

# **Solvency and Financial Condition Report**

2022

Certified by the Statutory Auditor and Responsible Actuary



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# Summary





The Regime Jurídico de Acesso e Exercício da Atividade Seguradora e Resseguradora [legal framework on the taking-up and pursuit of the business of insurance and reinsurance] approved by Law No. 147/2015, of 9 September, requires insurance undertakings and insurance groups to disclose publicly, on an annual basis, a report on their solvency and financial condition.

The qualitative information <sup>1</sup> that insurance groups are required to disclose is set out in Chapter V of Title II of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014.

The quantitative information <sup>1</sup> to be disclosed together with this report is laid down in Articles 4 and 5 of Commission Implementing Regulation (EU) No. 2015/2452, of 2 December, amended and rectified by Commission Implementing Regulation (EU) No. 2017/2190, of 24 November.

In line with the description contained in Article 292 of the Delegated Regulation, a "clear and concise" summary of the items detailed in this report will be presented below.

#### **BUSINESS AND PERFORMANCE**

The Fidelidade Group operates in the Portuguese insurance market, selling products across all lines of business, as part of a multibrand strategy using a vast and diversified distribution network. The Fidelidade Group's products reach customers through three different brands, Fidelidade, Multicare and OK!Teleseguros, all of which are leaders in their segments.

The Fidelidade Group has a wide range of products and services available to its customers, resulting from its solid experience and the constant focus on diversification and innovation. The Group has been developing a comprehensive offer in the insurance business and reaffirming its aim of positioning itself more as a partner for its customers in the provision of protection and assistance services.

Within the scope of the insurance business, the Fidelidade Group has a wide range of products, which cover most Life and Non-Life lines of business.

Through the Group companies, services are also provided in other areas such as Health, Assistance, Real Estate, Asset Management, Loss Adjusting and Motor Vehicle Repairs.

Throughout 2022, the Fidelidade Group continued to invest in the launch of innovative products to meet customers' needs.

#### International Presence

Beyond the operation in Portugal, the Fidelidade Group's international insurance business is an important means of sustained growth and pursuit of its medium and long-term goals. The Group currently operates in four continents.

Fidelidade regards international expansion as a strategic priority to diversify its business, create synergies and transfer innovation between companies and, above all, between markets. The Group is also committed to developing the markets where it chooses to operate, in terms of both developing people and creating infrastructures or providing services and solutions for the people, while always keeping in mind the importance of guaranteeing that every operation is financially and operationally sustainable.

#### Consolidated Performance

In 2022, the Fidelidade Group attained total consolidated premiums written of EUR 5,118.1 million, registering an overall increase of 4.2% compared to the previous year, buoyed by the strong growth in the Non-Life business.

The Group maintained its leading position in the Portuguese market, recording an overall market share of 29.6%. International premiums reached EUR 1,540.2 million in 2022, recording an increase of 49.6% compared to the previous year, related to the evolution of both the Life segment and the Non-Life segment. The Latin America business represented 60% of the Fidelidade Group's international business, while Europe accounted for 26%, Africa 9% and Asia 4%.

Net income fell in 2022, due to the lower contribution of investment income, reflecting the recognition in the accounts of impairments associated with investment assets. At the end of 2022, Shareholders' Equity, excluding Non-Controlling Interests, was EUR 2,553.6

<sup>&</sup>lt;sup>1</sup> Quantitative information on monetary amounts is presented in thousands of euros, and in some circumstances the tables and graphs may present totals which do not correspond precisely to the sum of the parts, due to rounding up or down of those parts.



million, which was lower than the previous year and largely a reflection of the effect of the depreciation of financial assets in the Revaluation Reserve and the return of supplementary capital payments. The average return on equity (ROE) was 7.9%.

#### SYSTEM OF GOVERNANCE

Since Fidelidade – Companhia de Seguros, S.A. is the most representative company of the Group, the governance requirements applied to the insurance Group are defined therein. Accordingly, the relevant body to which the Group's governance requirements apply is the Executive Committee of Fidelidade – Companhia de Seguros, S.A.

Fidelidade has processes to assess the fit and proper requirements of the people who effectively run the Company, supervise it, are its managers or perform key functions within it.

The remuneration policy applicable to the management body and the way the practices in it are established promote sound and effective risk management and do not encourage excessive risk-taking.

Likewise, key functions of risk management, internal audit, actuarial and compliance, within the risk management and internal control systems, are carried out by Fidelidade bodies which perform functions across the Fidelidade Group's insurance business in Portugal and perform a supervisory role internationally.

The companies in the international sphere are very homogeneous in terms of respect for regulations and the local context, together with adequate articulation with the Group, resulting in a governance model that operates in two areas: independently and dependently, reporting to the central Board.

The Fidelidade Group's insurance area has implemented processes and procedures for managing risk by type of risk – strategic risk, underwriting risk (product design and pricing; underwriting; reserving; claims management processes; reinsurance and alternative risk transfer), market risk, counterparty default risk, concentration risk, liquidity risk and reputational risk.

Fidelidade's ORSA Policy aims to establish general principles for the own risk and solvency assessment. The ORSA plays a critical role in the management of the Fidelidade Group companies, and the results obtained from it are taken into consideration in Risk Management, Capital Management and Decision Making.

The rules and principles that the internal audit function must comply with are established in the Internal Audit Policy.

The internal audit function is performed with independence, impartiality and objectivity, and mechanisms have been set up to preserve these principles.

Due to the nature, complexity and scale of the Companies' portfolios, the actuarial function is subdivided into life actuarial and non-life and health actuarial. These actuarial functions are independent in functional terms.

A series of objective and transparent rules, which are subject to specific approval mechanisms, are applicable to transactions with related parties.

The operational risk and internal control management processes described in this report enable the dissemination, to all the Group Companies, of a culture of risk management, thereby strengthening the protection of their stakeholders, in particular, the policyholders and beneficiaries.

There were no material changes in the system of governance either of Fidelidade or of the Companies owned by it, during the period covered by this report.

#### **RISK PROFILE**

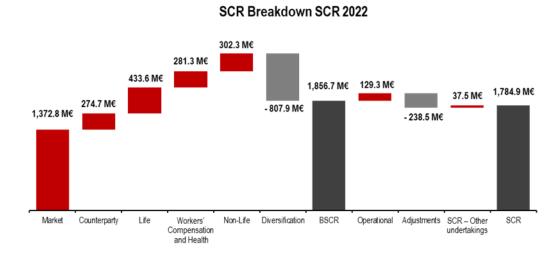
Risk management is an integral part of the daily activities of the Fidelidade Group Companies. An integrated approach is applied to ensure that the Group Companies' strategic objectives (customers' interests, financial strength and efficiency of processes) are maintained.

Accordingly, to outline Fidelidade Consolidated's risk profile the various risks to which the Group is exposed are identified and then assessed.



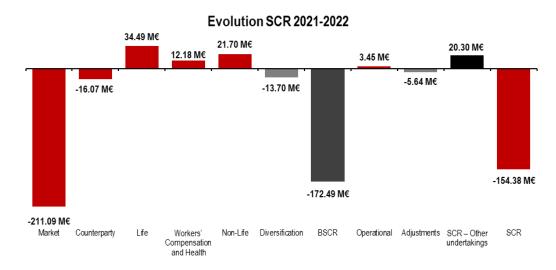
The risk assessment is based on the standard formula used to calculate the solvency capital requirement. For other risks, not included in that formula, the Group has opted to use a qualitative analysis to classify the foreseeable impact on its capital needs.

Hence, the calculation of Fidelidade Consolidated's solvency capital requirement (SCR) with reference to 31 December 2022 was as follows:



The market risk is clearly prominent in this requirement, followed by the much lower underwriting risks (of which the Life underwriting risk is more significant) and counterparty default risk. Operational risk is the lowest of the risk modules that make up the SCR calculated on the basis of consolidated data in line with Article 336 a) of Delegated Regulation (EU) 2015/35.

During the period covered by this report, there was a decrease in the solvency capital requirement (SCR) of around EUR 154.38 million, when compared with the figure at 31 December 2021.



The following elements can be highlighted in this evolution:

- The decrease in market risk, as detailed in Chapter C.2.;
- The increase in life underwriting risk, presented in Chapter C.1.1;
- The increase in non-life underwriting risk, presented in Chapter C.1.2; and
- The increase in workers' compensation and health underwriting risk, presented in Chapter C.1.3.

Various risk mitigation techniques are in use, or are being studied, at Fidelidade, for a set of risks to which Fidelidade Consolidated is exposed.



Risks that do not fall within the standard formula are identified as part of the ORSA process.

#### VALUATION FOR SOLVENCY PURPOSES

A description is provided of the bases, methods and main assumptions used for the valuation of assets for solvency purposes, and how these compare with those used in the financial statements. This information is divided into financial assets, real estate assets and other assets.

Recoverable amounts from reinsurance contracts and special purpose vehicles are also presented.

Amounts in thousand euros

Assets	Solvency II	Financial statements	Difference	Solvency II previous year
Financial assets	15,432,852	15,706,110	-273,258	16,357,262
Real estate assets	627,971	612,983	14,988	589,043
Other assets	1,746,920	2,083,777	-336,857	1,327,146
Reinsurance recoverables	360,452	682,803	-322,351	467,145
Total	18,168,195	19,085,673	-917,478	18,740,596

The differences are in the following classes of assets:

#### Holdings in related undertakings, including participations

This results from the valuation, for solvency purposes, of unlisted subsidiaries using the Adjusted Equity Method (AEM) (net, the total value of these holdings for solvency purposes fell by EUR 169,640 thousand).

The total difference includes (among less relevant others) the impacts of the valuation of Luz Saúde by the Adjusted Equity Method (the value of this participation, for solvency purposes, fell by EUR 360,873 thousand) and of Fidelidade Property Europe (increase of EUR 195,012 thousand in the valuation for solvency purposes).

#### Equities - listed

This results from valuation adjustments to standardise prices of assets held in more than one geography, the valuations of which in the individual accounts were obtained at different times (different time zones).

#### Equities - unlisted

This results from the valuation, for solvency purposes, of unlisted securities using the Adjusted Equity Method (AEM).

#### Government bonds

The difference corresponds to potential gains from the portfolio of financial assets valued at amortised cost recognised in Solvency II.

#### Corporate bonds

This results from valuation adjustments to standardise exchange rates on assets held outside the Euro area and prices of assets held in more than one geography.

#### Collective investment undertakings

This results from funds valuation adjustments where the look-through approach was applied. In the statutory financial statements, the available valuation at the close of accounts date was considered. In some funds this did not correspond to



the year-end valuation. For Solvency II purposes, it was possible to consider the year-end valuation that was made available in the meantime by the collective investment undertakings.

#### **Derivatives**

The Solvency II adjustment in these headings is justified by the revaluation made to reflect the full economic impacts on the Solvency II Balance Sheet, relating to the sale/purchase option existing over 12.1% of the capital of Fidelidade Moçambique – Companhia de Seguros S.A. (previously Seguradora Internacional de Moçambique, S.A.). These impacts are reflected in other balance sheet headings, namely "Holdings in related undertakings, including participations" and "Financial liabilities other than debts owed to credit institutions".

#### Deposits other than cash equivalents

As of the Q4 2022 report, assets with CIC 79 (margin and collateral accounts) were no longer included under the balance sheet heading "Deposits other than cash equivalents" due to a change in the classification. Following the ASF's guidelines, this amount is now reflected under the heading "Any other assets, not elsewhere shown".

#### Assets held for index-linked and unit-linked contracts

This results from the closing quoted prices at 31 December 2022 being obtained at different times. In the financial statements the valuation at 31 December 2022 was made some hours before the close of some financial markets which have an extended operation. For Solvency II it was possible to consider the final value after the close of all financial markets.

At the same time, the difference also results from adjustments to the valuation of the funds in unit-linked portfolios, where the look-through approach was applied. In the financial statements, the available valuation at the close of accounts date was considered. In some funds this did not correspond to the year-end valuation. For Solvency II purposes, it was possible to consider the year-end valuation that was made available in the meantime by the collective investment undertakings.

#### Property, plant and equipment held for own use

In the financial statements the valuation at cost was considered, and hence the difference results from the fact that in Solvency II property is valued at fair value, as required by the Supervisory Authorities.

#### Collective investment undertakings

This results from funds valuation adjustments where the look-through approach was applied. In the statutory financial statements, the available valuation at the close of accounts date was considered. In some funds this did not correspond to the year-end valuation. For Solvency II purposes, it was possible to consider the year-end valuation that was made available in the meantime by the collective investment undertakings.

#### Goodwill and Deferred acquisition costs

The value of these assets for solvency purposes is zero, in accordance with the Delegated Regulation.

#### Intangible assets

In order for these assets to have a value in the balance sheet for solvency purposes, they must be able to be sold separately and, moreover, it would be necessary to demonstrate that there is an active market in which similar intangible assets are traded. Given that the Group's assets considered in this class do not meet these requirements, their value for solvency purposes is zero.



#### Deferred tax assets

The difference results from the application of the tax rate to losses with taxable temporary differences implicit in the balance sheet for solvency purposes, that is, after adjustments with a negative impact on own funds.

#### Loans on insurance policies

The difference is due to an unnatural loan which, in line with the Solvency II Rules, is represented in Liabilities under the heading "Any other liabilities, not elsewhere shown".

#### Insurance and intermediaries receivables

The difference relates to receivables for reimbursement of amounts paid out in claims. This amount is considered in the Non-Life technical provisions, given that its valuation for solvency purposes is net of these receivables.

#### Reinsurance receivables

The difference relates to receivables for reimbursement of amounts paid out in claims. This amount is considered in the Non-Life technical provisions, given that its valuation for solvency purposes is net of these receivables.

#### Cash and cash equivalents

This results from the difference, when negative, between the balances of current accounts, which were considered in the valuation for Solvency II purposes under the heading "Any other liabilities, not elsewhere shown" in other liabilities.

#### Any other assets, not elsewhere shown

As of the Q4 2022 report, assets with CIC 79 were no longer included under the balance sheet heading "Deposits other than cash equivalents" due to a change in the classification. Following the ASF's guidelines, this amount is now reflected under the heading "Any other assets, not elsewhere shown".

#### Reinsurance and special purpose vehicles recoverables

The differences result from the method applied to calculate the best estimate, which uses assumptions that are not considered in the financial statements, such as the probability of counterparty default, consideration of the effects of inflation, discounting of estimated liabilities, and the method for calculating the provision for premiums.

The valuation of technical provisions for solvency purposes and a comparison with that used in the financial statements is presented in this report, segmented into:

- Life:
- Non-Life;
- Health:
  - SLT (Similar to Life Techniques);
  - NSLT (Not Similar to Life Techniques).



Amounts in thousand euros

Line of Business	Solvency II	Financial statements	Difference	Solvency II previous year
Life	10,443,433	11,470,660	-1,027,227	10,900,341
Non-Life	1,298,772	1,671,220	-372,448	1,203,541
Health – SLT	984,228	1,026,966	-42,738	1,214,551
Health – NSLT	466,566	495,329	-28,763	348,445
Total	13,192,999	14,664,175	-1,471,176	13,666,878

#### Life

For risk products the differences are basically justified by the different contract boundaries used for the technical provisions in the financial statements for a series of temporary annual renewable (TAR) group life insurance contracts, as described in point D.5.1.. This change to the contract boundaries has a positive impact on the Company's solvency capital requirement coverage ratio of around 4 pp.

For annuities products, the differences are essentially the result of applying the risk-free interest rate term structure.

The differences in the index-linked and unit-linked class arise from the current value of the difference between the estimated technical management costs and the future management costs.

For capital redemption products, with and without profit sharing, the differences result, on the one hand, from the application of the transitional measure on technical provisions and, on the other, from the difference between the rates guaranteed to customers and the rates contained in the reference interest rates curve (see point D.2.6.).

#### Non-Life

The main differences identified result from:

- The provisions calculated based on economic principles include the estimate of associated reimbursements, while the accounting provisions presented are gross of reimbursements, as mentioned previously in the paragraph entitled "Insurance and intermediaries receivables" in point D.1.3 Other Assets;
- A prudent provisioning policy, associated with good claims management and follow-up;
- The statutory provisions reflect:
  - Provision for premiums and provision for unexpired risks calculated using a different method to that applied to obtain the provision for premiums under Solvency II;
  - The estimate of payables not discounted.

The heading "Other technical provisions", which only appears in the financial statements with the value of EUR 35,645 thousand, mostly corresponds to amounts allocated to the equalisation provision.

#### **Health-SLT**

Considering the adjustment of the transitional measure on technical provisions, the impact of revaluing the provisions results fundamentally from the evolution of the interest rates term structure mentioned in point D.2.6.

#### **Health-NSLT**

The main differences identified between the figures for the accounting provisions and the provisions calculated based on economic principles result from:

- The provisions calculated based on economic principles include the estimate of associated reimbursements, while the
  accounting provisions presented are gross of reimbursements, as mentioned previously in the paragraph entitled
  "Insurance and intermediaries receivables" in point D.1.3 Other Assets;
- A prudent provisioning policy, associated with good claims management and follow-up;



- The statutory provisions reflect:
  - Provision for premiums and provision for unexpired risks calculated using a different method to that applied to obtain the provision for premiums under Solvency II;
  - The estimate of payables not discounted.

Pursuant to Article 25 of Law No. 147/2015, of 9 September, the Group applied the transitional deduction to technical provisions on the first day of 2022. The table below shows the amount of that deduction at 31 December 2022.

Amounts in thousand euros

			Transitional Deduction				
Lines of b	usiness/ Homogeneous risk groups	Recalculation 1/1/2019	Annual Decrease	Accumulated decrease to 31/12/2022 (3 years)	Amount at 31/12/2022		
29 and 33	Life insurance obligations - Health – SLT	256,882	-19,760	-59,280	197,602		
30	Life insurance obligations - Insurance with profit sharing - Capital redemption products	137,145	-10,550	-31,649	105,496		
32	Life insurance obligations - Other obligations similar to life - Capital redemption products	192,764	-14,828	-44,484	148,280		
Total		586,791	-45,138	-135,413	451,378		

A comparison is also provided between the valuation of other liabilities for solvency purposes and their valuation in the financial statements.

Amounts in thousand euros

Liabilities	Solvency II	Financial statements	Difference	Solvency II previous year
Other liabilities	2,291,395	2,000,305	291,090	2,141,011
Total	2,291,395	2,000,305	291,090	2,141,011

The differences, by class of liabilities, are:

#### Deferred tax liabilities

The difference results from the application of the tax rate to gains with taxable temporary differences implicit in the balance sheet for solvency purposes, that is, after adjustments with a positive impact on own funds.

#### Derivatives

The Solvency II adjustment in this heading is justified by the revaluation made to reflect the full economic impacts on the Solvency II Balance Sheet, relating to the sale/purchase option existing over 12.1% of the capital of Fidelidade Moçambique – Companhia de Seguros S.A. (previously Seguradora Internacional de Moçambique, S.A.). These impacts are reflected in other balance sheet headings, namely "Holdings in related undertakings, including participations" and "Financial liabilities other than debts owed to credit institutions"...

#### Financial liabilities other than debts owed to credit institutions

The Solvency II adjustment in this heading is justified by the revaluation made to reflect the full economic impacts on the Solvency II Balance Sheet, relating to the sale/purchase option existing over 12.1% of the capital of Fidelidade Moçambique – Companhia de Seguros S.A. (previously Seguradora Internacional de Moçambique, S.A.). These impacts are reflected in other balance sheet headings, namely "Holdings in related undertakings, including participations" and "Derivatives".



#### Insurance and intermediaries payables

The difference relates to payables for reimbursement of amounts paid out in claims. This amount is considered in the Non-Life technical provisions, given that its valuation for solvency purposes is net of these receivables.

#### Reinsurance payables

The difference relates to reinsurance ceded payables for reimbursement of amounts paid out in direct insurance claims. For solvency purposes these payables are included in the Non-Life and Health (SLT) technical provisions, the valuation of which was net of these.

#### Subordinated liabilities

The difference is due to the fact that in Solvency II subordinated liabilities are valued at fair value, while in the financial statements they are initially recognised at fair value (less directly related transaction costs) and subsequently measured at amortised cost.

#### Any other liabilities, not elsewhere shown

This results from the difference, when negative, between the balances of current accounts related with futures contracts and the components relating either to the valuation of unmatured contracts (recorded under the heading "Derivatives") or to the initial margin (collateral), which were considered in the financial statements valuation under the heading "Any other assets, not elsewhere shown", and "Sight deposits" with negative balances which were considered in the financial statements valuation under the heading "Cash and cash equivalents".

#### CAPITAL MANAGEMENT

Method 1 (accounting consolidation-based method) described in Article 270 of the Legal Framework on the Taking-up and Pursuit of the Business of Insurance and Reinsurance, approved by Law No. 147/2015, of 9 September, was used to calculate the Group's solvency, using the net data of any intra-group transactions.

The table below presents a comparison of the own funds as set out in Fidelidade Consolidated's financial statements and the excess of assets over liabilities calculated for solvency purposes:

Amounts in thousand euros

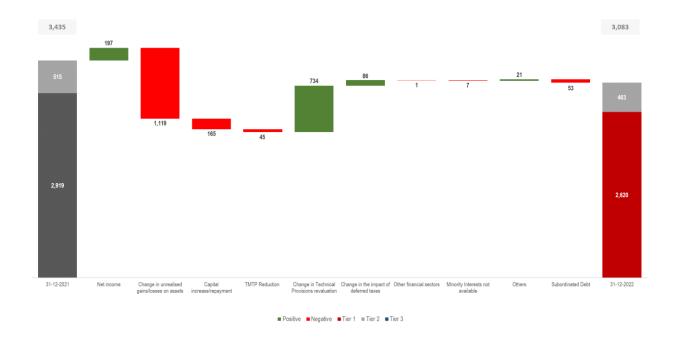
	Solvency II	Financial statements	Difference	Solvency II previous year
Assets	18,168,195	19,085,673	-917,478	18,740,596
Technical Provisions	13,192,999	14,664,175	-1,471,176	13,666,878
Other liabilities	2,291,395	2,000,305	291,090	2,141,011
Excess of assets over liabilities	2,683,801	2,421,193	262,608	2,932,707



The table below shows the amounts of own funds available and eligible to meet the solvency capital requirement (SCR) and the minimum capital requirement (MCR), classified by tier, relating to 31 December 2022 and 31 December 2021:

					Amoun	ts in thousand euros	
		Eligible own funds to meet					
		sc	R				
	Including financial sector	previous year	Excluding financial sector	previous year	MCR	previous year	
Tier 1	2,620,495	2,919,226	2,618,128	2,917,576	2,618,128	2,917,576	
Tier 2	462,590	515,360	462,590	515,360	125,777	124,074	
Tier 3	0	0	0	0	0	0	
Total	3,083,085	3,434,586	3,080,718	3,432,936	2,743,905	3,041,650	

The graph below shows the main changes to Fidelidade Consolidated's available own funds during the period covered by this report, in million euros.



When calculating the Solvency Capital Requirement (SCR), Fidelidade Consolidated's insurance companies use the standard formula and do not apply any internal model.

Calculation of capital requirements of the currency risk sub-module includes the effect of hedging of exchange rate exposure of assets held in portfolio denominated in American dollars (USD), Hong Kong dollars (HKD) and Pounds sterling (GBP), via the use of futures and foreign exchange forwards and swaps, and of assets denominated in Yen (JPY) and Swiss francs (CHF), via the use of foreign exchange forwards.

The counterparty default risk module also takes into account exposure to counterparties with which the above-mentioned hedging is performed.

The consolidated group solvency capital requirement (SCR) and the minimum consolidated group capital requirement (MCR), and the respective coverage ratios, relating to 31 December 2022 were as follows:



#### Amounts in thousand euros

	Capital Requirements	Capital Requirements previous year	Coverage Ratio	Coverage Ratio previous year
SCR	1,784,936	1,939,314	172.73%	177.10%
SCR excluding financial sector	1,784,936	1,939,314	172.60%	177.02%
MCR	628,884	620,369	436.31%	490.30%

Lastly, it should be stressed that if the Fidelidade Consolidated did not apply the transitional deduction to technical provisions, the consolidated group solvency capital requirement (SCR) coverage ratio would be 154.98%.

# A. Business and Performance





No activities or other significant events with a material impact on the Group occurred during the period covered by this report.

Notwithstanding, comparisons with the information included in the 2021 report are presented throughout this chapter.

#### A.1. Business

#### A.1.1. Name and legal form

Fidelidade - Companhia de Seguros, S.A., with its head office in Lisbon, Portugal, at Largo do Calhariz, 30, is a public limited liability company, resulting from the merger by incorporation of Império Bonança - Companhia de Seguros, S.A. in Companhia de Seguros Fidelidade-Mundial, S.A., in accordance with the public deed dated 31 May 2012, which produced accounting effects with reference to 1 January 2012. The operation was authorised by the Portuguese insurance regulator ("Autoridade de Supervisão de Seguros e Fundos de Pensões" or "ASF") by a resolution of its Board of Directors dated 23 February 2012. From 15 May 2014, with the initial acquisition of Fidelidade share capital, the Fidelidade Group, through Longrun Portugal, SGPS, S.A., ("Longrun") became part of Fosun International Holdings Ltd..

The Company's corporate purpose is the performance of the insurance and reinsurance business in all technical lines of business, in accordance with the respective statute that governs its activity. In order to carry out its activity, Fidelidade has a network of branches throughout the national territory, intermediary centres and customer agencies. Abroad, the Company has subsidiaries in Angola, Cape Verde, Macao, Mozambique, Peru, Bolivia, Paraguay, Chile and Liechtenstein, and branches in Spain, France and Luxembourg. It holds interests in other insurance companies and other subsidiaries, associates and joint ventures, which together form the Fidelidade Group.

The Group's insurance Companies held by the Company include Via Directa - Companhia de Seguros, S.A. ("Via Directa"), Companhia Portuguesa de Resseguros, S.A. ("CPR"), Garantia - Companhia de Seguros de Cabo Verde, S.A. ("Garantia"), Fidelidade Angola - Companhia de Seguros, S.A. ("Fidelidade Angola"), Multicare - Seguros de Saúde, S.A. ("Multicare"), Fidelidade Assistência - Companhia de Seguros, S.A. ("Fidelidade Macau - Companhia de Seguros, S.A. ("Fidelidade Macau Vida"), Fidelidade Macau Vida - Companhia de Seguros, S.A. ("Fidelidade Macau Vida"), La Positiva Seguros Y Reaseguros S.A. ("La Positiva Vida"), Alianza Vida Seguros y Reaseguros S.A. ("Alianza Vida"), Alianza Compañía de Seguros y Reaseguros S.A. ("Alianza"), Alianza Garantía Seguros Y Reasseguros S.A. ("Alianza Garantía"), La Positiva S.A. - Entidad Prestadora de Salud ("EPS"), FID Chile Seguros Generales, S.A. ("Fid Chile"), Seguradora Internacional de Moçambique, S.A. ("SIM") and Liechtenstein Life Assurance AG ("LLA").

#### A.1.2. Supervisory authority responsible for financial supervision of the group

The Autoridade de Supervisão de Seguros e Fundos de Pensões (ASF, the Portuguese Insurance and Pension Funds Supervisory Authority), with its head office at Av. da República, 76, 1600-205 Lisbon, is the national authority responsible for the regulation and supervision of insurance, reinsurance, pension funds and respective management companies and insurance mediation companies, from both a prudential and a market conduct point of view.

For the purposes of Supervision of Insurance Groups, the ASF is also the supervisor of the Fidelidade Group.

#### A.1.3. Statutory Auditor

The Statutory Auditor, at 31 December 2022, is Ernst & Young Audit & Associados – SROC, S.A., registered with the Portuguese Securities Market Commission under license no.20161480 and represented by the partner Ricardo Nuno Lopes Pinto, Statutory Auditor no. 1579.

The Statutory Auditor was appointed on 15 May 2014 and reappointed on 30 June 2020 to perform its duties until the end of the three-year period 2020/2022.



Besides the required statutory audit work, Ernst & Young Audit & Associados – SROC, S.A. provide the following services required by law:

- Certification of the Solvency and Financial Condition Annual Report pursuant to Regulation No. 2/2017-R, of 24 March;
- Opinion on the Risk Management and Internal Control Systems, regarding the mechanisms and procedures specifically
  adopted as part of the policy for the prevention, detection and reporting of insurance fraud situations, pursuant to Article
  36(4) of ASF Regulatory Standard no. 4/2022-R, of 26 April; and
- Opinion on the adequacy of the remuneration policy, pursuant to Article 90(4) of ASF Regulatory Standard no. 4/2022-R, of 26 April.

Besides the work mentioned above, Ernst & Young Audit & Associados – SROC, S.A. does not provide the Company, or the companies controlled by it, with any other type of services on a recurring basis.

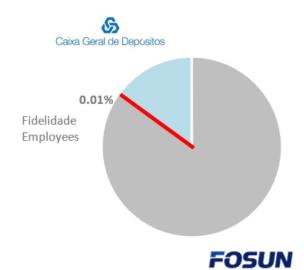
However, when these other services are provided, this is in strict compliance with the procedures defined in law.

#### A.1.4. Holders of qualifying holdings

In the context of an ever-evolving market with increasingly challenging legal and regulatory requirements, defining a sound governance structure, supported by ethical mechanisms, but also compliance and risk management mechanisms, is key to guaranteeing sustained development, creating value for all stakeholders.

Fidelidade-Companhia de Seguros, S.A. is the company that heads the Fidelidade Group.

It is owned by the Fosun Group (84.99%), through Longrun Portugal, SGPS, S.A., by Caixa Geral de Depósitos, S.A. (15.00%)



The Fosun Group is one of the largest Chinese private conglomerates with an international presence that is listed (Fosun International Limited) on the Hong Kong Stock Exchange (Code: 00656.HK). It has shareholdings in several sectors including insurance, banking, the pharmaceutical industry and tourism.

CGD is a Portuguese state-owned bank. It was established in 1876, and is currently one of the largest financial institutions in Portugal, with around 4 million clients.

The complementary relationship and ambition of these two shareholders of reference provide a guarantee of the stability and dynamism of the Fidelidade Group's operations.



The qualifying holdings in Fidelidade's share capital, at 31 December 2022, are set out in the table below.

Shareholder	Number of Shares	% Share Capital	% Voting Rights
Longrun Portugal, SGPS, S.A.	137,402,839	84.9892%	84.9892%
Caixa Geral de Depósitos, S.A.	24,250,644	15%	15%
Total	161,653,483	99.9892%	99.9892%

At 31 December 2022, the members of the management and supervisory bodies did not hold shares in the Company.

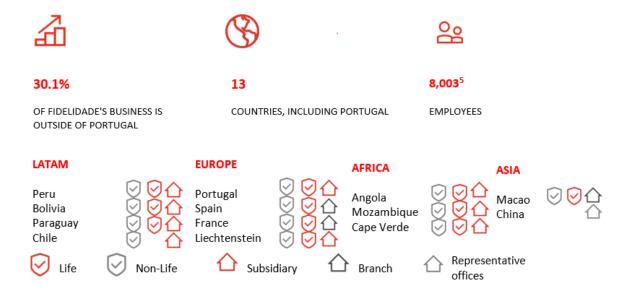
#### A.1.5. Insurance group structure

The Fidelidade Group is the current market leader in the Portuguese insurance sector, and has a high-potential international presence.

The Group operates in the Portuguese insurance market through five companies: Fidelidade, Multicare, Fidelidade Assistência, Via Directa and Companhia Portuguesa de Resseguros.

In the international market it operates through its branches and subsidiaries in several countries, namely Angola, Cape Verde, Macao, Peru, Bolivia, Paraguay, Chile, Mozambique and Liechtenstein.

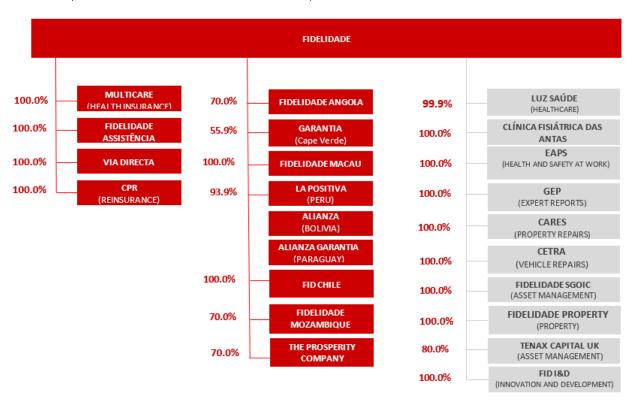
In terms of the Insurance Area:



The Fidelidade Group also has subsidiaries and strategic shareholdings in companies that provide services that are complementary to insurance (e.g., the Luz Saúde Group, CETRA, EAPS, Fidelidade Property, Tenax, etc.). These fit within the strategy of guaranteeing operational excellence and service quality throughout the value chain, enabling the Fidelidade Group to position itself as a global service provider of people protection.









Fidelidade - Companhia de

Seguros, S.A. is the

market. It provides a wide

range of Life and Non-Life

products and, as previously

mentioned, has operations

in several geographies.

insurance

Portuguese



Multicare - Seguros de Saúde, S.A. is the insurance company that heads the company within the group Fidelidade Group and is dedicated to health market leader in the insurance, managing the market leader in health insurance in Portugal, with over one million customers. It stands out for its pioneering spirit, focus on prevention and robust capital. It has a network with about 5,000 private health providers, including the main reference units. It is the only health insurer with ISO 9001 Quality Management System certification since 2011.

### FIDELIDADE

Fidelidade Assistência -Companhia de Seguros, S.A. is an insurance company specialised in Assistance and Legal Protection insurance. Operating essentially as a reinsurer, it is the market leader in Portugal.



Via Directa – Companhia de Seguros S.A. is the insurance company within the Fidelidade Group designed to sell insurance policies through remote channels (telephone and internet), and operates through several brands, among them the OK! Teleseguros brand. It is a pioneer in online sales of insurance in Portugal and leader in the direct insurers segment.



Companhia Portuguesa de Resseguros, S.A. operates in reinsurance in the Non-Life segment in Portugal, essentially underwriting risks under the Non-Proportional Treaties with Fidelidade.



#### FIDELIDADE ANGOLA

Angola

Fidelidade

sector.

FIDELIDADE 忠誠保險

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Companhia de Seguros, present in Macao since S.A., (previously Universal 1999, and is duly authorised to carry on the Seguros, S.A.), set up in 2012, is currently the third insurance business, serving largest insurer in Angola in the local population with a terms of turnover. It diverse offer of protection operates in the Non-Life solutions for private clients and Life segments, offering and companies. It initially operated through local a wide range of products. especially in the Corporate branches and subsequently through companies incorporated under local law: Fidelidade Macau -Companhia de Seguros, S.A. (set up in 2015) and Fidelidade Macau Vida -Companhia de Seguros, S.A. (set up in 2020). These

and Life

Nacional

agreement.

Fidelidade



Garantia - Companhia de Seguros de Cabo Verde, S.A., which is celebrating its 30th anniversary, is the market leader in insurance in Cape Verde and operates in the Life and Non-Life segments with a diverse range of products, including health insurance (the pioneer in the market). The company distributes its insurance through agencies and the banking channel, having entered into a Bancassurance agreement with Banco Comercial do also Atlântico, shareholder.



Founded in 1937, La Positiva Seguros ٧ Reaseguros, S.A. heads the insurance group that occupies 3rd place in the Peruvian market. It provides a wide range of products in the Non-Life and Life segments, and has a vast distribution network in that country. The La Positiva Group is also present in Bolivia and Paraguay, through its holdings in the companies Alianza Compañía de Seguros y Reaseguros S.A. E.M.A. and Alianza Vida Seguros y Reaseguros, S.A. (Non-Life) and its investee La Positiva Vida Seguros y Reaseguros, S.A. (Life) are companies listed on the Lima Stock Exchange (POSITIC1; POSITVC1).



Alianza Compañía Seguros y Reaseguros S.A. was founded in 1991 and heads the largest private capital insurance group in Bolivia, selling Non-Life and Life insurance. It operates through Alianza Vida Seguros y Reaseguros S.A., which is also the market leader among private capital insurers. Both companies are listed on the Bolivian stock market.



Alianza Garantia S.A. is an

insurance company that has been operating in the

Non-Life and Life segments

in Paraguay since 1972.

The company is a

Compañía de Seguros y

Reaseguros S.A. (Bolivia),

shareholder in 2014. It is

currently ranked 10th

among Non-Life insurers in

became

Alianza

subsidiary of

which

Paraguay.

FIDELIZADE impar

companies sell Non-Life

respectively, through an

agents' network and Banco

("BNU"), with which they

have a Bancassurance

insurance,

Ultramarino

Fidelidade Moçambique -Companhia de Seguros, S.A., previously called Seguradora Internacional de Moçambique, S.A., is one of the largest and most experienced insurance companies operating in Mozambique, with diverse offer of products in the Life and Non-Life segments. It currently occupies 3rd place in the insurance market. It is present throughout the country through a network of own stores in the province capitals and through exclusive access to Millennium Bim the network, one of the largest and most prestigious banks operating in Mozambique.



Chile Seguros Generales, S.A. is an insurance company in the Non-Life segment that began operating in January having 2020. after obtained authorisation from the Chilean regulator in the final quarter of 2019. FID Chile has developed a range of Non-Life products aimed at individual and corporate customers, and distributes these through brokers and other nontraditional channels.



Luz Saúde, S.A. is the head of the Luz Saúde group and one of the leading private healthcare providers in Portugal. It manages fourteen private hospitals, thirteen private clinics operating on an outpatient basis, and one retirement home. In 2022, it had 1,200 beds and performed 389,000 urgent consultations and 60,000 surgeries and births.



Safemode is the brand under which EAPS -Empresa de Análise. Prevenção e Segurança, S.A. develops and provides risk analysis and health and safety at work services, including occupational medicine, among others.







FIDELIDADE

FIDELIDADE REAL ESTATE INVESTMENT MANAGEMENT

Gestão Peritagens, S.A. is the expert reports and claims is present in Portugal, Angola and Cape Verde.

de CETRA - Centro Técnico de Reparação Automóvel, S.A. company responsible for is the company in the providing loss adjusting Fidelidade Group that provides motor vehicle inquiries for the insurers in repair services. It operates the Fidelidade Group, and under the Fidelidade Car Service brand.

The companies Fidelidade -Property Europe, S.A. and Fidelidade - Property responsible for managing the Fidelidade Group's real estate investments in the European Union and in the rest of the world.

Cares – Assistência e Reparações, S.A. is the Fidelidade Group company International, S.A. are that specialises in repairs, maintenance and assistance for property. It works in the insurance, retail and corporate markets, and is certified by ISO 9001 for Quality since 2013.

Fidelidade - Sociedade Gestora de Organismos de Investimento Coletivo, S.A. was set up in 2018, with the aim of managing real estate investment funds in Southern European markets.



Tenax Capital Limited is an TPC with company. low-capital-intensive different equity, bonds and alternative investment

#### the prosperity company

(The Prosperity management Company) is a group whose its main objective is to offer headquarters in London, savings solutions, currently specialising in the based on unit-linked management of funds for pension products, for insurers and private banks, individuals. The group's with a focus on building flagship company is a Liechtenstein-based products in these financial insurance company. The institutions. The company group also has other currently has around 800 companies to exploit other million euros of assets dimensions of its value under management in proposition, both for customers and intermediaries. Its activity today mainly concentrated in Switzerland and Germany.

#### A.1.6. Group Business

#### FIDELIDADE GROUP HISTORY

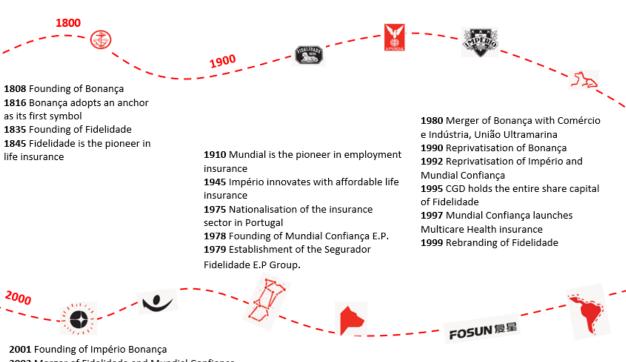
With over 200 years of history, Fidelidade is the result of the merger of several Portuguese insurers, and credibility, dimension and soundness are all part of our DNA.

Our roots date back to 1808, when the insurer Bonança was founded, but it was in 2004 that we were established as Fidelidade Mundial, following the integration of Fidelidade and Mundial Confiança, which was strengthened in 2005 when the Caixa Geral de Depósitos Group acquired Império Bonança.

The years that followed saw the progressive integration of the two companies, and the single Fidelidade brand was launched in 2013. 2014 was marked by the privatisation of Fidelidade, following the acquisition by the Fosun Group, and also a period of consolidation of the leadership in Portugal and international expansion.



#### A HISTORY THAT NEVER STOPS



2002 Merger of Fidelidade and Mundial Confiança

2004 Launch of the single brand Fidelidade Mundial

2005 Multicare is leader in health insurance

2006 Fidelidade Mundial becomes market leader 2007 Acquisition of Companhia Portuguesa de

Resseguros (CPR) 2008 Leve PPR is leader in retirement savings

Conclusion of acquisition of stake in *the prosperity company*Strengthening of majority stake in La
Positiva

Strengthening of majority stake in Luz Saúde Group

2011 Activity begins in Angola with Universal Seguros

2012 Merger of Império Bonança and Fidelidade Mundial and establishment of Fidelidade – Companhia de Seguros, S.A.

2013 Launch of the single brand Fidelidade

2014 Acquisition of Garantia (Cape Verde) by Fidelidade, acquisition of an 85% stake in Fidelidade by Fosun, Fidelidade Mozambique starts operations and acquisition of Espírito Santo Saúde, later rebranded Luz Saúde, by Fidelidade

2017 Rebranding of Universal Insurance to Fidelidade Angola 2019 Acquisition of a majority stake in the Peruvian La Positiva Group

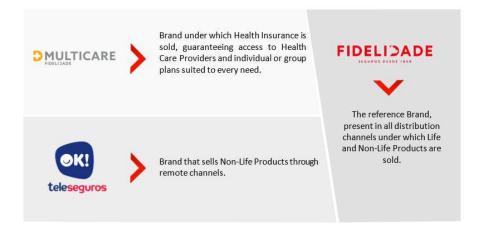
**2020** Fid Chile starts operations and acquisition of Tenax, a UK-based assessment management company

2021 Acquisition of 70% of Ímpar in Mozambique and agreement to acquire 70% of The Prosperity Group

#### INSURANCE BRANDS

The Fidelidade Group's insurance brands are focused on values such as transparency, customer loyalty, agility and effectiveness, which are visible across all the brands. The Group sells products in all the insurance lines of business in the Portuguese market, based on a multi-brand network and a diversified range of distribution channels. The product offer is segmented into three different brands - Fidelidade, Multicare and OK! teleseguros – all of which are national leaders in their segments. This diversity allows the Group to operate in different areas, promoting behaviour changes in people and companies and facilitating access to better options for savings, health, entrepreneurship and digital services.





#### PRODUCTS AND SERVICES

As part of its commitment to including ESG factors in the core of its business, the Fidelidade Group favours products and services that accompany people in the different stages of their lives, and is increasingly positioning itself as a group that promotes responsible behaviour and partnerships with customers in the provision of protection and assistance services. Fidelidade also favours products which contribute, in the different areas, to society's energy and ecological transition, always working towards offering the most sustainable products on the market.

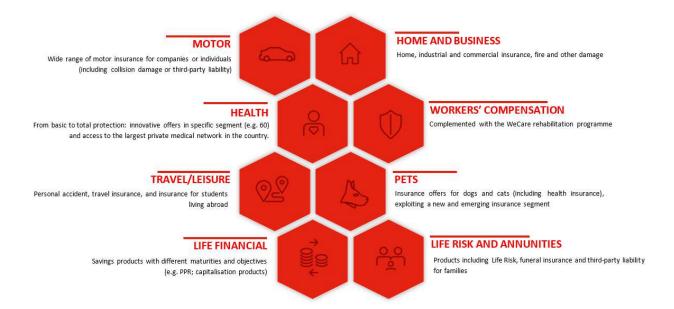
In terms of the environment, examples of this commitment include an emphasis on products that encourage more ecological mobility and providing benefits when individuals and companies that subscribe our products adopt more sustainable behaviour, for example, promoting health prevention, responsible driving habits or measures to mitigate risks in companies. By repeatedly updating and differentiating the underwriting, conditions and covers of our products and providing financial products aligned with ESG criteria, the Group is also decisively fostering the transition to environmentally and socially responsible assets and practices.

