

Suppliers' Code of Conduct

Identification of Responsibilities

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Review: Chief Executive Officer

Opinion:

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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

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1. Introduction

One principle has played a central role in the Fidelidade Group's business for over two centuries, and has been key in developing our solid brand and reputation: integrity in our business dealings with all our stakeholders and the communities to which we belong, which includes total respect for the Law and for business ethics.

Ethical behaviour and integrity in business dealings, based on a humanist vision and a deep respect for human rights, ensure long-lasting relationships and create value for all those who interact with Fidelidade – customers, employees, partners, shareholders, and society in general. They are values that make us proud to work for Fidelidade and to know that our stakeholders trust us.

As part of our business, the Fidelidade Group is in daily contact with an extensive network of suppliers, sub-contractors and business partners who make a decisive contribution to our success.

For that reason, because they play an important role in both our success and our sustainable growth, everything that our suppliers, sub-contractors and business partners do as part of their daily business, when they are acting on behalf of the Fidelidade Group's companies, must follow the highest standards of ethical integrity and professional conduct so as not to jeopardise the Group's reputation as a trusted business partner.

The Suppliers' Code of Conduct (the "Code") defines the attitude we expect from all the suppliers, sub-contractors and business partners of Fidelidade Macau – Insurance Company Limited and Fidelidade Macau Life – Insurance Company Limited (collectively known as "Fidelidade Macau" or "the Company"), and sets out the rules of conduct they must follow.

2. General provisions

2.1. Scope of Applications

The commitments and rules contained in the Suppliers' Code of Conduct are applicable at Fidelidade Macau and must be followed by all their respective suppliers, sub-contractors and business partners.

2.2. Who the Code is for

The Suppliers' Code of Conduct is for all entities that supply goods or provide services to Fidelidade Macau, and also for those entities intending to do so.

The suppliers, sub-contractors and business partners of Fidelidade Macau (collectively referred to as "Partners" in this Code) should adopt the Company's ethical values and principles in their own business dealings.

The following rules of conduct explain the behaviour that we expect from all our Partners and that we require them to adopt. The rules are organised in three areas that guide the Company's position:

- Social factors
- Ethical factors
- Environmental factors

2.3. Licences and registrations

Before entering into any formal contract to supply goods or provide services to Fidelidade Macau, our Partners must have all the licences and registrations they need to carry on their business in line with the applicable laws and regulations, and they must make these available to us.

During the contract, our Partners must promptly inform us of any fact that may have a material impact on their capacity to supply the goods or perform the duties and activities sub-contracted to them.

2.4. Use of Fidelidade Macau's assets and resources

Our Partners must seek to ensure the safekeeping, and prudent and effective use, of all resources given to them by Fidelidade Macau. This includes material assets, e.g. equipment and IT material, and non-material assets, e.g. confidential information and passwords.

2.5. Confidential information

Protecting Fidelidade Macau's business information is fundamental. Examples of business information are business plans, product plans, sales and marketing strategies, and other trade secrets, as well as intellectual property.

Given that this is one of the Company's major assets, our suppliers, sub-contractors and business partners must not, under any circumstances, disclose confidential, operational, financial or commercial information that they have access to during the provision of the contracted services. Even internally – within Fidelidade Macau or within our Partners' own organisational structure – confidential information must only be shared on a strictly need-to-know basis.

3. Commitments of the Company and of its Partners

Fidelidade Macau and its suppliers, sub-contractors and business partners play an important role in the economic, social and environmental development of the communities to which they belong.

The relationship between the Company and its Partners needs to be aligned with the rules in this Code if we are to satisfy the interests of all those who interact with us – customers, employees, partners, shareholders, and society in general.

