

Diversity, Equity, Inclusion and Belonging Policy

Company(ies)	Fidelidade Macau - Insurance Company Limited Fidelidade Macau Life - Insurance Company Limited
Guideline	Diversity, Equity, Inclusion and Belonging Policy
Version	1.0
Preparation	Human Resources & General Affairs Department
Review	Compliance Department and Sustainability Department
Approval	Executive Committee
Effective Date	27/11/2024
Distribution	All staff

INDEX

1.	Background	3
2.	Scope	3
3.	Key concepts	3
4.	Legal framework, conventions and internal rules	4
	4.1 International references	4
	4.2 Local and Internal references	5
5.	Strategic guidelines for valuing Diversity and Equity and promoting a more inclusive organisation	6
6.	Our Principles and Key Commitments	7
7.	Responsibility	8
8.	We respect, defend and promote Human Rights	8
9.	Governance Model	9
10.	Diversity, Equity, Inclusion and Belonging Programme	9
11.	Reporting channels	10
12.	Review, update and monitoring of the Policy	10

1. Background

In the Company, we work “so that life does not stop”. This is our purpose, aligned with that of the Fidelidade Group. We have long been an active economic agent, in our decision-making process, in our relations with stakeholders and in our day-to-day activities, that seeks to make the places where we operate more prosperous, more sustainable, healthier and more inclusive. Moreover, throughout our history, the Company has valued and recognised every one of its staff, always putting them first.

We live in an increasingly global and diverse world, which means that diversity is part of our daily concerns. The path we are on involves conscious work to ensure that everyone feels they belong to the organisation and have the same opportunities, and that they reflect who we are as a Company. We are therefore committed to initiatives that create a fairer and more equitable environment. We place emphasis on constant improvement, and we do everything we can to follow up on progress. This is why we are taking the path that brings us face to face with the challenges of Diversity, Equity, Inclusion and Belonging.

Our mission is to protect the Company’s staff, their health, their property and their businesses. The Company not only accepts and values individuality, but also fosters the inclusion of every single employee.

2. Scope

The scope of this Policy is to define the principles that guide Fidelidade Macau’s actions regarding Diversity, Equity, Inclusion and Belonging.

This Policy applies to all employees of Fidelidade Macau – Insurance Company Limited and Fidelidade Macau Life – Insurance Company Limited (hereinafter jointly called “Fidelidade Macau” or “the Company” or “We”). The principles set out in this Policy are aligned with the Fidelidade Group and adapted to the local legislation and culture of Fidelidade Macau.

Internal and external stakeholders of Fidelidade Macau should be aware of, be committed to, and act in accordance with the guidelines set out in this Policy.

3. Key concepts

A set of key concepts has been defined to aid in the application of this Policy, in addition to others contained in any applicable legislation and in other documents from reputable sources. The concepts defined below act as a support, within the context of the organisation, for increased awareness of and communication and learning about topics related to diversity, equity, inclusion and belonging.

Fidelidade Macau’s recognition of these terms reinforces its commitment to using references to guide positive actions that promote a more inclusive working environment.

Diversity: recognition of, respect for and valuing of differences between all people, including in particular those relating to gender, gender identity, sexual orientation, ethnicity, religion, beliefs,

place of origin, culture, language, nationality, place of birth, descent, age, political and ideological orientation, social background, marital status, family situation, economic situation, health status, disability, personal style and education.

Equity: the capacity of all members of a community to have full access to all opportunities, benefits and resources. Equity can be understood as fair treatment and the creation of equal opportunities for all.

Inclusion: the recognition and valuing of differences, establishing environments that favour all people and their particular characteristics. Inclusion is about fostering the creation of environments where everyone feels respected, welcome, valued and supported.

Belonging: full participation in a community, including a sense of integration, connection and responsibility for shared goals.

4. Legal framework, conventions and internal rules

4.1 International references

A number of international documents, as detailed below, were used by Fidelidade Group as a reference for drawing up their 'Diversity, Equity, Inclusion and Belonging Policy' which are also aligned by this Policy.

European Union

A Union of Equality: Gender Equality Strategy 2020-2025, European Commission, 5 March 2020.

- European Pact for Gender Equality (2011-2020), Council of the European Union, 7 March 2011.
- Directive (EU) 2019/882 of the European Parliament and of the Council, of 17 April 2019, on the accessibility requirements for products and services.

United Nations

- Universal Declaration of Human Rights, 10 December 1948.
- International Convention on the Elimination of All Forms of Racial Discrimination, 21 December 1965.
- Convention on the Elimination of All Forms of Discrimination against Women, 18 December 1979.
- Convention on the Rights of Persons with Disabilities, 13 December 2006.
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, June 1998.
- ILO Convention no. 87 on Freedom of Association and Protection of the Right to Organise, 9 July 1948.
- ILO Convention no. 98 on the Right to Organise and Collective Bargaining, 1 July 1949.