The Fidelidade Group also focuses on products and services that can address relevant social challenges in the different areas in which we operate. To increase access to better health conditions, in line with SDG 3, we provide products that include disease prevention (with regular check-ups included in all health insurance), covers that respond to emerging concerns, such as cancer and mental health, quicker and more convenient diagnosis through telemedicine, and programmes that reward healthy lifestyle habits, helping to prevent the development of more alarming medical situations.

Including ESG criteria in our portfolio of products and services means that, among other benefits, we are contributing to one of the key goals of society: the sustained and dignified longevity of the population. The emphasis on services that promote health and safety in both personal and professional spheres, from telematic solutions that reduce dangerous driving habits and road accidents to awareness raising and accident prevention in the workplace, is a significant part of our response to this challenge. Also of note is the adjusting of products and services to those who are more vulnerable, in particular senior citizens and those with weaker purchasing power, who need solutions adapted to their specific needs. Adjusting covers and capitals to attain a more affordable price for less fortunate families, establishing partnerships and activities to encourage financial literacy, and providing products and services that allow our customers to achieve their savings goals, help pave the way for a more stable family life, more sustainable retirement and, above all, more dignified conditions for life in society.

The Group highlights and invests in an increasingly significant offer of sustainable products, based on a responsible and transparent marketing approach.





In 2022, the Fidelidade Group continued to focus on diversification and innovation of its products and services, linked to sustainable development factors, digitalisation of processes and quality in the customer experience.

Innovation in the portfolio of products and services involves not only efforts to develop new value propositions for our customers, within several emerging areas, but also the automation and digitalisation of existing processes, for better management of the product itself and easier ways to use our services.

#### **DISTRIBUTION CHANNELS**

Omni-channel Approach in Portugal

By adopting an omni-channel approach, the Fidelidade Group can guarantee a high quality distribution network.





**REMOTE CHANNELS** | Internet distribution and telephone service accounted for 39%<sup>1</sup> of the market share, down from the previous year (42%).



**AGENTS** Fidelidade has the support of 3,137 agents in the marketing of its products, who offer a personalised service to its customers in Portugal. It is the leader in this channel with a 25% market share.



**BROKERS** | Through this channel, captured premiums corresponded to 36%<sup>1</sup> of total premiums in the Portuguese market.



**BANK** | With distributors such as CGD, Banco CTT and EUROBIC, Fidelidade has 909 bank branches that sell its products. Its market share represented 26%.



**OWN AGENCIES** | The Group has 49 branches across the country, leading the market in this channel with a 44%<sup>1</sup> market share.

12021 shares

In 2022, some improvements were noted in the distribution channels. The Commercial Platform, used for distributors' activity, recorded a usage rate of 91% for agents and 66% for brokers. A total of 87,262 calls were answered by the Contact Center, which is 12.9% down on the previous year, reflecting improvements in responding to customers and managing and optimising processes.

During the year, in pursuit of its aim to provide better customer service and appropriate responses, the Group decided to replace all premium rate customer telephone lines with local call rate lines. In the case of claims lines, given the specific nature of the services, both lines were kept, guaranteeing the monitoring of the call frequency to each of them, and thereby enabling potential risks to be mitigated.

International distribution

#### **EUROPE**

#### Spain

The distribution channel most used in Spain is the Agents and Brokers channel, with 82% (almost a quarter is bilateral business). Fidelidade España also uses two other distribution channels: Bancassurance with 10% of sales and the Direct Channel with 7%. In the different channels, five new distribution agreements were established, mainly aimed at sales of Pet and Corporate insurance.

In 2022, Spain invested in the digital channel, making its debut with Fidelidade Pets, the first product with 100% digital subscription. This strategy of entering the digital channel is aligned with the objective of increasing innovation and the omni-channel approach that Fidelidade España demonstrated throughout 2022. It is also an important tool for triggering new partnerships with innovative solutions, mainly in the bank channel, and boosting sales. An agreement was also signed with MGA *Orizon* to grow the corporate business in Life and Collective Accidents and, also, Third Party liability.

#### **France**

The distribution channels in France are Brokers (65%) and Bancassurance (35%).



#### Liechtenstein

The exclusive distribution channel of the Prosperity Company is the Agent and Brokers channel. This channel has been growing since 2017 thanks to an improvement in its activation through the existing platform for Brokers, optimisation and streamlining measures in the internal CRM, and campaigns focused on attracting new brokers. In addition, the Prosperity Company has been working on its digital platforms in order to capture and retain this network through innovation and accessibility.

#### **AFRICA**

#### Angola

Fidelidade Angola's main distribution channels include Brokers, Agencies, with 28 own stores and a team of over 700 specialist salespersons, and Bancassurance, with commercial partnerships with seven local banks: Caixa Angola, Banco Fomento Angola, *Standard Bank*, Banco Investimento Rural, Banco Valor, Banco Comercial do Huambo and Banco Comercial Angolano.

#### Mozambique

In 2022, Mozambique's distribution channels were enhanced with the acquisition of Seguradora Internacional de Moçambique, S.A., which operated under the brand Ímpar. The company changed its name to Fidelidade Moçambique – Companhia de Seguros, S.A. and now operates under the brand Fidelidade Ímpar. Distribution is through the Mediation channel (40%), comprising Brokers, Exclusive and Multi-Brand Agents and Promoters, the bank channel (34%), with partnerships with Millennium BIM, Nedbank, and Mozabank, and the Direct channel (26%), to which the company's eight own stores belong. Fidelidade Ímpar has focused on communication that is closer to the market, via Whatsapp Business and greater availability of its Call Center that is now open 24/7, 365 days a year.



#### Cape Verde

At Garantia, Agencies are the most important distribution channel with 70% of gross written premiums. Garantia has invested in the continual training of its human resources and in digital transformation, in order to innovate in the services provided by the agencies. The bank channel (15%) has also been a significant focus for Cape Verde, with the consolidation of commercial partnerships with the current banks BCA, BI, BAI, IIB and Ecobank.

#### **ASIA**

#### Macao

In Macao, the distribution channels differ according to the segment. In Life, they mainly include Bancassurance, with 94% of gross premiums written, and the direct channel with a less representative role of 6%. In Non-Life, the distribution channels include Brokers (32%), Bancassurance (29%), Direct Channel (28%) and Agents (11%).

#### **LATIN AMERICA**

#### Chile

In Chile we may highlight the following channels: Comerciais Santiago (29.56%), Branches (29.81%), Corporate (29.17%) and Affinities (11.46%). The business model of FID Seguros is based on a scalable technological platform that enables agile interface with different distribution partners.

#### Peru

La Positiva's distribution platform is based on several distribution channels that allow it to be near its customers and provide them with service quality. The distribution channels in Peru include Brokers (accounting for 43% of the portfolio), Non-traditional Channels (19%), Own Distribution (12%), Direct Channel (7%), Public Tenders (15%), Digital Salesforce (3%) and e-commerce (1%).

The non-traditional channels include the establishment of partnerships with banks, retailers and other entities. Own distribution is split between the sales force (organised in four teams: Annuities, Family Protection, Traditional Life and Non-Life), the call centre and e-commerce.

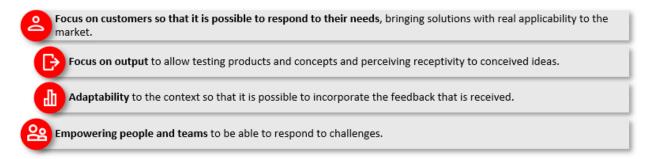
It is important to highlight the potential of the e-commerce channel, which has websites that enable insurance to be purchased directly online. The direct channel is mostly composed of retail agencies in shopping centres, located for the most part in Lima, which represents an opportunity for La Positiva to reach new clients.

#### **Bolivia**

The distribution channels in Bolivia are Bancassurance (40%), Brokers (35% of gross written premiums), Direct Channel (13%), and Sales Force (12%). The Brokers channel offers personalised sales assistance by line of business. In the Bancassurance channel, of note are the commercial partnerships with three of the largest retail banks in Bolivia: BMSC, FASSIL and FIE.

#### INNOVATION AND DIGITALISATION

Becoming a more agile company is a current priority for Fidelidade. This is based on four fundamental values:





We believe we are more effective in responding to our customers and the market and in rising to challenges because these values are part of our DNA. In 2022, focused on these four principles, we worked on several fronts.



#### The new strategic planning cycle

In 2021, the Fidelidade Group began designing a new strategic planning cycle with the aim of guaranteeing that our teams in the field would be more able to clearly understand the priorities and work more autonomously and with well-defined objectives.

#### This project led to:

- The Annual Business Planning (ABP), an annual plan that connects the strategic plan to the key initiatives to be carried out during the year. By empowering our teams, the strategic priorities and objectives are clear for the entire organisation.
- The Activity and Business Review (ABR), three moments in the year when the priorities for the next four-month period are reviewed, with allocation of people and resources and updating of priorities.
- The alignment of the budget and the scorecard of each area with the objectives defined by the ABP and the ABR, guaranteeing the alignment of incentives across the entire organisation.

Developing agility in projects implies working together across multiple areas and different competences, which is something the Fidelidade Group invested in, in 2022. We believe that these teams become autonomous and more customer-focused, while at the same time guaranteeing higher levels of efficiency and effectiveness. To implement this, new working tools were defined, coaching-on-the-job was guaranteed, an agility training programme, for Executives and for Employees, was designed, informal communities were created for sharing and development of certain functions within the Group, and an internal and external communication initiative was developed in order to share this process of organisational transformation.

#### Research & Development and Innovation

Research, development and innovation (R&D) is one of the main drivers of a company's growth and competitiveness. It enables the current knowledge base to be consolidated as well as enhanced learning of new opportunities, while at the same time stimulating productivity, creating more qualified jobs and raising quality standards. Thus, innovation is intrinsic and essential to the long-term sustainability of companies and the creation of positive impacts for society and the environment. The Fidelidade Group is keen to develop and strengthen its position in this field, through the creation of new disruptive value propositions, either in the insurance sphere or by partnering with its customers in the provision of prevention, protection and assistance services (beyond insurance), in order to stand out within the sector.

#### External level

According to the statistics on R&D in Portugal for 2020, produced by the General Directorate of Education and Science Statistics ("DGEEC"), the insurance, reinsurance and pension funds sectors (excluding mandatory social security) invested around EUR 18.4 million in R&D activities. The Fidelidade Group invested around EUR 9,5 million, contributing with over 51.5% of the R&D in its sector and occupying 28th position on the general list of companies/groups with the highest levels of investment in R&D activities that year.



Internal level

The Group's R&D is based on the 3 major pillars that span its entire structure.

INTERNAL PROCESSES
IMPROVEMENT

INNOVATIVE VALUE PROPOSITIONS

TRANSFORMATION ENABLERS

Internal Processes Improvement

#### Digitalisation and automation of processes:

- Fidelidade has been innovating in its motor claims processes since 2019. Now customers can schedule their inspection automatically, following automated opening of the process, and receive a message with information about the date and repair shop. The claims processes can recognise the completed Accident Report (Declaração Amigável de Acidente Automóvel DAAA), using Optical Character Recognition (OCR) and Intelligent Character Recognition (ICR) mechanisms. This project has made a decisive improvement to the service provided to our customers and business partners, and recently received an award for the Best Insurance Project at the IDC Portugal Digital Awards;
- B2B Web Services B2B projects enable the automatic integration of data and documents between Fidelidade systems and those of its business partners, with the aim of lightening the administrative burden, reducing administrative costs and increasing autonomy. Also in an effort to increase point of sales autonomy and reduce dependence on central services, Fidelidade developed tools and mechanisms that afford its distributors greater autonomy in final pricing adjustments, so as to provide customers with an immediate response. This methodology has helped to reduce the level of dependence on central services. The model, which was initially implemented in the individual motor line of business, will now be replicated for different mass market products;
- Liber 3G Multiplans Fidelidade developed the Liber 3G Multiplans project, a new motor simulator with a series of new functions and innovative characteristics that give distribution partners greater autonomy;
- New payment methods and invoicing solutions Fidelidade is committed to creating a seamless customer
  experience, both by facilitating payments by alternative means, either remotely or in-person, and by means of
  integrated electronic invoicing solutions;
- Assisted Sales From November 2022, we made it possible to sell insurance remotely, using the existing
  insurance platforms at Caixa Geral de Depósitos, and integrating subscription into homebanking. The products
  currently available are: Multicare products (health insurance), Vida Essencial (life insurance), AT Empregada
  Doméstica (accident insurance for domestic staff), and Pack Recheio (contents insurance);
- PPR Evoluir on Caixa Geral de Depósitos Homebanking In November 2022, we made PPR Evoluir (pension plan) available on Caixa Geral de Depósitos homebanking, with a digital signature function.
- Homebanking Health This project, which began at the end of 2022, offers greater agility in sales of health products to the individual segment, via the Caixa Geral de Depósitos website, Caixa Direta Online and the Caixa Directa app.

#### Automation of management processes:

- Customer Analytics Models Propensity for use, consumption and analyses models were developed, e.g.,
   Propensity for Use of Online Medicine, Propensity for Adhesion to and Use of the Vitality app and Propensity for Adhesion to Fidelidade Drive;
- Location Intelligence geographical solution @ Cares and Multicare More efficient initiative to support
  the management of the service providers network, which aims to expand the capacities for consulting and
  viewing geographical information in the Cares and Multicare businesses.



#### Robotisation

#### **Processes**

• Fidelidade has used Robotic Process Automation (RPA) technology in several areas, in particular to optimise processes for loading FSCD (financial system) data, which are part of the process for collecting non-lead coinsurance receipts.

#### **Fleets**

• The fleets robotisation process validates and automatically processes changes to the Risk Units in policies. Up to August 2022, this process meant that the creation of 7000 SIP processes was avoided, substantially reducing the time teams had to spend on this topic.

## Workers' Compensation and Personal Accidents

• From January 2023, updates to Insured Persons will be performed by automatic integration into the system. Fidelidade Angola estimates that this automation will eliminate 14,924 SIP creation actions, which corresponds to 75% of the actions for the Workers' Compensation and Personal Accidents lines of business, freeing up the teams to perform more critical tasks.

- Chatbot Trusty Fidelidade's chatbot uses Artificial Intelligence to give the customer a more personalised
  and automated service, via messages on the Fidelidade and Multicare websites. This project was launched in
  partnership with Visor.ai, the company that won Protechting 2017.
- PAX The chatbot PAX (Personal Assistant Xperience), which helps people in the Fidelidade Group with dayto-day issues, has become indispensable for sharing, cooperation and communication between our employees.
- Other process improvement projects
- Ideation and creativity workshops and remote sessions We run ideation and creativity workshops and remote sessions using digital tools to reduce the time our employees spend travelling between our buildings.
- BCTT and CTT Platforms In 2022, we implemented two commercial partners platforms for the BCTT and CTT channels, selling products in the Health and Life Financial lines of business.

#### Innovative Value Propositions

The aim of the Innovative Value Propositions pillar is to improve the quality of the Fidelidade Group's range of products and services, always putting our customers' needs first. That is why the Group works every day to be one step ahead of trends and respond to the challenges of a constantly changing market.

Protechting 5.0 - The Fidelidade Group regards entrepreneurship as a source of innovation and is continually working to enhance and speed up access to resources, creating opportunities for cooperation in pilot projects. In March 2022, Fidelidade, Fosun and Hospital da Luz Learning Health, with the support of the innovation consultant Beta-i, launched the 5th edition of Protechting. This international innovation programme aims to strengthen the connection between the selected startups, in the areas of Insurtech and Healthtech, with the Group companies in Portugal and abroad, in particular with Fidelidade Angola, Alianza in Bolivia, Garantia in Cape Verde, FID Seguros in Chile, Fidelidade France, Fidelidade Macau, Fidelidade Ímpar in Mozambique, Alianza Garantia in Paraguay, La Positiva in Peru and Fidelidade España.

In 2022, 99 applications were received, culminating in 3 startups being distinguished and receiving tickets and the right to a booth at Web Summit 2022.

Protechting has already contributed to the development of over 50 pilot projects and 5 commercial agreements. Sustainability has now been defined as a transversal pillar and one of the assessment criteria for applications will now be the level of Contribution to the Sustainability Strategy.



#### Transformation Enablers

Transformation enablers promote innovation within the Fidelidade Group by creating synergies and developing innovative, disruptive and accessible solutions.

- The Center for Transformation and the Center for Advanced Analytics New centres focused on R&D designed to follow
  the development of innovation projects and enhance analytics capacities. In 2022, more than 15 innovative solutions
  were tested within the scope of innovation team projects from the Center for Transformation.
- Office for Business Agility Area recently created at Fidelidade that applies Agile methods to facilitate the organisation's
  daily business and plan and develop disruptive projects with a positive impact on the Fidelidade Group's processes,
  within a hub & spoke model.
- Strategic partnerships These aim to create or solidify added value propositions in an ecosystem approach.
- Protechting Programme International innovation programme, developed to accelerate startups and create synergies with global companies.

#### INTERNATIONAL PRESENCE

In recent years, Fidelidade's international business has undergone a real transformation. Fidelidade has grown abroad and established itself as a reference in several markets where it operates. Geographic diversification gives Fidelidade greater resilience in the face of adverse situations, while also ensuring new opportunities for future growth for the insurance business.

Fidelidade classifies its companies abroad as strategic participations and aims to be a reference in the international markets where it operates. Accordingly, the international governance implemented in the recent past is based on a model of high proximity between local teams and central services. The objective is to promote development of the operations abroad, on one hand by taking advantage of Fidelidade best practice throughout the World and, on the other, by valuing the specific local characteristics of the different operations.

#### International Expansion

In its initial phase, Fidelidade's international expansion took place in countries where its shareholder and distribution partner, Caixa Geral de Depósitos, was already operating. The theory behind expansion to these markets was one of cooperation and of creating synergies with this partner in markets that had a strong cultural connection with the Portuguese market.

Within this context, Fidelidade developed its international presence in Europe from 1995 onwards, through its branches in Spain and France, and also in Africa (Angola, Cape Verde and Mozambique) and in Macao.

During the second phase, and after privatisation, international expansion developed at a fast pace as the Company entered markets with high potential, in terms of both their socio-economic outlook and the rapid growth of their insurance sectors.

Fidelidade entered Latin America in 2019, with the purchase of a majority stake in the La Positive insurance company, with its headquarters in Peru. This purchase also guaranteed its entry into the Bolivian and Paraguayan market. In 2020, Fidelidade launched its operation in Chile.



Expansion into South America, in 2019, was a turning point in the Group's internationalisation strategy. Fidelidade acquired a majority stake in the La Positiva Insurance Group, a leading group in the Peruvian market. With this acquisition, the Fidelidade Group gained access to the Bolivian and Paraguayan markets. In 2020, Fidelidade also set up a new insurer in Chile. The number of Spanish-speaking employees and clients therefore became similar to the number speaking Portuguese.

In 2022, the international business exceeded EUR 1.5 billion of Gross Premiums Written, as a result of consistent growth in all the geographies where Fidelidade operates.



Fidelidade enhanced its competitive position, gaining market share in practically all markets and competing on a daily basis in many geographies for leadership positions.

Growth in the international operations was the fruit of organic growth obtained in many of the geographies, and of the two acquisitions made during the year, Seguradora Internacional de Moçambique and The Prosperity Company (TPC) in Liechtenstein. In the first of these, Fidelidade strengthened its presence in the Mozambique market where it was already present, thus becoming one of the major insurers in Mozambique. In the case of TPC, the acquisition of a majority stake guaranteed access to an insurer with an advanced technological platform and a broad offer of Life products.

A.1.7. 2022 Highlights

#### Corporate matters

**Acquisitions** 

#### the prosperity company

Acquisition of the insurer, The Prosperity Company ("TPC") – Fidelidade completed the acquisition of 70% of the capital of the TPC Group holding, the core business of which is the development of long-term savings products, based on innovative technological solutions. TPC is present in several countries, e.g. Germany, Switzerland and Italy.

#### La Positiva Generales

Increase in the participation in La Positiva - Fidelidade successfully completed a Public Takeover Bid for shares in the Peruvian insurer La Positiva Seguros y Reaseguros, S.A. ("La Positiva") which allowed it to acquire a further 42.9% of the equity, with an investment of 396.3 million Peruvian Soles (around EUR 101.2 million). Fidelidade already held 51% of the equity and hence now controls 93.9% of the insurer. This operation, which was already planned in the initial agreement of 2018, has allowed Fidelidade to increase its controlling position in La Positiva, which is considered a strategic asset in the Group's international expansion.

#### Luz Saúde

Increase in the participation in Luz Saúde – implementing the plan outlined in 2017, Fidelidade completed the acquisition of a further 49% of the equity of Luz Saúde, so that it now directly owns 99.9% of the capital. This operation is part of the strategy to strengthen the Group's position in the health area, in particular regarding the provision of high quality hospital health care and differentiation, an area in which the Luz Saúde Group has a leading position and continues to affirm itself.

#### **Tenax Capital Limited**

5% increase in the equity of Tenax Capital Limited, through the exercise of a call option that was contractually agreed, so that Fidelidade now holds 80% of the share capital.

Ratings

#### **IN PORTUGAL**

#### Fidelidade

The financial rating agency Fitch this year reaffirmed the A- stable (IDR) and A stable (IFS) ratings for Fidelidade, one of the highest ratings in the Portuguese business context, which expresses Fidelidade's strong capacity to honour its financial commitments.

Fidelidade obtained the ESG Rating from Sustainalytics, which demonstrates the efforts Fidelidade has made over the years to act in an increasingly socially, environmentally and economically

#### INTERNATIONAL BUSINESS

#### Fidelidade Macau - Fitch

The financial rating agency Fitch assigned Fidelidade Macau, for the first time, the Rating A-stable (IFS), one of the highest ratings in the Macao Special Administrative Region.

#### FID Chile - Feller Rate

The Feller Rate agency assigned FID Seguros an A+ rating with a stable outlook, contributing to the company's process of consolidation in the Chilean market.



responsible way. Of particular note is management of the Data Privacy and Security risk, which was assessed as being "Strong".

#### La Positiva - Moodys and Pacific Credit Rating

La Positiva Generales and La Positiva Vida were awarded A ratings with stable outlooks by Moodys and by Pacific Credit Rating.

#### **Products and Services**

#### **Forest Fund**

In 2022, it was proposed that a forestry fund be set up. With a view to appreciation of the capital invested by managing forestry and agricultural resources, the fund aims to be a relevant instrument in promoting a more sustainable forestry policy in Portugal. Through investment in the forestry sector with compliance with environmental risk management and social criteria and best governance practices (ESG - Environmental, Social and Governance), this fund should guarantee management of live assets that are part of the forest resources and management of the surrounding real estate. The aim is also to safeguard profitability, risk and liquidity criteria, taking into account and valuing the interests of the fund's Participants and the invested capital.

Health

#### IN PORTUGAL

#### Check-Ups

Regular screening is one of the most important tools for disease prevention and early diagnosis. In 2022, the most recent update of the Oncological Check-up was carried out. The free post-COVID-19 check-up was also continued in 2022. The focus on post-COVID-19 consequences continues to generate much debate and scientific research, and it is important, therefore, that we continue to support our customers.

#### **Online Medicine**

The telemedicine platform was continued in 2022. Over 175,000 medical consultations were given, representing an increase of over 20% compared to 2021. In 2022, three new specialities (Cardiology, Gastroenterology and Ophthalmology) were launched, communication on the Online Assistant Doctor was enhanced, and the programme "Põe-te em Forma" (Get in Shape) was launched with advice from Personal Trainers.

#### Vitality

In 2022, this programme, which is still a case study in Portugal in terms of health prevention, continued to be boosted, and the 2<sup>nd</sup> edition of the Multicare Vitality Run also took place. A tailor-made (Corporate) version for customers was launched, with a good level of take-up.

#### INTERNATIONAL BUSINESS

#### Fidelidade Macau - Vaccination Insurance

In 2022 Fidelidade Macau developed a new insurance product for vaccines, in conjunction with the Government of Macao, with the aim of protecting the local population.

#### Fidelidade Ímpar – Health Insurance

In 2022, Fidelidade Ímpar implemented new health insurance plans and covers, as part of the development of improvements and new products that took place throughout the year.

#### Alianza Garantia - Salud Gold

In 2022, Alianza Garantia launched its first health insurance product, *Salud Gold*, thus becoming the first insurer in the market with this type of product.

#### Operation

#### IN PORTUGAL

#### Integrated Insurance Proposal

#### INTERNATIONAL BUSINESS

#### China – Reference partnership

In 2022, Fidelidade maintained its commitment to be the reference partner for Chinese companies with an international presence, working with different industries in the Top 100 of the largest Chinese



In 2022, a key document was developed to summarise, aggregate and systematise the offer of protection solutions, which aim to meet customer needs identified in the initial stage of the sales process.

#### Homebanking

Homebanking has developed as a simple service for families and businesses, with their mobility and convenience in mind, and with innovative functions. CGD is one of our main partners and offers this service. In 2022, some financial products were offered on the Caixadirecta Service (namely on the online channels and app and by telephone). The following functions were provided for the PPR Evoluir product: consultation, subscription, increase, redemption, recomposition and change to the planned payments.

#### **CTT Platform**

In 2022, a partners commercial platform was developed for the CTT channel, with two lines of business being sold, Health and Life Financial. This platform was made available in July 2022.

companies and attaining around EUR 16.4 million in gross written premiums in the various geographies. In terms of the bilateral agreement, the commitment with Portuguese companies was also enhanced in 2022, and increasingly global solutions were provided for our customers' needs, for example, business from Portuguese customers in Spain totalled EUR 13.1 million in gross written premiums.

## Garantia - Anti-Money Laundering and Counter-Terrorist Financing

Garantia began implementing the first phase of its Anti-Money Laundering and Counter-Terrorist Financing procedures, as part of the corporate project of Fidelidade's Compliance Division.

#### FID Chile - Teleton

For the second year running, FID Chile continued its promotional work with *Teleton* (a child rehabilitation institute), with an internal plan to raise awareness in order to increase participation and donations to the charity.

#### A.2. Underwriting performance

#### A.2.1. Insurance sector environment

#### Evolution of the insurance market in Portugal

In 2022, the insurance sector registered a decline compared to the previous year, with the total premiums being affected by the economic environment of inflation and high interest rates. The insurance market closed the year with total gross premiums of EUR 12.1 billion, a decrease of 9.5% YOY, compared to 2021, reflecting the evolution of the Life segment (-21.8% to EUR 6.0 billion). On the other hand, the Non-Life segment continued to grow, with premiums of EUR 6.0 billion, 7.4% YOY more than in 2021.

In this environment of economic recovery, the insurance sector registered strong growth with total premiums outstripping the prepandemic levels. Up 34.5% on 2020, the insurance market closed 2021 with gross premiums totalling 13.3 billion euros. The Life segment was the core driver of this increase, surging by 69.5%, accompanied by the Non-Life segment that remained on an upwards trajectory – gaining 4.8% year-on-year.

#### **Portuguese Insurance Market**



Unit: million euros Source: ASF

The decrease in premiums in the Life segment was mainly due to the Life Financial component, particularly unit-linked products. Despite the economic context of increasing interest rates, which began to be felt in the second half of 2022, the loss of income



caused by inflation and instability in the financial markets had a negative impact on this type of financial products. This evolution contrasts with the increase in premiums seen in 2021, which benefited from high levels of household savings compared to the prepandemic years, reflecting uncertainty about the evolution of the economic situation still under the shadow of the pandemic.

In turn, premiums in the Non-Life segment retained the trend for growth, and once again gained greater traction when compared to the growth of the previous year, primarily deriving from the recovery in economic activities.

In this segment, it is worth noting the positive trend registered in the Health line of business (+11.8%) at a time when the population is increasingly aware of the need to complement the state's National Health Service. This growth enabled Health to consolidate its position as the second largest line of business in the Non-Life segment, with direct insurance premiums amounting to EUR 1,156 million.

#### Non-Life: Gross Premiums

		Gross Premiums	
Non-Life	2021 <b>5,621</b>	2022 <b>6,039</b>	Change <b>7.4%</b>
Motor	1,894	1,966	3.8%
Health	1,034	1,156	11.8%
Workers' Compensation	965	1,027	6.4%
Fire and Other Damage	1,000	1,074	7.4%
Others	728	816	12.0%

Unit: million euros; Source: ASF

#### Evolution of the insurance market in Latin America

In the Latin America market where the Fidelidade Group is present – especially Peru, Bolivia and Chile -, the Non-Life segment maintained the trend in premiums growth, with acceleration in 2022 in the Chile and Bolivia markets.

#### **Non-Life: Gross Premiums**

	Gross Pr	remiums
Country	2021	2022
Peru	9.8%	0.3%
Chile	2.6%	4.2%
Bolivia	0.5%	9.8%

Unit: % change rate

Source: Local Regulatory Bodies with information updated to October and August 2022 (Peru and Bolivia); Chile with figures forecast by AACH (Asociacion de Aseguradores de Chile A.G.)

In 2022, premiums in the Life segment maintained a very high level of growth, reflecting the strong commercial dynamic of annuity products (survival and old age).



#### **Life: Gross Premiums**

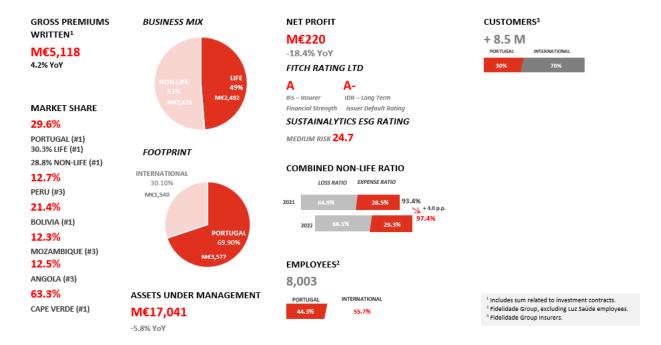
	Gross P	remiums
Country	2021	2022
Peru	37.1%	5.1%
Chile	3.2%	26.3%
Bolivia	2.9%	14.0%

Unit: % change rate

Source: Local Regulatory Bodies with information updated to October and August 2022 (Peru and Bolivia); Chile with figures forecast by AACH

#### A.2.2. Group Performance

Key indicators in 2022 are:

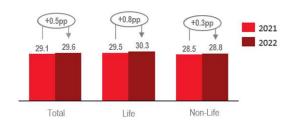


#### POSITION IN THE PORTUGUESE MARKET

In 2022, the Fidelidade Group held its position as market leader in Portugal, recording an overall market share of 29.6%, corresponding to an increase of 0.5 pp compared to the previous year, reflecting the performance in both the Life and Non-Life segments.



# Total Market Share, Life and Non-Life (Unit: %; Source: ASF)

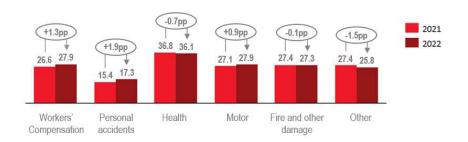


In the Life segment, and despite a fall in premiums, the Fidelidade Group increased its market share by 0.8 pp compared to 2021, reflecting the commercial performance of Financial Products, particularly unit-linked products, where the market share increased from 27.3% in 2021 to 35.1% in 2022.

Fidelidade's market share also increased in the Non-Life segment compared to 2021, reflecting the positive contribution of most lines of business:

- In the Workers' Compensation line of business the market share increased by 1.3 pp, which enabled Fidelidade to return
  to a position of market leader in this line of business;
- The Motor and Personal Accidents lines of business also saw an improvement in their position, with increases in market share of 0.9 pp and 1.9 pp, respectively, reflecting a strong commercial dynamic;
- There was a decrease in market share in the Health and Fire and Other Damage lines of business, compared to 2021, basically reflecting the more judicious underwriting of risks.

### Non-Life Segment - Market Shares (Unit: %; Source: ASF)



### POSITION IN THE INTERNATIONAL MARKET

LATIN AMERICA - In 2022, the Fidelidade Group consolidated its position in the Latin America insurance market 2:

- Peru: 3rd place, with the La Positiva Group achieving a market share of 12.7%<sup>3</sup>, similar to the previous year. In the Non-Life market, La Positiva Seguros held 3rd place, with a market share of 15.4%, and La Positiva Vida also reached 5th place in the Life segment, with 10.6%.
- Bolivia: 1st place, with a market share of 21.4% in the Non-Life business and 24.2% in the Life business, strengthening
  its leadership position among private capital insurers;
- Chile: 17th place (the operation only commenced its activity in 2020);
- Paraguay: 10th place with a market share of 3.27%.

OTHER GEOGRAPHIES – The Fidelidade Group also consolidated its position in Africa. In Mozambique, the acquisition of Seguradora Internacional de Mocambique, S.A., which operates under the brand Impar, allowed it to reach 3rd place in the

<sup>&</sup>lt;sup>2</sup> Source: Peru: SBS December 2021 and October 2022, Bolivia: APS August 2022, Chile: CMF September 2022, Paraguay: BCP, Banco Central do Paraguai October 2022.

<sup>&</sup>lt;sup>3</sup> Including La Positiva Seguros and La Positiva Vida.



insurance market, with a market share of 12.3%<sup>4</sup>. In Angola, the Group market share was 12.5%, leading to the operation ranking in 3rd place <sup>5</sup>.

## CONSOLIDATED FINANCIAL PERFORMANCE

### **EXECUTIVE SUMMARY**

Units: thousand €	2022	2021	Change 22/21
Summary INCOME STATEMENT			-
Premiums written	5,118,141	4,911,602	4.2%
Life	2,491,991	2,628,513	-5.2%
Non-Life	2,626,149	2,283,089	15.0%
Combined Ratio (%) <sup>1</sup>	97.4%	93.4%	4.0 pp
Technical Income	71,274	45,311	57.3%
Non-technical Income	108,838	31,270	248.1%
Investment Yield (%) <sup>2</sup>	2.0%	3.6%	-1.6 pp
Investment Income <sup>3</sup>	158,096	330,410	-52.2%
Net Income <sup>4</sup>	220,475	270,242	-18.4%
Summary BALANCE SHEET			
Assets under Management <sup>5</sup>	17,041,678	18,099,943	-5.8%
Total Assets	20,249,171	20,350,385	-0.5%
Technical Provisions	14,472,260	14,054,213	3.0%
Shareholders' Equity <sup>6</sup>	2,553,597	3,054,714	-16.4%
ROE	7.9%	8.8%	-0.9 pp

<sup>1.</sup> Non-Life Combined Ratio adjusted to the technical costs of the insurance business; 2. Excluding unit-linked products and properties for own use; 3. Financial income less allocation to customers/technical interest and expenses related to investment management; 4. After non-controlling interests; 5. Including properties for own use; 6. Excluding non-controlling interests

In 2022, the Fidelidade Group attained total consolidated premiums written of EUR 5,118.1 million, registering an overall increase of 4.2% compared to the previous year, buoyed by the strong growth in the Non-Life business.

The combined ratio increased year-on-year, brought about by the return to normality in economic activity, reflected in the claims rate, and by the effect of inflation.

Technical income rose to EUR 71.3 million, reflecting the improvement in yield from the Life Risk lines of business in the post-pandemic context.

Investment income registered a fall of 52.2%, reaching EUR 158.1 million, influenced by the effect of the depreciation of investment assets throughout 2022, reflecting both the instability felt in the financial markets and the effect of the increase in inflation and interest rates.

Although the non-technical income increased to EUR 108.8 million, aided by the improvement in income from the Fidelidade Group's non-insurance activity, this was not sufficient to offset the drop in investment income. As a result, the net income was EUR 49.8 million lower than in 2021, settling at EUR 220.5 million.

Also worth noting is that at the end of 2022 the Fidelidade Group had EUR 17.0 billion in assets under management, a decrease of 5.8% compared to 2021, mostly reflecting the effect of the depreciation of financial assets. On the other hand, technical provisions recorded an increase of 3.0% compared to 2021.

Shareholders' Equity reached EUR 2,553.6 million, and the average return on shareholders' equity ("ROE") was 7.9%.

<sup>&</sup>lt;sup>4</sup> Source: Report of Quarterly Key Indicators (III Quarter 2022) - ISSM (Mozambigue Institute of Insurance Supervision).

<sup>&</sup>lt;sup>5</sup> Source: Angola Association of Insurers, November 2022.



### **PREMIUMS WRITTEN**

## **Consolidated Premiums**

Units: thousand €	2022	% Mix	2021	% Mix	Change 22/21
Premiums Written					
Life <sup>1</sup>	2,491,991	48.7%	2,628,513	53.5%	-5.2%
Risk and Annuities	522,849	21.0%	443,081	16.9%	18.0%
Life Financial	1,969,142	79.0%	2,185,433	83.1%	-9.9%
Non-Life	2,626,149	51.3%	2,283,089	46.5%	15.0%
Motor	747,747	28.5%	668,183	29.3%	11.9%
Health	541,694	20.6%	466,993	20.5%	16.0%
Fire and Other Damage	560,233	21.3%	477,570	20.9%	17.3%
Workers' Compensation	375,454	14.3%	312,145	13.7%	20.3%
Other Non-Life	401,021	15.3%	358,198	15.7%	12.0%
TOTAL	5,118,141	100.0%	4,911,602	100.0%	4.2%
TOTAL	5,118,141	100.0%	4,911,602	100.0%	4.2%
TOTAL  Geographical Breakdown	5,118,141	100.0%	4,911,602	100.0%	4.2%
	5,118,141 2,491,991	100.0%	4,911,602 2,628,513	100.0%	-5.2%
Geographical Breakdown	, ,				-5.2%
Geographical Breakdown Life <sup>1</sup>	2,491,991	100.0%	2,628,513	100.0%	<b>-5.2%</b> -19.6%
Geographical Breakdown  Life <sup>1</sup> Portugal	<b>2,491,991</b> 1,831,491	<b>100.0%</b> 73.5%	<b>2,628,513</b> 2,277,607	<b>100.0%</b> 86.7%	
Geographical Breakdown  Life¹ Portugal International	<b>2,491,991</b> 1,831,491 660,500	<b>100.0%</b> 73.5% 26.5%	<b>2,628,513</b> 2,277,607 350,906	100.0% 86.7% 13.3%	-5.2% -19.6% 88.2% 15.0%
Geographical Breakdown  Life¹ Portugal International  Non-Life	2,491,991 1,831,491 660,500 2,626,149	100.0% 73.5% 26.5% 100.0%	<b>2,628,513</b> 2,277,607 350,906 <b>2,283,089</b>	100.0% 86.7% 13.3% 100.0%	-5.2% -19.6% 88.2% 15.0% 8.8%
Geographical Breakdown  Life¹ Portugal International  Non-Life Portugal	2,491,991 1,831,491 660,500 2,626,149 1,746,405	100.0% 73.5% 26.5% 100.0% 66.5%	<b>2,628,513</b> 2,277,607 350,906 <b>2,283,089</b> 1,604,564	100.0% 86.7% 13.3% 100.0% 70.3%	-5.2% -19.6% 88.2% 15.0% 8.8% 29.7%
Geographical Breakdown  Life¹ Portugal International  Non-Life Portugal International	2,491,991 1,831,491 660,500 2,626,149 1,746,405 879,745	100.0% 73.5% 26.5% 100.0% 66.5% 33.5%	2,628,513 2,277,607 350,906 2,283,089 1,604,564 678,524	100.0% 86.7% 13.3% 100.0% 70.3% 29.7%	<b>-5.2%</b> -19.6% 88.2%

<sup>1.</sup> Including investment contracts

Due to the macroeconomic situation of great uncertainty in 2022, the Life business recorded a decrease of 5.2% compared to the previous year, to EUR 2,492 million, reflecting the behaviour of the Life Financial premiums in Portugal. On the other hand, the international Life business recorded an increase of 88.2% compared to the previous year, benefiting both from the performance of the international operations and from the integration of The Prosperity Company within the group at the start of 2022. This company conducts its business in several European markets.

In the Non-Life segment, the Fidelidade Group grew 15.0% in 2022 to EUR 2,626 million, with positive performance in all lines of business and all geographies. In 2022 the international business accounted for around one third (33.5%) of the total premiums written in the Non-Life segment.

The lines of business with the greatest growth in 2022 were Workers' Compensation (+20.3%), Fire and Other Damage (+17.3%), and Health (+16.0%).



## Premiums in Portugal

Units: thousand €	2022	% Mix	2021	% Mix	Change 22/21
Premiums Portugal					
Life	1,831,491	51.2%	2,277,607	58.7%	-19.6%
Risk and Annuities	197,630	10.8%	191,050	8.4%	3.4%
Life Financial	1,633,861	89.2%	2,086,557	91.6%	-21.7%
Non-Life	1,746,405	48.8%	1,604,564	41.3%	8.8%
Motor	549,147	31.4%	512,610	31.9%	7.1%
Health	417,944	23.9%	380,478	23.7%	9.8%
Fire and Other Damage	298,086	17.1%	276,100	17.2%	8.0%
Workers' Compensation	286,623	16.4%	256,387	16.0%	11.8%
Other Non-Life	194,604	11.1%	178,990	11.2%	8.7%
TOTAL	3,577,896	100.0%	3,882,172	100.0%	-7.8%

In Portugal, the Fidelidade Group recorded positive premiums performance in the Non-Life segment, growing 8.8% compared to the previous year and above the market average (7.4%), with most lines of business contributing to this result. This evolution enabled the Group to increase the Non-Life market share by 0.3 pp to 28.8%.

In the Non-Life business, the Workers' Compensation and Health lines of business recorded the greatest growth, with total premiums reaching EUR 286.6 million and EUR 417.9 million, respectively. Fidelidade's market share in Portugal in the Workers' Compensation line of business increased to 27.9% (compared to 26.6% in 2021).

In the Life business in Portugal, Fidelidade recorded a fall of 19.6% compared to the previous year, influenced by the negative evolution of Life Financial products. However, since the market recorded a fall of 21.8% year-on-year, the Fidelidade Group's market share increased.

## International Premiums

Units: thousand €	2022	% Mix	2021	% Mix	Change 22/21
International Premiums					
Life Premiums	660,500	42.9%	350,906	34.1%	88.2%
Risk and Annuities	325,219	49.2%	252,031	71.8%	29.0%
Life Financial	335,281	50.8%	98,875	28.2%	239.1%
Non-Life	879,745	57.1%	678,524	65.9%	29.7%
Motor	198,600	22.6%	155,573	22.9%	27.7%
Health	123,750	14.1%	86,515	12.8%	43.0%
Fire and Other Damage	262,146	29.8%	201,470	29.7%	30.1%
Workers' Compensation	88,831	10.1%	55,758	8.2%	59.3%
Others	206,417	23.5%	179,209	26.4%	15.2%
TOTAL	1,540,245	100.0%	1,029,430	100.0%	49.6%

Premiums from the international business reached EUR 1,540.2 million in 2022, recording year-on-year growth of 49.6%, reflecting both the Life and Non-Life segments.

The Non-Life business grew 29.7%, with Peru, Chile and Angola contributing most to the increase of EUR 201.2 million in the international Non-Life premiums.

The Workers' Compensation line of business saw very marked growth (59.3%), propelled by the Fidelidade Group's business in Mozambique and Angola. The Health line of business recorded growth of 43.0%, influenced by the increase in demand for health insurance, also in Mozambique and Angola.

The Life Risk and Annuities line of business, which carries significant weight in the Latin America business, recorded a sizeable increase of 29.0%, essentially reflecting the increase in demand for life policies in the Bolivia and Peru operations, in addition to the effect of local currency appreciation against the Euro.



Lastly, in the international business, the Life Financial line of business registered growth of 239%, reflecting the integration of The Prosperity Company.