Hence, Fidelidade Macau is committed to:

- Adopting, in relation to their suppliers, sub-contractors and business partners, fair and ethical behaviour with integrity, seeking to establish and consolidate long-lasting relationships, and paying for goods and services acquired in the terms and within the time limits agreed;
- Guaranteeing transparent procurement processes that are properly documented and auditable, with clear rules and criteria for awarding contracts;
- Taking decisions regarding management of their contractual relationships with their suppliers, sub-contractors and business partners, including in selection and contracting processes, based on objective and impartial technical and financial criteria, without any subjective or discriminatory factors influencing this;
- Encouraging its Partners to implement improvements in relation to social and environmental issues;
- Promoting and maintaining a value chain that reflects and is aligned with Fidelidade Macau's values and principles and with the ethical manner in which we carry on our business.

For their part, we expect our suppliers, sub-contractors and business partners to:

- Satisfy all the legal and regulatory requirements applicable to their business in the countries where they operate;
- Follow the rules of conduct contained in this Code;

- Disseminate and promote the rules of conduct in this Code among their employees and, where applicable, among their subsequent sub-contractors, certifying that they have the qualifications and competences required to perform their functions in line with those rules;
- Notify Fidelidade Macau of any actual or suspected breaches of or non-compliance with the rules of conduct in this Code, including any that involve subsequent sub-contractors, and when requested provide the necessary evidence.

4. Social factors

At Fidelidade Macau, we are committed to developing a fairer, more open and more sustainable society. We therefore expect our suppliers, sub-contractors and business partners to respect human rights, embrace diversity and inclusion and implement fair and decent employment practices.

4.1. Human Rights

We expect the activity of our suppliers, sub-contractors and business partners to follow the Principles of the UN Global Compact and the International Labour Organization (ILO) conventions that are considered fundamental for human rights in the workplace.

Therefore, Fidelidade Macau's Partners must:

- Promote behaviour founded on respect for Human Rights. This includes respect for human dignity and the safeguarding of life and of physical and mental integrity, the freedoms of conscience, religion, organisation, association (in particular trade union association), opinion and expression, the right to equality and non-discrimination and to a fair wage, the prohibition of child and forced labour, respect for youth employment, and strict respect for the confidentiality of employees' data;
- Guarantee that their business is not associated with any type of serious and/or repeated infringement of human rights.

4.2. Prevent harassment and discrimination. Promote diversity and inclusion

Fidelidade Macau's Partners must discourage and prevent any type of:

- Discriminatory practices based on age, nationality, ethnic origin, sex, sexual orientation, gender identity or expression, religion, political or ideological beliefs, economic and social situation, marital status or any other criterion set out in the applicable legislation, in particular in selection and contracting processes, and the assessment, career progression and remuneration of their employees;
- Harassment, of a moral, sexual or work-related nature.

Suppliers, sub-contractors and business partners must actively promote a culture of equality, diversity and inclusion, including implementing:

- practices to prevent discrimination, intimidation or harassment of any type;
- actions to increase their diversity and inclusion

4.3. Fair and decent employment practices

a) Labour law

Fidelidade Macau's Partners must comply with the applicable labour law, in all the locations where they operate, and must make every effort to guarantee that their logistics chain does the same. They must also respect employees' rights to freedom of association and collective bargaining, in line with the applicable local legal and regulatory requirements.

b) Remuneration and working hours

Fidelidade Macau's Partners must pay their employees a fair and appropriate salary, in compliance with all the legal requirements and collective employment agreements in force. Salaries must be paid on time and must be equal to at least the statutory minimum salary in each country where they operate, in order to meet employees' basic needs.

Fidelidade Macau's suppliers, sub-contractors and business partners must abide by the maximum number of working hours, mandatory rest periods and rest days and the rules on payment for overtime. They must also pay the social security contributions and taxes set out in the law of the locations where they operate.

Fidelidade Macau's Partners must ensure that their subsequent sub-contractors also comply with these principles.

c) Undeclared, forced and child labour

Fidelidade Macau considers the use of prohibited or precarious labour practices and association with any type of human trafficking activity to be reprehensible and unacceptable.

