

- An automatic screening tool, whenever available, applied to the beneficiary's data; and/or
- Manual analysis, in cases where the process is not covered by an automatic tool or when there are potential matches that require verification.

3. Handling of Potential Matches

- Potential matches are forwarded to the Legal and Compliance Department and the Finance Department;

- The payment is suspended until the analysis is completed;
- If it is confirmed that the beneficiary is subject to applicable sanctions, the payment is not executed and appropriate measures are adopted.

Responsibilities Flow

Operational areas are responsible for ensuring the correct and complete collection of beneficiary data and for complying with the procedures defined under this Policy. The Finance Department ensures that payments are executed only after confirmation that the applicable screening mechanisms have been complied with.

The Legal and Compliance Department is responsible for defining and maintaining the sanctions screening criteria and procedures, supporting the interpretation of the applicable framework, analysing potential matches and monitoring the application of this Policy, assessing its adequacy in light of the identified risk.

The Internal Audit function incorporates in its audit plans the independent and periodic assessment of the effectiveness of the control system associated with sanctions screening in the covered processes and may issue recommendations aimed at strengthening the effectiveness of controls and mitigating any weaknesses identified.

The Board of Directors is responsible for approving this Policy, ensuring its alignment with RNA's overall strategy and risk appetite, as well as ensuring the availability of adequate resources for the implementation of control mechanisms and promoting an organisational culture of compliance.

Policy Review

This Policy is subject to review whenever deemed appropriate, taking into account developments in the applicable legal and regulatory framework, relevant changes in the operational or technological model, the results of internal monitoring, as well as any recommendations from Internal Audit or conclusions arising from supervisory actions.

The reviews aim to ensure that the Policy remains current, appropriate and proportionate to RNA's risk profile, and any material changes shall be subject to review and approval by the Board of Directors.

Disclosure and Approval

This Policy is approved by the Board of Directors and enters into force on the date of its publication.

It shall be reviewed whenever significant changes occur in the company's structure or when required by applicable legislation.

Version Control

Version:	Prepared by:	Approved by:	Effective date:	Notes:
1.0	Compliance Department	Board of Directors	01.20.2026	Initial version