Units: thousand €		2022			2021		Change 22/21
International Premiums	%Life	%NL	Total	%Life	%NL	Total	%
PERU	34%	66%	597,556	36%	64%	520,098	14.9%
LIECHTENSTEIN	100%	0%	237,562	-	-	-	-
BOLIVIA	49%	51%	214,141	44%	56%	172,100	24.4%
FRANCE + LUX	39%	61%	120,989	31%	69%	98,864	22.4%
CHILE	0%	100%	101,578	0%	100%	61,624	64.8%
ANGOLA	6%	94%	77,199	4%	96%	42,350	82.3%
MACAO	73%	27%	66,106	76%	24%	65,118	1.5%
SPAIN	7%	93%	45,494	12%	88%	27,894	63.1%
MOZAMBIQUE	12%	88%	44,334	1%	99%	10,109	338.6%
CAPE VERDE	15%	85%	19,763	15%	85%	16,750	18.0%
PARAGUAY	4%	96%	15,522	4%	96%	14,524	6.9%
TOTAL	43%	57%	1,540,245	34%	66%	1,029,430	49.6%

In terms of geographical distribution, in 2022, the Latin America business represented 60% of the Fidelidade Group's international business, while Europe accounted for 26%, Africa 9% and Asia 4%.



## **PROFITABILITY**

### Combined Ratio

(%)	2022	2021	Change 22/21
Combined Ratio			
Consolidated CoR	97.4%	93.4%	4.0 pp
Loss Ratio	68.1%	64.9%	3.2 pp
Expense Ratio	29.3%	28.5%	0.8 pp
CoR Portugal	95.3%	93.0%	2.4 pp
CoR International	105.4%	96.6%	8.7 pp

The Fidelidade Group's consolidated combined ratio was 97.4%, increasing 4.0 pp compared to the previous year, mostly reflecting the return to normal of claims rates in most lines of business, and the inflation-driven increase in costs.

This increase in the combined ratio was seen in both the Portugal business (+ 2.4 pp compared to 2021, to 95.3%) and the international business (+ 8.4 pp compared to 2021, to 105.4%), with the latter being influenced by non-recurrent impacts.



## Net Income

Units: thousand €	2022	2021	Change 22/21
Income			
Technical Income	71,274	45,311	57.3%
Investment Income	158,096	330,410	-52.2%
Non-Technical Income	108,838	31,270	248.1%
Income before Tax	338,208	406,991	-16.9%
Tax and Non-Controlling Interests	-117,734	-136,750	13.9%
NET INCOME	220,475	270,242	-18.4%

Net income fell in 2022, due to the lower contribution of investment income, reflecting the recognition in the accounts of impairments associated with investment assets.

### **BALANCE SHEET INDICATORS**

## Assets under Management

Units: thousand €	2022	Mix (%)	2021	Mix (%)	Change 22/21
Assets under Management					
Not Unit Linked <sup>1</sup>	13,881,758	81%	16,339,673	90%	-15.0%
Unit Linked	3,159,920	19%	1,760,270	10%	79.5%
Total Assets under Management	17,041,678	100%	18,099,943	100%	-5.8%
yield² (%)	2.0%		3.6%		-1.6 pp
RoTE (%)	10.5%	-	10.9%	-	-0.4 pp

<sup>1.</sup> Including properties for own use; 2. Excluding unit-linked products and properties for own use.

At the end of 2022 had assets under management of EUR 17.0 billion, with 19% of that figure related to Unit-Linked products.

The investment portfolio not connected to Unit-Linked products was EUR 13.9 billion, and the annualised average yield was 2.0%.

Also, in 2022 the policy of diversifying by class of asset and geographies was continued, as a means of maximising yield with an appropriate level of risk given the climate of rising interest rates, and taking into account capital optimisation under the Solvency II rules.

## **Technical Provisions**

Units: thousand €	2022	Mix (%)	2021	Mix (%)	Change 22/21
Technical Provisions					
Life	11,469,049	79%	11,227,249	80%	2.2%
Non-Life	3,003,211	21%	2,826,964	20%	6.2%
Total	14,472,260	100%	14,054,213	100%	3.0%

In 2022, technical Provisions stood at EUR 14.5 billion, displaying an increase of 3.0% compared to 2021, reflecting the evolution of the Life and Non-Life segments.

## Shareholders' Equity

Units: thousand €	2022	2021	Change 22/21
Shareholders' Equity			
Shareholders' Equity and Non-Controlling Interests	2,856,100	3,618,980	-21.1%
Non-controlling Interests	302,502	564,267	-46.4%
Shareholders' Equity without Non-Controlling Interests	2,553,597	3,054,714	-16.4%
ROE (%)	7.9%	8.8%	-0.9 pp



At the end of 2022, Shareholders' Equity, excluding Non-Controlling Interests, was EUR 2,553.6 million, which was lower than the previous year and largely a reflection of the effect of the depreciation of financial assets in the Revaluation Reserve and the return of supplementary capital payments. The average return on equity (ROE) was 7.9%.

## Debt

Units: thousand €	2022	2021	Change 22/21
Debt			
Subordinated debt	502,165	501,054	0.2%
Debt Ratio (%)	2.5%	2.5%	0.0 рр

In 2021, Fidelidade issued subordinated debt in the financial markets for the first time, enabling optimisation of its capital structure. At the end of 2022, subordinated debt totalled EUR 502.2 million and the ratio of subordinated debt to total assets was 2.5%.

## A.2.3. Premiums, claims and expenses by line of business

The tables below provide a breakdown of premiums, claims and expenses by line of business.

Life Line of business	Insurance with profit sharing	Index-linked and unit-linked insurance	Other life insurance	Life reinsurance	Total	Previous year
Premiums written						
Gross	107,431	1,306,210	1,073,954	4,397	2,491,992	2,628,513
Reinsurers' share	1,031	0	126,041	0	127,072	99,400
Net	106,400	1,306,210	947,913	4,397	2,364,920	2,529,113
Premiums earned						
Gross	107,460	1,306,210	1,073,862	4,504	2,492,036	2,625,764
Reinsurers' share	1,045	0	128,518	0	129,563	97,735
Net	106,415	1,306,210	945,344	4,504	2,362,473	2,528,029
Claims incurred						
Gross	377,493	122,523	1,865,366	6,231	2,371,613	2,881,396
Reinsurers' share	570	0	100,097	-4	100,663	112,396
Net	376,923	122,523	1,765,269	6,235	2,270,950	2,769,000
Changes in other technical	provisions					
Gross	-266,556	0	-29,068	25	-295,599	-126,682
Reinsurers' share	-66	0	2,770	0	2,704	6,015
Net	-266,490	0	-31,838	25	-298,303	-132,697
Expenses incurred						
Expenses incurred	19,598	126,624	201,769	16	348,007	210,651



					,	to in thousand cures
Health – SLT Line of business	Health insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Total	Previous year
Premiums written						
Gross	0	0	0	0	0	0
Reinsurers' share	0	0	0	0	0	0
Net	0	0	0	0	0	0
Premiums earned						
Gross	0	0	0	0	0	0
Reinsurers' share	0	0	0	0	0	0
Net	0	0	0	0	0	0
Claims incurred						
Gross	0	39,178	0	0	39,178	117,796
Reinsurers' share	0	0	0	0	0	0
Net	0	39,178	0	0	39,178	117,796
Changes in other technical pr	ovisions					
Gross	0	0	0	0	0	0
Reinsurers' share	0	0	0	0	0	0
Net	0	0	0	0	0	0
Expenses incurred						
Net	0	2,154	0	0	2,154	2,024



				7 (1110 (111	to in thousand curos
Health – NSLT Line of business	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Total	Previous year
Premiums written					
Gross - Direct business	539,488	58,571	375,426	973,485	825,552
Gross - Proportional reinsurance accepted	320	799	28	1,147	728
Gross - Non-proportional reinsurance accepted	0	0	0	0	0
Reinsurers' share	17,696	22,423	2,922	43,041	37,271
Net	522,112	36,947	372,532	931,591	789,009
Premiums earned					
Gross - Direct business	528,565	53,633	371,900	954,098	821,991
Gross - Proportional reinsurance accepted	325	799	112	1,236	964
Gross - Non-proportional reinsurance accepted	0	0	0	0	0
Reinsurers' share	15,701	17,911	2,922	36,534	34,697
Net	513,189	36,521	369,090	918,800	788,258
Claims incurred					
Gross - Direct business	409,745	87,535	195,361	692,641	523,504
Gross - Proportional reinsurance accepted	7	233	-2,207	-1,967	-12,336
Gross - Non-proportional reinsurance accepted	0	0	0	0	0
Reinsurers' share	11,219	8,654	1,462	21,335	35,391
Net	398,533	79,114	191,692	669,339	475,777
Changes in other technical provisions					
Gross - Direct business	2,428	143	-191	2,380	8,455
Gross - Proportional reinsurance accepted	0	0	0	0	-8,614
Gross - Non-proportional reinsurance accepted	0	0	0	0	0
Reinsurers' share	0	0	0	0	0
Net	2,428	143	-191	2,380	-159
Expenses incurred					
Net	112,917	19,584	102,258	234,759	205,780
Expenses incurred				,	



Non-Life Line of business	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Total	Previous year
Premiums written											
Gross - Direct business	407,905	339,665	59,859	545,571	123,476	29,665	7,231	57,097	62,932	1,633,401	1,441,58
Gross - Proportional reinsurance accepted	76	102	216	14,661	2,208	52	0	698	104	18,117	15,22
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0	
Reinsurers' share	23,605	33,410	36,651	310,951	72,517	21,080	7	253	32,005	530,479	431,21
Net	384,376	306,357	23,424	249,281	53,167	8,637	7,224	57,542	31,031	1,121,039	1,025,59
Premiums earned											
Gross - Direct business	403,191	320,135	58,214	526,653	113,733	29,887	6,968	55,282	62,569	1,576,632	1,369,09
Gross - Proportional reinsurance accepted	89	102	235	12,761	2,372	52	2	645	138	16,396	15,10
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0	
Reinsurers' share	23,459	25,468	35,080	297,056	62,611	22,069	8	254	31,286	497,291	386,90
Net	379,821	294,769	23,369	242,358	53,494	7,870	6,962	55,673	31,421	1,095,737	997,30
Claims incurred											
Gross - Direct business	248,169	144,989	11,096	188,081	18,793	1,646	277	36,397	22,467	671,915	716,07
Gross - Proportional reinsurance accepted	483	-8	175	7,015	1,301	0	-1	780	53	9,798	8,94
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0	
Reinsurers' share	20,103	24,726	9,123	126,254	10,709	-11,036	0	89	14,136	194,104	229,30
Net	228,549	120,255	2,148	68,842	9,385	12,682	276	37,088	8,384	487,609	495,71
Changes in other technical provisions											
Gross - Direct business	-4,540	478	-79	4,672	14,455	26	-170	25	72	14,939	27,28
Gross - Proportional reinsurance accepted	0	0	0	532	15	0	0	66	0	613	3
Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0	
Reinsurers' share	0	0	0	0	12,414	0	0	0	0	12,414	14,13
Net	-4,540	478	-79	5,204	2,056	26	-170	91	72	3,138	13,18
Expenses incurred											
Net	147,803	129,236	11,290	129,232	34,308	4,388	3,558	24,125	19,664	503,604	463,40



# A.3. Investment performance

# A.3.1. Income and expenses from investments

At 31 December 2022, the allocation of investments and other assets to insurance contracts or insurance contracts and other operations classified as investment contracts is as follows (amounts for solvency purposes):

Investments and other assets	Life	Non-Life	Not allocated	Total	Previous year
Property, plant and equipment held for own use	0	25,517	129,108	154,625	153,939
Property (other than for own use)	0	20,630	237,195	257,825	229,197
Holdings in related undertakings, including participations	1,208,694	919,794	204,204	2,332,692	2,261,233
Equities - listed	59,435	329,533	31,687	420,655	545,193
Equities - unlisted	378	5,807	23,043	29,228	28,363
Government bonds	2,597,732	232,242	117,734	2,947,708	4,059,355
Corporate bonds	4,187,607	973,136	79,991	5,240,734	6,186,733
Structured notes	166,272	6,174	309	172,755	205,494
Collateralised securities	0	0	0	0	0
Collective investment undertakings	312,983	551,365	36,512	900,860	1,113,673
Derivatives	74,132	17,155	20,888	112,175	28,076
Deposits other than cash equivalents	94,630	60,900	201,402	356,932	375,124
Assets held for index-linked and unit-linked contracts	3,131,473	0	3,164	3,134,637	1,759,925
Loans and mortgages	0	0	13,905	13,905	1,204
Cash and cash equivalents	0	0	384,881	384,881	542,012
Total	11,833,336	3,142,253	1,484,023	16,459,612	17,489,521



The investments in the table above include investments allocated to unit-linked contracts, which break down as follows:

Investments allocated to unit-linked contracts	Total	Previous year
Group companies debt instruments	24,301	24,203
Public debt instrument – domestic issuers	40,288	13,611
Other public domestic issuers	3,905	5,405
Other public foreign issuers	775	0
International financial organisations	19,428	293
Public debt instrument – foreign issuers	72,459	8,831
Debt instrument – other domestic users	183,439	177,164
Debt instrument – other foreign users	809,074	399,587
Equity instruments - resident	423	498
Equity instruments – non-resident	124,576	134,790
Other financial instruments – Units of participation - resident	127,899	126,388
Other financial instruments – Units of participation – non-resident	1,458,856	544,169
Other financial instruments – Other resident	6,262	23,545
Receivables	-4,612	-2,312
Other deposits	872	240
Derivatives	113,398	122,126
Land and buildings	47,044	39,216
Sight deposits	106,373	142,516
Term deposits	1,058	0
Total	3,135,815	1,760,270



In 2022, the following income was gained from investments:

Investments	Dividends	Interest	Rents	Total	Previous year
Investments allocated to technical provi	sions – life seament				
Government bonds	0	107,335	0	107,335	118,745
Corporate bonds	0	172,792	0	172,792	164,704
Equities	12,619	0	0	12,619	15,075
Collective investment undertakings	16,134	2,359	0	18,493	21,207
Structured notes	0	0	0	0	0
Collateralised securities	0	0	0	0	0
Cash and cash equivalents	0	4,118	0	4,118	5,601
Loans and mortgages	0	9,976	0	9,976	32
Property	0	0	30,071	30,071	313
Derivatives	0	-13,333	0	-13,333	-13,193
Others	0	162	0	162	225
Credit Derivatives	0	0	0	0	0
Subtotal	28,753	283,409	30,071	342,233	312,709
Investments allocated to technical provi	sions – non-life segment				
Government bonds	0	14,484	0	14,484	6,915
Corporate bonds	0	44,454	0	44,454	25,893
Equities	25,122	0	0	25,122	14,951
Collective investment undertakings	11,214	2,130	0	13,344	14,183
Structured notes	0	0	0	0	0
Collateralised securities	0	0	0	0	0
Cash and cash equivalents	0	3,183	0	3,183	1,402
Loans and mortgages	0	3,746	0	3,746	0
Property	0	0	30,348	30,348	5,231
Derivatives	0	0	0	0	0
Others	0	0	0	0	0
Credit Derivatives	0	0	0	0	0
Subtotal	36,336	67,997	30,348	134,681	68,575
Investments not allocated					
Government bonds	0	4,912	0	4,912	2,311
Corporate bonds	0	2,279	0	2,279	2,528
Equities	2,231	0	0	2,231	4,529
Collective investment undertakings	578	0	0	578	255
Structured notes	0	0	0	0	0
Collateralised securities	0	0	0	0	0
Cash and cash equivalents	0	1,518	0	1,518	3,583
Loans and mortgages	0	41	0	41	0
Property	0	0	23,420	23,420	8,004
Derivatives	0	0	0	0	-1,096
Others	0	0	0	0	0
Credit Derivatives	0	0	0	0	0
Subtotal	2,809	8,750	23,420	34,979	20,114
Total	67,898	360,156	83,839	511,893	401,398



In 2022, the financial expenses resulting from investments were as follows:

Investment expenses	Life	Non-Life	Not allocated	Total	Previous year
Costs allocated	33,747	26,813	55,706	116,266	116,316
Other investment expenses	1,315	219	3,597	5,131	3,229
Total	35,062	27,032	59,303	121,397	119,545



# A.3.2. Information on gains and losses directly recognised in shareholders' equity

In 2022, the net gains and losses in financial instruments were as follows:

				nts in thousand euros	
Investments	As a ch	narge to	Total	Drovious weer	
investments	Income statement	Shareholders' equity	lotai	Previous year	
Investments allocated to technical provisions – life	segment				
Government bonds	114,719	-5,994	108,725	127,404	
Corporate bonds	174,583	-110,951	63,632	364,699	
Equities	-49,787	100,745	50,958	136,918	
Collective investment undertakings	-34,226	-180,029	-214,255	43,163	
Structured notes	0	0	0	0	
Collateralised securities	0	14	14	-14	
Cash and cash equivalents	4,120	0	4,120	5,611	
Loans and mortgages	7,842	-16,274	-8,432	32	
Property	30,088	13,673	43,761	272	
Derivatives	-37,068	-24,265	-61,333	-182,943	
Others	162	0	162	614	
Credit Derivatives	0	0	0	-1,528	
Subtotal	210,433	-223,081	-12,648	494,228	
Investments allocated to technical provisions – nor	n-life segment				
Government bonds	14,243	-24	14,219	6,971	
Corporate bonds	84,285	-3,100	81,185	47,499	
Equities	8,901	139,806	148,707	-16,040	
Collective investment undertakings	23,420	-1,374	22,046	36,652	
Structured notes	0	0	0	0	
Collateralised securities	0	0	0	0	
Cash and cash equivalents	3,232	3	3,235	2,278	
Loans and mortgages	2,942	-6,121	-3,179	-4	
Property	40,601	11,937	52,538	5,767	
Derivatives	-495	-76,139	-76,634	-31,226	
Others	0	0	0	1	
Credit Derivatives	0	0	0	0	
Subtotal	177,129	64,988	242,117	51,898	
Investments not allocated					
Government bonds	4,987	0	4,987	2,305	
Corporate bonds	818	-411	407	16,795	
Equities	5,263	-278,189	-272,926	-85,479	
Collective investment undertakings	623	200	823	-1,447	
Structured notes	0	0	0	0	
Collateralised securities	0	0	0	0	
Cash and cash equivalents	-3,427	-309	-3,736	2,233	
Loans and mortgages	925	0	925	0	
Property	13,850	22,219	36,069	20,130	
Derivatives	-2,788	-10,309	-13,097	-11,968	
Others	0	0	0	-4	
Credit Derivatives	0	2,158	2,158	-2,279	
Subtotal	20,251	-264,641	-244,390	-59,714	
Total	407,813	-422,734	-14,921	486,412	



### A.3.3. Information on investment in securitisations

At 31 December 2022, the value of investment in securitisations is immaterial, and no information is therefore included in this chapter.

### A.4. Performance of other activities

There are no other activities performed by the companies included in Fidelidade Consolidated's consolidation perimeter with material relevance for the purposes of disclosure in this report.

# A.5. Any other information

### A.5.1. Group structure

Since Fidelidade – Companhia de Seguros, S.A, is the most representative company of the Group, the governance requirements applied to the insurance Group are defined therein.

The subsidiaries, grouped according to the nature of their main business, are the following:

### **INSURANCE**

**Fidelidade - Companhia de Seguros, S.A.** is a public limited liability company resulting from the merger by incorporation of Império Bonança - Companhia de Seguros, S.A. ("Império Bonança") in Companhia de Seguros Fidelidade-Mundial, S.A. ("Fidelidade Mundial"), in accordance with the public deed dated 31 May 2012, which produced accounting effects with reference to 1 January 2012. This operation was authorised by ASF through a resolution of its Board of Directors dated 23 February 2012. The Company's purpose is to perform the "Non-life" and "Life" insurance activity, as set out in the statute governing this activity.

**Multicare - Seguros de Saúde, S.A.**, with its head office in Lisbon, at Rua Alexandre Herculano, no. 53, was set up on 9 March 2007 with the corporate purpose of performing insurance and reinsurance activities, in all legally authorised non-life insurance lines of business and operations, and may also perform activities related to insurance and reinsurance. The company is focused on the management of health insurance.

**Fidelidade Assistência – Companhia de Seguros, S.A. (previously Cares – Companhia de Seguros, S.A.)**, with its head office in Lisbon, at Avenida José Malhoa nº 13 - 7°, was set up on 17 February 1995, with the name Companhia de Seguros Tágus, S.A., with the corporate purpose of performing insurance and reinsurance activities, in all legally authorised non-life insurance lines of business and operations, and may also perform activities related to insurance and reinsurance. In 2015, CARES – Companhia de Seguros, S.A. changed its name and image to Fidelidade Assistência – Companhia de Seguros, S.A. and now acts under the Fidelidade Assistance brand.

Via Directa - Companhia de Seguros, S.A. (OK Teleseguros), with its head office in Lisbon, at Avenida José Malhoa, no 13 - 4°, was set up on 28 November 1997 with the corporate purpose of performing insurance and reinsurance activities, in all legally authorised non-life insurance lines of business, and may also perform activities related to insurance and reinsurance.

**Companhia Portuguesa de Resseguros, S.A.**, with its head office in Lisbon, at Largo do Calhariz nº 30, was set up on 22 September 1979 with the corporate purpose of performing any operations regarding reinsurance of non-life lines of business, both in Portugal and abroad, in addition to participating in the redistribution in the market of certain risks of a specific type or dimension.



**Fidelidade Angola – Companhia de Seguros, S.A.**, with its head office in Luanda, at Condominium Cidade Financeira, S8, Building 10, 3<sup>th</sup> floor, Talatona, Luanada, Angola, was set up on 2 June 2009 with the corporate purpose of performing insurance activities in the life and non-life lines of business in the national territory of the Republic of Angola.

Garantia - Companhia de Seguros de Cabo Verde, S.A. resulted from the split of the former Instituto de Seguros e Providência Social, EP which occurred on 30 October 1991, pursuant to Decree-Law No. 136/91, of 2 October, with all the assets and liabilities related to the insurance business being transferred to it. The Company has its head office in Chã de Areia, C.P. 138, Cidade da Praia, in the Republic of Cape Verde, and branches in the Sal, São Vicente, Boavista, São Nicolau, Fogo and Santo Antão islands. In order to attract clients to purchase insurance policies, the company also has a network of agents. The Company is engaged in the activity of direct insurance and reinsurance in all lines of business and operations, and may also perform related and complementary activities.

**Fidelidade Macau – Companhia de Seguros, S.A.**, with its head office in Macao at Avenida da Praia Grande, no. 567, BNU Building, 14th floor, was set up on 30 September 2015 with the corporate purpose of performing the insurance and reinsurance activities, in all legally authorised non-life insurance lines of business and operations, and may also perform activities related to insurance and reinsurance.

**Fidelidade Macau Vida – Companhia de Seguros, S.A.**, with its head office at Avenida da Praia Grande, no. 567, BNU Building, 14th floor, Macao, was set up on 31 March 2020 with the corporate purpose of performing insurance and reinsurance activities, in all legally authorised life insurance lines of business, and may also perform activities related to insurance and reinsurance.

La Positiva Seguros Y Reaseguros S.A.A., with its head office at Calle Francisco Masías 370, 3rd floor, San Isidro, Lima, Peru, was set up on 27 September 1937 with the corporate purpose of providing the services of a general risk insurance and reinsurance company, assuming as insurer and reinsurer all the risks that, in accordance with the law, may be subject to that contract, both in Peru and abroad. It may also develop any other subsidiary or business that, in line with the General Law of the Financial System, the Insurance System and the Banks and Insurance Supervisory Organisation, a general risk insurance and reinsurance company may undertake, while complying with the requirements of the legal regulations.

La Positiva Vida Seguros Y Reaseguros S.A., with its head office at Calle Francisco Masías 370, 3rd floor, San Isidro, Lima, Peru, was set up on 20 July 2005, with the corporate purpose of providing the services of a life insurance and reinsurance company, assuming as insurer and reinsurer all the risks that, in accordance with the law, may be subject to that contract. It may also develop any other subsidiary or business that, in line with the General Law of the Financial System, the Insurance System and the Banks and Insurance Supervisory Organisation, a life insurance and reinsurance company may undertake, while complying with the requirements of the legal regulations.

**Alianza Vida Seguros y Reaseguros S.A.**, with its head office in Santa Cruz de la Sierra, Bolivia, was set up on 5 July 1999, and is engaged in the sale of personal insurance and pre-paid services, social security insurance and savings and capitalisation services, co-insurance, reinsurance and related transactions, on its own behalf or on behalf of third parties.

Alianza Compañía de Seguros y Reaseguros S.A. E.M.A., with its head office in La Paz, Bolivia, was set up on 9 July 1991, and is engaged in the sale of general insurance, including transport and suretyship insurance, both directly and through reinsurance, on its own behalf, on behalf of third parties or through participation with third parties.

**Alianza Garantía Seguros Y Reasseguros S.A.**, with its head office in Paraguay, was set up in the city of Assunção on 27 November 1972, and is engaged in selling general insurance and life insurance, the main risk being motor insurance.

La Positiva S.A. Entidad Prestadora de Salud, with its head office at Calle Francisco Masías 370, 3<sup>rd</sup> floor, San Isidro, Lima, Peru, was set up on 14 February 2017, and is engaged in the provision of health prevention and rehabilitation services, with the main objective of providing health services to its insured persons, through its own infrastructures and those of third parties, subject to SUSALUD controls.

**Fid Chile Seguros Generales, S.A.**, with its head office in Santiago, Chile, at Av. Vitacura 2939, 16<sup>th</sup> floor, office 1601, Las Condes, was set up on 15 November 2019 with the corporate purpose of performing, on the basis of premiums, insurance and reinsurance operations for the risks included in the first group referred in to Article 8 of Decree with legal force no. 251 of 1931 or the subsequent legal or regulatory provisions that may replace or modify it, and any other business that the applicable law or the Financial Market Commission, by means of a general rule, declares to be related with or complementary to the business of the insurance companies of the first group.



**Fidelidade Moçambique – Companhia de Seguros, S.A.**, with its head office at Edifício Platinum Corporate, Rua de Kassuende, no. 210, 19th floor, Bairro Polana Cimento A, CEP 0101-09, in Maputo, Mozambique, was set up on 27 November 2001 with the main corporate purpose of performing insurance and reinsurance activities in the life and non-life lines of business, with the scope authorised by law. The company may also perform other activities that are subsidiary or complementary to its main purpose and, in particular, may perform all complementary acts within its industry sector, such as those related to salvage, repairs to damaged objects and use of its reserves and capital.

**Liechtenstein Life Assurance AG**, with its head office at Industriering 37, 9491 Ruggell, Liechtenstein, was set up on 10 January 2008 with the corporate purpose of operating direct or indirect life insurance, in particular unit-linked life insurance, in the country and abroad, and all directly related activities. Non-insurance activities are not permitted. The Company can set up national and foreign branches and maintain holdings in, fund or set up or acquire undertakings of any kind.

### **PROPERTY**

**Fidelidade – Property Europe, S.A.**, using this name since 2014, with its head office in Lisbon, at Largo do Calhariz, no 30, was set up on 19 November 1991 with the main corporate purpose of renting own property which it has acquired or built and the provision of related services. On 24 November 2004 a public deed was signed for the merger by incorporation of Caixa Imobiliário - Sociedade de Gestão e Investimento Imobiliário, S.A., in Mundial Confiança - Sociedade de Gestão e Investimento Imobiliário, S.A., which changed its name to Fidelidade-Mundial, Sociedade de Gestão e Investimento Imobiliário, S.A., and this name was changed in 2013 to Fidelidade – Investimentos Imobiliários, S.A.

**Fidelidade – Property International, S.A.**, with its head office in Lisbon, at Largo do Calhariz, no 30, was set up on 5 November 2014 with the main corporate purpose of purchasing and selling real estate, including purchase for re-sale, renting or the setting up of other real rights over property and, also, developing, promoting and administering real estate projects, in the area of construction and rehabilitation, in addition to the provision of related services.

Fundo de Investimento Imobiliário Aberto IMOFID (previously Bonança I) was set up on 22 December 1993 with an investment policy of achieving increasing medium and long-term capital appreciation, by investing in a diversified range of assets, predominantly real estate. Until September 2018, this fund was managed by Fundger – Sociedade Gestora de Fundos de Investimento Imobiliário, S.A., and from 1 October 2018 it was managed by Fidelidade - Sociedade Gestora de Organismos de Investimento Imobiliário, S.A.. From 4 May 2020 the IMOFID fund was transformed into an open-ended CIU.

**FPI (UK) 1 LIMITED**, with its head office at Legalinx Limited, One Fetter Lane, London, EC4A 1BR, England, was set up on 18 December 2014 with the corporate purpose of purchasing property.

**FPE (IT) Società per Azioni**, with its head office at Via Maria Teresa 11 Cap 20123, Milan, Italy, was set up on 2 July 2015, and has the corporate purpose of acquiring and selling, renovating, leasing and managing real estate properties.

**FPE (Lux) Holding S.à r.l.**, with its head office at 18, rue Robert Stümper, L-2257 Luxembourg, was set up on 2 February 2016, and has the corporate purpose of acquiring holdings, interests and units, in Luxembourg and abroad, in any form, and the management of those holdings, interests and units.

Thomas More Square (Lux) Holdings S.à r.l., with its head office at 18, rue Robert Stümper, L-2257 Luxembourg, was set up on 6 January 2016, and has the corporate purpose of acquiring holdings, interests and units, in Luxembourg and abroad, in any form, and the management of those holdings, interests and units.

**Thomas More Square (Lux) S.à r.l.**, with its head office at 18, rue Robert Stümper, L-2257 Luxembourg, was set up on 6 January 2016, and has the corporate purpose of acquiring holdings, interests and units, in Luxembourg and abroad, in any form, and the management of those holdings, interests and units.

**Fundo Broggi**, set up on 24 March 2017 under Italian law, is an alternative closed-end real estate fund. The fund is managed by IDeA FIMIT - Società di Gestione del Risparmio S.p.A., an Italian investment fund management company.

**Broggi Retail S.R.L.** is an Italian company, 100% held by IDeA FIMIT - Società di Gestione del Risparmio S.p.A., in its capacity as Fundo Broggi's management company, and in the interest of Fundo Broggi. Its corporate purpose is, among others, the management, restructuring, appreciation and maintenance of real estate assets, both its own and those of third parties.

Fidelidade - Sociedade Gestora de Organismos de Investimento Coletivo, S.A. with its head office in Lisbon, at Largo do Chiado, nº 8, 1st floor, was set up on 8 February 2018 with the corporate purpose of managing, on behalf of the participants and



in their exclusive interest, one or more public or private, closed-ended or open-ended real estate investment undertakings, and managing the property included in the portfolios of applications or collective interest undertakings managed by it. It changed its name in 2020.

**FPE (BE) Holding S.à.r.l..**, with its head office at Avenue Marnix 23, 5éme étage, 1000, Brussels, Belgium, was set up on 15 March 2019 with the corporate purpose of performing, in its own name, all business and transactions of holdings and real estate investment entities. This may include, in particular, various transactions related with shares and other securities, management of investments in subsidiaries, granting of loans to subsidiaries in certain circumstances and different types of real estate transactions.

**FPE (PT), S.A.**, with its head office in Lisbon, at Largo do Calhariz, no 30, was set up on 3 October 2018 with the corporate purpose of purchasing and selling real estate and re-sale of properties acquired for such purpose, real estate promotion, consultancy, management and support to real estate projects, marketing of real estate products, projects and setting up of real estate investments, and the administration, management and renting of its own properties and those of third parties.

**FPE (HU) Kft.**, is a special purpose vehicle, with its head office in Budapest, at Andrássy út 100, in Hungary. It was set up on 21 October 2020.

**FPE (UK) 1 LIMITED** is a special purpose vehicle, with its head office in London, at Suite 1, 3<sup>rd</sup> floor 11 – 12 St James's Square, in the United Kingdom. It was set up on 10 December 2020.

**FPE (Lux) 1, S.à.r.I.**, with its head office in Luxembourg, at 1A, Heienhaff, L-1736 Senningerberg, was set up on 5 August 2015 and has the corporate purpose of performing all operations directly or indirectly related with the acquisition and holding of real estate and the acquisition of participations in companies that may acquire and hold real estate properties and other assets necessary for the management of those real estate properties and real estate holding companies the purpose of which is to indirectly acquire and hold real estate properties and other assets necessary for the management of those real estate properties through the acquisition and holding of participations in other entities, and the administration, management, control, development and disposal of those real estate properties and participations in real estate companies and real estate holding companies.

FPE (PT), SGPS, S.A. with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 18 December 2020 with the purpose of managing shares in other companies, as an indirect means of exercising economic activities.

**FPE (PT) OFFICE A, S.A.** with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 23 December 2020 with the purpose of purchasing and selling real estate, including purchase for re-sale, renting or the setting up of other real rights over property and, also, developing, promoting and administering real estate projects, in the area of construction and rehabilitation, in addition to the provision of related services.

**FPE (PT) 2 OFFICE B, S.A.** with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 23 December 2020 with the purpose of purchasing and selling real estate, including purchase for re-sale, renting or the setting up of other real rights over property and, also, developing, promoting and administering real estate projects, in the area of construction and rehabilitation, in addition to the provision of related services.

**FPE (PT) 3 RESIDENTIAL, S.A.** with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 23 December 2020 with the purpose of purchasing and selling real estate, including purchase for re-sale, renting or the setting up of other real rights over property and, also, developing, promoting and administering real estate projects, in the area of construction and rehabilitation, in addition to the provision of related services.

**FPE (PT) 4 RET, S.A.** with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 23 December 2020 with the purpose of purchasing and selling real estate, including purchase for re-sale, renting or the setting up of other real rights over property and, also, developing, promoting and administering real estate projects, in the area of construction and rehabilitation, in addition to the provision of related services.

**FPE (PT) 5 PARK, S.A.** with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 23 December 2020 with the purpose of purchasing and selling real estate, including purchase for re-sale, renting or the setting up of other real rights over property and, also, developing, promoting and administering real estate projects, in the area of construction and rehabilitation, in addition to the provision of related services.

**GK Lisbon**, with its head office at Tokyo Kyodo Accounting Office 3-1-1, Marunouchi, Chiyoda-ku, Tokyo, Japan, was set up on 3 March 2021 with the purpose of purchasing, selling, investing in and managing real estate.



**TMK Lisbon**, with its head office at Tokyo Kyodo Accounting Office 3-1-1, Marunouchi, Chiyoda-ku, Tokyo, Japan, was set up on 8 March 2021 with the main purpose of assuming specified assets in line with the Asset Liquidation Plan, under the Asset Liquidation Law, and business related with the management and disposal of those assets.

**EA One Holding, Inc.**, with its head office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, USA, was set up on 22 July 2018 with the corporate purpose of performing any legal act or activity that companies may perform under the Delaware General Corporation Law.

**IBERFID - Fundo de Investimento Imobiliário Fechado**, with its head office in Lisbon, at Largo do Chiado, nº 8, 1st Floor, was set up on 6 November 2020. This fund is managed by Fidelidade - Sociedade Gestora de Organismos de Investimento Coletivo, S.A., and was initially set up under the name FSG SAÚDE – FUNDO DE INVESTIMENTO IMOBILIÁRIO FECHADO. Its investment policy is defined on the basis of the aim of achieving increasing medium and long-term capital appreciation and obtaining a stable income, by setting up and managing a portfolio of assets, predominantly real estate, based on criteria of prudence, selectivity, security, profitability and liquidity, protecting and appreciating the interests of its Participants.

#### HEALTH

**Luz Saúde, S.A.**, with its head office in Lisbon, at Rua Carlos Alberto da Mota Pinto, 17 - 9°, was set up on 6 July 2000 with the legal character of a "Holding Company", pursuant to Decree-Law No. 495/88, of 30 December, and is one of the largest healthcare provider groups in terms of revenues in the Portuguese market. The Group provides services via 18 units in the North, Centre and Centre-South of the country, and has a significant presence in Lisbon, where it operates Hospital da Luz, the largest private hospital in Portugal, and in Greater Porto, where it operates the Hospital da Arrábida.

Clínica Fisiátrica das Antas, Unipessoal, Lda., with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 16 December 1988 with the purpose of performing specialist medical practice activities, on an outpatient basis.

**Multi Health, S.A.**, with its head office at Largo do Calhariz, n.º 30, in Lisbon, was set up on 7 April 2022 with the corporate purpose of providing consultancy services and the development of new digital solutions and platforms, and analytical models, in the health area, as well as the sale and distribution of those solutions and models.

### OTHER SECTORS

Cetra - Centro Técnico de Reparação Automóvel, S.A. (Fidelidade Car Service), with its head office in Lisbon, at Rua Cidade de Bolama, nº 1 - B, was set up on 12 February 1973 with the corporate purpose of performing all and any type of activity related with motor vehicles, including repairs, loss adjustments, assessments and salvage recovery, in addition to vehicle leasing operations. The company may also perform related or complementary operations.

**E.A.P.S. - Empresa de Análise, Prevenção e Segurança, S.A. (Safemode)**, with its head office in Lisbon, at Av. José Malhoa, n.º 13 -3°, parish of Campolide, was set up on 11 November 1996 with the corporate purpose of providing risk analysis and prevention services, in addition to technical consultancy and training to improve hygiene, safety and health conditions in the workplace, laboratory support, planning and monitoring of environmental recovery interventions and management of industrial facilities for treatment, recovery or recycling operations.

**GEP - Gestão de Peritagens Automóveis, S.A.**, with its head office in Lisbon, at Av. José Malhoa, n.º  $13 - 8.^{\circ}$ , parish of Campolide, 1099-006 Lisboa, was set up on 11 November 1996 with the corporate purpose of providing services to assess damage to light and heavy motor vehicles, motorbikes and bicycles, including their trailers and coupled items.

**Fidelidade - Serviços de Assistência, S.A.**, with its head office in Lisbon, at Av. José Malhoa, nº 13 – 7°, was set up on 29 January 1991, with the corporate purpose of representing and assisting foreign insurance companies and providing claims management support services for national and foreign insurers. In 2015, it changed its name from Cares RH - Companhia de Assistência e Representação de Seguros, S.A., to Fidelidade - Serviços de Assistência, S.A..

**Cares - Assistência e Reparações, S.A.** (previously Cares Multiassistance, S.A.), with its head office in Lisbon, at Av. José Malhoa,  $n^{\circ}$  13 –  $5^{\circ}$ , parish of Campolide, 1070-157 Lisboa, was set up on 19 June 2002 with the corporate purpose of providing services for the organisation, assessment and management of any repair and restoration work.

FCM Beteiligungs GmbH, with its head office at Garstedter Weg 14, 22453 Hamburg, Germany, was set up on 6 May 2014 with the corporate purpose of acquiring, disposing of, holding or managing its own investments in other companies in Germany and



abroad, and is active in the import, export, wholesale and retail of textiles and all types of fashion items, including related complementary businesses. This company was liquidated in December 2022.

**FID III (HK) LIMITED** is a special purpose vehicle with its head office at Level 54 Hopewell Centre 183, Queen's Road East, Hong Kong and was set up on 4 November 2014.

**Fidelidade - Consultoria e Gestão de Risco, Lda.**, with its head office at Rua 1393, nº 47 (Parallel to Rua José Craveirinha), Bairro da Polana – Maputo, Mozambique, was set up on 23 July 2015 with the purpose of performing health and safety at work activities, and providing risk analysis and prevention services, technical consultancy and human resources management and training services, laboratory support, planning and monitoring of environmental recovery interventions and facilities management. This company was liquidated in January 2022.

**GEP Moçambique – Gestão de Peritagens, Limitada** (previously Fidelidade - Assistência e Serviços, Lda.), with its head office at Rua 1393, nº 47 (Parallel to Rua José Craveirinha), Bairro da Polana – Maputo, Mozambique, was set up on 23 July 2015 with the main purpose of providing assistance services and claims management support services, and services in accounting, human resource management, and IT support, and also the provision of services for the organisation, evaluation, expert assessment and management of any repair work, restoration, installation and improvements to be made to any property, and the hiring of any entities to perform such work, acquisition and supply of various materials, products and tools, and the provision of any services which are related or complementary to these activities.

**FID Loans 1 (Ireland) Limited** is a special purpose vehicle, with its head office at 1st Floor, 118 Lower Baggot Street, Dublin 2, Ireland, and was set up on 13 June 2017.

**Universal - Assistência e Serviços, Lda.**, with its head office at Condomínio Cidade Financeira, Via S8, Edifício 10, 3<sup>rd</sup> Floor, Talatona, Luanda, was set up on 21 April 2017 with the purpose of providing assistance services and claims management support services, and services in accounting, technical consultancy, human resource management, training, IT support, risk analysis and prevention, laboratory support, planning and monitoring of environmental recovery interventions, and facilities management. It also provides services for the organisation, evaluation, expert assessment and management of any repair work, restoration, installation and improvements to be made to any property, and the hiring of any entities to perform such work, acquisition and supply of various materials, products and tools, and the provision of any services which are related or complementary to these activities.

**FID LatAm SGPS, S.A.**, with its head office in Lisbon, at Largo do Calhariz, no 30, was set up on 19 February 2018 with the purpose of managing shares in other companies, as an indirect means of exercising economic activities.

**GEP Cabo Verde Gestão de Peritagens, Lda.**, with its head office at Rua Serpa Pinto, nº 9 – 4th Floor Dto, Plateau, Ilha de Santiago, Cape Verde, was set up on 5 June 2018 with the main purpose of providing and managing motor vehicle and property loss adjusting services and inquiries, providing claims management assistance and support services, providing and managing any repair work, restoration, installation and improvements to be made to any property, and the hiring of any entities to perform such work, acquisition and supply of various materials, products and tools, and the provision of any services which are related or complementary to these activities.

**FID Perú, S.A.**, with its head office in Lima, Peru, at Avenida Emilio Cavenecia 129-137-151, Office 701 y 702 - Torre Cavenecia, Miraflores, Lima., was set up on 9 July 2018 with the corporate purpose of investments and the holding of securities, including, but not limited to, shares in other companies, either national or foreign, in any form. FID Chile, SpA., with it.

**FID Chile, SpA.**, with its head office in Santiago, Chile, was set up on 16 October 2018 with the corporate purpose of making all kinds of investments, in tangible and intangible assets, all kinds of securities and property, and setting up and participating in other companies and/or legal persons of any kind, regardless of their purpose, managing those investments and assessing their results, and carrying on any other type of investment that the partners agree.

**FID Chile & MT JV SpA**, with its head office in Santiago, Chile, was set up on 14 January 2019 with the corporate purpose of forming and creating one or more companies the purpose of which is to develop the insurance business in Chile, participating in those companies, receiving income from those participations, and carrying on any other type of investment that the partners agree.

Alianza Sociedad Administradora de Fondos de Inversión S.A. ("Alianza SAFI"), with its head office in Bolivia, was set up in the city of La Paz on 18 September 2013, and is engaged in providing investment fund management services and other related activities. Alianzas SAFI is regulated by the Financial System Supervisory Authority (ASFI).



**Full Assistance S.R.L. (Full Assistance)**, with its head office in Bolivia, was set up in the city of Santa Cruz de la Sierra on 22 March 2012, and is engaged in providing call centre services, providing advice to clients, answering queries, conducting surveys, campaigns, updating databases and other related services.

**FID I&D, S.A.**, with its head office in Lisbon, at Largo do Calhariz, no 30, was set up on 27 December 2019 with the purpose of providing consultancy services and services for the development of new digital solutions and platforms, analytical models, new solutions based on artificial intelligence models and Machine Learning and other advanced analytics models, as well as the sale and distribution of those solutions and models.

**Tenax Capital Limited**, with its head office at Dominican House, 4 Priory Court, Pilgrim Street, in London, was set up on 30 July 2004 with the main activity of managing investment funds.

**Cetra - Car Remarketing, S.A.**, with its head office in Barcarena, Oeiras, at Rua Mário Castelhano, n°1, was set up on 1 March 2021 with the purpose of performing all and any type of activity related to motor vehicles, in particular maintenance and repairs, including remarketing, loss adjustments, assessments and salvage recovery, in addition to vehicle leasing operations.

**Worldwide Security Corporation S.A.**, with its head office at Barrio Villa Mercedes C/ Río Mamorecillo Esq. C/ Usuri, Santa Cruz, Bolivia, engages in business within the scope of technological and business security solutions.