Sustainable Development Goals (“SDG”)

- SDG 5 – Gender Equality
- SDG 10 – Reduced Inequalities

Global Reporting Initiatives (“GRI”)

- GRI 405 – Diversity and Equal Opportunity
- GRI 406 – Non-discrimination

Other Documents

- Global Compact
- PSI – Principles of Sustainability Insurance
- Associação APPDI (Portuguese Diversity and Inclusion Association) – Diversity Charter
- EFRAG - ESRS S1 Own Workforce

4.2 Local and Internal references

A number of local and internal documents, as detailed below, were used as a reference for drawing up and applying this Policy.

Local

- Labour Relations Law, Law No. 7/2008
- Framework Law on Employment Policy and Worker's Rights, Law No. 4/98/M
- Protection of Equal Opportunities and Treatment for Male and Female Employees in Employment Decree Law No. 52/95/M

Internal

- Code of Conduct
- Suppliers' Code of Conduct
- Sustainability Policy
- Reporting of Irregularities Policy

5. Strategic guidelines for valuing Diversity and Equity and promoting a more inclusive organisation

Fidelidade Macau is committed to promoting and maintaining an Organisation based on the Diversity of our staff, Equity and active Inclusion, fostering a sense of Belonging.

We believe that only with an organisation made up of people with different perspectives, origins and experiences, and who respect the socio-cultural aspects of the communities where we are present, will it be possible to have a better working environment and to increase the quality of our services for stakeholders.

This Policy sets out the guiding principles and commitments of the Company in relation to diversity, equity, inclusion and belonging. At the same time, it considers the following priority areas: gender, disability, social background and origin.

Priority areas may be changed or adjusted depending on different circumstances.

- **Gender:** we are committed to enhancing equal opportunities, leading to diverse and global teams, in particular in selection and hiring processes, assessments, remuneration, growth and pay equity.
- **Social Background and Origin:** we are committed to improving the representation of different social backgrounds and origins in Fidelidade Macau.

Only then we will be able to better understand the needs of the Company's staff.

We shall invest in training and empowerment to challenge stereotypes and prejudices related to gender, origin and social background, preventing harassment in the workplace and promoting a balance between work and family life.

- **Disability:** we recognise that having a disability, of any kind, creates added difficulty in terms of employability, so we want to work harder to reduce the stigmas that may be attached to disabilities, by:
 - Promoting the recruitment of staff with disabilities;
 - Adapting the workplace environment to the needs of each of these staff to guarantee their full integration, and at the same time providing support to the teams they will join in terms of preparation, capacity building and training in order to receive them.

6. Our Principles and Key Commitments

- **Create an environment of reference to promote acceptance of and respect for individuality:** as a Company, we have a responsibility to develop and implement processes that actively contribute to ensuring that any staff, regardless of their cultural, social and ethnic origin, religion, ideology, sexual or political orientation, gender, age, disability, physical characteristics, personal style or nationality, can feel accepted and respected in terms of their individuality. One of our goals is to foster a physically and emotionally safe space, by searching for and implementing inclusive solutions that take shape as specific, transversal and tangible behaviour.
- **Not tolerate prejudice, discrimination and harassment:** everyone in the Company has a duty to respect the dignity and human rights of others, adopting a proper position with absolute respect for the law and internal rules in force. We contribute to the advancement of our staff by establishing equal opportunities, encouraging knowledge, building and promoting a good working environment that is free of discrimination and harassment and based on mutual respect and cooperation. We are also committed to promoting the use of inclusive language that respects the individuality of each staff and does not reflect any kind of prejudice or discrimination.
- **Promote leadership that is increasingly inspiring and a driver of Diversity, Equity, Inclusion and Belonging:** All team leaders must aim to transmit to their teams the principles of Diversity, Equity, Inclusion and Belonging, by setting an example. It is their responsibility to ensure that the principles and values of this Policy are effectively applied in the Company, promoting a culture of diversity, equity and inclusion.
- **Promote inclusive recruitment processes:** we are committed to promoting equal opportunities in global and diverse teams. As a result, we will continue to i) encourage the hiring or internal mobility of women for positions of responsibility and leadership; ii) encourage the hiring of staff with special needs, of whatever kind, and provide support to their teams regarding their full integration, providing an environment that is adapted to the needs of every staff; iii) encourage equal opportunities in hiring and (national or international) internal mobility, which takes into account staff's qualifications and skills regardless of their social background and origin. Our aim is for the Company to be made up of staff who can bring different perspectives to the Company in terms of analysing problems and finding solutions, as a result of their own professional, personal, social and cultural experiences.
- **Promote equal opportunities for growth and development within the Company:** alongside an inclusive recruitment process, with the aim of ensuring that all staff, regardless of their gender, gender identity, sexual orientation, ethnicity, religion, place of origin, culture, language, nationality, place of birth, descent, age, political and ideological orientation, social background, marital status, family situation, economic situation, health status, disability, personal style, have equal access to integration, to progression of their work and to their progression within the Company.
- **Promote pay equity:** Fidelidade Macau is committed to assessing, monitoring and eliminating all situations of potential unjustified pay discrimination and inequality, in

particular on the basis of gender, in line with the legislation in force at any given time on the promotion of equal pay for men and women.

