




POLICY ON THE TREATMENT OF POLICYHOLDERS, INSUREDS AND BENEFICIARIES

RNA – Rede Nacional de Assistência, S.A

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Taxpayer Number: 509 113 010 | Registered at the Lisbon C.R.C under the same number
Share Capital 1.200.000.00€

This Policy complies with the applicable legislation in force, namely the Legal Framework for Insurance and Reinsurance Distribution, approved by Law no. 7/2019 of January 16, as well as the provisions set out in Articles 32 and 33 of Regulatory Standard no. 13/2020 of December 30, Regulatory Standard no. 7/2022 of the Insurance and Pension Funds Supervisory Authority, and Article 154 of Law no. 147/2015.

Given that RNA operates within the insurance market, it is subject to a specific and demanding regulatory framework, fully adopting the legally mandated practices, procedures, and control mechanisms applicable to the sector. In this context, RNA makes every effort to ensure compliance with the rules and procedures governing its relationship with Policyholders, Insured Persons, and Beneficiaries.

SCOPE

1. Under Article 4 of Regulatory Standard no. 7/2022-R of June 30, insurance companies are responsible for defining and approving a policy on the treatment of policyholders, insured persons, and beneficiaries, as well as ensuring its proper implementation and monitoring compliance therewith.
2. This document reflects the principles and standards of conduct that guide RNA and embody its values. Accordingly, the behaviour of both its employees and service providers, in their relationships with the third parties, must comply with the principles set out herein.

FAIR, DILIGENT AND TRANSPARENT TREATMENT

1. As a service provider, RNA adopts processes designed to ensure that, in its relationships with policyholders, insured persons, and beneficiaries, they are treated:
 - a. Impartially and fairly, promoting equal treatment;

- b.** Professionally, diligently, and responsibly, ensuring respect for the legitimate interests of policyholders, insured persons, beneficiaries, and injured third parties, and providing a rigorous, high-quality service;
- c.** Transparently, ensuring that the information provided is accurate, clear, and objective.

CLIENT VULNERABILITY

- 1.** In its relationships with clients, RNA considers situations of particular vulnerability, namely due to illness, age, financial difficulties, communication difficulties, or language barriers, ensuring fair and appropriate treatment to address such circumstances.
- 2.** To this end, RNA makes ongoing efforts to protect clients in more vulnerable situations, namely by:
 - Providing continuous training to employees to address the specific needs of vulnerable clients;
 - Ensuring that pre-contractual and contractual information is presented in a clear, simple, and tailored manner;
 - Explaining claims reporting procedures clearly, ensuring that client vulnerability does not hinder access to potential compensation;
 - Adopting criteria to identify clients with the limitations.
- 3.** In this regard, RNA seeks to ensure fair outcomes and prevent the exploitation of vulnerabilities, while maintaining transparency in client relationships.

ADEQUATE HANDLING OF INFORMATION AND CLARIFICATION NEEDS

- 1.** In the performance of their duties, RNA employees must ensure that policyholders, insured persons, and beneficiaries are provided with legally required information and appropriate clarification, considering their profile and the complexity of the situation, to support informed decision-making.

2. The obligations relating to information and clarification incumbent upon the company, as well as the mechanisms to ensure that contracts or capitalization operations are not marketed with characteristics unsuitable to the profile of the respective policyholders or insured persons, must be fulfilled.
3. Where these rights are not ensured by the company, the supervisory authority (ASF) may require amendments to this Policy.

PROCESSING OF PERSONAL DATA

1. The processing of personal data of policyholders, insured persons, and beneficiaries must be carried out in strict compliance with applicable legal and regulatory provisions.
2. All personal data collected, stored, and processed are subject to personal data protection legislation, namely the General Data Protection Regulation (GDPR).
3. Personal data are processed for the purpose of performing the contract to which the data subject is a party. Where this is not applicable, processing is carried out to pursue legitimate or vital interests, or to comply with a legal obligation, and only for these purposes and legal bases. For further information, please consult our Privacy and Personal Data Protection Policy.

PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

1. "Conflict of interest" refers to any situation in which an employee may have a direct or indirect interest, as well as situations involving their spouse, relatives, or in-laws up to the first degree, or companies and other legal entities in which they hold a direct or indirect interest.
2. RNA ensures the prevention and management of conflicts of interest, including in the context of complaints handling, in compliance with applicable legal, regulatory, and conduct obligations.

3. RNA employees are required to report any situation that may give rise to a conflict of interest, for any reason.
4. In compliance with applicable legislation, RNA has a Policy on the Prevention, Disclosure, and Resolution of Conflicts of Interest, which is communicated to all employees and is permanently available and accessible through internal communication channels.

SWIFT AND EFFICIENT PROCESS MANAGEMENT

1. RNA Seguros is committed to performing its duties, whenever processes involving policyholders, insured persons, or beneficiaries are concerned, with promptness and efficiency, without compromising rigor, quality, or customer service, particularly regarding claims and complaints handling.
2. RNA Seguros ensures that all complaints received are immediately forwarded for review and handled within the shortest possible timeframe.
3. In compliance with applicable legislation, RNA has a complaints management policy that is known to all employees of the institution.

ADEQUATE QUALIFICATIONS

1. All RNA employees possess the appropriate training and qualifications to perform their duties, within which they interact directly or indirectly with policyholders, insured persons, or beneficiaries.

ANTI-FRAUD POLICY

1. RNA, as a service provider operating in the insurance sector, is committed to maintaining a zero-tolerance stance toward fraudulent activities, in any form or manifestation.

2. Accordingly, and in compliance with applicable legislation, RNA has an Anti-Fraud Policy available for consultation by all employees and clients.

POLICY DISCLOSURE

1. This Policy is communicated to all RNA employees and is permanently accessible.
2. Through its risk management and internal control system, RNA ensures the existence of reporting and monitoring mechanisms to guarantee compliance with the provisions set out in this Policy.