The Prosperity Company AG, with its head office at Industriering 40, 9491 Ruggell, Liechtenstein, was set up on 11 March 2016 with the corporate purpose of establishing, acquiring, holding and disposing of national and foreign investments. The Company may participate in, fund, create or acquire companies of any type. The Company also has the purpose of providing business consultancy and management services to national and foreign companies on strategic, financial and economic matters. It may, in particular, grant loans or other finance to its subsidiaries, whether interest-free or interest-bearing, and provide guarantees of any type. The Company can also acquire and manage national and foreign real estate assets, and acquire, manage and commercially explore patents, licences and other national and foreign industrial property rights.

**Prosperity Brokershome AG**, with its head office at Industriering 40, 9491 Ruggell, Liechtenstein, was set up on 23 May 2019 with the corporate purpose of providing consultancy services to national and foreign companies; acquiring, holding, managing, and exploiting participations; and performing commission and brokerage activities for which FMA approval is not required. The Company may grant loans or other finance to its subsidiaries, whether interest-free or interest-bearing, and establish branches within the country and abroad, set up and fund subsidiaries, acquire intellectual property rights and corresponding licences, and exploit intellectual property rights and know-how.

**Prosperity Solutions AG**, with its head office at Industriering 40, 9491 Ruggell, Liechtenstein, was set up on 10 November 2009 with the corporate purpose of brokerage of financial services products, in particular life insurance contracts and pension products. To do this, the Company intends to operate a digital platform. The Company can establish branches within the country and abroad, set up and fund subsidiaries, acquire intellectual property rights and corresponding licences, and exploit intellectual property rights and know-how.

**Prosperity Solutions GmbH**, with its head office at Liegnitzer Straße 15, DE-10999 Berlin, Germany, was set up on 23 October 2018 with the corporate purpose of providing consultancy services with an emphasis on management consultancy. The Company may assume or represent other entities of the same type or of a similar nature and set up branches with the same name or with a different name.

**Prosperity Cashtech AG**, with its head office at Industriering 40, 9491 Ruggell, Liechtenstein, was set up on 10 October 2018 with the corporate purpose of organising payment flows, in particular clearing of insurance and financial services, risk and savings contributions and other remunerations, in the area not subject to approval, as well as the brokerage of small loans and consumer loans, which are not subject to the Liechtenstein Banking Act and are also not subject to the supervision of the FMA. The company also has the purpose of advising national and foreign companies on financial and economic matters.

**Prosperity Brokershome GmbH**, with its head office at Liegnitzer Straße 15, DE-10999 Berlin, Germany, was set up on 29 June 2022 with the corporate purpose of providing consultancy services with an emphasis on management consultancy.

**Prosperity Funds SICAV**, with its head office at Äulestrasse 6, 9490 Vaduz, Liechtenstein, was set up on 1 October 2020 with the sole corporate purpose of managing assets on behalf of investors, investing in authorised instruments, in accordance with the provisions of the Liechtenstein Alternative Investment Fund Management Act (AIFMA).



**Fid Real Assets, SGPS, S.A.**, with its head office at Largo do Calhariz, n.º 30, parish of Misericórdia, 1200-086 Lisboa, was set up on 1 June 2022 with the main corporate purpose of managing shares in other companies, as an indirect means of exercising economic activities.

**Fid Real Assets Spain, S.L.**, with its head office at Calhe Nuñez de Balboa. № 116, 3<sup>th</sup> Floor − 1C, 28006 Madrid, Spain, was set up on 2 August 2022 with the corporate purpose of managing and administering real estate assets, the acquisition and disposal, by purchase and sale or by any other means, and the promotion, holding, management, non-financial leasing and marketing of all types of rural and urban properties, buildings and constructions.

### A.5.2. Information on the scope of the Group

For the preparation of Fidelidade Consolidated's consolidated financial statements, the subsidiaries listed in point A.5.1 above were considered in the company's consolidation perimeter.

For the determination of consolidated data for solvency purposes, and taking into account both the provisions of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, and the understanding of the ASF, the following subsidiaries and associates were not considered in the consolidation perimeter:

- FIDELIDADE PROPERTY EUROPE, S.A.
- Audatex Portugal S.A.
- FIIF IMOFID
- Luz Saude
- FIDELIDADE PROPERTY INTERNATIONAL, S.A.
- FID III (HK) LIMITED
- FPI (UK) 1 LIMITED
- FPE (IT) Societa per Azioni
- FPE (Lux) Holding S.a r.l.
- Thomas More Square (Lux) Sarl
- Thomas More Square (Lux) Holdings Sarl
- Fundo Broggi
- Fidelidade Sociedade Gestora de Org. de Investimento Imobiliari
- Fid Loans 1 (Ireland) Limited
- Broggi Retail S.R.L.
- SERFUN PORTUGAL, SGPS, S.A.
- FPE (BE) HOLDING S.a.r.l.
- Alianza SAFI, S.A.
- FID I & D, S.A.
- EA One Holding, Inc.
- FPE (PT), S.A.
- Tenax Capital Ltd
- FPE (HU) Kft
- FSG Saude Fundo de Investimento Imobiliario Fechado
- FPE (UK) 1 LIMITED
- FPE (Lux) 1
- FPE (PT), SGPS, S.A.



- FPE (PT) OFFICE A, S.A.
- FPE (PT) 2 OFFICE B, S.A.
- FPE (PT) 3 RESIDENTIAL, S.A.
- FPE (PT) 4 RET, S.A.
- FPE (PT) 5 PARK, S.A.
- GK Lisbon
- TMK Lisbon
- Prosperity Brokershome AG
- prosperity solutions AG
- prosperity solutions GmbH
- cashyou AG
- prosperity funds SICAV
- FID REAL ASSETS, SGPS, S.A.
- Prosperity Brokershome GmbH
- FID REAL ASSETS SPAIN, S.L.

Taking into account these differences between the scope of the Group used in the consolidated financial statements and the scope of the consolidated data for solvency purposes, consolidated financial statements were prepared for comparative purposes, considering the consolidation perimeter for solvency purposes, that is, not including the above-mentioned entities.

Thus, the table below summarises the main differences between Fidelidade Consolidated's consolidated financial statements (Accounting Financial Statements) and the consolidated financial statements considering the consolidation perimeter for solvency purposes described above (Solvency II Financial Statements).

Amounts in thousand euros

	Financial St	tatements		Financial Statements previous year			
	Accounting Perimeter	Solvency II Perimeter	Difference	Accounting Perimeter	Solvency II Perimeter		
Total Assets	20,249,171	19,085,673	1,861,998	20,350,385	18,991,695		
Total Liabilities	17,393,072	16,664,480	728,592	16,731,404	16,064,287		
Excess of assets over liabilities	2,856,099	2,421,193	1,133,406	3,618,981	2,927,408		

Accordingly, in Chapter D of this report, the valuation of assets, technical provisions and other liabilities for solvency purposes is compared to the consolidated financial statements considering the consolidation perimeter for solvency purposes described above (Solvency II Financial Statements).

Likewise, in Chapter E, the excess of assets over liabilities calculated for solvency purposes is compared to that resulting from the Solvency II Financial Statements.

### A.5.3. Intra-group operations and transactions

The main movements in the Group's subsidiaries during 2022 were as follows:

On 6 January 2022 the company Fidelidade - Consultoria e Gestão de Risco, Lda. was liquidated.

On 27 January 2022 the Group acquired 70,000 shares in The Prosperity Company AG ("TPC"), for EUR 27,513,859, resulting in it holding a 70% participation in the TPC Group, which comprises the following companies: Liechtenstein Life Assurance AG;



prosperity brokershome AG; prosperity solutions AG; prosperity solutions GmbH; prosperity cashtech AG; prosperity funds SICAV; prosperity brokershome GmbH.

In March the Group acquired a further 12.84% of the company EA One Holding, Inc. for EUR 5,691,792, resulting in it holding a 57% participation in the company's share capital (Note 5). This transaction is not classified as a Business Combination as defined in IFRS 3, and was therefore registered as an Asset Acquisition. As such, the difference between the value of the net assets acquired, which was EUR 6,383,346 at the acquisition date, and the value of the acquisition was registered under the heading "Investment Properties".

In March 2022 the Group increased the share capital of the company Worldwide Security Corporation S.A., resulting in it holding a 53.21% participation.

On 7 April 2022, the company Multi Health, S.A., was set up, with share capital of EUR 50,000, wholly owned by the Group.

On 1 June 2022 the company Fid Real Assets, SGPS, S.A., was set up, with share capital of EUR 50,000, wholly owned by the Group.

On 30 September 2022, Fidelidade acquired, from Fosun International Limited ("FIL"), 46,815,704 shares in Luz Saúde, S.A., representing 49% of the latter's share capital, for EUR 280,000.000.00 Euros, resulting in Fidelidade holding a 99.86% participation. This amount was paid partly by offsetting the amount of EUR 278,910,000 owed by FIL to Fidelidade, by way of capital and interest, under the Xingtao Bond, which was thus extinguished. The remaining amount was paid in cash.

In August 2022 the company Prosperity Brokershome GmbH was set up, with share capital of EUR 48,197, 70% of which is owned by the Group.

On 2 August 2022, the company Fid Real Assets Spain, S.L., was set up, with share capital of EUR 10,000, wholly owned by the Group.

In October 2022 the Group acquired 15,000 shares in the company Tenax Capital Limited for EUR 402,439, resulting in it holding an 80% participation.

In October 2022 there was a Public Tender Offer that culminated in the acquisition of 42.93% of La Positiva Seguros Y Reaseguros S.A by FID Peru S.A. for EUR 103,123,066. In the light of this transaction, the amount of the put option that was accounted for under the heading "Put option financial liability" was cancelled, and a zero balance was presented at 31 December 2022, as per Note 24. This acquisition resulted in a real increase in the participation of 2.43%.

In December 2022, the company FCM Beteiligungs GmbH was liquidated.

On 30 December 2022, the name of FSG Saúde – Fundo de Investimento de Imobiliário Fechado changed to IBERFID – Fundo de Investimento Imobiliário Fechado.



# a) Equity-type transactions, debt and asset transfer

Investor / lender name	Issuer / borrower name	Transaction type	Transaction issue date	Transaction maturity date	Currency	Contractual amount of transaction / Transaction price	Amount of redemptions/ prepayments/ paybacks during reporting period	Amount of dividends/interes t / coupons and other payments made during reporting period	Balance of contractual amount of transaction at reporting date	Coupon/ Interest rate
Fidelidade - Companhia de Seguros, S.A.	Garantia - Companhia de Seguros de Cabo Verde, S.A.	Shares and equity securities — Shares / participations	01/06/2022	31/12/9999	CVE	0	0	641	0	0
FID PERU S.A.	Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	B0B	0	0	1,556	0	0
Positiva Seguros y Reaseguros S.A.A	Alianza Vida Seguros y Reaseguros S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	BOB	0	0	15	0	0
Positiva Seguros y Reaseguros S.A.A	Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	BOB	0	0	184	0	0
Positiva Seguros y Reaseguros S.A.A	La Positiva S.A Entidad Prestadora de Salud	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	N BE	0	0	18	0	0
LA POSITIVA VIDA SEGUROS Y REASEGUROS, S.A.A.	Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	808	0	0	1,793	0	0
LA POSITIVA VIDA SEGUROS Y REASEGUROS, S.A.A.	Alianza Vida Seguros y Reaseguros S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	808	0	0	149	0	0
LA POSITIVA VIDA SEGUROS Y REASEGUROS, S.A.A.	La Positiva S.A Entidad Prestadora de Salud	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	PEN	0	0	36	0	0
Alianza Vida Seguros y Reaseguros S.A.	Alianza SAFI, S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	808	0	0	28	0	0
Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	Alianza Vida Seguros y Reaseguros S.A.	Shares and equity securities — Shares / participations	01/09/2022	31/12/9999	BOB	0	0	47	0	0
Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	Alianza SAFI, S.A.	Shares and equity securities — Shares / participations	01/05/2022	31/12/9999	BOB	0	0	39	0	0
Fidelidade - Companhia de Seguros, S.A.	GEP - Gestao de Peritagens Automoveis, S.A.	Shares and equity securities — Shares / participations	01/06/2022	31/12/9999	EUR	0	0	119	0	0
FID PERU S.A.	Positiva Seguros y Reaseguros S.A.A.	Bonds/Debts — uncollateralised	15/10/2018	31/12/9999	PEN	15,948	1,025	0	40	0,067950
Fidelidade - Companhia de Seguros, S.A.	Fidelidade - Consultoria e Gestao de Risco, Lda.	Shares and equity securities — Shares / participations	01/01/2022	31/12/9999	MZM	0	0	0	0	0
EAPS - EMPRESA DE ANALISE, PREVENCAO E SEGURANCA, S.A.	Fidelidade - Consultoria e Gestao de Risco, Lda.	Shares and equity securities — Shares / participations	01/01/2022	31/12/9999	MZN	0	0	0	0	0
FID CHILE & MT JV SpA	FID Chile Seguros Generales, S.A.	Shares and equity securities — Shares / participations	01/02/2022	31/12/9999	CLP	9,007	0	0	0	0
Fid Chile SpA	FID Chile Seguros Generales, S.A.	Shares and equity securities — Shares / participations	01/02/2022	31/12/9999	CLP	1	0	0	0	0
FIDELIDADE ASSISTENCIA - COMPANHIA DE SEGUROS, S.A.	CARES - Assistencia e Reparacoes, S.A.	Shares and equity securities — Shares / participations	01/02/2022	31/12/9999	EUR	-256	0	0	0	0
Fidelidade - Companhia de Seguros, S.A.	FID LatAm SGPS	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	EUR	100	0	0	0	0
Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	Worldwide Security Corporation S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	BOB	574	0	0	0	0



Fidelidade - Companhia de Seguros, S.A.	The Prosperity Company AG	Shares and equity securities — Shares / participations	31/01/2022	31/12/9999	H	27,514	0	0	0	0
MULTICARE - SEGUROS DE SAUDE, S.A.	Multi Health, S.A.	Shares and equity securities — Shares / participations	01/04/2022	31/12/9999	EUR	50	0	0	0	0
Fidelidade - Companhia de Seguros, S.A.	Fidelidade Angola, S.A.	Shares and equity securities — Shares / participations	01/12/2022	31/12/9999	AOA	0	0	759	0	0
GEP - GESTAO DE PERITAGENS, S.A.	Fidelidade - Assistencia e Servicos, Lda.	Shares and equity securities — Shares / participations	01/04/2022	31/12/9999	MZN	50	0	0	0	0
GEP - GESTAO DE PERITAGENS, S.A.	Fidelidade - Assistencia e Servicos, Lda.	Shares and equity securities — Shares / participations	01/06/2022	31/12/9999	MZN	50	0	0	0	0
SAP 1800	Fidelidade - Companhia de Seguros, S.A.	Shares and equity securities — Shares / participations	01/06/2022	31/12/9999	EUR	-164,977	0	0	0	0
CETRA - CENTRO TECNICO DE REPARACAO AUTOMOVEL, S.A.	Cetra Car Remarketing, S.A.	Shares and equity securities — Shares / participations	01/06/2022	31/12/9999	EUR	10	0	0	0	0
Fidelidade - Companhia de Seguros, S.A.	Fid Chile SpA	Shares and equity securities — Shares / participations	01/11/2022	31/12/9999	CLP	8,479	0	0	0	0
Fid Chile SpA	Fid Chile & MT JV SpA	Shares and equity securities — Shares / participations	01/11/2022	31/12/9999	CLP	8,478	0	0	0	0
Fid Chile SpA	FID Chile Seguros Generales, S.A.	Shares and equity securities — Shares / participations	01/11/2022	31/12/9999	CLP	8,540	0	0	0	0
FID CHILE & MT JV SpA	FID Chile Seguros Generales, S.A.	Shares and equity securities — Shares / participations	01/11/2022	31/12/9999	CLP	1	0	0	0	0
CETRA - CENTRO TECNICO DE REPARACAO AUTOMOVEL, S.A.	Cetra Car Remarketing, S.A.	Shares and equity securities — Shares / participations	01/11/2022	31/12/9999	EUR	10	0	0	0	0
FID PERU S.A.	Positiva Seguros y Reaseguros S.A.A.	Shares and equity securities — Shares / participations	01/11/2022	31/12/9999	PEN	109,442	0	0	0	0
Fidelidade - Companhia de Seguros, S.A.	Seguradora Internacional Mocambique, S.A.	Shares and equity securities — Shares / participations	01/04/2022	31/12/9999	MZN	0	0	3,835	0	0
Fidelidade - Companhia de Seguros, S.A.	FID PERU S.A.	Shares and equity securities — Shares / participations	01/12/2022	31/12/9999	PEN	91,947	0	0	0	0
FIDELIDADE ASSISTENCIA - COMPANHIA DE SEGUROS, S.A.	Fidelidade - Servicos de Assistencia, S.A.	Shares and equity securities — Shares / participations	01/12/2022	31/12/9999	EUR	4,098	0	0	0	0
FIDELIDADE ASSISTENCIA - COMPANHIA DE SEGUROS, S.A.	Fidelidade Angola, S.A.	Shares and equity securities — Shares / participations	01/12/2022	31/12/9999	AOA	0	0	3	0	0
MULTICARE - SEGUROS DE SAUDE, S.A.	Fidelidade Angola, S.A.	Shares and equity securities — Shares / participations	01/12/2022	31/12/9999	AOA	0	0	3	0	0
EAPS - EMPRESA DE ANALISE, PREVENCAO E SEGURANCA, S.A.	Fidelidade Angola, S.A.	Shares and equity securities — Shares / participations	01/12/2022	31/12/9999	AOA	0	0	3	0	0
Liechtenstein Life Assurance AG	Liechtenstein Life Assurance AG	Shares and equity securities — Shares / participations	01/06/2022	31/12/9999	CHF	0	0	2,488	0	0
FID PERU S.A.	Alianza Vida Seguros y Reaseguros S.A.	Shares and equity securities — Shares / participations	01/03/2022	31/12/9999	B0B	0	0	84	0	0



## b) <u>Derivatives, including the guarantees supporting any derivatives instruments</u>

In the Group structure at 31-12-2022, in particular FPI, FPE and FPE (Lux) and Luz Saúde were not consolidated, but reported to Adjusted Equity. In this group structure context, there are no intra-group derivative transactions, although there is a sales transaction agreed between Fidelidade, Companhia de Seguros S.A. and the minority shareholders of Seguradora Internacional de Moçambique, S.A.. on the date the latter company was purchased, and the resulting liability is recognised in Financial Liabilities other than debts owed to credit institutions for the amount of EUR 11,312 thousand.



# c) Reinsurance

		Type of		Validity period	Validity period	0	Maximum cover	No.	Table become	Reinsurance result
Name of cedant	Name of reinsurer	reinsurance contract / treaty	Line of Business	(start date)	(expiry date)	Currenc y	by reinsurer under contract / treaty	Net Receivables	Total reinsurance recoverables	(for reinsured entity)
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2022	31/12/2022	EUR	10,000	136	9	0
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	General liability insurance	01/01/2014	01/01/2022	EUR	6,000	-20	78	-16
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Facultative proportional	General liability insurance	01/01/2022	31/12/2022	EUR	3,000	-145	244	-396
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	General liability insurance	01/01/2021	01/01/2022	EUR	6,750	0	0	0
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	General liability insurance	01/01/2022	31/12/2022	EUR	600	0	1,065	139
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	General liability insurance	01/01/2022	31/12/2022	EUR	6,750	-2	0	-27
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Income protection insurance	01/01/2022	31/12/2022	EUR	30,000	-5	0	-27
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Income protection insurance	01/01/2021	01/01/2022	EUR	30,000	0	0	-1
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Income protection insurance	01/01/2018	01/01/2022	EUR	25,000	0	0	0
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Income protection insurance	01/01/2016	01/01/2022	EUR	25,000	-74	36	-73
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Motor vehicle liability insurance	01/01/2019	01/01/2022	EUR	57,500	-46	557	-39
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Motor vehicle liability insurance	01/01/2022	31/12/2022	EUR	2,250	0	0	87
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Motor vehicle liability insurance	01/01/2022	31/12/2022	EUR	57,500	-25	0	-105
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Motor vehicle liability insurance	01/01/2021	01/01/2022	EUR	57,500	108	158	91
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Motor vehicle liability insurance	01/01/2020	01/01/2022	EUR	57,500	13	19	11
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Motor vehicle liability insurance	01/01/2014	01/01/2022	EUR	45,000	-58	0	-48
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per event and per risk)	Non-proportional health reinsurance	01/01/2022	31/12/2022	EUR	2,300	0	0	52
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Workers' compensation insurance	01/01/2020	01/01/2022	EUR	30,000	53	77	80
Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Workers' compensation insurance	01/01/2021	01/01/2022	EUR	30,000	-31	0	-48



Fidelidade - Companhia de Seguros, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per risk)	Workers' compensation insurance	01/01/2022	31/12/2022	EUR	30,000	-14	0	-124
Fidelidade - Companhia de Seguros, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Assistance	01/01/2022	31/12/2022	EUR	0	-3,126	-3,064	-38,107
Fidelidade - Companhia de Seguros, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	0	771	0	-1,769
Fidelidade - Companhia de Seguros, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	General liability insurance	01/01/2022	31/12/2022	EUR	0	119	0	-88
Fidelidade - Companhia de Seguros, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	01/01/2022	31/12/2022	EUR	0	261	-24,671	-707
Fidelidade - Companhia de Seguros, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Income protection insurance	01/01/2022	31/12/2022	EUR	0	-125	0	-1,905
Fidelidade - Companhia de Seguros, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Legal expenses insurance	01/01/2022	31/12/2022	EUR	0	1,435	0	-3,289
Fidelidade - Companhia de Seguros, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Workers' compensation insurance	01/01/2022	31/12/2022	EUR	0	-471	0	-6,862
Fidelidade - Companhia de Seguros, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Health reinsurance	01/01/2022	31/12/2022	EUR	0	-6,124	93,317	-45,820
Fidelidade - Companhia de Seguros, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Health reinsurance	01/01/2020	01/01/2022	EUR	0	2	-29	14
Fidelidade - Companhia de Seguros, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Health reinsurance	01/01/2021	01/01/2022	EUR	0	7	-103	51
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	EUR	35,500	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	OSN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2021	01/01/2022	EUR	27,364	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/12/2019	01/01/2022	EUR	18,506	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	EUR	80	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2016	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	EUR	27,364	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	EUR	27,364	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/12/2021	30/11/2022	EUR	18,506	0	0	0



COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	EUR	11,080	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	09/01/2017	01/01/2022	OSD	6,914	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	02/06/2016	01/01/2022	OSD	30,565	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	asn	3,402	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	09/01/2019	01/01/2022	asn	6,914	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	15/03/2017	01/01/2022	asn	3,750	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/07/2020	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	EUR	80	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2016	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2016	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	USD	13,110	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	04/04/2016	01/01/2022	EUR	56,800	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	EUR	9,299	0	1	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/12/2020	01/01/2022	EUR	18,506	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	OSD	13,110	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	09/01/2021	08/01/2022	OSD	6,914	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2018	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	08/03/2019	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2021	01/01/2022	MZM	0	46	3	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	09/01/2020	01/01/2022	OSD	6,914	0	0	0



COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2018	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/07/2019	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2018	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2021	01/01/2022	MZN	0	0	25	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZN	30,605	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2016	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2022	31/12/2022	OSN	3,402	0	11	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	09/01/2018	01/01/2022	OSD	6,914	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2018	01/01/2022	MZN	0	0	1	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	17/04/2020	01/01/2022	OSN	4,373	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2021	01/01/2022	MZM	0	0	9	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	asn	0	0	3	0



COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	EUR	55,200	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2018	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	17/04/2019	01/01/2022	USD	4,373	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2022	31/12/2022	MZN	0	68	48	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	16/12/2013	01/01/2022	MOP	22,705	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional fire and other damage to property reinsurance	01/01/2017	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	28/08/2019	01/01/2022	OSD	3,052	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	15/02/2017	01/01/2022	EUR	3,000	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2020	01/01/2022	OSD	3,402	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2018	01/01/2022	asn	3,402	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/07/2017	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	20/10/2016	01/01/2022	EUR	2,607	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2019	01/01/2022	asn	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/12/2017	01/01/2022	EUR	18,506	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	11/12/2015	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/01/2021	01/01/2022	OSD	3,402	158	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/07/2016	01/01/2022	EUR	0	0	214	-428
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	06/10/2018	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/12/2018	01/01/2022	EUR	18,506	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	03/05/2020	01/01/2022	USD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	06/10/2019	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	03/05/2019	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	03/05/2018	01/01/2022	OSD	0	0	0	0



COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2012	01/01/2022	EUR	0	0	48	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional general liability reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional general liability reinsurance	01/01/2017	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2019	01/01/2022	EUR	0	0	189	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/01/2019	01/01/2022	EUR	4,000	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/01/2018	01/01/2022	EUR	4,000	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/01/2017	01/01/2022	EUR	4,000	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional general liability reinsurance	01/01/2018	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2020	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2019	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2020	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2020	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2019	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	15/05/2019	01/01/2022	OSD	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional general liability reinsurance	01/07/2014	01/01/2022	EUR	0	0	11	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional marine, aviation and transport reinsurance	01/01/2019	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional marine, aviation and transport reinsurance	01/01/2018	01/01/2022	MZN	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional marine, aviation and transport reinsurance	19/02/2018	01/01/2022	EUR	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	Proportional medical expense reinsurance	01/01/2019	01/01/2022	MZM	0	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional medical expense reinsurance	27/04/2019	01/01/2022	OSD	2,220	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional medical expense reinsurance	27/04/2018	01/01/2022	OSD	2,220	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional motor vehicle liability reinsurance	14/01/2019	01/01/2022	asn	82	0	0	0
COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Non-proportional health reinsurance	01/01/2020	01/01/2022	MZM	0	0	0	0



CORPANSA PRITICUSEALE   FEBRIANCE COMPANIES   RECORDS   FEBRIANCE COMPANIES   RECORDS   RECORD										
RESISTICATION S. A. SCRIPCOS SA. POELLANGE CORPHINAN RESISTICATION S. A. POELLANGE COR			Non-proportional health reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
RESSEGUAGO, S.A.  SEGUAGO S.A.  COMPANIA PORTIJUERADE DE PELLANDE COMPANIA PROCESSOR SEGUAGO SE SEG			Non-proportional health reinsurance	01/01/2018	01/01/2022	MZM	0	0	0	0
RESSECUTION, S. A. SECURIOS S. A. SE		Quota share	Proportional other motor reinsurance	01/01/2019	01/01/2022	MZN	0	0	0	0
Companyage of profit Questions   Security		Quota share	Proportional other motor reinsurance	01/01/2019	01/01/2022	MZN	0	0	23	0
RESSCURIOS S.A.  COMPANIAN PORTUCUESADE  RESSCURIOS S.A.  FORLANDA PORTUCUESADE  RESSCURIOS S.A.  FORLANDA COMPANIAN  FORLANDA PORTUCUESADE  RESSCURIOS S.A.  COMPANIAN PORTUCUESADE  RESSCURIOS S.A.  FORLANDA COMPANIAN  FORLANDA PORTUCUESADE  RESSCURIOS S.A.  COMPANIAN PORTUCUESADE  RESSCURIOS S.A.  FORLANDA COMPANIAN  FORLANDA PORTUCUESADE  RESSCURIOS S.A.  COMPANIAN PORTUCUESADE  RESSCURIOS S.A.  COMPA		Quota share	Proportional other motor reinsurance	01/01/2018	01/01/2022	MZN	0	0	0	0
RESSEQUIROS S.A  COURMANHA PORTIQUESADE  RESSEQUIROS S.A  FIDELIDADE COMPANHA  COURMANHA PORTIQUESADE  RESSEQUIROS S.A  FIDELIDADE COMPANHA  COURMANHA PORTIQUESADE  RESSEQUIROS S.A  FIDELIDADE COMPANHA  COURMANHA PORTIQUESADE  RESSEQUIROS S.A  COMPANHA PORTIQUESADE  RESSEQUIROS S.A  FIDELIDADE COMPANHA  COMPANHA PORTIQUESADE  RESSEQUIROS S.A  COMPANHA PORTIQUESADE		Quota share	Proportional other motor reinsurance	01/01/2018	01/01/2022	MZN	0	0	10	-67
RESSEGUROS S.A.  COMPANHA PORTIQUIESA DE FOELDADE COMPANHA SEQUIROS SA COMPANHA PORTIQUIESA DE FOELDADE COMPANHA SEQUIROS SA SA SOURCES SA SOUR		Quota share	Proportional other motor reinsurance	01/01/2017	01/01/2022	MZN	0	0	0	0
RESSEGUROS, S.A.  SEGUROS SA  ODDIPAMENTA PORTUCULESA DE  RESSEGUROS, S.A.  COMPANENTA PORTUCULESA DE  RESSEGUROS, S.A.  FÜELLOADE COMPANHA  SEGUROS SA  COMPANHA PORTUCULESA DE  RESSEGUROS, S.A.  FÜELLOADE COMPANHA  CONTRANHA PORTUCULESA DE  RESSEGUROS, S.A.  SEGUROS SA  COMPANHA PORTUCULESA DE  RESSEGUROS, S.A.  FÜELLOADE COMPANHA  FÜELLOADE COMPAN		Quota share	Proportional other motor reinsurance	01/01/2017	01/01/2022	MZN	0	0	24	0
RESSECUROS, S.A.  SECUROS SA  COMPANHIA PORTUGUESA DE  RESSECUROS, S.A.  FIDELIDADE COMPANHIA SECUROS SA  COMPANHIA PORTUGUESA DE  RESSECUROS, S.A.  FIDELIDADE COMPANHIA SECUROS SA  COMPANHIA PORTUGUESA DE  RESSECUROS, S.A.  FIDELIDADE COMPANHIA SECUROS SA  COMPANHIA PORTUGUESA DE  RESSECUROS, S.A.  FIDELIDADE COMPANHIA SECUROS SA  COMPANHIA PORTUGUESA DE  RESSECUROS, S.A.  SECUROS SA  SECUROS SA  COMPANHIA PORTUGUESA DE  RESSECUROS, S.A.  SECUROS SA  SECUROS SA  SECUROS SA  SECUROS SA  SECUROS SA  COMPANHIA DE SECUROS, S.A.  SECUROS SA  SECUROS		Quota share	Proportional other motor reinsurance	01/01/2016	01/01/2022	OSD	0	0	15	0
RESSEGUROS, S.A.  COMPANHA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHA DE SEGUROS, S.A.  VIA DIRECTA - COMPANHA DE SEGUROS, S.A.  FIDELIDADE COMPANHA E EXCENDAN A SEGUROS SA  VIA DIRECTA - COMPANHA DE SEGUROS, S.A.  FIDELIDADE COMPANHA E EXCENDAN A SEGUROS SA  VIA DIRECTA - COMPANHA DE SEGUROS, S.A.  FIDELIDADE COMPANHA SEGUROS		Quota share	Proportional other motor reinsurance	01/01/2016	01/01/2022	asn	0	0	0	0
RESSEGUROS, S.A.    SEGUROS SA   Quota share   Proportional other motor transurance   O101/2015   O101/2022   S   O   O   O   O   O		Quota share	Proportional other motor reinsurance	01/01/2015	01/01/2022	asn	0	0	0	0
RESSEGUROS, S.A.  SEQUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA SEQUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEQUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEQUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEQUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEQUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  COMPANHIA PORTUGUESA DE RESSEGUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  VIA DIRECTA - COMPANHIA DE SEGUROS,  S.A.  VIA DIRECTA - COMPANHIA DE SEGUROS,  S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  Surplus  Fire and other damage to property insurance  O1/01/2022  SI/1/2/2022  D 0 0 154  O 2-24  O 3-37  VIA DIRECTA - COMPANHIA DE SEGUROS,  S.A.  SIPLELIDADE COMPANHIA  SEGUROS SA  Surplus  Fire and other damage to property insurance  O1/01/2022  O 3-64  O 3-7  O 4-7  O 5-84  VIA DIRECTA - COMPANHIA DE SEGUROS,  S.A.  SEGUROS SA  Surplus  Fire and other damage to property insurance  O1/01/2022  O 1/01/2022  O 7-7  O 8-24  VIA DIRECTA - COMPANHIA DE SEGUROS,  S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  SURPLUS  Fire and other damage to property insurance  O1/01/2022  O 0 7-7  O 0 0 153  CM 153  CM 154  CM 155		Quota share	Proportional other motor reinsurance	01/01/2015	01/01/2022	OSD	0	0	0	0
RESSEGUROS, S.A.  SEGUROS SA  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  Quota share  Proportional workers' compensation reinsurance  1904/2018  01/01/2012  17.764  0 0 0  0  0  0  COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.  FIDELIDADE COMPANHIA  SEGUROS SA  Quota share  Proportional workers' compensation reinsurance  01/01/2019  01/01/2022  00 0 1 1 0  00  00  00  00  00  00  00		Quota share	Proportional workers' compensation reinsurance	01/01/2016	01/01/2022	asn	0	0	0	0
RESSEGUROS, S.A. SEGUROS SA proportional Proportional workers compensation reinsurance 19/4/2016 01/01/2022 5 1,764 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		Quota share	Proportional workers' compensation reinsurance	01/01/2015	01/01/2022	asn	0	0	0	0
RESSEGUROS, S.A.         SEGUROS SA         Quota share         Proportional workers compensation reinsurance         01/01/2018         01/01/2012         © 0         0         1         0           COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.         FIDELIDADE COMPANHIA SEGUROS SA         FIDELIDADE COMPANHIA SEGUROS SA         Quota share         Proportional workers' compensation reinsurance         01/01/2018         01/01/2022         \$\text{\text{\$\text			Proportional workers' compensation reinsurance	19/04/2018	01/01/2022	OSD	1,764	0	0	0
RESSEGUROS, S.A.  SEGUROS SA  GUIda share  Proportional workers compensation reinsurance  U1/01/2018  U1/01/2018  U1/01/2012		Quota share	Proportional workers' compensation reinsurance	01/01/2019	01/01/2022	MZN	0	0	1	0
RESSEGUROS, S.A.  SEGUROS SA  UIA DIRECTA - COMPANHIA DE SEGUROS, S.A.  VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.  FIDELIDADE COMPANHIA SEGUROS, S.A.  VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.  FIDELIDADE COMPANHIA SURPLUS Fire and other damage to property insurance  01/01/2022  31/12/2022		Quota share	Proportional workers' compensation reinsurance	01/01/2018	01/01/2022	MZM	0	0	153	-3
SA. SEGUROS SA event) Fire and other damage to property insurance 01/01/2022 31/12/2022		Quota share	Proportional workers' compensation reinsurance	01/01/2017	01/01/2022	MZN	0	0	9	28
S.A. SEGUROS SA Surplus Fire and other damage to property insurance 01/01/2022 31/12/2022 3 0 -4 0 -37  VIA DIRECTA - COMPANHIA DE SEGUROS, S.A. Surplus Fire and other damage to property insurance 01/01/2022 31/12/2022 3 0 -64 154 -123  VIA DIRECTA - COMPANHIA DE SEGUROS, S.A. Surplus Fire and other damage to property insurance 01/01/2022 31/12/2022 3 0 -64 154 -123  VIA DIRECTA - COMPANHIA DE SEGUROS, S.A. Surplus Fire and other damage to property insurance 01/01/2021 01/01/2022 3 0 0 -7 3 82  VIA DIRECTA - COMPANHIA DE SEGUROS, FIDELIDADE COMPANHIA SURPLUS Fire and other damage to property insurance 01/01/2020 01/01/2022 5 0 0 -7 3 82			Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	6,500	0	0	-72
S.A. SEGUROS SA Surplus Fire and other damage to property insurance 01/01/2022 31/12/2022		Surplus	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	0	-4	0	-37
S.A. SEGUROS SA Surplus Fire and other damage to property insurance U1/01/2021 U1/01/2022 $\stackrel{\frown}{\Box}$ U -/ 3 62  VIA DIRECTA - COMPANHIA DE SEGUROS, FIDELIDADE COMPANHIA Surplus Fire and other damage to property insurance U1/01/2020 $\stackrel{\frown}{\Box}$ U -/ 3 62		Surplus	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	0	-64	154	-123
		Surplus	Fire and other damage to property insurance	01/01/2021	01/01/2022	EUR	0	-7	3	82
		Surplus	Fire and other damage to property insurance	01/01/2020	01/01/2022	EUR	0	0	153	54



VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Surplus	Fire and other damage to property insurance	01/01/2019	01/01/2022	EUR	0	-1	7	-1
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Surplus	Fire and other damage to property insurance	01/01/2018	01/01/2022	EUR	0	0	0	-8
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Surplus	Fire and other damage to property insurance	01/01/2017	01/01/2022	EUR	0	0	0	-14
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Income protection insurance	01/01/2022	31/12/2022	EUR	410	0	0	-5
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2022	31/12/2022	EUR	2,000	0	264	-929
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2021	01/01/2022	EUR	2,000	0	274	69
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2020	01/01/2022	EUR	2,000	0	144	-19
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2015	01/01/2022	EUR	2,000	0	5	-2
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2014	01/01/2022	EUR	2,000	0	5	-15
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2019	01/01/2022	EUR	2,000	0	187	-158
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2018	01/01/2022	EUR	2,000	0	1,462	-106
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2017	01/01/2022	EUR	2,500	7	2,065	-33
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2016	01/01/2022	EUR	2,000	0	21	-30
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event)	Motor vehicle liability insurance	01/01/2012	01/01/2022	EUR	2,000	0	751	-1
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Excess of loss (per event and per risk)	Motor vehicle liability insurance	01/01/2017	01/01/2022	EUR	2,875	14	15	-1
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Assistance	01/01/2022	31/12/2022	EUR	0	-399	-3,405	-5,274
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Legal expenses insurance	01/01/2022	31/12/2022	EUR	0	144	-272	-280
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2020	01/01/2022	EUR	0	0	0	0
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2016	01/01/2022	EUR	0	0	0	0
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2015	01/01/2022	EUR	0	0	0	0
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2021	01/01/2022	EUR	0	0	4	-65
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2019	01/01/2022	EUR	0	0	0	0



VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2018	01/01/2022	EUR	0	0	0	0
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2017	01/01/2022	EUR	0	0	0	0
VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Quota share	Medical expenses insurance	01/01/2022	31/12/2022	EUR	0	-23	100	-37
MULTICARE - SEGUROS DE SAUDE, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Medical expenses insurance	01/01/2016	31/12/2022	EUR	0	67	0	-1,014
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Income protection insurance	01/01/2022	31/12/2022	asn	50,000	-2	0	0
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Marine, aviation and transport insurance	01/01/2022	31/12/2022	asn	20,000	-4	0	0
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Marine, aviation and transport insurance	01/01/2022	31/12/2022	asn	40,000	-28	1,459	-783
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Proportional motor vehicle liability reinsurance	01/01/2022	31/12/2022	asn	7,500	-9	0	0
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Proportional other motor reinsurance	01/01/2022	31/12/2022	OSD	20,000	-6	0	0
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Workers' compensation insurance	01/01/2022	31/12/2022	asn	1,000	-40	0	0
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Assistance	01/01/2022	31/12/2022	AOA	0	-160	12	-99
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Assistance	01/01/2022	31/12/2022	AOA	0	-58	14	-45
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Legal expenses insurance	01/01/2022	31/12/2022	AOA	0	-1	0	-2
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Medical expenses insurance	01/01/2022	31/12/2022	AOA	0	-196	7	-90
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	MULTICARE SEGUROS SAUDE SA	Stop loss	Health plan	01/01/2020	01/01/2022	EUR	0	-1,759	316	-14
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	14/10/2022	13/10/2023	EUR	3,398	-2	10	7
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	0	0	129	0
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	13/07/2022	12/07/2023	EUR	82,924	0	21	-63
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	06/11/2020	01/01/2022	EUR	12,460	0	0	0
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/06/2021	31/05/2022	EUR	43,475	0	47	-14
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/09/2022	31/08/2023	EUR	11,469	0	5	-7
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	3,268	0	0	-1
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	34,493	0	0	-6
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/01/2019	01/01/2022	EUR	6,367	0	0	0



FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/11/2021	31/10/2022	EUR	12,624	0	0	-71
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	30/11/2021	29/11/2022	EUR	179,568	0	0	-49
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	11/08/2019	01/01/2022	EUR	27,979	0	0	0
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	03/05/2022	02/05/2023	EUR	22,534	-13	16	-12
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	87,485	0	0	-146
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Proportional fire and other damage to property reinsurance	01/07/2016	01/01/2022	EUR	11,722	0	0	0
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	General liability insurance	15/06/2021	22/06/2027	EUR	350	0	3	-1
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	General liability insurance	17/08/2020	17/12/2027	EUR	525	0	4	-1
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Medical expenses insurance	01/01/2022	31/12/2022	EUR	0	0	0	0
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Medical expenses insurance	11/11/2019	01/01/2022	EUR	1,743	0	0	0
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Medical expenses insurance	01/03/2022	28/02/2023	EUR	1,750	0	1	-7
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Miscellaneous financial loss	01/09/2019	01/01/2022	EUR	4,809	0	0	0
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Facultative proportional	Miscellaneous financial loss	01/07/2022	30/06/2023	EUR	32,325	0	10	-24
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	COMPANHIA PORTUGUESA RESSEGUROS, SA	Facultative proportional	Health plan	16/12/2013	01/01/2022	EUR	25,786	0	14	-5
Seguradora Internacional Mocambique, SA (SIM)	COMPANHIA PORTUGUESA RESSEGUROS, SA	Surplus	Fire and other damage to property insurance	01/01/2022	31/12/2022	MZM	0	30	628	230
Seguradora Internacional Mocambique, SA (SIM)	COMPANHIA PORTUGUESA RESSEGUROS, SA	Surplus	General liability insurance	01/01/2022	31/12/2022	MZM	0	4	0	28
Seguradora Internacional Mocambique, SA (SIM)	COMPANHIA PORTUGUESA RESSEGUROS, SA	Surplus	Income protection insurance	01/01/2022	31/12/2022	MZM	0	1	0	5
Seguradora Internacional Mocambique, SA (SIM)	COMPANHIA PORTUGUESA RESSEGUROS, SA	Surplus	Marine, aviation and transport insurance	01/01/2022	31/12/2022	MZM	0	3	0	22
Seguradora Internacional Mocambique, SA (SIM)	COMPANHIA PORTUGUESA RESSEGUROS, SA	Surplus	Medical expenses insurance	01/01/2022	31/12/2022	MZM	0	19	0	143
Seguradora Internacional Mocambique, SA (SIM)	COMPANHIA PORTUGUESA RESSEGUROS, SA	Surplus	Other motor insurance	01/01/2022	31/12/2022	MZM	0	18	216	142
Seguradora Internacional Mocambique, SA (SIM)	COMPANHIA PORTUGUESA RESSEGUROS, SA	Surplus	Workers' compensation insurance	01/01/2022	31/12/2022	MZN	0	27	56	204
Seguradora Internacional Mocambique, SA (SIM)	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Assistance	01/01/2022	31/12/2022	MZM	0	-32	3	-233
Seguradora Internacional Mocambique, SA (SIM)	FIDELIDADE ASSIST COMP SEGUROS SA	Quota share	Legal expenses insurance	01/01/2022	31/12/2022	MZN	0	-3	0	-22



Seguradora Internacional Mocambique, SA (SIM)	MULTICARE SEGUROS SAUDE SA	aggregate excess of loss	Medical expenses insurance	01/01/2022	31/12/2022	MZN	0	-370	70	-371
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Other proportional treaties	Fire and other damage to property insurance	01/01/2022	31/12/2022	EUR	4,535	-99	39	-270
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	General liability insurance	01/01/2022	31/12/2022	EUR	6,750	-39	13	-23
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Quota share	General liability insurance	01/01/2022	31/12/2022	EUR	700	-33	51	-75
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Stop loss	Health plan	01/01/2022	31/12/2022	EUR	30	-11	0	-8
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Income protection insurance	01/01/2022	31/12/2022	EUR	30,000	0	2	-11
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Other proportional treaties	Income protection insurance	01/01/2022	31/12/2022	EUR	30,000	-7	18	3
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Marine, aviation and transport insurance	01/01/2022	31/12/2022	EUR	13,000	0	1	-26
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Other proportional treaties	Marine, aviation and transport insurance	01/01/2022	31/12/2022	EUR	544	0	5	0
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Other proportional treaties	Marine, aviation and transport insurance	01/01/2022	31/12/2022	EUR	1,333	-4	3	0
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Other proportional treaties	Marine, aviation and transport insurance	01/01/2022	31/12/2022	EUR	2,267	17	161	-240
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Motor vehicle liability insurance	01/01/2022	31/12/2022	EUR	765	-16	219	-22
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Excess of loss (per event and per risk)	Workers' compensation insurance	01/01/2022	31/12/2022	EUR	9,000	4	303	-4
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Facultative proportional	Assistance	01/01/2022	31/12/2022	EUR	33	-76	33	-287
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	MULTICARE SEGUROS SAUDE SA	Stop loss	Health plan	01/01/2022	31/12/2022	EUR	3	-25	12	1



# d) Internal cost sharing, contingent liabilities (other than derivatives) and off balance sheet items and other types of intragroup transactions

Investor / buyer / beneficiary name	Issuer / seller provider name	Transaction type	Trigger event	Transaction issue date	Currency	Value of transaction/ collateral/ guarantee
Fidelidade - Companhia de Seguros, S.A.	E.A.P.S Empresa de Analise, Prevencao e Seguranca, S.A.	Internal cost sharing	Assignment of employees	31/12/2022	EUR	118
FIDELIDADE ASSISTENCIA - COMPANHIA DE SEGUROS, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Internal cost sharing	Assignment of employees	31/12/2022	EUR	686
MULTICARE - SEGUROS DE SAUDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Internal cost sharing	Assignment of employees	31/12/2022	EUR	3,891
Fidelidade - Companhia de Seguros, S.A.	E.A.P.S Empresa de Analise, Prevencao e Seguranca, S.A.	Internal cost sharing	External supplies and services	31/12/2022	EUR	1,142
FIDELIDADE - SERVICOS DE ASSISTENCIA, S.A.	FIDELIDADE ASSIST COMP SEGUROS SA	Internal cost sharing	External supplies and services	31/12/2022	EUR	546
MULTICARE - SEGUROS DE SAUDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Internal cost sharing	External supplies and services	31/12/2022	EUR	1,202
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	Universal - Assistencia e Servicos, Lda.	Internal cost sharing	External supplies and services	31/12/2022	EUR	563
MULTICARE - SEGUROS DE SAUDE, S.A.	FIDELIDADE COMPANHIA SEGUROS SA	Internal cost sharing	External supplies and services	31/12/2022	EUR	431

# B. System of Governance





During the period covered by this report, there were no material changes in the Company's system of governance.