In all the locations where they operate, Fidelidade Macau's suppliers, sub-contractors and business partners must observe the standards of the International Labour Organization (ILO) regarding child labour, forced labour and undeclared labour.

Under no circumstances may Fidelidade Macau's Partners use any kind of child labour, forced labour or undeclared labour, and they must also confirm that none of their subsequent sub-contractors engage in any of these practices, regardless of the location.

d) Health, safety and hygiene in the workplace

Fidelidade Macau's suppliers, sub-contractors and business partners must protect the environment and the health and safety of their employees and customers and the communities where they operate.

They must comply with the relevant legislation on health and safety in the workplace in all locations where they operate, and they are expected to provide their employees with appropriate information and instructions on this issue and promote a safe working environment.

5. Ethical factors

Fidelidade Macau is committed to high ethical standards during the course of our business.

As a principle, we choose Partners who share our values and adopt ethical commercial practices. We therefore expect our suppliers, sub-contractors and business partners not to tolerate behaviour that involves breaking the law or other applicable rules, either directly or indirectly, and not to be involved in any activity that violates those laws or rules. We also expect them to avoid conduct that could harm the Company's reputation and have a negative effect on our interests, even if that behaviour does not actually break the law.

5.1. Conflicts of interest

Preventing conflict of interest situations means Fidelidade Macau is able to maintain its integrity and the trust that customers, employees, shareholders, suppliers and partners place in the Company.

Our Partners must avoid situations and refrain from participating in any activity where there is a conflict of interest with Fidelidade Macau, including any interaction with the Company's employees that may affect the duty of those employees to act in the best interests of the Company.

Suppliers, sub-contractors and business partners must inform Fidelidade Macau of all conflict of interest situations that they become aware of.

Suppliers, sub-contractors and business partners must also refrain from giving any gifts, invitations or benefits of any kind that could interfere with or condition, or appear to interfere with or condition, the actions of any Fidelidade Macau's employee in the performance of their duties.

5.2. Personal data protection

Fidelidade Macau is committed to demonstrating accountability in the processing of its stakeholders' personal data, by adopting a risk-based approach and following the principles of privacy by design and privacy by default.

The Company's suppliers, sub-contractors and business partners must work with the Company to fulfil its obligations with regard to personal data protection. As a minimum, they are required to:

- Comply with the laws and regulations on privacy and data protection, including those governing cross-border transfers of data and cyber security;
- Make sure they are aligned with Fidelidade Macau's privacy and security policies;
- Obtain prior permission from the Company for any subsequent sub-contracting, and apply the privacy and security measures they are subject to as the supplier, sub-contractor or business partner to any subsequent sub-contractors;
- Process personal data only for the purposes agreed with Fidelidade Macau;
- Promptly notify Fidelidade Macau of any actual or suspected personal data breach.

5.3. Anti-money laundering and counter-terrorist financing

Because of the type of activities Fidelidade Macau engages in, money laundering, terrorist financing, and UN and EU sanctions and restrictive measures are significant risks for the Company, and consequently no degree of tolerance to those risks is acceptable.

All Partners of Fidelidade Macau are therefore required to comply fully with the applicable laws and regulations on money laundering and terrorist financing and with sanctions regimes in the business relationships they establish with certain countries, entities or individuals.

5.4. Prevention of corruption and related offences

Fidelidade Macau has a zero tolerance approach to any indication of corruption or similar offences.

Any act of corruption, besides being illegal, is an unacceptable affront to Fidelidade Macau's values and principles of ethics, integrity and transparency.

The Company strongly objects to this. We therefore expect our suppliers, sub-contractors and business partners to have policies and procedures in force to mitigate the risk of bribery and corruption and to comply with the legislation on the prevention of corruption and related offences.