- **Promote behaviour that, in addition to a sense of belonging to the organisation, fosters a sense of mental and physical well-being:** a sense of belonging leads to positive interpersonal relationships, reduces stress and anxiety and increases staff's overall satisfaction. Therefore, we will continue to mitigate psychosocial risks, and, at the same, promote initiatives to improve the well-being and health of our staff, and encourage work-life balance.

7. Responsibility

Everyone in Fidelidade Macau has a duty to play an active role in promoting and enhancing a culture of diversity, equity, inclusion and belonging, in the following ways:

- Respecting the individuality of everyone they interact with as part of their role, complying with the principles of this Policy;
- Dealing with co-workers, or with other people they have any business interaction with, inside or outside of the Company, without prejudice;
- Fostering an environment inside the Company that is free of discrimination and harassment;
- Using the internal reporting channel to report any situations or behaviour that contravene the principles of this Policy.

8. We respect, defend and promote Human Rights

We treat everyone who works in Fidelidade Macau fairly and without discrimination. We recognise that our staff are entitled to work in conditions that respect their physical and moral integrity and their dignity, with absolute respect for fundamental human rights.

We are committed to respecting all locally and internationally recognised human rights and labour rights, and is especially committed, in the context of diversity, equity, inclusion and belonging, to:

- **Not tolerating any form of discrimination** on the basis, in particular, of sex, sexual orientation, gender identity, family and/or socio-economic situation, reduced capacity for work, disability, chronic illness, ethnic or racial origin, descent, nationality, place of origin, language, religion, political or ideological beliefs and trade union membership.
- **Respecting and promoting freedom of assembly and association**, recognising the right of every staff to be represented by any organisation to defend their rights and interests and/or to form affinity groups or groups of belonging, within the limits imposed by the law in force. These rights are recognised by Fidelidade Macau, in compliance with that set out in both the domestic Labour Relations Law and the principles enshrined in Conventions 87 and 98 of the International Labour Organization, and no-one can be harmed, or discriminated against, for participating in them.

9. Governance Model

Implementation of the commitments of this Policy and the Programmes associated with it, and also its monitoring, reporting and continuous improvement, are the responsibility of the Chief Executive Officer, in conjunction with the Head of Human Resources and General Affairs Department.

In addition, all the Executive Directors and department heads have the following responsibilities:

- Ensuring and validating the implementation, monitoring, reporting and continuous improvement of the commitments established in this Policy and of any related programmes;
- Promoting global alignment discussions to advance the implementation of the Company's Diversity, Equity, Inclusion and Belonging Strategy;
- Promoting discussion of the results and taking decisions on strategic next steps;
- Providing information on implementation and fostering implementation of the commitments with goals and clear targets;
- Sharing internal and external knowledge benchmarks, experiences and best practice, which ensure good decision-making and continuous improvement;
- Promoting sharing, learning and networking between the different geographical locations.

In articulation with Fidelidade Group, a periodic survey may be conducted by an external entity to assess the perception of the Company's staff regarding Diversity, Equity, Inclusion and Belonging. The survey may aid in the subsequent definition of future actions to be carried out on this topic within the Fidelidade Group and/or the Company.

10. Diversity, Equity, Inclusion and Belonging Programme

Fidelidade Macau is committed to setting up and detailing goals and targets aligned with the defined strategy.

These goals and targets will be included in the Diversity, Equity, Inclusion and Belonging Programme and are subject to periodic review, to guarantee that they adequately reflect the Fidelidade Macau's constantly evolving values and needs.

11. Reporting channels

The following channels are provided to aid the scrutinizing, transparency and effective applicability of this Policy and its continuous improvement:

1. **Feedback, suggestions and queries channel:** the Company is entrusting to the Head of Human Resources & General Affairs the responsibility for the implementation and oversight of this Policy, which reports directly to the Executive Committee to whom regular updates on progress and initiatives should be reported. All staff shall have a voice and share their feedback, suggestions and any matters they wish to have clarity on topics related to this Policy, either by email to hr@fidelidade.com.mo or by direct appointment with the Head of Human Resources & General Affairs. The Head of Human Resources & General Affairs will analyse, monitor, deal with and reply to all communications received.
2. **Whistleblowing channels:** whistleblowers can report incidents through the Company's specific postal and email addresses as stated in the Reporting of Irregularities Policy, which guarantees anonymity, confidentiality and protection of data of all persons involved in a whistleblowing event.

12. Review, update and monitoring of the Policy

This Policy comes into force on the date it is approved by the Executive Committee. The Human Resources & General Affairs Department is responsible for its review, with the support of the Compliance Department and Sustainability Department, 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 Fidelidade Macau.

The Human Resources & General Affairs Department monitors the matters set out in this Policy, and any reporting of irregularities that may occur.