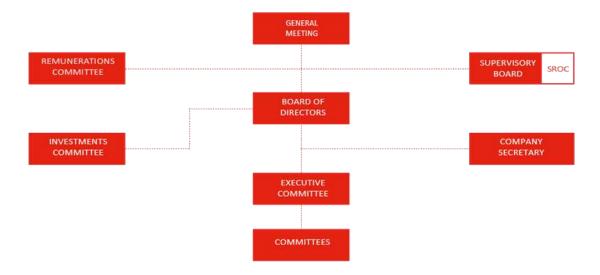
# B.1. General information on the system of governance

#### B.1.1. Corporate governance structure

Corporate governance involves a series of relationships between the management of the Company, its shareholders and other stakeholders, by means of which the Company's objectives are defined, and also the means by which these will be achieved and monitored.

Fidelidade adopts a unitary corporate governance model with a Board of Directors which includes an Executive Committee and a supervisory body comprising a Supervisory Board and a Statutory Auditor.

The figure below represents Fidelidade's Corporate Governance structure during 2022:



The main competences of the bodies included in the corporate governance structure are:

#### GENERAL MEETING

Resolutions of the General Meeting are approved by a majority of the votes of the shareholders present or represented at the General Meeting, whenever the law or the Articles of Association do not require a greater number (Article 11(2) of the Articles of Association).

Resolutions concerning any amendments to the Articles of Association, including amendment of the corporate purpose, an increase or reduction in the share capital, merger, demerger, transformation and dissolution of the Company, suppression or reduction of the preference right of the Company shareholders in increases in share capital, cancellation of shares representing the share capital, the suspension or cessation of the exercise of the principal activity included in the Company's corporate purpose, authorisation for the sale and purchase of own shares when this is not realised on a pro-rata basis, and the appointment of the Company's supervisory body and the respective external auditor when this is not one of the four largest international auditing companies, may only be approved if a vote in favour is achieved with a majority of at least 95% of the voting rights representing the entirety of the share capital.



#### **BOARD OF DIRECTORS**

The Board of Directors is composed of at least five and at most seventeen members, elected for mandates of three years, which are renewable.

As one of the Company's corporate bodies, the Board of Directors has the broadest of powers to manage and represent the Company. Pursuant to Article 15(1) of the Company's Articles of Association, in addition to the general powers given to it by law, the Board of Directors is responsible for:

- Managing the Company business and performing all the acts and operations related to the corporate purpose which do not fall within the competence of other Company bodies;
- Representing the Company in and out of court, actively and passively, with the power to withdraw, settle and accept liability in any proceedings, and also entering into arbitration agreements;
- Acquiring, selling or otherwise disposing of or encumbering movable and immovable rights and property;
- Setting up companies, subscribing, acquiring, pledging and disposing of shares;
- Establishing the technical and administrative organisation of the Company and the rules of internal operation, namely regarding employees and their remuneration;
- Appointing legal representatives, with the powers it deems appropriate, including those of delegation.

#### **EXECUTIVE COMMITTEE**

Without prejudice to the possibility of rescinding powers delegated to the Executive Committee, the Board of Directors has delegated the day-to-day management of the Company to this committee, which includes:

- All insurance and reinsurance operations and operations which are connected or complementary to insurance and reinsurance operations, including those which relate to acts and contracts regarding salvage, the rebuilding and repair of real estate, vehicle repair, and the application of provisions, reserves and capital;
- Representation of the Company before the supervisory authorities and associations for the sector;
- Acquisition of services;
- Employee admissions, definition of levels, categories, remuneration conditions and other benefits, and appointment to management positions;
- Exercise of disciplinary powers and the application of any sanctions;
- Representation of the Company before any bodies which represent the employees;
- Opening and closing of branches or agencies;
- Nomination of the person representing the Company at the general meetings of companies in which it holds shares, with determination of how the vote is to be cast;
- Nomination of the persons who will take up company positions for which the Company is elected, and the persons that the Company will indicate to take up company positions in companies in which it holds a share;
- Issuing of instructions which are binding on the companies which are in a group relationship with the Company involving full control;
- Representation of the Company in and out of court, actively and passively, including initiating and defending any judicial
  or arbitration proceedings, and accepting liability in, withdrawing from or settling any actions, and assuming arbitration
  commitments;
- Appointment of legal representatives, with or without power of attorney, to perform certain acts, or categories of acts, with definition of the scope of the respective mandates.

The delegation of powers to the Executive Committee does not cover matters which remain the exclusive competence of the Board of Directors.



#### **INVESTMENTS COMMITTEE**

All of the Company's investment decisions are subject to supervision by the Investments Committee, and the Executive Committee reports operations performed to the Investments Committee.

# **REMUNERATIONS COMMITTEE**

The Remunerations Committee is responsible for establishing the remuneration of the members of the Company's corporate bodies.

The members of the Remunerations Committee are persons who, given their professional experience and curriculum vitae, have the appropriate knowledge and profile with regard to remuneration policy issues.

The Remunerations Committee submitted a declaration to the General Meeting of 31 March 2022, on the Remuneration Policy for the members of the respective management and supervisory bodies, which was approved by all the shareholders present or represented.

#### SUPERVISORY BOARD AND STATUTORY AUDITOR

Supervision of the Company is charged, pursuant to Article 413(1) a) of the Code of Commercial Companies, to a Supervisory Board and a Statutory Auditor, with the competences set out in law and the current mandate of which corresponds to the period 2020/2022.

The Company's Articles of Association establish the Supervisory Board's competences as those which are set out in the law.

#### **COMPANY SECRETARY**

The Company Secretary is a Corporate Body, appointed by the Board of Directors, which, besides ensuring the legal functions of Company Secretary in the companies in the Fidelidade Group where so appointed, coordinates the Company Secretariat, a Structural Body that reports directly to the Executive Committee and guarantees the corporate governance function of all the companies in the Fidelidade Group, in Portugal and abroad.

#### **COMMITTEES**

The specific committees operate according to competences delegated by the Executive Committee, without prejudice to the subsequent ratification of their decisions by the management body.

The specific committees are, therefore, structures which report to the Executive Committee, which delegates competences to them, and are intermediary decision-making bodies.

Accordingly, the specific committees are decision-making bodies set up to assess and decide on proposals regarding different areas of the day-to-day management.

Furthermore, the competence delegated to each of the specific committees is limited exclusively to acts of day-to-day management regarding matters which are the responsibility of the structural bodies which include each of the committees, as permanent members.

#### B.1.2. Internal governance

Internal governance is the responsibility of the executive management body and its main concerns are to define the Company's business objectives and risk appetite, the organisation of the Company's business, the granting of responsibilities and authority, the reporting lines and the information that must be provided, as well as the organisation of the internal control system.

The Company guarantees an adequate separation of functions and delegation of responsibilities, by approving each structural body's organic and functional structure, defining its scope and general aims, the related organisational chart and main functions, and appointing its heads.



Means of internal communication are defined for transmitting decisions and resolutions of the Executive Committee, for presenting decision-making proposals and for communication between the structural bodies.

To guarantee an adequate connection between corporate governance, personified in the Executive Committee, and the organisational structure, which ensures the greatest consistency and implementation of the Company's executive management, the members of the Executive Committee are given areas of governance, so that each of them is responsible for monitoring a group of structural bodies.

#### INTERNATIONAL GOVERNANCE MODEL

In the international sphere, investment in strengthening the Governance Model is through consolidation of internal teams, their structures and the way these operate. This process began with changes at central level and in the international operations and is now consolidated, with a review in progress to increase teams' performance even further and strengthen processes.

In general terms, all the companies are very homogeneous in terms of respect for regulations and the local context, coherent representation and adequate articulation with the Group.

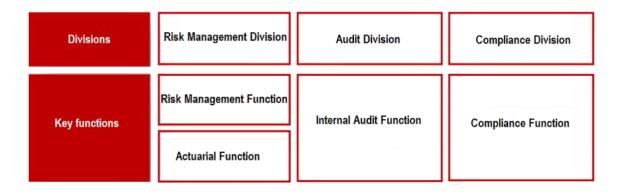
Representation follows specific guidelines, which include the mandatory representation of three members of Fidelidade in the local governance.

The international model comprises a governance body that operates in two areas: independently and dependently, reporting to the central Board.

#### B.1.3. Key functions

The key functions established within the risk management and internal control systems in the Fidelidade Group's insurance area have policies, processes and procedures aligned with the business strategy and operations, guaranteeing sound and prudent management of the business. Accordingly, Group-wide key functions are established, in risk management, internal audit, actuarial and compliance, within the scope of the risk management and internal control systems, which are guaranteed by the Risk Management Division, the Audit Division and the Compliance Division.

The key functions established within the risk management and internal control systems are given to the following bodies:



The following functions are defined for these bodies:

#### B.1.3.1. Risk Management Function

- Ensuring information is produced and made available to support decision-making, both by the Executive Committee and by the other decision-making bodies;
- Ensuring the development, implementation and maintenance of a risk management system which enables all material
  risks to which the Insurers and the group are exposed to be identified, assessed and monitored;
- Assessing and monitoring the current and future solvency situation;



- Identifying, assessing and monitoring the market risks and counterparty credit risks;
- Monitoring compliance with the defined level of liquidity and coverage of estimated payments by estimated receipts;
- Identifying, assessing and monitoring operational risks incurred in the insurance group, as well as identifying and characterising the existing control tools;
- Diagnosing and identifying improvements in the operational risk management and internal control systems;
- Assessing and monitoring the risk mitigation instruments, namely Reinsurance;
- Identifying, assessing and monitoring underwriting risks and the credit risk of instruments to mitigate those risks, and preparing information to support decision-making.
- Revising the medium-term Capital Management Plan and respective Contingency Plans;
- Coordinating and conducting the annual ORSA exercise:
- Ensuring that the report on mechanisms and procedures to be adopted specifically within the scope of the Policy for the
  prevention, detection and reporting of insurance fraud situations is produced in line with the stipulations of that policy;
- Drawing up, proposing and revising the Risk Management Policy;
- Drawing up, proposing and revising or cooperating with the revision of all specific risk management policies for each category of material risk, including:
  - Cooperating with the revision of the Underwriting Policy;
  - Cooperating with the revision of the Reinsurance Policy;
  - Cooperating with the revision of the Reserving Policy;
  - Cooperating with the drawing up and revision of the Investments Policy;
  - Cooperating with the drawing up and revision of the Asset and Liability and Liquidity Risk Management Policy;
  - Drawing up, proposing and revising the Operational Risk Management Policy;
  - Cooperating with the proposal and revision of the Capital Management Policy;
- Cooperating with the revision of the Dividends Policy;
- Drawing up, proposing and revising Deferred Tax Policy;
- Drawing up, proposing and revising the Own Risk and Solvency Assessment Policy;
- Drawing up, proposing and revising the Risk Appetite Framework.

#### B.1.3.2. Actuarial Function

- Monitoring the accounting Technical Provisions, assessing their level of prudence;
- Undertaking an actuarial assessment of the portfolios, including calculation of the fair value of liabilities of a technical nature;
- Ensuring consultancy and actuarial technical assistance to the bodies and institutions which request it, as part of
  contracts for the provision of actuarial-type services, in particular, on the subject of pension funds, benefits plans or any
  other private pension plan frameworks;
- Drawing up, proposing and revising the Provisioning Policies;
- Coordinating calculation of the technical provisions;
- Assessing the adequacy and quality of the data used in the technical provisions calculation;
- Ensuring that appropriate methodologies, basic models and assumptions are used in the technical provisions calculation;
- Comparing the technical provisions best estimate with the actual amounts;
- Informing the management body of the level of reliability and adequacy of the technical provisions calculation;
- Supervising the technical provisions calculation whenever the insurer does not have sufficient data and with the quality needed to apply a reliable actuarial method and, for that reason, if approximate values are used;



- Issuing an opinion on the global underwriting policy;
- Issuing an opinion on the adequacy of reinsurance agreements;
- Contributing to the effective application of the risk management system, particularly regarding the risk modelling on which
  the solvency capital requirement and minimum capital requirement are based, and also regarding the own risk and
  solvency assessment.

#### B.1.3.3. Internal Audit Function

- Drawing up, implementing and maintaining an Annual Audit Plan based on a methodical analysis of risk, covering all significant activities and the governance system of the Insurers in the Fidelidade Portugal Group, including planned developments regarding activities and innovations;
- Assessing compliance with the principles and rules defined as part of the internal control and operational risk
  management, identifying possible insufficiencies and suggesting action plans to mitigate the inherent risk or optimise the
  control in terms of effectiveness;
- Carrying out audit actions based on a specific methodology which, since it always has risk assessment in mind, can help
  to determine the probability of the risks occurring and the impact they may have on the Fidelidade Group;
- By means of an IT application, presenting the Board of Directors and the Executive Committee with audit reports produced, demonstrating the conclusions obtained and recommendations issued;
- Drawing up the Annual Audit Report, with a summary of the main deficiencies detected in the audit actions, and presenting it to the Board of Directors, the Executive Committee and the Supervisory Bodies;
- Analysing the level of implementation of recommendations issued;
- Aiding the Executive Committee, when requested by the latter, in uncovering the facts relating to potential disciplinary breaches by employees and irregularities performed by agents or service providers;
- Performing ad hoc audits, as requested by the Board of Directors, the Executive Committee or another Structural Body;
- Working with the External Audit and with the Statutory Auditor.

#### B.1.3.4. Compliance Function

- Proposing the Compliance strategy and policies and ensuring revision of these;
- Ensuring the development and maintenance of the Compliance risk management system with a risk-assessment approach
- In conjunction with the other key functions, maintaining the Compliance risks catalogue up to date;
- Ensuring the actions necessary to promote a Compliance culture within the Group;
- Preparing and proposing the Fidelidade Group's Code of Conduct, and the internal rules that develop and implement it, and ensuring these are disseminated and revised;
- Preparing and proposing the Compliance Policy, ensuring its revision, and the annual Compliance Plan;
- Articulating the Compliance function with the other key functions of the Group's insurance and reinsurance companies;
- Contributing to the development of the Group's international governance system.

# B.1.4. Committees

The following Committees also ensure the management of the risk management and internal control systems:

#### **RISK COMMITTEE**

This Committee has the aim of making recommendations on all matters related to Risk Management and Internal Control, including risk policy revision, risk appetite framing and process monitoring, as a means of support to the Executive Committee.



#### PRODUCTS COMMITTEE (LIFE AND NON-LIFE)

The Products Committee's main mission is to approve and coordinate the launch of new products of all Group companies, and to update and monitor existing products, during their lifecycle, ensuring that the offer is consistent with the omni-channel and value creation strategy. The Committee is responsible for ensuring that both new and existing products are aligned with the Company's strategic planning and risk appetite as defined by the Executive Committee and that the different guidelines in terms of Product Design and Approval Policies, Risk Management, Investment, Underwriting and Reinsurance are followed.

#### ASSETS AND LIABILITIES MANAGEMENT COMMITTEE

The main objectives of the Assets and Liabilities Management Committee (ALCO) are to supervise the asset / liability matching, the investments portfolio and the market risks (namely interest rate risk, currency risk and liquidity risk). Another aim is to establish an optimal structure for the Company's balance sheet to allow maximum profitability, limiting the level of risk possible and monitoring the performance of the Company's investments in terms of risk and return and the implementation of the ALM strategy, as well market and liquidity risks.

#### SUSTAINABILITY COMMITTEE

The objective of the Sustainability Committee is to make recommendations and validate or provide support for decisions of the company bodies on all matters related with Sustainability, in particular in defining the strategic pillars of sustainability and monitoring Fidelidade's actions in these areas, in revising procedures and policies from the sustainability perspective and in the general assessment of performance in this area.

#### B.1.5. Remuneration rights of the members of the corporate bodies

The Remunerations Committee submitted a statement to the General Meeting of 31 March 2022 on the Remuneration Policy for the members of the respective management and supervisory bodies, which was approved by all the shareholders present or represented.

According to that statement, the Remuneration Policy was based on the following principles:

"The remuneration of the members of the Company's management and supervisory bodies is fixed by the Remuneration Committee in light of the Remuneration Policy in force, which uses as a reference the applicable legal and regulatory standards, and the guiding principles of the remuneration policy of the members of the corporate bodies of the Group companies.

- In order to ensure alignment with the Company's interests, the remuneration of the executive members of the corporate bodies comprises a fixed component and a variable component.
- The fixed component is defined with reference to the values adopted in companies of a similar size, nature and complexity.
- Fixed remuneration is paid in 14 monthly instalments, including the corresponding holiday and Christmas subsidies, in accordance with the legislation in force.
- The variable component is determined according to performance measured on the basis of a set of defined objectives, in particular, financial, operational, risk and strategic objectives, and is awarded, on an individual and annual basis, in relation to the year that has ended. It should not represent more than a certain percentage of the gross fixed remuneration in force at the end of that year, in order to be properly balanced.
- The non-executive members of the Board of Directors may receive fixed remuneration, if so decided.
- The members of the Supervisory Board only receive fixed remuneration.
- The members of the Company's corporate bodies and supervisory bodies do not benefit from any share allocation or stock option plans."

The non-executive members of the Board of Directors, when remunerated, only receive fixed remuneration.

Information on the annual amount of remuneration received by the members of the corporate bodies is contained in the Corporate Governance Report.



#### B.1.6. Transactions with related parties

Fidelidade has adopted a set of transparent and objective rules which are applicable to transactions with related parties, which are subject to specific approval mechanisms.

All transactions with related parties were subject to control.

Operations to be performed between the Company and holders of qualifying shares or entities which are in a controlling or group relationship with them are subject to assessment and a decision of the Board of Directors, and these operations, like all others performed by the Company, are subject to supervision by the Supervisory Board

Information on business with related parties is in the Notes to the Separate Financial Statements (Note 44) and the Notes to the Consolidated Financial Statements (Note 49).

#### B.1.7. Assessment of the adequacy of the system of governance

Fidelidade considers that its system of governance is adequate for the nature, scale and complexity of the risks to which it is exposed, and complies with the requirements set out in the Legal Framework on the Taking-up and Pursuit of the Business of Insurance and Reinsurance.

# B.2. Fit and proper requirements

The Fit & Proper Policy currently in force, which falls within the Legal Framework on the Taking-up and Pursuit of the Business of Insurance and Reinsurance (RJASR), aims to establish general principles for assessing whether the persons who effectively run the Company, supervise it, are its managers or perform key functions within it are fit and proper.

The fit and proper requirements assessed in the terms and for the purposes of this Policy are:

- Integrity;
- Professional Qualification;
- Independence, Availability and Capacity.

Professional qualification is assessed in the light of academic qualifications, specialist training and professional experience.

When assessing academic qualifications and specialist training, value is particularly given to knowledge obtained in the fields of insurance and general finance or in any other area which is relevant for the activity to be performed.

When assessing professional experience, the nature, size and complexity of activities previously performed is compared to those that will be performed in the future.

In the specific case of Top Management, meaning management positions with direct reporting to the executive management body, 5 years' previous professional experience is required.



In the case of key functions, the following professional qualifications are required:

	Academic Qualifications	Specialist Training	Professional Experience
Internal Audit (head)	Degree in Business Management, Economics, Auditing or similar	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function.	15 years of experience in the area
Internal Audit (team member)	Degree in Economics, Management, Business Management or similar	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function. Higher education (at post-graduate level) in Financial Markets or similar areas is also relevant.	2 years' minimum experience in the area or similar, depending on the specific function the employee is performing
Compliance (head)	Law Degree	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function.	15 years of experience in the area or similar
Compliance (team member)	Law Degree	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function. Higher education (at post-graduate level) in European Studies, Business Management, Compliance or similar areas is also relevant.	5 years of experience in the area or similar
Risk Management (head)	Higher education in Business Organisation and Management, Mathematics, Actuarial Studies, Economics, Statistics or similar	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function.	15 years of experience in the area or similar
Risk Management (team member)	Higher education in Mathematics, Management, Actuarial Studies, Finance, Economics, Actuarial Science, Statistics, Sociology, Engineering or similar.	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function. Higher education (at post-graduate level) in Banking and Insurance Management and in Markets and Financial Assets is also relevant.	4 years' minimum experience, depending on the specific function the employee is performing
Actuarial Function (head)	Higher education in Mathematics, Actuarial Studies, Economics or Statistics	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function. Higher education (at post-graduate level) in Actuarial Science is also relevant.	10 years' experience in actuarial
Actuarial Function (team member)	Higher education in Mathematics, Actuarial Studies, Economics or Statistics	Ongoing training, provided by the Fidelidade Group, to develop technical and behavioural skills to perform the function. Higher education (at post-graduate level) in Actuarial Science is also relevant.	5 years' experience in actuarial

In line with the Fit and Proper Policy, the scope of application of which is singular, covering the various insurance companies within the Longrun, SGPS, S.A., universe and Longrun itself, persons who effectively run the Company, supervise it, are its managers or perform key functions within it must possess and demonstrate the capacity to at all times guarantee sound and prudent management of the insurance company, with a view, in particular, to safeguarding the interests of policyholders, insured persons and beneficiaries.

For this reason, they must comply with the requirements of qualifications (fit), integrity (proper), independence and availability. Additional requirements are provided for collegiate bodies.

The following persons are subject to the assessment: members of the management body, members of the supervisory body, the statutory auditor who is responsible for issuing the statutory auditor's report and the responsible actuary.

The following persons are also subject to the assessment: persons who perform other functions which give them significant influence over the management of the Companies, Top-Level Managers, persons who are responsible for or perform risk management, compliance, internal audit and actuarial functions, representatives of the Companies' branches and, where key functions are outsourced, the internal interlocutor for those functions.

The Companies must confirm that the persons subject to the assessment fulfil the fit and proper requirements to perform their respective functions. The Policy therefore sets out the process for assessing those requirements, divided into three major areas: (1) Assessment; (2) Registration; (3) Appointment.

The Assessment Committee is responsible for assessing the fit and proper requirements of the members of the Management and Supervisory Bodies, the Statutory Auditor and the Responsible Actuary. The Assessment Committee is also responsible for



assessing the heads of the risk management, compliance and internal audit functions, and also the head of the People and Organisation Division.

The responsibility for assessing other persons – top-level managers, the persons responsible for the actuarial function, branch representatives, staff who perform key functions and those responsible for important or critical functions or activities which are outsourced – lies with the People and Organisation Division.

The assessment is carried out prior to the commencement of functions (initial assessment) and continuing compliance with the fit and proper requirements is confirmed every three years thereafter (successive assessment), by means of a statement presented for the purpose by the interested party, whenever that compliance continues.

Since the appointed persons must inform the insurance company of any facts subsequent to the appointment or to the registration which change the content of the statement initially presented, an extraordinary assessment will be carried out whenever they become aware of any subsequent circumstances which may lead to the requirements not being fulfilled within the scope of their functions.

# B.3. Risk management system including the own risk and solvency assessment

The risk management and internal control systems are managed by the following bodies: the Risk Management Division, the Audit Division, the Compliance Division, the Risk Committee, the Products Committee (Life and Non-Life), the Assets and Liabilities Management Committee and the Sustainability Committee.

#### B.3.1. Risk management processes

The following sub-paragraphs describe the Group's risk management processes for each category of risk, including how these are identified, monitored and managed.

#### B.3.1.1. Strategic Risk

The Fidelidade Group's medium to long-term strategy is defined on the basis of analysis and discussion in a broad forum, in which reflection is encouraged on the Group's position in the various lines of business, considering the broader evolution of the external macroeconomic situation, the insurance sector and the Group's main stakeholders. The results of this reflection are supported and summarised on key tools and outputs such as the long-term Business Plan and the selection of strategic Imperatives and Orientations.

The Company's strategy is executed by means of a chain of responsibilities beginning with the Executive Committee, which defines the high-level strategic objectives, and then passing to the heads of each Division, who establish strategic objectives for their sphere of action and propose a plan of initiatives to achieve those objectives. The execution of the strategy ends with the Company's employees, who seek, on a daily basis and within the scope of their functions, to achieve the proposed objectives by carrying out the prioritised initiatives.

The strategic decisions taken by the Companies are based on well-defined processes of approval and of implementation and monitoring, which have proved to be both effective in terms of implementing the strategy and adequate as a reaction to external factors which may affect the Group's activity.

## B.3.1.2. Underwriting Risk – Product Design and Pricing

The Business Divisions are responsible for managing and assessing this risk. The Business Divisions ensure the technical development of new products, or reformulation of existing ones, by defining their technical characteristics and technical documentation, and by establishing their prices, doing so in conjunction with DET (the Statistics and Technical Studies Division), both by drawing up rules for delegation of powers and underwriting policies, and by drawing up technical information to support the sales activity.



For each product, there is a process of identifying the needs which are intended to be met and defining the Company's strategic objectives which are intended to be achieved with its launch / reformulation.

The launch of new products, reformulation of existing ones and pricing updates are approved in advance by the Products Committee (Life and Non-Life).

When a new product is launched, or when significant changes are made to the characteristics of existing products, training programmes and communication plans are scheduled with the aim of introducing the product to the commercial networks, emphasising, in particular, its characteristics and the underwriting policies that have been defined.

Analyses are periodically undertaken of products/prices, and also of the composition and behaviour of the respective portfolios, with the purpose of assessing how adequate they are in terms of contractual conditions versus profitability.

#### B.3.1.3. Underwriting Risk - Underwriting

The Business Divisions are responsible for managing and assessing the risks associated with underwriting the Company's products, and the acceptance of risk is delegated to the sales areas and/or distribution channels in situations where knowledge of the risk is high and the technical risk is low.

The aim of the Group's General Underwriting Policy is to classify the risks according to the level of exposure to and knowledge of the risk. This policy takes the form of underwriting rules and delegation of available competences.

The Group has an Underwriting Policy Acceptance and Supervision Committee, the mission of which is to analyse and accept risks the acceptance of which, as defined in the Underwriting Policy, is not delegated to the Business Divisions.

The Business Divisions are responsible for underwriting risks the acceptance of which is not delegated.

In order to guarantee that the underwriting policy is properly implemented, in the products' sales phase, the Operations and Procurement Division (DOP) and the Non-Life Business Divisions, in the case of Non-Life products, and the Life Business Divisions, in the case of Life products, check compliance with the underwriting rules defined. Besides this check, the Business Divisions and the Statistics and Technical Studies Division, in the case of Non-Life products, regularly monitor the adequacy of the underwriting policies, by means of statistical indicators of the portfolio's development, the drawing up of risk profiles and occasional analyses of contracts.

There is a system of Portfolio Selection and Checking which occurs monthly, aimed at checking and monitoring customers in the portfolio, in order to safeguard profitability of the business.

There is also a process to monitor underwriting quality, which seeks, on one hand, to identify situations of false declarations or omission of declarations in the issue of contracts and, on the other, to rectify these situations, ensuring articulation between all those involved: the Business Divisions, Commercial Divisions and Operations and Procurement Division. This monitoring process, which seeks to assess irregular types of behaviour, is performed weekly and is mainly supported by cross-referencing with sources of external or internal historical data and identifying anomalous patterns.

#### B.3.1.4. Underwriting Risk – Reserving

The Group's Provisioning Policy establishes the methodologies for calculating provisions, broken down by line of business and in accordance with the obligations to be estimated. Accordingly, different provisions methodologies are defined for each line of business, based on recognised actuarial methods.

In order to guarantee the reliability of the information used in the process for establishing provisions for the Group's obligations, the quality of the information is validated by reconciling the accounting information with the operational information.

Alongside this process, an analysis is conducted, for the Life segment, of the provisions set up, considering the methodologies used for calculating the provisions and the insurer's historical experience relating to each of the obligations, and compliance with the rules in force regarding the calculation of provisions is also validated. Forecasts are made annually of the technical results for the different lines of business with the aim of assessing the adequacy of the technical bases in force.



For the Non-Life segment, the Group also regularly assesses compliance of the provisions by analysing the obligations in terms of uncertainty, length of contract, nature of claims and expenses with settlement of claims. Compliance with the rules in force regarding the calculation of provisions is also validated. In addition, a range of micro and macro-economic scenarios are used to confirm the adequacy of the amount of the provision.

#### B.3.1.5. Underwriting Risk - Claims Management Processes

The Business Divisions are the main players in the management and assessment of risk associated with the Group's claims processes.

The Group's Claims Management Policy is formalised in procedures manuals of the divisions responsible for its management, namely, the Business Divisions, and compliance with it is guaranteed by rules defined in the claims management systems and by the configuring of the profiles allocated to each user of those applications.

In order to promote better following up of claims management, regarding claims which are slow or complex to resolve, time limits are defined for settlement. If these are exceeded, the claims are sent for analysis by specialised sectors. In addition, in business areas which have time limits established by law, the operating systems have an important set of alarm features that guarantee that management is warned when those time limits are becoming critical.

Regular statistical information is prepared on this matter to ensure control of the time limits for settling claims and supervision of those which are covered by reinsurance treaties.

#### B.3.1.6. Underwriting Risk – Reinsurance and Alternative Risk Transfer

The Reinsurance Division negotiates and manages reinsurance treaties, closely accompanied by the Executive Committee, which approves the conditions negotiated prior to their acceptance.

As part of the monitoring of this risk, the Reinsurance Division carries out constant follow-up of the treaties, manages the run-off portfolio, controls risk peaks and periodically analyses the technical results by treaty. In order to study annual and multi-annual trends, these analyses include a comparison with the information relating to previous years (minimum 5 years), thus allowing the evolution of the reinsurance technical results to be monitored. This information is used for subsequent negotiations with the reinsurers.

In terms of the Group's Reinsurance Policy, the Reinsurance Division operates in line with the objectives and strategic guidelines defined in conjunction with the Executive Committee and based on an analysis of business needs conducted with the technical and actuarial areas.

The Reinsurance Policy is implemented by the Reinsurance Division, with the drawing-up of proposals, negotiation of treaty conditions, approval of these and their signing and renewal, and monitoring and follow-up of the various reinsurance contracts existing in the Group.

#### B.3.1.7. Market Risk

The Group's objectives, rules and procedures on market risk management are governed by means of its Investments Policy, which is revised annually.

The Investments Policy defines:

- The main guidelines for managing investments and how the Group assesses, approves, implements, controls and monitors its investment activities and the risks resulting from those activities;
- Activities related to the Group's investment process, including Strategic Asset Allocation (SAA), Tactical Asset Allocation (TAA), the decision-making process and control and reporting activities;
- The duties and responsibilities of those involved in the investment process.



The Investments Policy aims to ensure alignment between the portfolio objectives and the investment strategy, and to encourage effective and continual monitoring. It is the cornerstone of the Group's investment process.

Considering these aspects, the Group's investment management cycle is composed of the following critical activities:

- Defining Defining and approving the general investment management cycle, including the global investment strategy, investment policies, asset and liability management (ALM) and liquidity management, and strategic asset allocation (SAA);
- Investing Performing all investment activities, in line with the strategies and policies defined (identifying, assessing and approving investment opportunities, and placing, settling and allocating investments);
- Monitoring Monitoring the evolution of the assets portfolio in terms of performance, liquidity and credit quality;
- Managing Reviewing the strategies, policies, benchmarks and limits in line with current and future market conditions/expectations and internal risk capacity;
- Controlling Ensuring compliance with all the strategies, policies, procedures and responsibilities assigned.

#### B.3.1.8. Counterparty Default Risk

The Group is essentially exposed to Counterparty Default Risk when selecting and accompanying investments in the different classes of assets and also reinsurers.

Securities issuers are assessed in order to measure their credit quality. This assessment uses various quantitative and qualitative data, including information on their rating, and evaluates the portfolio's compliance with the limits of exposure to this issuer defined in the Investments Policy.

The analysis by investment essentially derives from the selection grid at the time of the asset purchase defined in the Investments Policy, in order to protect insured persons through restrictions on the use of the Companies' assets. However, the risk is constantly monitored, and an effort is made to follow the opinions / outlooks of the international ratings agencies so as to prevent a decline in the rating of the securities held. On the other hand, establishing internal limits by class of asset, rating, duration, industry, geography and currency, and not authorising situations of risk accumulation, means that proper spreading of risk can be quaranteed over time.

Regarding reinsurance, decisions concerning the selection of reinsurers are taken in line with the Reinsurance Policy, which only authorises contracts with reinsurers with a minimum credit rating of "A-" or in line with the exceptions defined in the Reinsurance Policy.

#### B.3.1.9. Concentration Risk

Management of this risk is connected with the processes for managing other risks, since it is transversal to the different areas.

In order to follow the portfolio's level of exposure to the various sources of concentration risk mentioned, the Business Divisions conduct periodic qualitative analyses of the portfolio.

As part of the Group's underwriting policies, procedures are defined which aim to mitigate Concentration Risk, in particular, when situations are detected in which there are two or more policies which cover risks situated at a location considered to be a common risk, these are classified as situations of risk accumulation and require a specific analysis. Apart from some exceptions related with the nature of some businesses, the acceptance of Life Risk risks – and the reinsurance of these – takes into account the capital accumulation per entity.

Regarding the Concentration Risk associated with investments, as previously stated, the Investments Policy in force defines different exposure limits namely by class of assets, rating, duration, industry, currency and geography. These limits are revised annually and amended when necessary.

Management of this risk associated with reinsurers requires the Reinsurance Division to produce an annual report with a summary of the Companies' reinsurance treaties for the following year, plus a summary of the conditions of these treaties and the percentages of exposure to each reinsurer, organised by lines of business, in order to comply with the Reinsurance Policy.



#### B.3.1.10. Liquidity Risk

In a short-term perspective, responsibility for managing investments liquidity is given to the Investments Division.

The Group's aim in terms of liquidity is a treasury capable of managing all of the Companies' funding needs (cash outflows) in an appropriate timeframe, without resorting to credit or unplanned selling off of assets, and particularly the capacity to generate significant liquidity in a short space of time. In a short-term perspective, the Company also takes into account the cash-in from the investment portfolio and the sales forecasts for financial products being marketed.

In a medium / long-term perspective, the Companies conduct a monthly ALM analysis of the liabilities and assets linked to the Life and Non-Life segments.

The analyses performed cover the interest rate gap, considering the yield to maturity and the modified duration of the liabilities and of the respective assets, including the convexity effect, and short and long-term cash flow matching.

This analysis also includes a comparison between the liquidity-generating capacity and the estimated cash flow.

The articulation between functions related to investment, asset and liability management and liquidity is established in the Companies' Investments Policy.

In relation, specifically, to Asset and Liability and Liquidity Management processes, in 2022 the Group approved a review of the Asset and Liability and Liquidity Risk Management Policy (the ALM and Liquidity Policy).

Together with the Investments Policy, this Policy describes the strategy for managing financial risks, insurance risks and liquidity risks, in the short, medium and long term, in a context of asset and liability management.

In this way, the ALM and Liquidity Policy seeks to guarantee alignment between assets and liabilities, with a particular focus on maximising return and minimising interest rate risk and liquidity risk.

Taking these aspects into consideration, asset and liability management must be performed, on the one hand, as a risk mitigation exercise and, on the other, as part of the Companies' decision-making structure, formulating strategies related with its assets and liabilities. It is therefore composed of the following critical activities:

- Defining Defining and approving the asset and liability and liquidity management strategy;
- Monitoring Monitoring the evolution of cash flow matching and different metrics associated with asset and liability management, producing monthly and annual reports;
- Managing Reviewing the objectives and limits set out in the ALM and Liquidity Policy in line with current and future market conditions/expectations and internal risk capacity;
- Controlling Ensuring compliance with the asset and liability management strategy, limits, procedures and responsibilities assigned.

#### B.3.1.11. Reputational Risk

Management of the Group's reputational risk is fundamentally based on:

- The existence of a function responsible for corporate communication and media relations;
- The existence of a brand communication function;
- The function of customer complaints management, which includes providing management information to the heads of the different Company Areas and the Executive Committee;
- Planning and monitoring of the Company's Human Resources;
- The Corporate Social Responsibility programme.
- The existence of a Sustainability Division.



In addition, being aware of the growing importance of reputation for an organisation's standing and success, Fidelidade also set up a Communication Coordination Committee, which meets regularly and is led by the Chairman of the Executive Committee, in order to better articulate all of the Companies' internal and external communication flows.

The activities conducted within this scope have produced results as demonstrated by the various awards the Company has received for service excellence / customer satisfaction.

A focus on operational excellence and service quality has long been a priority for the Group and has a strong impact in terms of customer satisfaction. As a result of this effort, the Group's skill in these areas has been noted, and is identified and recognised by customers.

The Group is proud to have consolidated its leadership as the best insurer in Portugal and to have been recognised on several occasions as a reference brand for the Portuguese. Fidelidade is the insurance company that has won the most awards in Portugal.

These results are the fruit of continual work. They are a consequence of the innovative products and covers that the Group has developed, thinking about people's real needs and the commitment to giving customers exemplary service and accompanying them closely when they need it most.

#### RECOGNITION

In 2022, we continued to be proudly recognised by consumers and companies as one of the best insurers in Portugal, collecting awards in different product categories and in campaigns held. This recognition is the result of continual investment in an innovative and quality product range, which focuses on people's real needs and on being at their side in all the stages of their lives.



#### **Trusted Brands 2022**

Fidelidade and Multicare were recognised as Trusted Brands 2022, in the Life and Property, Motor and Health Insurance categories by Reader's Digest *Selecções*.



#### Consumer's Choice 2022

All three of the Fidelidade Group's brands received the Consumer's Choice award; Fidelidade, in the Insurance category; OK! teleseguros, in the Direct Insurance category; and Multicare, in the Health Insurance category. These awards were given for the eighth, fourth and third year in a row, respectively.



#### Five Stars Award 2022

OK! teleseguros won the Five Stars Award 2022 in the Direct Insurance category, having been elected by consumers, who registered the highest levels of satisfaction, recommendation or purchasing intention.



#### **Powerful Brands Awards**

Recognition of Fidelidade and Multicare as winning brands in the Large Insurance Company and Health Insurance categories, respectively. These awards are a tool for gauging the value of brands in areas which are not yet very tangible, but crucial for the value chain, such as brand sustainability, purpose, ethics and innovation.





#### **Efficacy Awards**

The Efficacy Awards highlight campaigns developed by agencies in Portugal. The Fidelidade Pets campaign was awarded Gold in different categories – Financial Services and Insurance, Low Budget, Commerce & Shopper, and Activation and Sponsorships – and Fidelidade Start (Mediator of the Future) was awarded Bronze, also in the Financial Services and Insurance category.



#### **Marketeer Awards 2022**

Fidelidade received the Marketeer Award - Edition 2022.

#### COMPLAINTS MECHANISMS

Fidelidade reviewed and updated the **Customer Ombudsman Regulation** and drew up a **Complaints Management Policy** in 2022, both of which were subsequently published on the Group companies' websites. The main purpose of this review was to help improve the quality of the products and services provided by the Group to customers, employees and partners. The Policy made it possible to define, in a very clear and unambiguous way, the principles and actions to be observed by all employees when dealing with complaints.

The complaints processes are centralised in the Complaints Management Centre ("CGR"), which acts as a central point for receiving and responding to complaints, and which is duly identified internally and externally. Besides the CGR, which the customer can visit, complaints may be made at any Company or mediator branch, sent to the address of the Centre or registered in the physical or electronic Complaints Book.

In addition, and whenever so justified, customers' complaints are reported to the audit, compliance and/or risk management divisions and the Legal Affairs Division, whenever they involve situations, actions, omissions and failure to comply with procedures which are considered, in the light of that reported, to justify an audit process/analysis by those structural bodies.

#### B.3.1.12. Operational Risk

Procedures are implemented specifically for managing both operational risk and internal control, namely:

- Documentation and classification of existing control activities, linking them to the risks previously identified in the business processes;
- Decentralised recording of events and subsequent losses, including near misses, resulting from risks associated with the business processes, and also own assessment of risks and control activities.

This risk is discussed further in Chapter B.4.1. Information on the internal control system.

#### B.3.2. Risk Management Function

The risk management function is part of the risk management system, and is performed by the Risk Management Division, a first-line body in the corporate structure, reporting directly to the Company's Executive Committee. This function is performed across all the Fidelidade Group's insurance companies.

The mission of the risk management function is based on defining, implementing and maintaining a risk management system which enables identification, measuring, monitoring and reporting of risks, individually or collectively, including risks not contemplated in the solvency capital requirement, enabling the Executive Committee and the various Divisions involved to incorporate this knowledge into their decision-making process.

The activities carried out by the Risk Management Division, in 2022, were fundamentally based on the enhancement and consolidation of several matters related with the three solvency pillars, and technical aspects and certification of information produced within this scope.



The following activities can be highlighted:

- Conducting the annual own risk and solvency assessment (ORSA) and reporting the results to the ASF in the respective supervisory report;
- Preparing and sending annual information, with reference to 31 December 2021, incorporated in the Quantitative Reporting Templates (QRT), which has been subject to certification by the statutory auditor and the responsible actuary pursuant to the regulations issued by the ASF, and also the Regular Supervisory Report;
- Reporting to the ASF and publicly disclosing the Solvency and Financial Condition Report relating to 31 December 2021, accompanied by certification by the statutory auditor and the responsible actuary;
- Preparing and sending the quarterly quantitative reporting under Solvency II.

It is also important to mention the activities related with the review of the system of governance, namely, the review and maintenance of policies and the review of processes and data quality, with the review of the Risk Appetite Framework and the conducting of the ROCI Cycle – 2022.

#### B.3.3. Own risk and solvency assessment

The Companies in the Fidelidade Group have an ORSA Policy with the aim of establishing the general principles for the own risk and solvency assessment regarding:

- Processes and procedures;
- Functions and responsibilities;
- Criteria and methodologies;
- Reporting:
- Articulation with the strategic management process and use of the ORSA results.