5.5. Prevention of anti-competition practices

Fidelidade Macau is committed to promoting free competition, which is fundamental if we want to provide our customers with innovative products and services that give them ever better protection throughout their lives.

Any practices that affect free competition may have a significant negative impact on the Company's brand and reputation, or lead to financial losses or regulatory penalties.

Fidelidade Macau's suppliers, sub-contractors and business partners must engage in fair competition in line with the competition laws in force in each location where they operate, and must refrain from participating in agreements, understandings or coordinated activities with customers or competitors that could eliminate or reduce free competition.

5.6. Subsequent sub-contractors

Fidelidade Macau's Partners are expected to properly mitigate the risks of their logistics chain, by incorporating social, ethical and environmental factors in their processes for selecting suppliers and/or service providers, promptly fulfilling their contractual obligations to suppliers and service providers, developing their own related policies (e.g. their own suppliers' code of conduct) and, in particular, guaranteeing that the fair and decent employment practices described in 4.3 of this Code are correctly followed.

6. Environmental factors

Fidelidade Macau has established sustainability as a key priority in the different areas where we operate, in order to make a positive impact on society. Given the importance of this issue for Fidelidade Macau's success in the future, we believe that our suppliers must be committed to reducing the environmental footprint of their operations.

6.1. What we expect of our suppliers

We expect our suppliers, sub-contractors and business partners to support and follow Fidelidade Macau's environmental protection commitments.

They should:

- Comply with all applicable national and international rules on environmental protection;
- Take steps to reduce the environmental footprint of their operations (e.g. carbon emissions, energy consumption, travel, water consumption, paper usage);
- Implement responsible governance to reduce the environmental footprint of their operations;
- Work with Fidelidade Macau to reduce the environmental footprint of the services provided to the Company;
- Work with their own suppliers and others in their logistics chain to reduce the environmental footprint of their operations.

6.2. What we encourage our suppliers to do

Fidelidade Macau is aware of the environmental footprint of our chain of providers, and so we encourage our suppliers, sub-contractors and business partners to do the following, among others:

- Mitigate their carbon emissions, and define targets for reducing emissions;
- Establish plans for the transition to renewable electricity;

- Establish plans for the transition to electric and/or hybrid vehicles;
- Define plans to reduce waste and increase recycling.

7. Final provisions

7.1. Adherence to the Code

Adherence to this Suppliers' Code of Conduct (or a declaration signed by the supplier or service provider stating that their own rules of conduct are in line with those in this Code) is a mandatory requirement in order for a contractual relationship to exist with Fidelidade Macau.

Suppliers, sub-contractors and business partners must be able, at any time, to demonstrate their level of compliance with the commitments and rules established in this Code.

7.2. Reporting of irregularities

Any irregularities or breaches of the Law or this Code, including attempted breaches, must be reported using the Company's whistleblowing communication channels, following the procedure in the Reporting of Irregularities Policy.

If suppliers, sub-contractors or business partners of Fidelidade Macau become aware of or suspect the practice of any irregularities that may affect the Company's reputation, including cases of fraud or corruption, or practices that harm the interests and public image of the Company, they must report this situation immediately.

This duty to report irregularities applies even if Partners do not have full information or proof, including documents.

Fidelidade Macau guarantees confidentiality and will not retaliate against any whistleblower who has acted in good faith and with adequate grounds.

7.3. Breaches of the Code of Conduct

In the event of failure to comply with the principles and rules set out in the Suppliers' Code of Conduct, Fidelidade Macau will adopt necessary and appropriate measures which, depending on the severity of the

breach, may lead to termination of the contractual relationship with the supplier, subcontractor or business partner in question.

7.4. Review and publication

The Suppliers' Code of Conduct will be reviewed every three years or whenever appropriate and specifically when there are changes to legislation and regulations. This Code is reviewed and updated by the Compliance Department and then submitted for the approval of the Executive Committee. The Suppliers' Code of Conduct is published on the intranet, and also on the website of the Company.