According to the Policy, the ORSA aims to provide a level of security which is acceptable to the Companies' Executive Committee regarding compliance with the strategic objectives, within the framework of the risk appetite established.

Accordingly, considering the risk appetite defined, the ORSA seeks to provide a prospective vision of the capacity of the available capital of both the Companies and the Fidelidade Group to support different levels of risk, resulting both from strategic decisions and from scenarios involving external factors.

The ORSA is, therefore, an integrated process in the Companies' strategic management, which enables a global vision to be gained on a regular basis of all the relevant risks which are a threat to the pursuit of the strategic objectives and the consequences of these in terms of (future) capital needs.

This process also contributes to promoting the Companies' risk culture, by measuring the risks the Companies are exposed to (including those not considered in the capital requirements), introducing the concept of economic capital in the management processes and communicating the risks, thereby allowing those receiving this information to incorporate this knowledge into their decision making.

In order to comply with these objectives, the ORSA process is divided into five major activities: (1) definition of the business strategy and risk appetite; (2) global solvency needs assessment; (3) stress tests and analysis of scenarios; (4) prospective assessment of the global solvency needs; (5) reporting. In addition to these five major activities, a further activity is defined: continual monitoring of the solvency position of the Group Companies.

The Executive Committee is responsible for steering the entire ORSA process, including approving it. The CRO (the member of the Executive Committee responsible for risk management) and the Risk Committee are responsible for regularly monitoring the ORSA process, by means of regular monitoring meetings. The Risk Management Division and the Strategic Planning and Business Development Division are involved in carrying out the process.

When performing the ORSA, the Group Companies begin by conducting an assessment (which is qualitative and, whenever so justified, quantitative) of the possible differences between the risk profile and the assumptions underlying the calculation of the SCR using the standard formula.



The global solvency needs are then calculated taking into account the risk profile of Fidelidade's insurance group. The concept of Economic Capital is used to produce this calculation, which is based on the standard formula for calculating the solvency capital requirement (SCR), and the changes that the Group deems relevant to better reflect its risk profile are introduced. In this process, all the risks that the Group is or may be exposed to are identified. These risks are assessed quantitatively and/or qualitatively.

As a complement to the assessment of the global solvency needs, a series of stress tests and sensitivity analyses are planned in order to validate the defined strategy in extreme scenarios.

To provide a prospective vision of the risk profile of the Group Companies and, consequently, of their global solvency needs, forecasts are produced, for a time period which coincides with the period defined in strategic planning, of their financial position, the result of its operations, the changes in its own funds and its solvency needs.

The ORSA is conducted annually and may also be carried out extraordinarily in certain situations. Reports are produced both for the supervisor and for internal use.

Also within the scope of the ORSA process, continual assessment is carried out of the regulatory capital requirements and the requirements applicable to the technical provisions. This consists of the production of a monthly report containing the estimated Solvency II position, adjusted by the effect of capital optimisation measures in progress or being studied.

The ORSA plays a key role in the management of the Fidelidade Group Companies, and the results obtained from it are taken into consideration in the Risk Management of the various Group Companies, in Capital Management and in Decision Making.

One of the key elements of the ORSA is to identify and measure the risks to which the Companies are exposed and project their evolution for the period under analysis.

Therefore, based on the results obtained, the Group defines possible actions to be taken:

- Assuming the risks;
- Taking additional mitigation measures (controls/ capital, etc.);
- Transferring the risks; or
- Eliminating activities which lead to risks which the Fidelidade Group is not willing to run.

The ORSA also provides support for the main activities related with Capital Management, namely:

- Assessing, together with risk management, the risk appetite structure in relation to the business strategy and capital management strategy;
- Contributing to the commencement of the strategic planning process, through the performance of a capital adequacy
  assessment in the most recent period, involving both regulatory capital and economic capital;
- Monitoring capital adequacy.

Considering the results obtained in the ORSA, and if the capital requirements are not in line with those defined, both in regulatory terms and in terms of other limits defined internally, the Company defines the corrective actions to be implemented, in order to restore the adequate/intended level of capital.

#### B.4. Internal control system

# B.4.1. Information on the internal control system

The Risk Management Division is responsible for managing operational risk and the Companies' internal control system.

In turn, the Audit Division is responsible for assessing the adequacy of the system of operational risk management and the internal control system, in order to report fragilities / deficiencies detected and make recommendations for their improvement.



Management of the Companies' operational risk and their internal control is performed according to the following flow diagram:



#### **BUSINESS PROCESSES**

All the Companies' business processes are documented considering a pre-defined "tree" of processes containing three levels (macroprocess; process; sub-process) that represent the activities of an insurance company.

Documentation and updating of the Companies' business processes are a requirement for the risk management and internal control systems.

#### RISKS AND CONTROLS

For the documented business processes, the significant risks to which they are exposed are identified, classified in line with a predefined risk matrix. Existing mitigation mechanisms (controls) are identified for these risks.

The risks and controls existing in the Company are thus documented and characterised.

#### **ASSESSMENT**

To assess the Company's operational risk, quantitative information is collected on the risks previously identified by means of own assessment of risk questionnaires and the recording of loss events and subsequent losses.

The assessment of the internal control system is supported by a process of own assessment of the controls, which occurs by means of responses to questionnaires. These questionnaires aim to assess the effectiveness of the controls in mitigating risk.

It is important to mention that the various Structural Bodies of the Companies are responsible for enhancing the risk management and internal control process, in order to ensure that the management and control of operations is performed in a sound and prudent manner. They are also responsible for ensuring that documentation on the business processes, respective risks and control activities exists and is up to date.

#### B.4.2. Information on activities performed by the Compliance Function

The Compliance Division performs functions related to management of Compliance risks, including, among others, the risk of money laundering and terrorist financing, and also the risk of faults in personal data processing and protection. The Compliance Division is a structural body, with functional independence, which performs key functions within the system of Risk Management and Internal Control.

The Compliance Division's mission is to define, implement and maintain a Compliance risk management cycle, contributing so that the management bodies, management structure and staff of the Group Companies comply with the legislation and standards in force at a given time, both externally and internally, and with the guidelines of the national and international supervisory bodies, in order to avoid situations of non-conformity that may harm the Group companies' image and their reputation in the market, and/or that may give rise to financial losses.



In 2022, the Compliance Division carried out a significant number of initiatives with the aim of strengthening the internal control mechanisms and safeguarding an adequate level of compliance with the legislation and standards in force at any given time, both externally and internally.

Compliance Topic	Brief Description
Communication and Training	Designing and implementing a medium-term communication and training plan to increase awareness and build capacity among employees on the various Compliance topics.
Prevention of anti-competition practices	Implementation of a programme to identify, assess and mitigate risks related with anti-competition practices.
Anti-money laundering and counter-terrorist financing	Improvement of control tools for filtering counterparties and monitoring operations, and in Know Your Counterparty (KYC) processes within the scope of investment processes.
Data protection	Consolidation of methods intended to identify, assess and mitigate the risks associated with data protection.
Reporting Channels (whistleblowing)	Implementation of whistleblowing channels at the Fidelidade Group.
Analysis of main regulatory changes	Development of a process to map and assess potential impacts arising from new regulations, thus contributing to timely adaptation to the new requirements and obligations.
Analysis of new products and advertising and marketing tools	Consolidation of methods to follow products' management life cycle – Compliance By Design – including the process for checking compliance with regulatory requirements on the subject of advertising in the insurance sector.
Rules on ethics and conflicts of interest	Revision of the Fidelidade Group's Code of Conduct.
Anti-Corruption and related offences	Development of the plan for the prevention of corruption risk.
International governance model	Development of a model for regularly monitoring the effectiveness of the Compliance function in the Group's international operations.

The Companies' Compliance Policy, which establishes the strategy, mission, governance, types of risks and the processes associated with the exercise of the Compliance function in the Fidelidade Group, was revised in 2022, and is duly formalised and available to all employees in the internal communication channels.

# B.5. Internal Audit Function

As stated above, the internal audit function is given to the Audit Division, which is a first-line body in the corporate structure, reporting directly to the Companies' Board of Directors. Its mission is to guarantee assessment and monitoring of the risk management and internal control systems of the Fidelidade Group Companies. Its general purpose, therefore, is to contribute to creating value and improving circuits and procedures, seeking to increase the effectiveness and efficiency of operations, the safeguarding of assets, trust in the financial reporting and legal and regulatory Compliance.

The rules and principles that the Internal Audit function must obey are established in the Internal Audit Policy, which was revised in July 2022.

This Policy sets out the competence and scope of intervention of the internal audit function, which is performed by the Audit Division within the scope of the Fidelidade Group's insurance undertakings.

Three mechanisms are used to preserve the independence, impartiality and objectivity of the internal audit function. Firstly, persons who perform the internal audit function are not responsible for any other operational functions. Secondly, the internal audit function communicates its conclusions directly and exclusively to the Chairman of the Board of Directors. Lastly, all the audit work carried out, in particular the conclusions obtained and the recommendations issued, is duly documented and filed. At the end of 2022, the internal audit module of the Corporate Governance software application used by the Risk Management Division and the Compliance Division was implemented, which allows the audit work performed and its conclusions to be documented, as well as monitoring of the level of implementation of the recommendations made. The application also enables the audit reports to be made available to all relevant parties.



To perform its function, the Audit Division has access to all the structural bodies, and to all the documentation, and the management bodies, top-level managers and staff of the various insurance companies must cooperate with the Audit Division, providing it with all the information they have and that is requested of them.

The internal auditors, for their part and in the performance of their functions, must follow the deontological principles set out in the Internal Audit Policy, in particular those of independence, integrity, confidentiality, objectivity and competence. The Policy also rules on the reporting of conflicts of interest.

Regarding the audit process, there are definitions of the types of internal audit, modes of intervention (in person and at a distance) and the scope of auditing activities (global or sectorial) which must be included in the annual audit plan to be submitted for the appreciation of the Chairman of the Board of Directors and for the appreciation and ratification of the Executive Committee.

When performing the internal audits, the auditors must observe the procedures established in the Policy regarding the naming of the team, the establishment of the audit schedule and the preparation and conducting of the audit.

In terms of reporting, principles are set out which must govern the drawing up of the reports, their minimum content, the persons to whom they are addressed and the type of reports (preliminary report and final report). There are also provisions on internal audit's monitoring of the application of any improvement actions proposed, with the production of follow-up reports whenever justified.

Lastly, the Audit function is responsible for producing the Annual Audit Report, which contains an analysis of compliance with the Annual Audit Plan, identifies the work undertaken and provides a summary of the conclusions obtained and recommendations issued. The Annual Audit Report is submitted to the Chairman of the Board of Directors for analysis and to the Executive Committee for analysis and approval.

# B.6. Actuarial Function

Due to the nature, complexity and scale of the Companies' portfolios, the actuarial function is subdivided into life actuarial and non-life and health actuarial.

The actuarial function coordinates and monitors the calculation of the accounting technical provisions, and, for such purpose, assesses both the methodologies applied and the amounts set out in the financial statements.

In the life segment, considering that most of the technical provisions are calculated automatically by policy management systems, configured in line with the technical notes of the products and with the ASF rules, tests are conducted monthly to assess the adequacy of the respective technical provisions.

When calculating the technical provisions of the non-life and health segments, the ASF rules are observed, namely regarding the identification of the provisions to be set up and the calculation rules to be observed in each of the technical provisions.

The actuarial function involves the calculation of the technical provisions for solvency purposes, with calculation of the best estimate and risk margin.

The calculations are made as part of the reporting to the ASF, evolution over time is analysed and comparisons are made with the statutory reporting amounts, and any differences are identified and documented.

The actuarial function reports regularly to the Executive Committee on the results obtained from monitoring the provisions levels.

The Life and Non-Life actuarial functions produce annual actuarial reports related to the annual period being analysed.

The information used by the actuarial function is subject to validation processes which include, among others, comparisons with previous positions and with the statutory reporting amounts, and any divergences are identified and justified, and, if necessary, corrected.



The actuarial function monitors the prospective valuation of the technical provisions for solvency purposes, assessing its reasonableness, taking into account the strategic objectives assumed by the Companies, the factors for converting the valuation of the technical provisions in the financial statements to their valuation for solvency purposes and the application of measures, either regulatory (transitional deduction to technical provisions) or management measures (changes in the contract boundaries of group risk life insurance contracts and changes in the characteristics and guarantees of new products sold in the life savings segment).

There is a policy for designing and approving new products and for reformulating existing ones, which sets out the actuarial function's articulation with the business and marketing areas which are responsible for proposals for new products and respective specifications. The same applies to changes to existing products, where the actuarial function intervenes by giving its opinion on the proposed changes.

The actuarial function provides support to the reinsurance area in the negotiation of reinsurance treaties, providing information with risk and profitability metrics and sensitivity analyses and portfolio statistics, and monitoring the evolution of the reinsurance treaties, including their conditions in the actuarial analyses conducted. The adequacy of the treaties for the Companies' obligations is subject to actuarial analysis.

#### B.7. Outsourcing

#### B.7.1. Outsourcing Policy

In line with the Outsourcing Policy, the scope of application of which is singular, covering the various insurance companies within the Longrun SGPS, S.A., universe, general principles are established which are applicable to the outsourcing of critical or important functions or activities, and the main process activities leading to their contracting either from within the group or outside of it: (1) Identification and documentation of the critical or important functions or activities, (2) Selection of the service provider; (3) Contract formalisation; (4) Notification to the ASF.

Insofar as the Companies maintain full responsibility for any functions or activities which may be outsourced, definitions are provided of the main aspects to be implemented related with the monitoring inherent to the outsourced function or activity, and the responsibilities of each of the participants are identified, both in the outsourcing process and in the subsequent monitoring of the service provider.

The Outsourcing Policy also establishes the principles and process applicable to new outsourcing of critical or important functions or activities.

#### B.7.2. Outsourced critical or important functions or activities

Of the range of functions or activities considered critical or important that are outsourced in the Company, of note are the activities related with asset management regarding, on the one hand, a Senior Secured Loans portfolio and, on the other, four Investment Grade Fixed Income Securities portfolios plus a series of unit-linked portfolios managed by three external providers.

The jurisdictions of the providers of these services are located in Portugal, Ireland, the United Kingdom, Luxembourg, Germany and Hong Kong.

Among the functions outsourced outside the group, of note are the Contact Center management and operation services, provided in Evora and Lisbon, at the premises of a service provider with its registered office in Portugal, and the management and operation services provided by Datacenters, in Evora, Lisbon and Porto, by service providers with their registered offices in Portugal.

Also of note is the outsourcing of Microsoft Applications services, housed in a cloud infrastructure and the respective maintenance, updating, performance monitoring and information security control services. The service is provided by Microsoft Ireland Operations Limited, with its registered office in the Republic of Ireland.



# B.8. Any other information

B.8.1. Option to produce a single own risk and solvency assessment document

As soon as the regulations have been created for such, the Group intends to request permission to produce a single own risk and solvency assessment document.

# C. Risk Profile





Risk management is an integral part of the daily activities of the Fidelidade Group Companies. An integrated approach is applied to ensure that the Group Companies' strategic objectives (customers' interests, financial strength and efficiency of processes) are maintained.

On the other hand, this integrated approach ensures value creation via the identification of adequate balance between risk and return, simultaneously guaranteeing the Companies' obligations to their stakeholders.

Risk management assists the Companies in identifying, assessing, managing and monitoring risks, in order to ensure that adequate and immediate measures are adopted in the event of material changes in their risk profile.

Accordingly, to outline Fidelidade Consolidated's risk profile the various risks to which the Group is exposed are identified and then assessed.

The risk assessment is based on the standard formula used to calculate the solvency capital requirement. For other risks, not included in that formula, the Group has opted to use a qualitative analysis to classify the foreseeable impact on its capital needs.

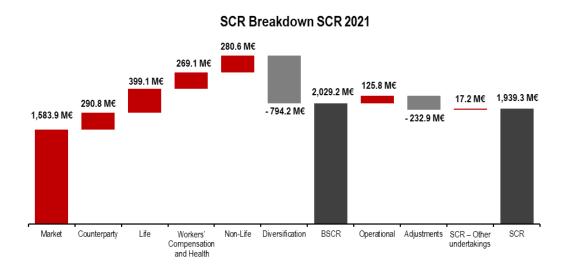
Hence, the calculation of Fidelidade Consolidated's solvency capital requirement (SCR) with reference to 31 December 2022 was as follows:

#### 302.3 M€ 281.3 M€ 433.6 M€ 1,856.7 M€ 129.3 M€ 1,784.9 M€ 37.5 M€ 274.7 M€ - 807.9 M€ 1,372.8 M€ - 238.5 M€ Market Life Non-Life Diversification SCR Counterparty **BSCR** Operational Adjustments SCR - Other Workers Compensation and Health

#### SCR Breakdown SCR 2022

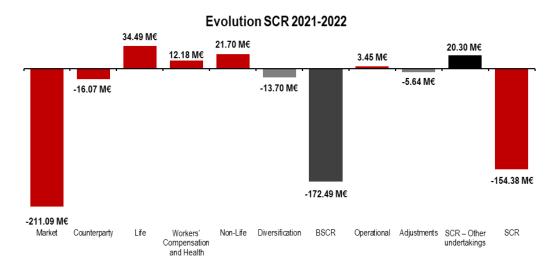
The market risk is clearly prominent in this requirement, followed by the much lower underwriting risks (of which the Life underwriting risk is more significant) and counterparty default risk. Operational risk is the lowest of the risk modules that make up the SCR calculated on the basis of consolidated data in line with Article 336 a) of Delegated Regulation (EU) 2015/35.

The same calculation relating to 31 December 2021 was as follows:





The decrease of EUR 154.38 million is shown in the graph below.



The following elements can be highlighted in this evolution:

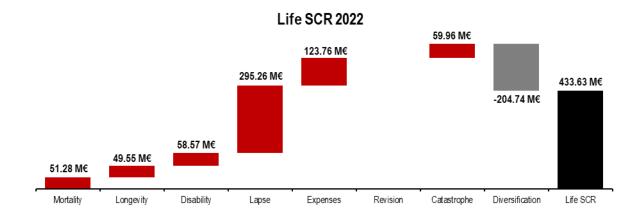
- The decrease in market risk, as detailed in Chapter C.2.;
- The increase in life underwriting risk, presented in Chapter C.1.1;
- The increase in non-life underwriting risk, presented in Chapter C.1.2; and
- The increase in workers' compensation and health underwriting risk, presented in Chapter C.1.3.

These risks will now be analysed, in particular with regard to their nature and impact on Fidelidade Consolidated.

# C.1. Underwriting risks

#### C.1.1. Life underwriting risk

The life underwriting risk is the second most significant for Fidelidade Consolidated.



Analysing the sub-modules that make up this risk, the lapse risk is the most important within the life underwriting risk module.



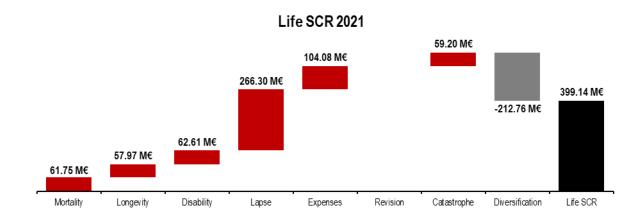
Its importance results from the impact of temporary annual renewable contracts linked to mortgages and contracts with the "Funeral Service Organisation and Expenses" and "Adjustment of the funeral service to a Vault, Drawer or Perpetual Grave" covers, which Fidelidade is not entitled to cancel or change the prices of, so that the contract boundaries considered for the purpose of assessing the technical provisions are, for the former, the maturity of the mortgage associated with each of them and, for the latter, indefinite.

The second most significant sub-module, although carrying much less weight than the lapse risk, is the expense risk, which basically results from the fact that, when calculating the capital requirements of this risk sub-module, Fidelidade Consolidated considered as expenses, for the total amount of the Life obligations, as per the understanding of the ASF, the commissions to be paid for the intermediation activity of brokers, within the scope of Article 31 of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, and, consequently, these were subject to the shocks applicable to this risk.

With similar values we have the disability risk, which results from the significant weight in sums insured associated with life risk contracts, mortality and catastrophe risks, both with their origins in Life Risk insurance contracts, and lastly, the longevity risk, the significance of which is relatively low in this risk module, since the Company's Annuities portfolio is small.

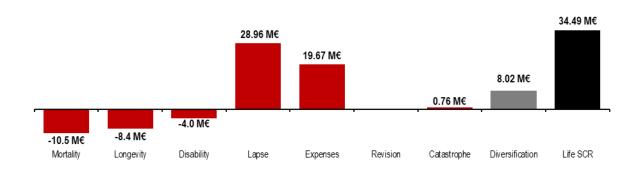
The revision risk is zero since there is no exposure to this risk.

The Life SCR at 31 December 2021 was:



The increase of EUR 34.49 million is shown in the graph below.

# Evolution Life SCR 2021-2022



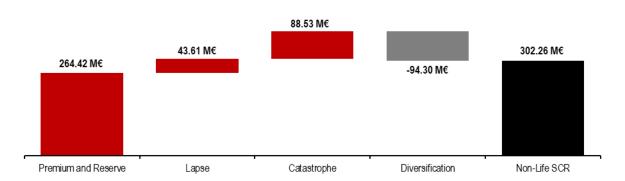
The increase in Life underwriting risk results from the inclusion within the Group of the prosperity company with an impact on the lapse and expense risk. The decrease in the other underwriting risks is basically the result of the evolution of the risk-free interest rate term structure, with the most significant impact being on the mortality and longevity risk mainly due to mortgage-linked life insurance risk and lifelong annuities, respectively.



#### C.1.2. Non-Life underwriting risk

The non-life underwriting risk is the third most significant for Fidelidade Consolidated.

#### Non-Life SCR 2022



Within this sub-module, the premium and reserve risk is the most important.

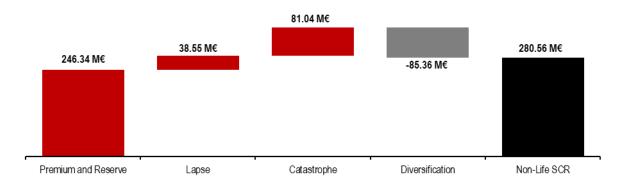
The weight of this risk basically results from the volume of premiums and reserves relating to motor insurance contracts (liability and other covers), fire and other damage insurance and general liability insurance.

With a much lower figure, there is the catastrophe risk, which basically arises from the significant amount of sums insured with seismic phenomena coverage. However, in the event of a seismic phenomenon, because of the existing reinsurance contracts only a part of the liability will be assumed by the Companies. The effect of this risk is not significant for this reason. It is also important to state that the mitigating effect of these reinsurance contracts is considered in the counterparty risk module.

Regarding the lapse risk, its weight is less insignificant, given that the insurance contracts have a contract boundary up to the next renewal date.

The Non-Life SCR at 31 December 2021 was:

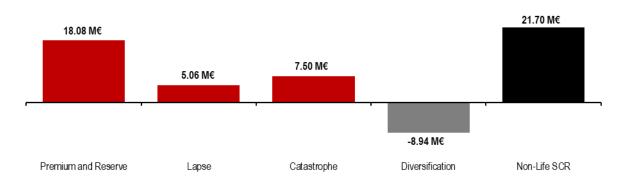
#### Non-Life SCR 2021





The increase of EUR 21.70 million is shown in the graph below.

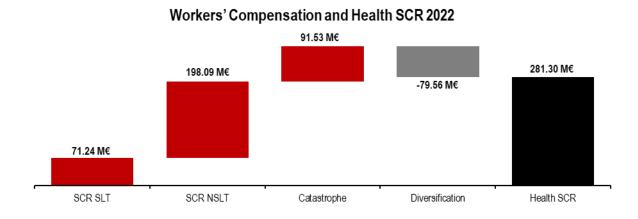
# Evolution Non-Life SCR 2021-2022



The increase in this risk results from the Company's activity, with an increase in the volume of premiums and reserves of contracts in the motor and fire lines, and the increase in catastrophe risk, which was impacted by the increase in business in the third party liability line of business.

#### C.1.3. Workers' Compensation and Health underwriting risk

In terms of weight, this is the fourth risk for the Group, and of the three underwriting risks it is the risk with the lowest weight.



The most significant sub-module is the NSLT (not similar to life techniques) health sub-module, originating from the premium and reserve risk in workers' compensation and personal accidents and health lines of business.

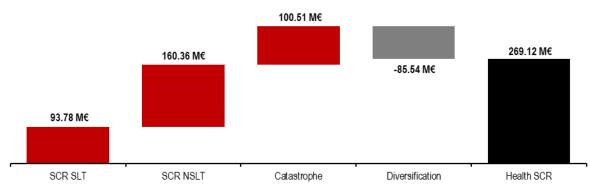
The second largest sub-module is the catastrophe risk sub-module, mainly resulting from the concentration of accidents, given the sums insured involved.

The SLT (similar to life techniques) health sub-module presents a lower figure, and is basically composed of longevity risk resulting from pensions and permanent assistance expenses in the workers' compensation line of business.



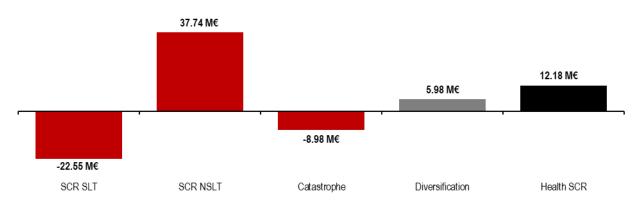
The Workers' Compensation and Health SCR at 31 December 2021 was:

# Workers' Compensation and Health SCR 2021



The increase of EUR 12.18 million is shown in the graph below.

# Evolution Workers' Compensation and Health SCR 2021-2022



The evolution in this module was basically due to:

- The Company's activity;
- The catastrophe risk derived from the decrease in persons exposed to risk despite an increase in the average salaries considered in the scenario established for calculating concentration risk.

### C.1.4. Mitigation measures - underwriting risk

For a number of lines of business, the Group uses reinsurance contracts which guarantee mitigation of underwriting risks for life, non-life and workers' compensation and health. This mitigation is taken into account when calculating the respective capital requirements.

The effect of this mitigation when calculating the capital requirement associated with underwriting risks is also reflected in the counterparty default risk module.



# C.2. Market risk

Market risk is Fidelidade Consolidated's most significant risk and is clearly above the other risk modules.



Within this module, the most important sub-module is property risk, reflecting the investment strategy being pursued, where there is significant exposure to the real estate market.

The second most important market risk sub-module is spread, which is a result of the Group's high exposure to fixed income financial instruments, other than European government bonds.

The third most important sub-module is currency, the main unhedged foreign currency exposure being to the US Dollar, the Swiss Franc and the Peruvian Sol. The currency risk also reflects the hedging for the most significant exposures to foreign currency.

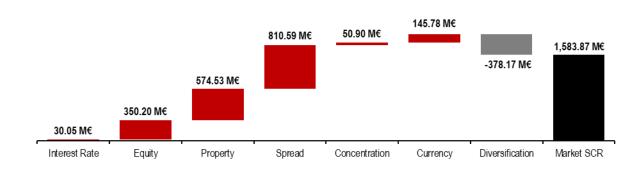
The fourth most important sub-module in the market risk module is the equity sub-module, as a result of the Group's significant exposure to equity markets.

The interest rate risk has a lower value, which is a result of the Asset and Liability management carried out by the Group with the aim of maintaining the duration gap at low values.

Lastly, there is the concentration risk sub-module, where the Company's greatest exposures are to the economic groups HSBC and Caixa Geral de Depósitos and to the Republic of Peru.

The Market Risk SCR at 31 December 2021 was:

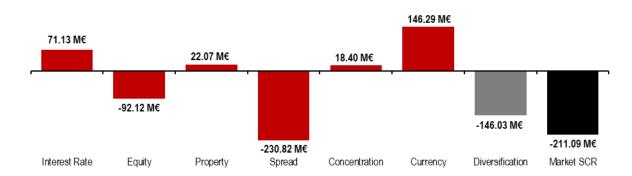
# Market SCR 2021





The decrease of EUR 211.09 million is shown in the graph below.

#### **Evolution Market SCR 2021-2022**



The decrease in spread risk is basically due to the significant decrease in exposure to corporate debt.

The increase in currency risk is basically explained by the increase (in absolute terms) in direct exposure to PEN (Peruvian Sol), USD (US Dollar) and CHF (Swiss Franc).

The decrease in equity risk is basically justified by a lower exposure to "Type 2" equities and by the significant fall in symmetric adjustment.

The increase in interest rate risk is justified by the change in the portfolio and in the interest rate curve.

The change in property risk is explained by the slight increase in both direct and indirect exposure to real estate assets.

The increase in concentration risk is predominantly explained by the increase in exposure to the Caixa Geral de Depósitos Group.

#### C.2.1. Mitigation measures – market risk

The Group Companies' investment process, besides guaranteeing compliance with the prudent person principle, seeks to enable both rational and reasoned decisions when selecting assets and an adequate balance between risk and return.

The process, therefore, begins with the identification of investment opportunities, through tracking, identification and analysis of investment opportunities all over the world, which leads to investment proposals being presented. These are based, on the one hand, on qualitative aspects, such as a description of the investment, including different possibilities on how it can be made, and a description of the business rationale, and, on the other, on quantitative aspects such as financial indicators or the expected return.

These proposals are analysed, including a preliminary study on capital consumption in the light of the Solvency II rules.

If the investment proposal is accepted, an investment case is prepared, containing a summary of the investment to be made, an analysis of compliance with the legal limits and the limits set out in the Group's Investments Policy, an analysis of the adequacy of the investment in ALM terms (cash flow matching), calculation of the capital consumption associated with the investment in line with the Solvency II rules.

This investment case includes an Internal Communication to the Executive Committee which contains the proposal and the grounds for making the investment, as well as other information. When securities transactions are performed, the traders responsible for these are subject to limits defined in the Investments Policy.

The entire process falls within the Group's general investment guidelines.

According to these guidelines, the main objective of the investment portfolio is to generate income for the Companies, while considering the associated risks and other restrictions arising from the business strategy defined by the Executive Committee.



Assets are allocated to each investments portfolio in a way that enables the aggregate return from all portfolios and respective cumulative risk to meet the established investment objectives.

#### Market Risk - Currency

Using futures, forwards and swaps contracts the Companies hedge the currency exposure of their directly or indirectly held assets:

- The exposure to assets denominated in American Dollars (USD) and in Hong Kong Dollars (HKD), given the high correlation between USD and HKD, is mitigated by using futures, forwards and swaps contracts in USD;
- The exposure to assets denominated in Pounds Sterling (GBP) is mitigated by using futures, forwards and swaps contracts in GBP;
- The exposure to assets denominated in Yens (JPY) and in Swiss Francs (CHF) is mitigated by using forwards in JPY and CHF.

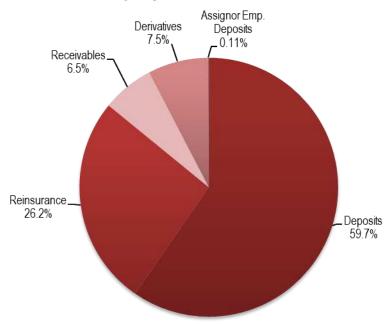
The Company intends to replace the futures contracts with similar contracts, at the end of their maturity period.

#### C.3. Counterparty Default risk

The counterparty default risk module is the fifth highest of all the risks assessed by Fidelidade Consolidated.

The breakdown of this risk by counterparty type at 31 December 2022 is:

#### Counterparty Default Risk Breakdown



The solvency capital requirement for the counterparty default risk results essentially from the component relating to deposits (around 59.7%), in which exposure to Caixa Geral de Depósitos carries significant weight. Of the remaining exposures, the most significant is that relating to exposure to counterparties to which the Group transfers a part of underwriting risks through reinsurance contracts.



#### C.4. Liquidity risk

The Fidelidade Group's liquidity risk is managed so that there is always capacity to meet the Group's obligations and liabilities.

The Liquidity Risk is analysed individually for the following European companies: Fidelidade, Via Directa, Multicare, Fidelidade Assistance and Companhia Portuguesa de Resseguro, as these offer a good approximation to the Group's Liquidity level. The same method is applied in the following non-European companies: Garantia, Fidelidade Angola, Macau Vida, Macau Não Vida, La Positiva Seguros y Reaseguros, La Positiva Vida Seguros Y Reaseguros, Alianza Vida Seguros y Reaseguros, Alianza Compania de Seguros y Reaseguros, Alianza Garantia Seguros Y Reaseguros, Fid Chile Seguros Generales and La Positiva S.A. - Entidad Prestadora de Salud.

Accordingly, an ALM analysis is prepared monthly for the European companies, and includes Assets and Liabilities, and Monitoring of the ALM and Liquidity Policy. For the non-European companies, the ALM analysis, including Assets and Liabilities, is prepared on a quarterly basis.

The ALM analyses conducted cover the interest rate gap, considering the yield to maturity and modified duration of the liabilities and the respective assets, including the convexity effect, and short and long-term cash flow matching. This analysis also includes a comparison between the cash flow matching and liquidity-generating capacity of assets without maturity, namely shares, funds and property.

Liquidity-generating needs are analysed following the ALM process. Based on the ALM report, the adequacy of the portfolio size is tested, in particular, compared to the known liabilities, taking into account the movements of liabilities maturities foreseeable in the current month. The result of this diagnosis is the application or generation of liquidity, identifying portfolios and amounts of liquidity to be generated or applied that lead to recommendations on the need to purchase or sell assets.

The ALM and Liquidity Policy describes a series of characteristics for classifying the asset liquidity and consequently liquidity levels based on situations of stress, on both the liabilities and assets side.

Given the above, there is considered to be adequate mitigation of this risk in the Group, which allows for the conclusion that this risk is low.

Regarding liquidity risk, "expected profits included in future premiums" (EPIFP) is considered to be the current expected value of future cash flows resulting from the inclusion in the technical provisions of premiums relating to existing insurance and reinsurance contracts, which should be received in the future, but which may not be received for some reason other than the occurrence of insured events, regardless of the legal or contractual rights of the policyholder to terminate the policy.

The EPIFP, at 31 December 2022, was:



This figure only refers to the life risk line of business, and the methods and main assumptions described in point D.2.1 of this report are used.

Premiums considered when calculating this profit are net of reinsurance obligations.

Lastly, the valuation referred to in Article 260(1) d) ii) of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, is not adjusted to the characteristics of the products associated with this line of business.



#### C.5. Operational risk

Operational risk is the risk of losses resulting either from the inadequacy or failure of internal procedures, persons, or systems or from the occurrence of external events.

This is the risk module with the least weight of all the risks assessed by the Companies. Its increase reflects the evolution of the Company's activity in the life business and the increase in unit-linked expenses.

In its management of operational risk and internal control, the Company identifies, within its processes, the most significant operational risks to which each of these are exposed (based on a pre-defined risk matrix) and it documents the controls which exist to mitigate these.

Additionally, to assess each Group Company's operational risk, quantitative information is collected on the risks previously identified and an assessment is carried out of the internal control system, supported by a process of own assessment of the control activities documented.

#### C.6. Other material risks

Risks that do not fall within the standard formula are identified as part of the ORSA process.

For the risks that are not present in the standard formula and that were analysed in this accounting period, no significant deviations were found in relation to the Internal Profile of the Companies.

#### C.6.1. Reputational risk

Management of the Group's Reputational Risk is fundamentally based on:

- The existence of a function responsible for corporate communication and media relations;
- The existence of a brand communication function;
- The function of customer complaints management, which includes providing management information to the heads of the different Areas of the Companies and the Executive Committee;
- Planning and monitoring of the Companies' Human Resources;
- The Corporate Social Responsibility programme.

In addition, being aware of the growing importance of reputation for an organisation's standing and success, the Group also set up a Communication Coordination Committee, which meets regularly and is led by the Chairman of the Executive Committee, in order to better articulate all of the Companies' internal and external communication flows.

The activities conducted within this scope have produced results as demonstrated by the various awards the Company has received for service excellence / customer satisfaction. This risk is therefore considered to be adequately mitigated and is therefore classified as low.

#### C.6.2. Strategic risk

The Group's strategy is attained by means of a chain of responsibilities beginning with the Executive Committee, which defines the high-level strategic objectives (this process is accommodated within a governance model which involves the Board of Directors, the Investments Committee and the Advisory Board), passing to the heads of each Division, who are responsible for outlining plans to achieve those objectives, and ending with the Companies' employees, who seek to achieve the proposed objectives on a daily basis within the scope of their functions.



The strategic decisions taken by the Group are based on well-defined processes of approval and of implementation and monitoring, which have proved to be both effective in terms of implementing the strategy and adequate as a reaction to external factors which may affect the Companies' activity. This risk is therefore considered to be low.

#### C.6.3. Business (continuity) risk

Like any other insurance undertaking operating in Portugal, the Companies may be exposed to potential market events. However, this risk is classified as low, given the Group's strong position in the Portuguese insurance market, which has also been increasing.

When analysing this risk, the possibility of the Companies suffering losses as a consequence of centralising the development of its business in a given sector or geographical area or with specific customers was also considered.

The Group's business concentration risk is considered low, given the high level of diversification in the type of products sold and the sales channels used and in the Group's customers. However, it should be noted that there is still a high level of concentration geographically speaking, with most of the business being in Portugal. Nevertheless, the Group is in the process of expanding its business internationally, in particular in markets outside Europe where it has already been carrying on its business.

#### C.6.4. Legal risk

Although this risk is included in the definition of operational risk, the decision was made to analyse it separately, given both its importance and the method of assessment / measurement set out in the standard formula for operational risk, which does not allow for it to be highlighted.

The Group is constantly adapting to the rules in force (at both national and international level) and to the impacts that these have on its business. However, there is a risk, which is considered medium, resulting from potential regulatory changes.

Regarding fiscal changes to which it may become subject, we may highlight those related with deferred taxes, namely in terms of the tax rate and/or period for reporting tax losses.

Linked to this risk there is also the risk of possible changes to the level of tax benefits related with certain investment products. If these changes occur, some products may lose the competitive advantage associated with them, which leads to a risk related to sales of these products. Although this situation has already occurred in the past with some products, without any significant impact for the Group, this risk must still be considered.

In addition, the Group Companies are exposed to compliance risks during the normal course of its operations. One example of this risk is the recent decision by the Competition Authority (AdC), on 28 December 2018, in an ongoing case against several insurance companies. In this decision, the AdC concluded that contacts established between different insurance companies in the past, in relation to the renewal of certain corporate policies that are characterised by heavy deficits, in some lines of business, are contrary to competition law, and a global fine of EUR 12 million was set. No natural persons were subject to sanctions.

In conclusion, and considering all the points covered above, the legal risk associated with the Group is considered medium, due to the impacts that potential changes in the tax legislation would have and due to uncertainties related with the application of the Solvency II rules.

#### C.7. Any other information

#### C.7.1. Adjustment for the loss-absorbing capacity of deferred taxes

Since 2018, the Group Companies have recognised adjustment for the loss-absorbing capacity of deferred taxes not only relating to the impact on deferred tax liabilities, but also the impact on deferred tax assets, in this case using exclusively the effect deriving from temporary differences and not the recovery of tax losses.



#### C.7.2. Risk sensitivity

The sensitivity of the solvency ratio, at 31 December 2022, to the main risks to which Fidelidade Consolidated is exposed, expressed as an absolute impact on that ratio (in percentage points), is presented in the table below.

Disk Type	Effect of o	Total offeet	
Risk Type	Eligible Funds	Capital Requirement	Total effect
Equity value -20%	-9.2	+4.0	-5.5
Property value -10%	-12.6	+4.3	-8.6
Spread +100bps	-14.9	+1.7	-13.4
Interest Rate – Increase of 100 bps	+1.0	+0.2	+1.2
Interest Rate – Decrease of 50 bps	-1.1	-0.9	-2.0

#### At 31 December 2021, sensitivity of the solvency ratio was:

Dialy Trops	Effect of changes on		Total affect
Risk Type	Eligible Funds	Capital Requirement	Total effect
Equity value -20%	-5.8	+4.9	-1.1
Property value -10%	-10.8	+3.9	-7.1
Spread +100bps	-18.3	-2.3	-20.3
Interest Rate – Increase of 100 bps	+2.2	+1.4	+3.6
Interest Rate – Decrease of 50 bps	-2.6	+0.1	-2.5

#### Explanation of the Solvency II sensitivity analyses:

Risk	Scenario
Equity	Impact of a 20% decrease in the value of equity, including Equity funds.
Property	Impact of a 10% decrease in the value of property, including Real Estate Funds.
Spread	Impact of a 100 bps (basis points) increase in debt securities.
Interest rate	Impact of a parallel increase of 100 bps (basis points) along the whole curve.
Interest rate	Impact of a parallel decrease of 50 bps (basis points) along the whole curve.

#### C.7.3. Risk concentration

The table below presents significant concentrations of risk between entities within the scope of Group supervision and third parties which exceed 10% of the Group's solvency capital requirement.

Amounts in thousand euros

	Type of Exposure				
Country of exposure	Assets - Shares and equity securities	Assets - bonds	Assets - others	Liabilities - insurance	
		Exposure amount		Exposure amount	Maximum amount payable by reinsurer
PT	2,348,485	702,261	466,758	14,589,911	0
GB	825,128	788,432	0	0	0
IT	0	982,365	0	0	0
ES	0	904,567	0	0	0
IE	312,759	0	0	0	0
PE	0	364,717	312	0	0
FR	0	224,196	1	0	0



The amount of exposure for 'Liabilities – insurance' corresponds to the sums insured per entity.

Regarding the 'Assets' exposures, the greatest concentration relates to shares and equity securities of Fidelidade Property Europe (EUR 1,710,572 thousand) and Italian, Spanish and Portuguese public debt (EUR 982,365 thousand, EUR 904,567 thousand and EUR 603,990 thousand respectively), representing approximately 51% of the Group's total assets.

The sixth largest exposure within 'Assets-others" exposure is to Caixa Geral de Depósitos, SA, representing approximately 6% of the Group's total assets.

#### C.7.4. SCR - other undertakings

The SCR of other undertakings was EUR 37.5 million.

The companies included in this module are:

- Luz Saúde
- Tenax
- SGOI

# D. Valuation for Solvency Purposes





In this chapter we present information on the valuation of the assets, technical provisions and other liabilities for solvency purposes and compare this valuation with that used in the financial statements, with reference to 31 December 2022.

The same information, for solvency purposes, is presented in relation to 31 December 2021.

During the period covered by this report, there were no material changes, when compared with the period covered by the previous report, in the bases, methods and main assumptions used for the valuation of the assets or in the relevant assumptions used to calculate the technical provisions.

The following paragraphs describe the bases, methods and main assumptions used for the valuation for solvency purposes, which breaks down as follows:

Amounts in thousand euros

		Solvency II	Financial statements	Difference	Solvency II previous year
Assets					
D.1	Total Assets	18,168,195	19,085,673	-917,478	18.740.596
Liabilities					
D.2	Technical Provisions	13,192,999	14,664,175	-1,471,176	13.666.878
D.3	Other liabilities	2,291,395	2,000,305	291,090	2.141.011
Total	Liabilities	15.484.394	16,664,480	-1,180,086	15,807,889
Excess of a	ssets over liabilities	2.683.801	2,421,193	262,608	2,932,707

#### D.1. Assets

The valuation of the assets for solvency purposes and a comparison with that used in the financial statements is presented in this report, segmented into:

- Financial assets;
- Real estate assets;
- Other assets.

This chapter also includes the amounts recoverable from reinsurance and special purpose vehicles.

The table below summarises the comparison, which is discussed further in the sub-chapters below.

Amounts in thousand euros

Assets	Solvency II	Financial statements	Difference	Solvency II previous year
Financial assets	15,432,852	15,706,110	-273,258	16,357,262
Real estate assets	627,971	612,983	14,988	589,043
Other assets	1,746,920	2,083,777	-336,857	1,327,146
Reinsurance recoverables	360,452	682,803	-322,351	467,145
Total	18,168,195	19,085,673	-917,478	18,740,596



#### D.1.1. Financial assets

The table below presents the valuation of the financial assets for solvency purposes, by class of asset.

Amounts in thousand euros

Assets	Solvency II	Solvency II previous year
Holdings in related undertakings, including participations	2,332,692	2,261,233
Equities — listed	420,655	545,193
Equities — unlisted	29,228	28,363
Government bonds	2,947,707	4,059,356
Corporate bonds	5,240,734	6,186,733
Structured notes	172,754	205,494
Collateralised securities	0	0
Collective investment undertakings	685,339	907,766
Derivatives	112,175	28,076
Deposits other than cash equivalents	356,932	375,123
Other investments	0	0
Assets held for index-linked and unit-linked contracts	3,134,636	1,759,925
Total	15,432,852	16,357,262

For solvency purposes, financial assets are valued in line with the following bases, methods and assumptions.

Financial assets are registered at fair value, which corresponds to the amount for which a financial asset could be sold or a liability settled between independent, knowledgeable parties interested in concluding the transaction in normal market conditions (exit price).

Within the scope of the Solvency II rules, to determine the fair value of financial instruments, assets are classified according to the fair value hierarchy criteria defined as part of IFRS 13 (Fair Value Measurement) in the following categories:

QMP - Quoted market price in active markets for the same assets

In this category, the fair value is determined considering the bid price in the active market available on the electronic platform.

QMPS - Quoted market price in active markets for similar assets

In this category, fair value is determined by considering the prices obtained from the market maker. The portfolio assets in this situation are essentially private placements.

AVM - Alternative valuation methods

The Group does not make valuations from financial models.

AEM - Adjusted equity method

Assets considered in this category are initially recognised at cost and are periodically subjected to revaluation in line with the financial statements disclosure.

IEM - IFRS equity methods

Not currently applicable.



The table below presents a comparison of the valuation of financial assets for solvency purposes and their valuation in the financial statements.

Amounts in thousand euros

Assets	Solvency II	Financial statements	Difference
Holdings in related undertakings, including participations	2,332,692	2,502,332	-169,640
Equities — listed	420,655	420,712	-57
Equities — unlisted	29,228	31,657	-2,429
Government bonds	2,947,707	2,970,044	-22,337
Corporate bonds	5,240,734	5,240,823	-89
Structured notes	172,754	172,782	-28
Collateralised securities	0	0	0
Collective investment undertakings	685,339	685,105	234
Derivatives	112,175	113,587	-1,412
Deposits other than cash equivalents	356,932	434,312	-77,380
Other investments	0	0	0
Assets held for index-linked and unit-linked contracts	3,134,636	3,134,756	-120
Total	15,432,852	15,706,110	-273,258

The main differences, by class of asset, are as follows:

#### Holdings in related undertakings, including participations

This results from the valuation, for solvency purposes, of unlisted subsidiaries using the Adjusted Equity Method (AEM) (net, the total value of these holdings for solvency purposes fell by EUR 169,640 thousand).

The total difference includes (among less relevant others) the impacts of the valuation of Luz Saúde by the Adjusted Equity Method (the value of this participation, for solvency purposes, fell by EUR 360,873 thousand) and of Fidelidade Property Europe (increase of EUR 195,012 thousand in the valuation for solvency purposes).

#### Equities - listed

This results from valuation adjustments to standardise prices of assets held in more than one geography, the valuations of which in the individual accounts were obtained at different times (different time zones).

#### Equities - unlisted

This results from the valuation, for solvency purposes, of unlisted securities using the Adjusted Equity Method (AEM).

#### Government bonds

The difference corresponds to potential gains from the portfolio of financial assets valued at amortised cost recognised in Solvency II.

#### Corporate bonds

This results from valuation adjustments to standardise exchange rates on assets held outside the Euro area and prices of assets held in more than one geography.



#### Collective investment undertakings

This results from funds valuation adjustments where the look-through approach was applied. In the statutory financial statements, the available valuation at the close of accounts date was considered. In some funds this did not correspond to the year-end valuation. For Solvency II purposes, it was possible to consider the year-end valuation that was made available in the meantime by the collective investment undertakings.

#### Derivatives

The Solvency II adjustment in these headings is justified by the revaluation made to reflect the full economic impacts on the Solvency II Balance Sheet, relating to the sale/purchase option existing over 12.1% of the capital of Fidelidade Moçambique – Companhia de Seguros S.A. (previously Seguradora Internacional de Moçambique, S.A.). These impacts are reflected in other balance sheet headings, namely "Holdings in related undertakings, including participations" and "Financial liabilities other than debts owed to credit institutions".

#### Deposits other than cash equivalents

As of the Q4 2022 report, assets with CIC 79 (margin and collateral accounts) were no longer included under the balance sheet heading "Deposits other than cash equivalents" due to a change in the classification. Following the ASF's guidelines, this amount is now reflected under the heading "Any other assets, not elsewhere shown".

#### Assets held for index-linked and unit-linked contracts

This results from the closing quoted prices at 31 December 2022 being obtained at different times. In the financial statements the valuation at 31 December 2022 was made some hours before the close of some financial markets which have an extended operation. For Solvency II it was possible to consider the final value after the close of all financial markets.

At the same time, the difference also results from adjustments to the valuation of the funds in unit-linked portfolios, where the look-through approach was applied. In the financial statements, the available valuation at the close of accounts date was considered. In some funds this did not correspond to the year-end valuation. For Solvency II purposes, it was possible to consider the year-end valuation that was made available in the meantime by the collective investment undertakings.

#### D.1.2. Real estate assets

The table below presents the valuation of real estate assets for solvency purposes, by class of asset.

Amounts in thousand euros

Assets	Solvency II	Solvency II previous year
Property, plant and equipment held for own use	154,626	153,939
Property (other than for own use)	257,825	229,196
Collective investment undertakings	215,520	205,908
Total	627,971	589,043

For solvency purposes, real estate assets are valued in line with the following bases, methods and assumptions:

The Companies' real estate assets are accounted for at their Market Value, which is the price for which the property could be sold, at the valuation date, in a private agreement between an independent and interested vendor and purchaser, it being implied that:

- i) the asset is put up for sale on the market;
- ii) the conditions of sale permit a regular sale;
- the period for negotiating the sale is normal, considering the nature of the property.



Following this, one of the following valuation methods is used to determine the Market Value:

#### Market Approach

The Market Approach consists of determining the value of a property by comparing it with identical or similar properties, according to the information available on the market regarding transaction values or prices practiced for comparable properties.

In line with this approach, the value of the property is the result of adjustment to the values and prices obtained on the market, in the light of the location and physical characteristics of the property being valued.

#### Cost Approach

The Cost Approach consists of applying the principle that a purchaser will not pay more for an asset than the cost of obtaining another with the same level of utility, whether through purchase or construction, unless undue time, inconvenience, risk or other factors are involved.

This approach provides an indication of value by calculating the current replacement or reproduction cost of the asset and deducting for deterioration and all other relevant forms of obsolescence.

#### Income Approach

The Income Approach considers information relating to the income and operating expenses of the property being valued, determining the value by a capitalisation process. In this approach, taking into account the principle of replacing the asset, it is assumed that at a given rate of return required by the market, the revenue flow generated by the property will lead to its most probable fair value.

Accordingly, the estimate of the property's value results from converting the income it generates (usually the net revenue) by applying a given capitalisation rate or update rate, or even both, which reflects the expected level of return on the investment.

In order to comply with the regulations applicable to the Portuguese insurance sector, the following method is applied to value the real estate assets of the Group companies:

- It is necessary, unless otherwise stated in the paragraphs below, to follow the property valuation criteria defined for insurance sector entities within the scope of the Conselho Nacional de Supervisores Financeiros (CNSF) [National Board of Financial Supervisors], namely as set out in the future regime of the document "A Avaliação e Valorização de Property Uma Abordagem Integrada para o Sistema Financeiro Português" [Appraisal and Valuation of Property An Integrated Approach for the Portuguese Financial System];
- Besides being registered with the Portuguese Securities Market Commission (except for valuation processes outside Portuguese territory, for which local valuers are accepted) and having taken out general liability insurance, the valuer must be a RICS member, and follow RICS standards;
- Where a property's market value is estimated to be over EUR 2.5 million, two valuations are performed by different experts, and the lower value prevails;
- It is necessary to use at least one of the three methods in IFRS 13, with the Income Approach being compulsory;
- The valuation report must itemise the valuation of the land and the valuation of the building(s);
- In the case of buildings under the horizontal property regime, the valuation report must also allocate valuations per unit, that is, it must include a breakdown of the quota share of the land and the building(s) per unit;
- The valuation report may include a sensitivity analysis regarding the most relevant variables in the valuation;
- Following a principle of prudence, real estate assets must be revalued annually.

The table below presents a comparison of the valuation of real estate assets for solvency purposes and their valuation in the financial statements.



Amounts in thousand euros

Assets	Solvency II	Financial statements	Difference
Property, plant and equipment held for own use	154,626	140,306	14,320
Property (other than for own use)	257,825	257,825	0
Collective investment undertakings	215,520	214,852	668
Total	627,971	612,983	14,988

The differences, by class of asset, are:

#### Property, plant and equipment held for own use

In the financial statements the valuation at cost was considered, and hence the difference results from the fact that in Solvency II properties are being valued at fair value, as required by the Supervisory Authorities.

#### Collective investment undertakings

This results from funds valuation adjustments where the look-through approach was applied. In the statutory financial statements, the available valuation at the close of accounts date was considered. In some funds this did not correspond to the year-end valuation. For Solvency II purposes, it was possible to consider the year-end valuation that was made available in the meantime by the collective investment undertakings.

#### D.1.3. Other Assets

The table below presents the valuation of other assets for solvency purposes, by class of asset.

Amounts in thousand euros

Assets	Solvency II	Solvency II previous year
Goodwill	0	0
Deferred acquisition costs	0	0
Intangible assets	0	0
Deferred tax assets	570,948	303,667
Pension benefit surplus	25,305	12,247
Loans and mortgages to individuals	0	0
Other loans and mortgages	12,402	0
Loans on insurance policies	1,503	1,204
Deposits to cedants	965	948
Insurance and intermediaries receivables	399,085	330,148
Reinsurance receivables	142,512	84,922
Receivables (trade, not insurance)	95,314	27,400
Own shares (held directly)	149	149
Amounts due in respect of own fund items or initial funds called up but not yet paid in	0	0
Cash and cash equivalents	384,881	542,011
Any other assets, not elsewhere shown	113,856	24,450
Total	1,746,920	1,327,146

Other assets are generally valued in the financial statements at fair value. Specific situations where that is not the case are explained in the following table, which presents a comparison of the valuation of other assets for solvency purposes and their valuation in the financial statements.



Amounts in thousand euros

Assets	Solvency II	Financial statements	Difference
Goodwill	0	53,982	-53,982
Deferred acquisition costs	0	89,148	-89,148
Intangible assets	0	261,789	-261,789
Deferred tax assets	570,948	432,025	138,923
Pension benefit surplus	25,305	25,305	0
Loans and mortgages to individuals	0	0	0
Other loans and mortgages	12,402	12,300	102
Loans on insurance policies	1,503	1,493	10
Deposits to cedants	965	965	0
Insurance and intermediaries receivables	399,085	608,232	-209,147
Reinsurance receivables	142,512	142,516	-4
Receivables (trade, not insurance)	95,314	95,031	283
Own shares (held directly)	149	149	0
Amounts due in respect of own fund items or initial funds called up but not yet paid in	0	0	0
Cash and cash equivalents	384,881	328,299	56,582
Any other assets, not elsewhere shown	113,856	32,543	81,313
Total	1,746,920	2,083,777	-336,857

The differences, by class of asset, are:

#### Goodwill and Deferred acquisition costs

The value of these assets for solvency purposes is zero, in accordance with the Delegated Regulation.

#### Intangible assets

In order for these assets to have a value in the balance sheet for solvency purposes, they must be able to be sold separately and, moreover, it would be necessary to demonstrate that there is an active market in which similar intangible assets are traded. Given that the Group's assets considered in this class do not meet these requirements, their value for solvency purposes is zero.

#### Deferred tax assets

The difference results from the application of the tax rate to losses with taxable temporary differences implicit in the balance sheet for solvency purposes, that is, after adjustments with a negative impact on own funds.

#### Loans on insurance policies

The difference is due to a specific loan which, in line with the Solvency II Rules, is represented in Liabilities under the heading "Any other liabilities, not elsewhere shown".

#### Insurance and intermediaries receivables

The difference relates to receivables for reimbursement of amounts paid out in claims. This amount is considered in the Non-Life technical provisions, given that its valuation for solvency purposes is net of these receivables.



#### Receivables (trade, not insurance)

The difference in receivables from other operations results from an amount receivable from a matured deposit.

#### Cash and cash equivalents

This results from the difference, when negative, between the balances of current accounts, which were considered in the valuation for Solvency II purposes under the heading "Any other liabilities, not elsewhere shown" in other liabilities.

#### Any other assets, not elsewhere shown

As of the Q4 2022 report, assets with CIC 79 were no longer included under the balance sheet heading "Deposits other than cash equivalents" due to a change in the classification. Following the ASF's guidelines, this amount is now reflected under the heading "Any other assets, not elsewhere shown".

#### D.1.4. Reinsurance and special purpose vehicles recoverables

Reinsurance recoverables were calculated according to methodologies in line with those used for the valuation of technical provisions, considering adjustment to reflect the probability of reinsurer default.

Recoverables in the Non-Life, Health SLT and Health NSLT lines of business were obtained based on the following assumptions:

- In each of the insurers in the Group, in the Non-Life, Health SLT and Health NSLT lines of business, when calculating the claims provision, the values of the accounting provisions of reinsurance ceded adjusted by the expected losses from counterparty default were assumed as the base value, and these were then distributed in annual future cash flows calculated on the basis of the future pattern of payments obtained for direct insurance in each of the lines of business. Fidelidade Consolidated's values were obtained by consolidation, eliminating intra-group relations;
- The component of the provision for premiums in the Non-Life and Health NSLT lines of business was calculated as described in points D.2.2. and D.2.4.

Recoverables from the Life line of business were obtained based on the following assumptions:

To calculate Life reinsurance recoverables, projections are obtained of future premiums cash flows, claims, commissions and expenses in line with the reinsurance contracts, considering the contractual limits of the direct insurance contracts. All liabilities cash flows are based on the concept of expected value, insofar as they are linked to probabilities of occurrence of events to which they are subject, taking into account the time value of cash.

The expected inflation and interest rate structures referred to in points D.2.5 and D.2.6, respectively, were applied to the cash flows in the Life, Non-Life, Health SLT and Health NSLT lines of business.

The table below shows the amounts recoverable from reinsurance contracts and special purpose vehicles, by line of business.

Amounts in thousand euros

Line of Business	Solvency II	Financial statements	Difference	Solvency II previous year
Life and health similar to life, excluding health insurance and index- linked and unit-linked	87,500	121,511	-34,011	86,929
Life, index-linked and unit-linked	-161,852	0	-161,852	0
Non-life, excluding health insurance	399,332	514,111	-114,779	354,206
Health similar to life	0	0	0	0
Health similar to non-life	35,472	47,181	-11,709	26,010
Total	360,452	682,803	-322,351	467,145



The differences result from the method applied to calculate the best estimate, which uses assumptions that are not considered in the financial statements, such as:

- Probability of counterparty default;
- Consideration of the effects of inflation;
- Discounting of estimated liabilities;
- Method for calculating the provision for premiums.

#### D.2. Technical provisions

The valuation of technical provisions for solvency purposes and a comparison with that used in the financial statements is presented in this report, segmented into:

- Life;
- Non-Life:
- Health:
  - SLT (Similar to Life Techniques);
  - NSLT (Not Similar to Life Techniques).

The table below summarises the comparison, which is discussed further in the sub-chapters below:

Amounts in thousand euros

Line of Business	Solvency II	Financial statements	Difference	Solvency II previous year
Life	10,443,433	11,470,660	-1,027,227	10,900,341
Non-Life	1,298,772	1,671,220	-372,448	1,203,541
Health – SLT	984,228	1,026,966	-42,738	1,214,551
Health – NSLT	466,566	495,329	-28,763	348,445
Total	13,192,999	14,664,175	-1,471,176	13,666,878

The valuation of the technical provisions results from applying statistical methods which have a degree of uncertainty resulting from random factors which may not yet be reflected in the base information used, namely, market factors, legal changes and political factors.

However, this degree of uncertainty is lower due to the Companies held by Fidelidade not using simplifications when calculating the technical provisions.

#### D.2.1. Life

The table below presents the value of the Life technical provisions by line of business, including the value of the best estimate, risk margin and the value of the application of the transitional measure on technical provisions.



Amounts in thousand euros

Line of Business	Best estimate	Risk Margin	ТМТР	Technical Provisions	Technical Provisions previous year
Index-linked and unit-linked insurance					
Contracts without options or guarantees	2,626,186	49,581	0	2,675,767	1,689,144
Contracts with options or guarantees	46,540	30,490	0	77,030	2,032
Capital redemption					
Contracts with profit sharing	1,513,492	12,490	-105,496	1,420,486	1,859,637
Contracts without profit sharing	5,306,079	8,371	-148,280	5,166,170	6,272,470
Risk					
Contracts with profit sharing	19,459	202	0	19,661	34,187
Contracts without profit sharing	-120,094	110,775	0	-9,319	-98,641
Annuities					
Contracts with profit sharing	91,313	4,740	0	96,053	119,730
Contracts without profit sharing	971,955	24,996	0	996,951	1,021,133
Reinsurance accepted					
Reinsurance accepted	634	0	0	634	649
Total	10,455,564	241,645	-253,776	10,443,433	10,900,341

The Life technical provisions result from the sum of the best estimate and the risk margin less the transitional measure on technical provisions (TMTP).

The best estimate corresponds to the current value of future projected cash flows related to insurance contracts, including premiums, claims, commissions and expenses, discounted at the relevant interest rate term structures (see point D.2.6). Stochastic techniques were used when determining the time value of the options and guarantees.

Future cash-flow projections are obtained by applying probabilities of events occurring based on a historical analysis of these events in the Group's portfolio, in particular mortality, disability, survival, lapse, expense and inflation.

The risk margin of each insurer in the Group is calculated using the formula mentioned in Article 37(1) of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, that is, using the cost of capital method with a rate of 6%, and the Group risk margin is obtained by applying Article 340 of that same Regulation.

In this method capital corresponds to the solvency capital requirement of the Life Underwriting Risk, Operational Risk and Counterparty Risk (in the part corresponding to the Life segment), allocated by line of business.

The value of the best estimate results from the sum of the claims provision and the value of the best estimate of future cash flows from policies held in portfolio.

All liabilities cash flows are based on the concept of expected value, insofar as they are linked to probabilities of occurrence of events to which they are subject. These probabilities constitute second-order technical bases, and that expected value is therefore the Group's best estimate, following a historical analysis covering several years.

Income to calculate profit sharing, included in the claims estimates, was determined on the basis of assets held in portfolio at 31 December 2022 and their potential gains at that date. For such purpose, a "risk neutral" projection was made, in which different securities were subject to the reference interest rates curve (see point D.2.6), added to the recognition of potential gains at that date.

Therefore, in the case of fixed income securities, in order to determine the cash flows default probabilities were calculated so that the current value of those cash flows, discounted at the reference curve, was the same as the market value.

Profit sharing was calculated based on the minimum percentage of allocation, defined contractually.

For insurance with demographic risk, profit sharing was calculated on the technical and financial results and was distributed by payment in cash. In the case of annuities insurance, the profit sharing calculation also comes from the technical and financial results and was allocated by increase in future annuities. For capital redemption products, profit sharing was calculated on the



financial results, and was allocated by addition to the mathematical provision, with the consequent increase in sums insured, that is, increase in the amounts paid at maturity, redemption or death.

The Monte Carlo method was used to determine the time value of the options and guarantees.

For unit-linked insurance without guarantees, the technical provision is calculated using the sum of the statutory technical provision (corresponding to the value of the assets) and the corresponding provision for expenses and risk margin. The provisions for expenses are calculated using the current value of the difference between the estimated expenses and the management costs charged at the end of each year.

For unit-linked insurance with guarantees, the best estimate is calculated using the current value of the best estimate of future cash flows, maturities, redemptions, claims, commissions, expenses and less any future premiums. When calculating the maturity cash flow, we consider the higher of the guaranteed value and the estimated value of the assets on the maturity date, with these figures being obtained based on their market value on the valuation date, on the reference curve (see point D.2.6) and net of the products' management costs.

Expenses are estimated using the unit costs calculated based on the total costs charged to unit-linked products in the previous year. Commissions are estimated in line with the distribution agreements for each product. Redemption and death cash flows are estimated based on probabilities calculated in line with Fidelidade Group's past history.

The following calculation assumptions were used:

#### Decreases by Death and Disability

Mortality was analysed by class of products, namely: products in the event of death, in the event of life and the financial component. The disability risk was treated in the same way as the risk of death.

#### Decreases by Redemption and Cancellation

Decreases by cancellations and decreases by redemption were determined according to the historical experience for each type.

#### Technical Management Costs

Since these come into play in determining the economic value of the existing business, the acquisition costs were removed from the total expenses charged to the Life Line of Business, at 31 December 2022.

#### Premiums

For products with demographic risk all future premiums were considered, while for capital redemption products it was assumed that, if the policy is in force, the policyholder will comply with the established premiums payment plan, provided that the product's general and specific conditions so permit and only in scenarios in which the reference interest rate (see point D.2.6) is lower than the product's technical rate. For products whose contracts allow for extraordinary payments, the average payments made in the last five years were taken into account.

#### Commissions

Commissions cash flows were calculated based on the provision of services/ commissioning agreements in force in the Group, defined in the technical specifications and notes of the different types.

#### Future management measures

Regarding future management measures, it was agreed to maintain the portfolio's asset mix at the valuation date. Thus, the proportion of each class of assets and the structure of securities within each class will tend to remain the same over time in the representation in the mathematical provisions.



#### Policyholders' behaviour

Policyholders' behaviour in terms of redemptions and cancellations is that described in the point on Decreases by Redemption and Cancellation.

For capital redemption products the payment plans are dealt with in line with that set out in the point on Premiums.

#### Risk margin

The risk margin of each insurer in the Group is calculated using the formula mentioned in Article 37(1) of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, that is, using the cost of capital method with a rate of 6%, and the Group risk margin is obtained by applying Article 340 of that same Regulation.

The table below presents a comparison of the valuation of Life technical provisions for solvency purposes and their valuation in the financial statements.

Amounts in thousand euros

Line of Business	Technical Provisions	Financial statements	Difference
Index-linked and unit-linked insurance			
Contracts without options or guarantees	2,675,767	3,035,861	-360,094
Contracts with options or guarantees	77,030	99,953	-22,923
Capital redemption			
Contracts with profit sharing	1,420,486	1,555,950	-135,464
Contracts without profit sharing	5,166,170	5,239,593	-73,423
Risco			
Contracts with profit sharing	19,661	22,452	-2,791
Contracts without profit sharing	-9,319	374,629	-383,948
Annuities			
Contracts with profit sharing	96,053	71,923	24,130
Contracts without profit sharing	996,951	1,069,665	-72,714
Reinsurance accepted			
Reinsurance accepted	634	634	0
Total	10,443,433	11,470,660	-1,027,227

For risk products the differences are basically justified by the different contract boundaries used for the technical provisions in the financial statements for a series of temporary annual renewable (TAR) group life insurance contracts, as described in D.5.1.. This change to the contract boundaries has a positive impact on the Company's solvency capital requirement coverage ratio of around 4 pp.

For annuities products, the differences are essentially the result of applying the risk-free interest rate term structure.

The differences in the index-linked and unit-linked class arise from the current value of the difference between the estimated technical management costs and the future management costs.

For capital redemption products, without profit sharing, the differences result, on the one hand, from the application of the transitional measure on technical provisions and, on the other, from the difference between the rates guaranteed to customers and the rates contained in the reference interest rates curve (see point D.2.6).



#### D.2.2. Non-Life

The table below presents the value of the Non-Life technical provisions by line of business, including the value of the best estimate and the risk margin.

Amounts in thousand euros

Line of Business	Best estimate	Risk Margin	Technical Provisions	Technical Provisions previous year
Motor vehicle liability insurance	457,121	11,116	468,237	464,254
Other motor insurance	168,618	6,165	174,783	144,280
Marine, aviation and transport insurance	25,070	964	26,034	17,530
Fire and other damage to property insurance	370,345	4,850	375,195	335,347
General liability insurance	170,807	2,807	173,614	152,290
Credit and suretyship insurance	5,227	358	5,585	24,104
Legal expenses insurance	3,696	173	3,869	4,113
Assistance	37,520	1,359	38,879	33,674
Miscellaneous financial loss	31,013	1,563	32,576	27,949
Non-proportional reinsurance accepted	0	0	0	0
Other technical provisions	0	0	0	0
Total	1,269,417	29,355	1,298,772	1,203,541

The Non-Life technical provisions result from adding the value of the best estimate of the claims and premiums provisions and the risk margin.

The best estimate of Fidelidade Consolidated's provisions is equal to the sum of the best estimate of the provisions of the different insurers in the Group, after elimination of intra-group effects.

The best estimate of the provisions of each insurer corresponds to the current value of future projected cash flows related to insurance contracts, including premiums, claims, commissions and expenses, discounted using the relevant interest rate term structures (see point D.2.6).

Future cash-flow projections are obtained by applying probabilities of events occurring based on a historical analysis of these events in the Group's portfolio, in particular claims, lapse, expense and inflation.

The risk margin of each insurer in the Group is calculated using the formula mentioned in Article 37(1) of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, that is, using the cost of capital method with a rate of 6%, and the Group risk margin is obtained by applying Article 340 of that same Regulation.

In this method capital corresponds to the solvency capital requirement of the Non-Life Underwriting Risk, Operational Risk and Counterparty Risk (in the part corresponding to the Non-Life segment), allocated by line of business.

The table below presents a comparison of the valuation of Non-Life technical provisions for solvency purposes and their valuation in the financial statements.



Amounts in thousand euros

Line of Business	Technical Provisions	Financial statements	Difference
Motor vehicle liability insurance	468,237	555,077	-86,840
Other motor insurance	174,783	219,131	-44,348
Marine, aviation and transport insurance	26,034	35,819	-9,785
Fire and other damage to property insurance	375,195	491,518	-116,323
General liability insurance	173,614	242,129	-68,515
Credit and suretyship insurance	5,585	12,236	-6,651
Legal expenses insurance	3,869	5,480	-1,611
Assistance	38,879	31,821	7,058
Miscellaneous financial loss	32,576	42,364	-9,788
Non-proportional reinsurance accepted	0	0	0
Other technical provisions	0	35,645	-35,645
Total	1,298,772	1,671,220	-372,448

The main differences identified result from:

- The provisions calculated on the basis of economic principles include the associated estimate of reimbursements, while the accounting provisions presented are gross of reimbursements, as previously stated in the paragraph entitled "insurance and intermediaries receivables" in point D.1.3 Other Assets;
- A prudent provisioning policy, associated with good claims management and follow-up;
- The statutory provisions reflect:
  - Provision for premiums and provision for unexpired risks calculated using a different method to that applied to obtain the provision for premiums under Solvency II;
  - The estimate of payables not discounted.

The heading "Other technical provisions", which only appears in the financial statements with the value of EUR 35,645 thousand, mostly corresponds to amounts allocated to the equalisation provision.

#### D.2.3. Health - SLT

The table below presents the value of the Health-SLT technical provisions by line of business, including the value of the best estimate, the risk margin and the value of the application of the transitional measure on technical provisions.

Amounts in thousand euros

Line of Business	Best estimate	Risk Margin	TMTP	Technical Provisions	Technical Provisions previous year
Health insurance (direct insurance)					
Contracts without options or guarantees	0	0	0	0	0
Contracts with options or guarantees	0	0	0	0	0
Health insurance (reinsurance accepted)					
Health insurance (reinsurance accepted)	0	0	0	0	0
Annuities stemming from non-life insurance c	ontracts				
relating to health insurance obligations	1,091,193	90,637	-197,602	984,228	1,214,551
relating to insurance obligations other than health insurance obligations	0	0	0	0	0
Total	1,091,193	90,637	-197,602	984,228	1,214,551

The Health - SLT technical provisions result from adding the value of the best estimate of the claims provisions and the risk margin, adjusted by the transitional measure on technical provisions.

The Fidelidade Group's best estimate is equal to the sum of the best estimate of the different insurers in the Group, after elimination of intra-group effects.



The best estimate of the provisions of each insurer corresponds to the current value of future projected cash flows related to insurance contracts, including claims and expenses, discounted using the relevant interest rate term structures (see point D.2.6.).

Future cash-flow projections are obtained by applying probabilities of events occurring based on a historical analysis of these events in the Group's portfolio, in particular survival, expense and inflation.

The risk margin of each insurer in the Group is calculated using the formula mentioned in Article 37(1) of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, that is, using the cost of capital method with a rate of 6%, and the Group risk margin is obtained by applying Article 340 of that same Regulation.

In this method capital corresponds to the solvency capital requirement of the Health - SLT Underwriting Risk and Operational Risk (in the part corresponding to the Health - SLT segment).

The table below presents a comparison of the valuation of Health - SLT technical provisions for solvency purposes and their valuation in the financial statements.

Amounts in thousand euros

Line of Business	Technical Provisions	Financial statements	Difference	
Health insurance (direct insurance)				
Contracts without options or guarantees	0	0	0	
Contracts with options or guarantees	0	0	0	
Health insurance (reinsurance accepted)				
Health insurance (reinsurance accepted)	0	0	0	
Annuities stemming from non-life insurance contracts				
relating to health insurance obligations	984,228	1,026,966	-42,738	
relating to insurance obligations other than health insurance obligations	0	0	0	
Total	984,228	1,026,966	-42,738	

Considering the adjustment of the transitional measure on technical provisions, the impact of revaluing the provisions results fundamentally from the evolution of the interest rates term structure referred to in point D.2.6.

#### D.2.4. Health - NSLT

The table below presents the value of the Health – NSLT technical provisions by line of business, including the value of the best estimate and the risk margin.

Amounts in thousand euros

Line of Business	Best estimate	Risk Margin	Technical Provisions	Technical Provisions previous year
Medical expense insurance	167,632	7,133	174,765	136,491
Income protection insurance	59,423	1,613	61,036	48,679
Workers' compensation insurance	215,170	15,595	230,765	163,275
Total	442,225	24,341	466,566	348,445

The Health – NSLT technical provisions result from adding the value of the best estimate of the claims and premiums provisions and the risk margin.

The Fidelidade Group's best estimate is equal to the sum of the best estimate of the different insurers in the Group, after elimination of intra-group effects.

The best estimate of the provisions of each insurer corresponds to the current value of future projected cash flows related to insurance contracts, including premiums, claims, commissions and expenses, discounted using the relevant interest rate term structures (see point D.2.6).

Future cash-flow projections are obtained by applying probabilities of events occurring based on a historical analysis of these events in the Group's portfolio, in particular claims, lapse, expense and inflation.



The risk margin of each insurer in the Group is calculated using the formula mentioned in Article 37(1) of Commission Delegated Regulation (EU) 2015/35, of 10 October 2014, that is, using the cost of capital method with a rate of 6%, and the Group risk margin is obtained by applying Article 340 of that same Regulation.

In this method capital corresponds to the solvency capital requirement of the Health - NSLT Underwriting Risk, Operational Risk and Counterparty Risk (in the part corresponding to the Health - NSLT segment), allocated by line of business.

The table below presents a comparison of the valuation of Health - NSLT technical provisions for solvency purposes and their valuation in the financial statements.

Amounts in thousand euros

Line of Business	Technical Provisions	Financial Statements	Difference
Medical expense insurance	174,765	186,020	-11,255
Income protection insurance	61,036	70,161	-9,125
Workers' compensation insurance	230,765	239,148	-8,383
Total	466,566	495,329	-28,763

The main differences identified between the figures for the accounting provisions and the provisions calculated on the basis of economic principles result from:

- The provisions calculated on the basis of economic principles include the associated estimate of reimbursements, while
  the accounting provisions presented are gross of reimbursements, as previously stated in the paragraph entitled
  "insurance and intermediaries receivables" in point D.1.3 Other Assets;
- A prudent provisioning policy, associated with good claims management and follow-up;
- The statutory provisions reflect:
  - Provision for premiums and provision for unexpired risks calculated using a different method to that applied to obtain the provision for premiums under Solvency II;
  - The estimate of payables not discounted.

#### D.2.5. Inflation rate

The following are used to calculate the best estimate in the life, non-life and workers' compensation and health segments:

- In the European insurers in Fidelidade Consolidated's perimeter the harmonised index of prices, three-year forecast, disclosed by Banco de Portugal in December 2022, is used. In the best estimate projections, 5.8% was considered in 2023, 3.3% in 2024 and 2.1% in subsequent years;
- In the projections for the non-European insurers, future inflation is considered to follow the pattern implicit in the historical information used to estimate future cash flows.

#### D.2.6. Reference interest rates

For technical provisions in currencies for which the Supervisor does not publish interest rate structures (Peruvian Sols (PEN), Bolivian Bolivianos (BOB), Paraguayan Guaranis (PYG), Angolan Kwanzas (AOA), Mozambican Meticais (MZN), Cape Verdean Escudos (CVE), and Macanese Patacas (MOP)), interest rate structures were calculated by applying a method similar to that considered by EIOPA, assuming as the basis of calculation for the first years the interest rate structure of Peruvian Government Bonds for PEN and PYG, Colombian Government Bonds for BOB, Brazilian Government Bonds for CVE, MZN and AOA, and Hong Kong Government Bonds for MOP and the long-term inflation rate expected by the respective Central Banks to determine the future behaviour of interest rate structures.

When valuing the other technical provisions, the Group used the relevant risk-free interest rate structures set out in Commission Implementing Regulation (EU) 2023/266 of 9 February 2023, without volatility adjustment.



#### D.3. Other liabilities

The table below presents a comparison of the valuation of other liabilities for solvency purposes and their valuation in the financial statements.

Amounts in thousand euros

Liabilities	Solvency II	Financial statements	Difference	Solvency II previous year
Contingent liabilities	0	0	0	0
Provisions other than technical provisions	46,191	46,191	0	73,694
Pension benefit obligations	6,418	6,418	0	313
Deposits from reinsurers	54,603	54,603	0	81,278
Deferred tax liabilities	581,509	177,184	404,325	356,377
Derivatives	171,924	173,458	-1,534	320,964
Debts owed to credit institutions	0	0	0	0
Financial liabilities other than debts owed to credit institutions	41,020	29,707	11,313	102,776
Insurance and intermediaries payables	224,209	232,083	-7,874	145,731
Reinsurance payables	347,703	487,356	-139,653	208,792
Payables (trade, not insurance)	111,863	111,863	0	162,820
Subordinated liabilities	462,590	502,165	-39,575	515,360
Any other liabilities, not elsewhere shown	243,365	179,277	64,088	172,906
Total	2,291,395	2,000,305	291,090	2,141,011

Other liabilities are generally valued in the financial statements at fair value. Specific situations where that is not the case are described below.

The differences, by class of liability, are:

#### Deferred tax liabilities

The difference results from the application of the tax rate to gains with taxable temporary differences implicit in the balance sheet for solvency purposes, that is, after adjustments with a positive impact on own funds.

#### Derivatives

The Solvency II adjustment in this heading is justified by the revaluation made to reflect the full economic impacts on the Solvency II Balance Sheet, relating to the sale/purchase option existing over 12.1% of the capital of Fidelidade Moçambique – Companhia de Seguros S.A. (previously Seguradora Internacional de Moçambique, S.A.). These impacts are reflected in other balance sheet headings, namely "Holdings in related undertakings, including participations" and "Financial liabilities other than debts owed to credit institutions".

#### Financial liabilities other than debts owed to credit institutions

The Solvency II adjustment in this heading is justified by the revaluation made to reflect the full economic impacts on the Solvency II Balance Sheet, relating to the sale/purchase option existing over 12.1% of the capital of Fidelidade Moçambique – Companhia de Seguros S.A. (previously Seguradora Internacional de Moçambique, S.A.). These impacts are reflected in other balance sheet headings, namely "Holdings in related undertakings, including participations" and "Derivatives".

#### Insurance and intermediaries payables

The difference relates to payables for reimbursement of amounts paid out in claims. This amount is considered in the Non-Life technical provisions, given that its valuation for solvency purposes is net of these receivables.



#### Reinsurance payables

The difference relates to reinsurance ceded payables for reimbursement of amounts paid out in direct insurance claims. For solvency purposes these payables are included in the Non-Life and Health (SLT) technical provisions, the valuation of which was net of these.

#### Subordinated liabilities

The difference is due to the fact that in Solvency II subordinated liabilities are valued at fair value, while in the financial statements they are initially recognised at fair value (less directly related transaction costs) and subsequently measured at amortised cost.

#### Any other liabilities, not elsewhere shown

This results from the difference, when negative, between the balances of current accounts related with futures contracts and the components relating either to the valuation of unmatured contracts (recorded under the heading "Derivatives") or to the initial margin (collateral), which were considered in the financial statements valuation under the heading "Any other assets, not elsewhere shown", and "Sight deposits" with negative balances which were considered in the financial statements valuation under the heading "Cash and cash equivalents".

#### D.4. Alternative valuation methods

As mentioned in point D.1.1 of this report, Fidelidade Consolidated does not make valuations from financial models.

#### D.5. Any other information

#### D.5.1. Information on the valuation for solvency purposes

The bases, methods and main assumptions used at Group level for the valuation of assets, technical provisions and other liabilities for solvency purposes do not differ from those used in any of the Group's European subsidiaries for valuation for solvency purposes of the respective assets, technical provisions and other liabilities.

#### D.5.2. Changing the contract boundaries of temporary annual renewable insurance contracts

When calculating the best estimate of the Life obligations relating to temporary annual renewable (TAR) life insurance contracts, the contract boundary considered is the date of the next renewal except for contracts for which the Group has provenly waived the unilateral right to terminate the contract and to reject or amend the tariffs in force.

For these contracts, which are all linked to mortgages, for the purpose of valuing their technical provisions, Fidelidade Group considered their contract boundary to be the maturity of the mortgage agreement associated with each adhesion, and for contracts with the "Funeral Service Organisation and Expenses" and "Adjustment of the funeral service to a Vault, Drawer or Perpetual Grave" covers the boundary was considered to be indefinite, and lapse probabilities were taken into account. Although the reinsurance treaty associated with these contracts is of annual duration, when calculating the reinsurance recoverables the Group assumed a time limit consistent with the limits of the insurance contract to which they relate, according to the understanding of the ASF.



#### D.5.3. Application of the transitional deduction to technical provisions

Of the Group's subsidiaries, only Fidelidade applied, pursuant to Article 25 of Law No. 147/2015, of 9 September, the transitional deduction to technical provisions for similar to life obligations, in the following groups of homogeneous risks:

- Capital redemption products, with and without profit sharing;
- Health SLT, relating to obligations with workers' compensation insurance contracts.

ASF ruled that for 2019 the transitional deduction to technical provisions must be recalculated, based on 31 December 2018 information, and the reduction resulting from that calculation (if greater than the normal gradual reduction) must be reported on the first day of 2019.

Accordingly, the table below contains the respective amounts of the gross technical provisions and the reinsurance recoverables, for solvency purposes, with the reference date of 1 January 2019<sup>6</sup>, and in the financial statements, with the reference date of 31 December 2018. The initial amount of the transitional deduction applied is also shown.

Amounts in thousand euros

		Gross Tec	hnical Provisio	ns	Reinsurance Recoverables		
Lines of business/ Homogeneous risk groups		Figure 1.1	Solvency II		Electrical de		Transitional
255	o: <u>Jaconicco, 10 iii o g</u> enecae nek <b>g. 0 ip</b> e	Financial Statements	Best Estimate	Risk Margin	Financial Statements	Solvency II	Deduction
29 and 33	Life insurance obligations - Health – SLT	699,747	881,404	75,225	0	0	256,882
30	Life insurance obligations - Insurance with profit sharing - Capital redemption products	1,254,522	1,382,107	9,559	0	0	137,145
32	Life insurance obligations - Other obligations similar to life - Capital redemption products	5,087,284	5,268,160	11,889	0	0	192,764
	Total	7.041.553	7,531,671	96,673	0	0	586,791

Pursuant to Article 25 of Law No. 147/2015, of 9 September, the Group applied the transitional deduction to technical provisions on the first day of 2022. The table below shows the amount of that deduction at 31 December 2022.

Amounts in thousand euros

		Transitional Deduction				
Lines of bu	usiness/ Homogeneous risk groups	Recalculation 1/1/2019	Annual decrease	Accumulated decrease to 31/12/2022 (3 years)	Amount at 31/12/2022	
29 and 33	Life insurance obligations - Health – SLT	256,882	-19,760	-59,280	197,602	
30	Life insurance obligations - Insurance with profit sharing - Capital redemption products	137,145	-10,550	-31,649	105,496	
32	Life insurance obligations - Other obligations similar to life - Capital redemption products	192,764	-14,828	-44,484	148,280	
Total		586.791	-45,138	-135,413	451,378	

The following table quantifies the impact on the Group's financial condition, at 31 December 2022, of not applying this transitional deduction, namely the impact on the amount of the technical provisions, solvency capital requirement, minimum capital requirement, basic own funds and eligible own funds to meet the minimum capital requirement and the solvency capital requirement.

Amounts in thousand euros

<sup>&</sup>lt;sup>6</sup> Pursuant to Article 25 of Law No. 147/2015, of 9 September 2015, the ASF requested all insurance companies covered by the transitional rules to recalculate the transitional deduction, using information relating to 31 December 2018 as the basis for recalculation and with an effective date of 1 January 2019.



	Transition	Transitional measure on technical provisions			
	Amount with the transitional measure	Impact of the transitional measure			
Technical provisions	13,192,999	13,644,377	-451,378		
Basic own funds					
Excess of assets over liabilities	3,080,553	2,771,363	309,190		
Eligible own funds to meet SCR	3,083,085	2,773,730	309,355		
Solvency Capital Requirement (SCR)	1,784,936	1,789,717	-4,781		
SCR coverage ratio	172.73%	154.98%			

The impact of the annual decrease in the transitional deduction to technical provisions, on the first day of 2023, is approximately 0.34% of the total amount of the technical provisions and 1.71 pp in the SCR coverage ratio.

## E. Capital Management





During the period covered by this report, there were no significant changes related to the objectives, policies and processes adopted by the Fidelidade Group to manage its own funds.

The changes which occurred in 2022, both in its own funds and in its solvency capital requirement are explained in this chapter.

Method 1 (the accounting consolidation-based method) described in Article 270 of the Legal Framework on the Taking-up and Pursuit of the Business of Insurance and Reinsurance, approved by Law No. 147/2015, of 9 September, was used to calculate the group's solvency, using data net of any intra-group transactions.

#### E.1. Own funds

#### E.1.1. Management of own funds

The new legal framework on the taking-up and pursuit of the business of insurance requires insurance undertakings to have an effective risk management system.

Accordingly, the own risk and solvency assessment, normally identified by the acronym ORSA, is considered a central element in this system, since, from a prospective vision, it relates risk, capital and return, in the context of the business strategy established by the insurance undertaking.

The ORSA exercise, which coincides with the strategic planning timeframe (never less than 3 years), therefore plays a key role in the Group's Capital Management, supporting its main activities, namely:

- Assessing, together with risk management, the risk appetite structure in relation to the business strategy and capital management strategy;
- Contributing to the commencement of the strategic planning process, through the performance of a capital adequacy assessment in the most recent period;
- Monitoring of capital adequacy in line with the regulatory capital requirements and the internal capital needs.

Considering the results obtained in the ORSA, and if the capital requirements are not in line with those defined, both in regulatory terms and in terms of other limits defined internally, corrective actions to be implemented are detailed, in order to restore the adequate/intended level of capital.

#### E.1.2. Structure, amount and tiering of own funds

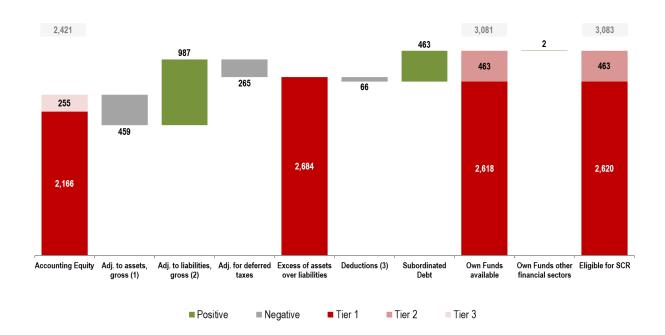
The table below presents a comparison of the own funds as set out in Fidelidade Consolidated's financial statements and the excess of assets over liabilities calculated for solvency purposes.

Amounts in thousand euros

	Solvency II	Financial statements	Difference	Solvency II previous year
Assets	18,168,195	19,085,673	-917,478	18,740,596
Technical Provisions	13,192,999	14,664,175	-1,471,176	13,666,878
Other liabilities	2,291,395	2,000,305	291,090	2,141,011
Excess of assets over liabilities	2,683,801	2,421,193	262,608	2,932,707



The difference is explained in the graph below in million euros.



- (1) Impact on Own Funds resulting from the difference between market value and book value of assets
- (2) Impact on Own Funds resulting from the difference between fair value plus risk margin and the transitional measure applicable to technical provisions, and the book value of liabilities (net of reinsurance, deferred acquisition costs and reimbursement of amounts paid in claims)
- (3) Deductions on Own Funds resulting from participations in credit and financial institutions and unavailable non-controlling interests



The table below provides information on the structure, amount and quality of the basic own funds and ancillary own funds, at 31 December 2022 and 31 December 2021.

Amounts in thousand euros

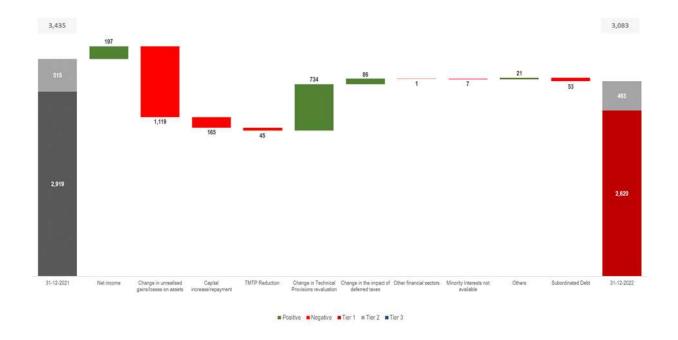
					II tilousanu euros
	Own Funds - Structure	Amount	Tier	Amount previous year	<b>Tier</b> previous year
	Ordinary share capital (gross of own shares)	509,264	1	509,264	1
	Non-available called but not paid in ordinary share capital at group level	0		0	
	Share premium account related to ordinary share capital	382,666	1	382,666	1
	Surplus funds	0		0	
	Non-available surplus funds at group level	0		0	
	Preference shares	0		0	
	Non-available preference shares at group level	0		0	
	Share premium account related to preference shares	0		0	
	Non-available share premium account related to preference shares at group level	0		0	
	Reconciliation reserve	1,791,723	1	1,875,651	1
sp	Subordinated liabilities	462,590	2	515,360	2
fun	Non-available subordinated liabilities at group level	0		0	
OWI	An amount equal to the value of net deferred tax assets	0		0	
Basic own funds	An amount equal to the value of net deferred tax assets non available at group level	0		0	
	Other own fund items approved by the supervisory authority as basic own funds not specified above	0		164,977	1
	Non–available own funds related to other own funds items approved by supervisory authority	0		0	
	Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	0		0	
	Basic own funds	3,146,243		3,447,918	
	Deductions for participations in other financial undertakings, including non- regulated undertakings carrying out financial activities whereof deducted according to art 228 of Directive 2009/138/EC-	5,024	1	2,850	1
	Deductions for participations where there is non–availability of information (Article 229)	0		0	
	Deductions for participations included with D&A when a combination of methods is used	0		0	
	Total basic own funds	3,141,219		3,445,068	



Amounts in thousand euros

	Own Funds - Structure	Amount	Tier	Amount previous year	<b>Tier</b> previous year
	Unpaid and uncalled ordinary share capital callable on demand	0		0	
<u>s</u>	Unpaid and uncalled preference shares callable on demand	0		0	
Ancillary own funds	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0		0	
ð	Letters of credit and guarantees under Article 96(2) of Directive 2009/138/EC	0		0	
ncillary	Letters of credit and guarantees other than under Article 96(2) of Directive 2009/138/EC	0		0	
Ā	Non-available ancillary own funds at group level	0		0	
	Other ancillary own funds	0		0	
	Total ancillary own funds	0		0	
	Total own funds	3,141,219		3,445,068	
Non	-Controlling interests (if not reported as part of another own fund item)	0		0	
Non	-available non-controlling interests at group level	-60,501	1	-12,132	1
	Total available own funds excluding financial sector	3,080,718		3,432,936	
Owr	n funds of other financial sectors	2,367	1	1,650	1
	Total eligible own funds including financial sector	3,083,085		3,434,586	

The graph below shows the main changes to the Group's available own funds during the period covered by this report, in million euros.





The table below shows the amounts of own funds available and eligible to meet the solvency capital requirement (SCR) and the minimum capital requirement (MCR), classified by tier, relating to 31 December 2022 and 31 December 2021.

Amounte	ın	thousand	DITTO

	SCR					
	Including financial sector	previous year	Excluding financial sector	previous year	MCR	previous year
Tier 1	2,620,495	2,919,226	2,618,128	2,917,576	2,618,128	2,917,576
Tier 2	462,590	515,360	462,590	515,360	125,777	124,074
Tier 3	0	0	0	0	0	0
Total	3,083,085	3,434,586	3,080,718	3,432,936	2,743,905	3,041,650

#### E.1.3. Restrictions to the transferability and fungibility of own funds in subsidiaries

No restrictions were identified which affect the availability and transferability of the own funds of the subsidiaries, and which might affect the Group's Solvency position.

#### E.2. Solvency capital requirement and minimum capital requirement

To calculate the solvency capital requirement, the Group applies the standard formula set out in Articles 119 to 129 of the Legal Framework on the Taking-up and Pursuit of the Business of Insurance and Reinsurance, approved by Law No. 147/2015, of 9 September, and does not use simplified calculations or specific parameters.

Calculation of the minimum capital requirement is in line with that set out in Article 147 of the aforementioned Legal Framework.

Information is presented below on the solvency capital requirement (SCR) and the minimum capital requirement (MCR) and also the respective coverage ratio, at 31 December 2022 and 31 December 2021.

Amounts in thousand euros

		Capital Requirements	Capital Requirements previous year	Coverage Ratio	Coverage Ratio previous year
SCI	₹	1,784,936	1,939,314	172.73%	177.10%
SCR excludin	_	1,784,936	1,939,314	172.60%	177.02%
MCI	₹	628,884	620,369	436.31%	490.30%

The table below provides a breakdown of the SCR by risk modules, with reference to 31 December 2022 and 31 December 2021, focusing, in particular, on the breakdown of the BSCR and the adjustments for the loss-absorbing capacity of the technical provisions and of deferred taxes.



Amounts in thousand euros

	SCR Breakdown	SCR Breakdown previous year
Market risk	1,372,785	1,583,870
Counterparty default risk	274,690	290,756
Life underwriting risk	433,628	399,141
Health underwriting risk	281,298	269,116
Non-life underwriting risk	302,259	280,561
Diversification	-807,927	-794,225
Intangible asset risk	0	0
Basic Solvency Capital Requirement	1,856,733	2,029,219
Operational risk	129,281	125,830
Loss-absorbing capacity of technical provisions	-2,677	-2,470
Loss-absorbing capacity of deferred taxes	-235,873	-230,437
Solvency capital requirement for companies using the consolidated method	1,747,464	1,922,142
Capital requirement for other financial sectors (capital requirements not linked to the insurance sector)	1,091	1,130
Capital requirement for residual undertakings	36,381	16,042
Consolidated Group Solvency Capital Requirement	1,784,936	1,939,314

Information on the main changes to the solvency capital requirement in the period covered by this report, and the reasons for those changes, are included in Chapter C.

#### E.3. Use of the duration-based equity risk sub-module in the calculation of the solvency capital requirement

The Fidelidade Group does not use the duration-based equity risk sub-module, set out in Article 125(5) of the Legal Framework on the Taking-up and Pursuit of the Business of Insurance and Reinsurance, approved by Law No. 147/2015, of 9 September.

#### E.4. Differences between the standard formula and any internal model used

As previously stated, the Fidelidade Group uses the standard formula, and does not apply any internal model.

### E.5. Non-compliance with the minimum capital requirement and non-compliance with the solvency capital requirement

There was no failure to comply with the minimum capital requirement or the solvency capital requirement during the period covered by this report.



#### E.6. Any other information

#### E.6.1. Transitional measure on equity risk

The Group did not apply the transitional regime applicable to the equity risk set out in Article 20(2) and (3) of Law No. 147/2015, of 9 September.

#### E.6.2. Futures, forwards and swaps contracts

Calculation of capital requirements of the currency risk sub-module includes the effect of hedging of exchange rate exposure of assets held in portfolio denominated in American dollars (USD), Hong Kong dollars (HKD) and Pounds sterling (GBP), via the use of futures and foreign exchange forwards and swaps, and of assets denominated in Yen (JPY) and Swiss francs (CHF), via the use of foreign exchange forwards.

The counterparty default risk module also takes into account exposure to counterparties with which the above-mentioned hedging is performed.

#### E.6.3. Solvency capital requirement and own funds of the group's insurance and reinsurance undertakings

The tables below present the solvency capital requirement of each of the Group's insurance and reinsurance undertakings included in the Fidelidade Group's solvency calculation.



# a) EEA Insurance Undertakings

#### Amounts in thousand euros

Legal name of undertaking	SCR Market Risk	SCR Counterparty Default Risk	SCR Life Underwriting Risk	SCR Health Underwriting Risk	SCR Non-Life Underwriting Risk	SCR Operational Risk	Individual SCR	Individual MCR	Individual Own Funds Eligible for SCR coverage
Fidelidade - Companhia de Seguros, S.A.	1,255,566	187,340	319,746	191,420	245,928	90,771	1,442,830	389,758	3,044,556
Comp Portuguesa Resseguros, S.A.	636	477	0	117	557	78	1,271	3,600	14,335
Fidelidade Assistência - Companhia de Seguros, S.A.	3,263	1,858	0	0	17,586	1,910	20,618	7,138	51,704
Via Directa - Companhia de Seguros, S.A.	3,259	1,571	0	56	17,048	1,788	19,263	8,668	30,562
Multicare - Seguros Saúde, S.A.	6,479	13,134	0	74,875	0	12,691	91,360	24,608	155,294



# b) Insurance and reinsurance undertakings outside the EEA (using Solvency II rules)

Amounts in thousand euros

Legal name of undertaking	Local capital requirement	Minimum local capital requirement	Eligible own funds in line with local rules
FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	22,985	9,899	28,426
FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	8,780	3,700	37,298
Positiva Seguros y Reaseguros S.A.A	72,804	23,041	116,364
LA POSITIVA VIDA SEGUROS Y REASEGUROS, S.A.A.	304,030	76,007	65,299
Alianza Vida Seguros y Reaseguros S.A.	12,459	8,962	16,181
Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	41,132	10,283	33,713
Alianza Garantia	7,269	7,400	8,076
La Positiva S.A Entidad Prestadora de Salud	10,821	3,700	1,430
FID CHILE SEGUROS GENERALES, S.A.	16,480	4,120	18,230
Fidelidade Macau Vida	19,312	4,828	18,062
Seguradora Internacional Mocambique, SA (SIM)	32,303	11,589	58,715
GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	9,575	7,400	17,445

# c) Other regulated and non-regulated financial undertakings including insurance holding companies and mixed financial holding companies

Amounts in thousand euros

Legal name of undertaking	Local capital requirement	Minimum local capital requirement	Eligible own funds in line with local rules
Fidelidade - Sociedade Gestora de Org. de Investimento Imobiliari	474	125	1,337
Tenax Capital Ltd	617	0	1,030

# E.6.4. Effects of Group diversification

Among the entities within the group's consolidation perimeter, Fidelidade's business has a very substantial weight, when compared with the other entities.



Accordingly, the effect of diversification resulting from the consolidation of the business of the Group's insurance and reinsurance undertakings is not significant, as can be seen in the table below.

Amounts in thousand euros

	7 illiounito illi unouounita ouroo
	SCR
Fidelidade - Companhia de Seguros, S.A.	1,442,830
Fidelidade Assistência - Companhia de Seguros, S.A.	20,618
Multicare - Seguros de Saúde, S.A.	91,360
Via Directa - Companhia de Seguros, S.A.	19,263
Companhia Portuguesa de Resseguro, S.A.	1,271
Fidelidade Angola - Companhia de Seguros, S.A.	22,985
Garantia - Companhia de Seguros de Cabo Verde, S.A.	9,575
Fidelidade Macau - Companhia de Seguros, S.A.	8,780
Fidelidade Macau Vida - Companhia de Seguros, S.A.	19,312
Fidelidade Chile	16,480
Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	41,132
Alianza Garantia Seguros Y Reasseguros S.A.	7,269
Alianza Vida Seguros y Reaseguros S.A.	12,459
SIM	32,303
LLA	98,938
La Positiva S.A Entidad Prestadora de Salud	10,821
La Positiva Vida Seguros Y Reaseguros S.A.	304,030
Positiva Seguros y Reaseguros	72,804
Total	2,232,230
Adjustment in Fidelidade participations	-165,218
Total	2,067,012
Group diversification effects	-282,076
Group SCR	1,784,936



# E.6.5. Minimum consolidated Group solvency capital requirement

The minimum consolidated Group solvency capital requirement corresponds to the sum of the following items:

Amounts in thousand euros

Insurance Undertakings	MCR	Amounts in thousand euros  Proportional part
Fidelidade - Companhia de Seguros, S.A.	389,256	100%
Companhia Portuguesa de Resseguro, S.A.	3,600	100%
Fidelidade Assistência - Companhia de Seguros, S.A.	7,138	100%
Via Directa - Companhia de Seguros, S.A.	8,668	100%
Multicare - Seguros de Saúde, S.A.	24,608	100%
Fidelidade Angola - Companhia de Seguros, S.A.	9,899	100%
Garantia - Companhia de Seguros de Cabo Verde, S.A.	7,400	100%
Fidelidade Macau - Companhia de Seguros, S.A.	3,700	100%
La Positiva Seguros Y Reaseguros	23,041	100%
La Positiva Vida Seguros Y Reaseguros	76,007	100%
Alianza Vida Seguros Y Reaseguros	8,962	100%
Alianza Compañia Seguros Y Reaseguros	10,283	100%
Alianza Garantia	7,400	100%
LaPositiva EPS	3,700	100%
FID CHILE	4,120	100%
Fidelidade Macau Vida- Companhia de Seguros, S.A.	5,198	100%
SIM	11,589	100%
LLA	24,314	100%
Minimum consolidated group solvency capital requirement	628,883	

# E.6.6. Optional additional information

The Group continues to monitor the conflict in Ukraine, and will actively react to any possible impacts on its solvency ratio.

# Annexes



Annex – Quantitative Information \*

Fidelidade Consolidado



Annex I S.02.01.02 Balance Sheet

		Solvency II Value
		C0010
ASSETS		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	0
Deferred tax assets	R0040	570,948
Pension benefit surplus	R0050	25,305
Property, plant and equipment held for own use	R0060	154,625
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	12,771,561
Property (other than for own use)	R0080	257,825
Holdings in related undertakings, including participations	R0090	2,332,692
Equities	R0100	449,883
Equities — listed	R0110	420,655
Equities — unlisted	R0120	29,228
Bonds	R0130	8,361,195
Government bonds	R0140	2,947,707
Corporate bonds	R0150	5,240,734
Structured notes	R0160	172,754
Collateralised securities	R0170	0
Collective investment undertakings	R0180	900,859
Derivatives	R0190	112,175
Deposits other than cash equivalents	R0200	356,932
Other investments	R0210	0
Assets held for index-linked and unit-linked contracts	R0220	3,134,636
Loans and mortgages	R0230	13,905
Loans on insurance policies	R0240	1,503
Loans and mortgages to individuals	R0250	0
Other loans and mortgages	R0260	12,402
Reinsurance recoverables from:	R0270	360,452
Non-life and health similar to non-life	R0280	434,804
Non-life, excluding health	R0290	399,332
Health similar to non-life	R0300	35,472
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	87,500
Health similar to life	R0320	0
Life, excluding health and index-linked and unit-linked	R0330	87,500
Life, index-linked and unit-linked	R0340	-161,852
Deposits to cedants	R0350	965
Insurance and intermediaries receivables	R0360	399,085
Reinsurance receivables	R0370	142,512
Receivables (trade, not insurance)	R0380	95,314
Own shares (held directly)	R0390	149
Amounts due in respect of own fund items or initial funds called up but not yet paid in	R0400	0
Cash and cash equivalents	R0410	384,881
Any other assets, not elsewhere shown	R0420	113,856
TOTAL ASSETS	R0500	18,168,195



Annex I S.02.01.02 Balance Sheet (Cont.)

(Cont.)		Solvency II Value
	<u> </u>	C0010
LIABILITIES		
Technical provisions — non-life	R0510	1,765,338
Technical provisions — non-life (excluding health)	R0520	1,298,772
TP calculated as a whole	R0530	0
Best Estimate	R0540	1,269,417
Risk margin	R0550	29,355
Technical provisions — health (similar to non-life)	R0560	466,565
TP calculated as a whole	R0570	0
Best Estimate	R0580	442,225
Risk margin	R0590	24,340
Technical provisions — life (excluding index-linked and unit-linked)	R0600	8,674,864
Technical provisions — health (similar to life)	R0610	984,228
TP calculated as a whole	R0620	0
Best Estimate	R0630	893,591
Risk margin	R0640	90,637
Technical provisions — life (excluding health and index-linked and unit-linked)	R0650	7,690,636
TP calculated as a whole	R0660	0
Best Estimate	R0670	7,529,062
Risk margin	R0680	161,574
Technical provisions — index-linked and unit-linked	R0690	2,752,797
TP calculated as a whole	R0700	2,367,194
Best Estimate	R0710	305,532
Risk margin	R0720	80,071
Other technical provisions	R0730	0
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	46,191
Pension benefit obligations	R0760	6,418
Deposits from reinsurers	R0770	54,603
Deferred tax liabilities	R0780	581,509
Derivatives	R0790	171,924
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	41,020
Insurance and intermediaries payables	R0820	224,209
Reinsurance payables	R0830	347,703
Payables (trade, not insurance)	R0840	111,863
Subordinated liabilities	R0850	462,590
Subordinated liabilities not classified in basic own funds (BOF)	R0860	0
Subordinated liabilities classified in basic own funds (FPB)	R0870	462.590
Any other liabilities, not elsewhere shown	R0880	243,365
TOTAL LIABILITIES	R0900	15,484,394

EXCESS OF ASSETS OVER LIABILITIES	R1000	2,683,801



Annex I S.05.01.02

Premiums, claims and expenses by line of business

			Line of Business: non-life insurance and reinsurance obligations (direct business and proportional reinsurance accepted)											Line of business: Non-proportional reinsurance accepted				
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation and transport	Property	Total
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written	Postso	F00.400	50.57	075.400	407.025	200.00=	50.052	545.531	400.470	00.00=	7.00:	F7.0C	00.000					0.000.555
Gross - Direct business	R0110	539,488	58,571	375,426	407,905	339,665	59,859	545,571	123,476	29,665	7,231	57,097	62,932					2,606,885
Gross — Proportional reinsurance accepted	R0120	320	799	28	76	102	216	14,661	2,208	52		698	104					19,264
Corre Non correlational existence and a	R0130													0	0	0	0	
Gross — Non-proportional reinsurance accepted  Reinsurers' share	R0140	17,696	22,423	2,922	23,605	33,410	36,651	310,951	72,517	21,080	7	253	32,005					573,518
Net	R0200	522,112	36,947	372,532	384,376	306,356	23,424	249,282	53,167	8,636	7,225	57,542	31,031				i	2,052,631
Premiums earned																		
Gross - Direct business	R0210	528,565	53,633	371,900	403,191	320,135	58,214	526,653	113,733	29,887	6,968	55,282	62,569					2,530,729
Gross — Proportional reinsurance accepted	R0220	325	799	112	89	102	235	12,761	2,372	52	2	645	138					17,632
0	R0230													0	0	0	0	
Gross — Non-proportional reinsurance accepted  Reinsurers' share	R0240	15,701	17,911	2,922	23,459	25,468	35,080	297,056	62,611	22,069	8	254	31,286					533,826
Net	R0300	513,189	36,521	369,089	379,822	294,769	23,369	242,358	53,493	7,870	6,961	55,673	31,421				i	2,014,536
Claims incurred																		
Gross - Direct business	R0310	409,745	87,535	195,361	248,169	144,989	11,096	188,081	18,793	1,646	277	36,397	22,467					1,364,557
Gross — Proportional reinsurance accepted	R0320	7	233	-2,207	483	-8	175	7,015	1,301		-1	780	53					7,832
	R0330													0	0	0	0	
Gross — Non-proportional reinsurance accepted  Reinsurers' share	R0340	11,219	8,654	1,462	20,103	24,726	9,123	126,254	10,709	-11,036		89	14,136					215,438
Net	R0400	398,534	79,115	191,692	228,549	120,255	2,149	68,842	9,384	12,682	276	37,088	8,385				i	1,156,951
Changes in other technical provisions																		
Gross - Direct business	R0410	2,428	143	-191	-4,540	478	-79	4,672	14,455	26	-170	25	72					17,320
Gross — Proportional reinsurance accepted	R0420							532	15			66						613
	R0430													0	0	0	0	
Gross — Non-proportional reinsurance accepted	R0440								12,414									12,414
Reinsurers' share Net	R0500	2,428	143	-191	-4,540	478	-79	5,204	2,057	26	-170	91	72				i	5,520
Expenses incurred	R0550	112,917	19,584	102,258	147,803	129,236	11,290	129,232	34,308	4,388	3,558	24,125	19,664				i	738,362
Other expenses	R1200																	487,123
Total expenses	R1300																	1,225,486



Annex I S.05.01.02 Premiums, claims and expenses by line of business (Cont.)

Premiums written	business (Cont.)										
Premiums written   Cross   R1410   107,431   1,306,210   1,073,954   4,397   2,491,991   Reinsurers' share   R1420   1,031   1,306,210   347,913   4   4,397   2,364,915   127,072   1,001	()				Line of business: Life	insurance obligations					
Premiums written   Cross   R1410   107,431   1,306,210   1,073,954   4,397   2,491,991   Reinsurers' share   R1420   1,031   1,306,210   347,913   4   4,397   2,364,915   127,072   1,001			Health insurance	Insurance with profit sharing	Index-linked and unit- linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance	Health reinsurance	Life reinsurance	Total
Gross         R1410         107,431         1,306,210         1,073,954         4,397         2,491,991           Reinsurers' share         R1420         1,031         126,041         127,072         127,072         127,072         127,072         127,072         127,072         127,072         127,072         127,072         127,072         127,072         127,072         128,548         128,548         128,518         129,563         128,518         129,563         129,563         128,518         129,563         128,518         129,563         128,518         129,563         128,518         129,563         128,518         129,563         128,518         4,504         2,362,472         129,563         128,518         4,504         2,362,472         129,563         128,518         4,504         2,362,472         129,563         128,518         4,504         2,362,472         129,563         39,178         6,231         2,410,791         2,410,791         4         100,663         100,967         4         100,663         100,979         4         100,663         2,310,427         100,972         4         100,663         2,310,427         100,663         2,29,688         2,29,688         2,25         2,255,598         2,250,598         2,250,598         2,250,598 </th <th></th> <th></th> <th>C0210</th> <th>C0220</th> <th>C0230</th> <th>C0240</th> <th>C0250</th> <th>C0260</th> <th>C0270</th> <th>C0280</th> <th>C0300</th>			C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Reinsurer's share R1420 1,031 126,041 126,041 1,306,210 947,913 4,397 2,364,915  Premiums earned  Gross R1510 107,460 1,306,210 128,518 128,518 129,563  Reinsurer's share R1520 1,045 128,518 128,518 129,563  Net R1600 106,414 1,306,210 945,343 1,806,364 39,178 6,231 2,410,791  Reinsurers' share R1620 570 100,097 4 100,663  Reinsurers' share R1620 570 100,097 5 4 100,663  Reinsurers' share R1620 570 100,097 5 5 2,310,422  Changes in other technical provisions  Changes in other technical provisions  Changes in other technical growisions  R1710 2-66,556 2-29,668 2-29,689  R1710 3-266,556 2,770 5 29,559  Reinsurers' share R1720 3-66 2,770 5 29,559  Reinsurers' share R1800 3-266,491 3-31,838 2 25 2-295,599  Expenses incurred R1900 19,598 126,624 201,769 2,154 16 350,161  Other expenses R2500 5 5 5 298,300											
Net         R1500         106,400         1,306,210         947,913         4,397         2,364,915           Premiums earned           Gross         R1510         107,460         1,306,210         1,073,862         4,504         2,492,035           Reinsurers' share         R1520         1,045         128,518         128,518         129,562           Net         R1600         106,414         1,306,210         1945,343         4,504         2,492,035           Reinsurere         Claims incured           Gross         R1610         377,493         122,523         1,865,366         39,178         6,231         2,410,791           Reinsurers' share         R1620         570         100,097         4         100,663           Net         R1700         376,922         122,523         1,765,269         39,178         6,235         2,310,127           Changes in other technical provisions           Changes in other technical provisions         81710         -266,556         -29,068         2,700         2,255,595         295,595         295,595         295,595         295,595         295,595         295,595         295,595         295,595         296,300         296,800					1,306,210					4,397	
Premiums earned  Gross R1510 107,460 1,306,210 1,073,862 4,504 2,492,035  Reinsurers' share R1520 1,045 128,518 129,563  Net R1600 106,414 1,306,210 945,343 4,504 2,362,472  Claims incurred  Gross R1610 377,493 122,523 1,865,366 39,178 6,231 2,410,791  Reinsurers' share R1620 570 100,097 4 100,663  Net R1700 376,922 122,523 1,765,269 39,178 6,235 2,310,127  Changes in other technical provisions  Cross R1710 -266,556 -29,068 5 25 -295,596  Reinsurers' share R1720 -66 2,770  Net R1800 -266,491 -31,838 5 25 -298,303  Expenses incurred R1900 19,598 126,624 201,769 2,154 16 350,161  Other expenses R2500 - 34,000					4 000 040					4.007	
Gross         R1510         107,460         1,306,210         1,073,862         4,504         2,492,035           Reinsurers' share         R1520         1,045         128,518         128,518         129,563           Net         R1600         106,414         1,306,210         945,343         4,504         2,362,472           Claims incurred           Gross         R1610         377,493         122,523         1,865,366         39,178         6,231         2,410,791           Reinsurers' share         R1620         570         100,097         4         100,663           Net         R1700         376,922         122,523         1,765,269         39,178         6,231         2,410,791           Changes in other technical provisions         6,235         2,301,127         2,301,127         2,301,127         2,301,127           Reinsurers' share         R1710         -266,556         -29,068         25         -295,596           Reinsurers' share         R1720         -66         2,770         2,700         2,700           Net         R1800         -266,491         -31,838         2,54         25         -298,303           Expenses incurred         R1900         19,59		K1500		106,400	1,306,210	947,913				4,397	2,364,919
Reinsurers' share R1520 1,045 128,518 129,562 Net R1600 106,414 1,306,210 945,343 4,504 2,362,472 Claims incurred Gross R1610 377,493 122,523 1,865,366 39,178 6,231 2,410,791 Reinsurers' share R1620 570 100,097 4 100,662 Net R1700 376,922 122,523 1,765,269 39,178 6,235 2,310,127 Changes in other technical provisions Gross R1710 -266,556 -29,068 5 25 2,95,598 Reinsurers' share R1720 -66 2,770 5 2,700 Net R1800 -266,491 -31,838 5 25 2,983,300 Expenses in curred R1900 19,598 126,624 201,769 2,154 16 350,161 Other expenses R2500 8 250		D4540		107.460	1 206 210	1 072 962				4.504	2 402 025
Net R1600 106.414 1,306,210 945,343 4,504 2,362,472  Claims incurred  Gross R1610 377,493 122,523 1,865,366 39,178 6,231 2,410,791  Reinsurers' share R1620 570 100,097 4 100,662  Net R1700 376,922 122,523 1,765,269 39,178 6,235 2,310,127  Changes in other technical provisions  Gross R1710 -266,556 -29,068 25 -295,598  Reinsurers' share R1720 -66 2,770 2,706  Net R1800 -266,491 -31,838 25 -298,300  Expenses incurred R1900 19,598 126,624 201,769 2,154 16 350,161  Other expenses R2500 - 346,344					1,300,210					4,504	
Claims incurred  Gross R1610 377,493 122,523 1,865,366 39,178 6,231 2,410,791  Reinsurers' share R1620 570 100,097 4 100,663  Net R1700 376,922 122,523 1,765,269 39,178 6,235 2,310,127  Changes in other technical provisions  Gross R1710 -266,556 -29,068 25 -295,595  Reinsurers' share R1720 -66 2,770 527,000  Net R1800 -266,491 -31,838 25 298,300  Expenses incurred R1900 19,598 126,624 201,769 2,154 16 350,161  Other expenses R2500 - 9 - 34,44					1 206 210					4 504	
Gross         R1610         377,493         122,523         1,865,366         39,178         6,231         2,410,791           Reinsurers' share         R1620         570         100,097         44         100,663         2,310,127           Net         R1700         376,922         12,523         1,765,269         39,178         6,235         2,310,127           Changes in other technical provisions           Gross         R1710         -266,556         -29,068         25         25         -295,595           Reinsurers' share         R1720         -66         2,770         2,770         2,700         2,700           Net         R1800         -266,491         -31,838         25         29,830         29,830           Expenses incurred         R1900         19,598         126,624         201,769         2,154         16         350,161           Other expenses         R2500		KIOOU		100,414	1,300,210	940,343				4,004	2,302,472
Reinsurers' share R1620 570 100,097 - 4 100,662  Net R1700 376,922 122,523 1,765,269 39,178 6,235 2,310,127  Changes in other technical provisions  Gross R1710 -266,556 -29,068 25 -295,598  Reinsurers' share R1720 -66 2,770 - 2,708  Net R1800 -266,491 -31,838 25 -298,303  Expenses incurred R1900 19,598 126,624 201,769 2,154 16 350,161  Other expenses R2500 - 344		R1610		377 493	122 523	1 865 366	30 178			6 231	2 410 791
Net         R1700         376,922         122,523         1,765,269         39,178         6,235         2,310,127           Changes in other technical provisions           Gross         R1710         -266,556         -29,068         25         -295,598           Reinsurers' share         R1720         -66         2,770         2,705           Net         R1800         -266,491         -31,838         25         -298,303           Expenses incurred         R1900         19,598         126,624         201,769         2,154         16         350,161           Other expenses         R2500					122,020		00,110				
Changes in other technical provisions           Gross         R1710         -266,556         -29,068         25         -295,598           Reinsurers' share         R1720         -66         2,770         2,708           Net         R1800         -266,491         -31,838         25         -298,303           Expenses incurred         R1900         19,598         126,624         201,769         2,154         16         350,161           Other expenses         R2500					122.523		39.178				
Gross         R1710         -266,556         -29,068         25         -295,598           Reinsurers' share         R1720         -66         2,770         2,705           Net         R1800         -266,491         -31,838         25         -298,303           Expenses incurred         R1900         19,598         126,624         201,769         2,154         16         350,161           Other expenses         R2500				1.1,322	.22,020	.,. 23,200	22,110			-,-50	_,_,_,
Reinsurers'share R1720 -66 2,770 2,705 Net R1800 -266,491 -31,838 25 -298,305 Expenses incurred R1900 19,598 126,624 201,769 2,154 16 350,161 Other expenses R2500 344	· · · · · · · · · · · · · · · · · · ·			-266,556		-29,068	<u> </u>			25	-295,599
Net         R1800         -266,491         -31,838         25         -298,302           Expenses incurred         R1900         19,598         126,624         201,769         2,154         16         350,161           Other expenses         R2500         344         344         344				,		-,					2,705
Expenses incurred         R1900         19,598         126,624         201,769         2,154         16         350,161           Other expenses         R2500         344 <td></td> <td>R1800</td> <td></td> <td>-266,491</td> <td></td> <td>-31,838</td> <td></td> <td></td> <td></td> <td>25</td> <td>-298,303</td>		R1800		-266,491		-31,838				25	-298,303
Other expenses R2500 344		R1900		19,598	126,624	201,769	2,154			16	350,161
	•	R2500									344
		R2600									350,505



Annex I S.05.02.01 Premiums, claims and expenses by country

		Country of Origin Top 5 countries (by amount of gross premiums written) – non-life obligations						Total of Top 5 countries and country of origin
	R0010	C0010	AO	во	FR	CL	PE	C0070
	Kooro	C0080	AU	ьо	T IX	OL.	1.5	C0140
Premiums written								
Gross — Direct business	R0110	1,739,471	72,890	97,353	74,061	101,578	391,541	2,476,895
Gross — Proportional reinsurance accepted	R0120	6,933	18	11,642			49	18,643
Gross — Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140	179,500	11,191	43,930	52,222	90,146	129,655	506,645
Net	R0200	1,566,905	61,717	65,065	21,839	11,432	261,935	1,988,893
Premiums earned								
Gross — Direct business	R0210	1,698,220	69,107	100,162	66,957	77,420	394,739	2,406,605
Gross — Proportional reinsurance accepted	R0220	5,143	23	11,642			36	16,844
Gross — Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240	162,470	12,399	48,574	44,146	67,634	134,642	469,863
Net	R0300	1,540,894	56,731	63,230	22,811	9,787	260,133	1,953,586
Claims incurred								
Gross — Direct business	R0310	929,265	33,684	44,487	43,151	38,277	227,082	1,315,946
Gross — Proportional reinsurance accepted	R0320	6,764	2	2,409			-2,271	6,904
Gross — Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340	51,269	6,668	15,808	30,533	33,076	54,610	191,964
Net	R0400	884,760	27,018	31,087	12,618	5,202	170,202	1,130,885
Changes in other technical provisions								
Gross — Direct business	R0410	2,563		2,412	12,451	-370	1,165	18,222
Gross — Proportional reinsurance accepted	R0420	613						613
Gross — Non-proportional reinsurance accepted	R0430							
Reinsurers' share	R0440				12,414			12,414
Net	R0500	3,177		2,412	37	-370	1,165	6,421
Expenses incurred	R0550	510,784	24,945	23,159	12,466	13,458	128,159	712,969
Other expenses	R1200							473,496
Total expenses	R1300							1,186,465



Annex I S.05.02.01 Premiums, claims and expenses by country

(Cont.)		Country of Origin	Total of Top 5 countries and country of origin					
	R1400		во	FR	и	МО	PE	C0210 C0280
Premiums written								
Gross	R1410	1,831,491	105,146	46,899	237,562	48,444	205,966	2,475,508
Reinsurers' share	R1420	18,219	40,728	9,387	3,455	268	52,425	124,483
Net	R1500	1,813,272	64,418	37,512	234,107	48,176	153,541	2,351,02
Premiums earned								
Gross	R1510	1,831,216	105,733	46,923	237,561	48,444	205,966	2,475,842
Reinsurers' share	R1520	18,215	43,115	9,399	3,455	268	52,425	126,87
Net	R1600	1,813,001	62,617	37,524	234,106	48,176	153,541	2,348,964
Claims incurred								
Gross	R1610	1,932,075	51,180	28,371	24,306	118,211	257,562	2,411,70
Reinsurers' share	R1620	5,206	33,250	9,031	455		51,818	99,760
Net	R1700	1,926,870	17,929	19,340	23,851	118,211	205,744	2,311,945
Changes in other technical provisions								
Gross	R1710	-211,168	723	16,093	65	-69,879	-33,439	-297,604
Reinsurers' share	R1720	3,346	76	-761		9		2,670
Net	R1800	-214,514	647	16,854	65	-69,887	-33,439	-300,274
Expenses incurred	R1900	135,526	43,077	7,572	100,785	2,472	53,717	343,148
Other expenses	R2500							343
Total expenses	R2600							343.491



#### Annex I S.22.01.22

Impact of long-term guarantees and transitional measures

		and transitional measures	technical provisions	impact of transitional measures on interest rate	impact of volatility adjustment set to zero	impact of matching adjustment set to zero	
		C0010	C0030	C0050	C0070	C0090	
Technical provisions	R0010	13,192,999	451,378	0	0	0	
Basic own funds	R0020	3,080,553	-309,190	0	0	0	
Eligible own funds to meet Solvency Capital Requirement	R0050	3,083,085	-309,355	0	0	0	
Solvency Capital Requirement	R0090	1,784,936	4,781	0	0	0	



Annex I S.23.01.22 Own funds

Own runds		_				
		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sectors						
Ordinary share capital (gross of own shares)	R0010	509,264	509,264	0		0
Non-available called but not paid in ordinary share capital at group level	R0020	0	0	0	0	0
Share premium account related to ordinary share capital	R0030	382,666	382,666	0	0	0
Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	R0040	0	0	0	0	0
Subordinated mutual members accounts	R0050	0	0	0	0	0
Non-available subordinated mutual member accounts at group level	R0060	0	0	0	0	0
Surplus funds	R0070	0	0	0	0	0
Non-available surplus funds at group level	R0080	0	0	0	0	0
Preference shares	R0090	0	0	0	0	0
Non-available preference shares at group level	R0100	0	0	0	0	0
Share premium account related to preference shares	R0110	0	0	0	0	0
Non-available share premium account related to preference shares at group level	R0120	0	0	0	0	0
Reconciliation reserve	R0130	1,791,723	1,791,723	0	0	0
Subordinated liabilities	R0140	462,590	0	0	462,590	0
Non-available subordinated liabilities at group level	R0150	0	0	0	0	0
An amount equal to the value of net deferred tax assets	R0160	0	0	0	0	0
An amount equal to the value of net deferred tax assets non-available at group level	R0170	0	0	0	0	0
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0
	R0190	0	0	0	0	0
Non-available own funds related to other own funds items approved by supervisory authority	R0200	0	0	0	0	0
Non-controlling interests (if not reported as part of a specific own fund item)	R0210	60,628	60,501	0	0	127
Non-available non-controlling interests at group level Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	10210	00,020	00,301	v	Ü	121
Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0	0	0	0	0
Deductions						
	R0230	5,062	5,024	0	0	38
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities whereof, deducted according to art 228 of the Directive 2009/138/EC	R0240	0	0	0	0	0
whereor, deducted according to art 226 or the birective 2009 136/EC		_	·	Ç	- 1	Ū
Deductions for participations where there is non-availability of information (Article 229)	R0250	0	0	0	0	0
Deduction for participations included with D&A when a combination of methods is used	R0260	0	0	0	0	0
Total of non-available own fund items	R0270	60,628	60,501	0	0	127
Total deductions	R0280	65,689	65,525	0	0	165
Total basic own funds after deductions	R0290	3,080,553	2,618,128	0	462,590	-165



Annex I S.23.01.22 Own funds (Cont.)

Unpaid and uncalled ordinary share capital callable on demand	R0300	0	0	0	0	0
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings, callable on	R0310	0	0	0	0	0
demand		· ·	·	0	0	0
Unpaid and uncalled preference shares callable on demand	R0320	0	0	0	0	0
A legally binding commitment to subscribe and pay for subordinated liabilities	R0330	ů		U	U	0
Letters of credit and guarantees other than under Article 96(2) of Directive 2009/138/EC	R0340	0	0	0	0	0
Letters of credit and guarantees under Article 96(2) of Directive 2009/138/EC	R0350	0	0	0	0	0
Supplementary members calls under first sub-paragraph of Article 96(3) of Directive 2009/138/EC	R0360	0	0	0	0	0
Supplementary members calls other than under first sub-paragraph of Article 96(3) of Directive 2009/138/EC	R0370	0	0	0	0	0
Non-available ancillary own funds at group level	R0380	0	0	0	0	0
	R0390	0	0	0	0	0
Other ancillary own funds  Total ancillary own funds	R0400	0	0	0	0	0
Own funds of other financial sectors	Notes	•		· ·		
Credit institutions, investment firms, financial institutions, alternative investment fund managers, financial institutions	R0410	2,367	2,367	0	0	0
Institutions for occupational retirement provisions	R0420	0	0	0	0	0
	R0430	0	0	0	^	0
Non-regulated entities carrying out financial activities	K0430	U	U	U	U	0
Total own funds of other financial sectors	R0440	2,367	2,367	0	0	0
Own funds when using D&A, exclusively or in combination with Method 1						
Own funds aggregated when using D&A and a combination of methods	R0450	0	0	0	0	0
Own funds aggregated when using D&A and a combination of methods, net of IGT	R0460	0	0	0	0	0
		0	0	0	0	0
Total available own funds to meet the consolidated group SCR (excluding own funds of other financial sectors and undertakings included via D&A)	R0520	3,080,553	2,618,128	0	462,590	-165
	R0530	3,080,718	2,618,128	0	462,590	0
Total available own funds to meet the minimum consolidated group SCR	Doron	0.000.740	0.040.400	2	400 500	Û
Total eligible own funds to meet the consolidated group SCR (excluding own funds of other financial sectors and undertakings included via D&A)	R0560	3,080,718	2,618,128	U	462,590	0
Title Piller of the could not be considered as a COD	R0570	2,743,905	2,618,128	0	125,777	0
Total eligible own funds to meet the minimum consolidated group SCR  Minimum consolidated group SCR	R0610	628,884	0	0	0	0
Ratio of eligible own funds to Minimum Consolidated Group SCR	R0650	436.31%	0	0	0	0
Total eligible own funds to meet the group SCR (including own funds of other financial sectors and undertakings included via D&A)	R0660	3,083,085	2,620,495	0	462590	0
	Docoo			•		
Group SCR	R0680	1,784,936	0	0	0	0
Ratio of eligible own funds to group SCR including own funds of other financial sectors and undertakings included via D&A	R0690	172.73%	0	0	0	0



Annex I S.23.01.22 Own funds (Cont.)

		C0060		
Reconciliation Reserve				
Excess of assets over liabilities	R0700	2,683,801		
Own shares (held directly and indirectly)	R0710	149		
Foreseeable dividends, distributions and charges	R0720	0		
Other basic own fund items	R0730	891,930		
Adjustments for restricted own fund items in respect of matching adjustment portfolios and ring-fenced funds	R0740	0		
Other non-available own funds	R0750	0		
Reconciliation Reserve	R0760	1,791,723		
Expected Profits				
Expected profits included in future premiums (EPIFP) — Life business	R0770	587,075		
Expected profits included in future premiums (EPIFP) — Non-life business	R0780	0		
Total expected profits included in future premiums (EPIFP)	R0790	587,075		



#### Annex I S.25.01.22

Solvency Capital Requirement — for undertakings on standard formula

Solvency Capital Requirement — for undertakings on standard formula				
		Gross solvency capital requirement	Undertaking Specific Parameter (USP)	Simplifications
		C0110	C0090	C0120
Market risk	R0010	1,372,785	0	
Counterparty default risk	R0020	274,690	0	
Life underwriting risk	R0030	433,628	0	
Health underwriting risk	R0040	281,298	0	
Non-life underwriting risk	R0050	302,259	0	
Diversification	R0060	-807,927	0	
Intangible asset risk	R0070	0	0	
Basic Solvency Capital Requirement	R0100	1,856,733	0	
Calculation of Solvency Capital Requirement	0	C0100		
Operational risk	R0130	129,281		
Loss-absorbing capacity of technical provisions	R0140	-2,677		
Loss-absorbing capacity of deferred taxes	R0150	-235,873		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0		
Solvency capital requirement excluding capital add-on	R0200	1,747,464		
Capital add-on already set	R0210	0		
SOLVENCY CAPITAL REQUIREMENT	R0220	1,784,936		
Other information on SCR	0	0		
Capital requirement for duration-based equity risk sub-module	R0400			
Total amount of Notional Solvency Capital Requirement for remaining part	R0410			
Total amount of Notional Solvency Capital Requirement for ring-fenced funds	R0420			
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430			
Diversification effects due to RFF SCR aggregation for Article 304	R0440			
Minimum consolidated group solvency capital requirement	R0470	628,884		
Information on other entities	0	0		
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500	1,091		
Capital requirement for other financial sectors (Non-insurance capital requirements) — Credit institutions, investment firms and financial institutions, alternative investment fund managers, UCITS management companies	R0510	1,091		
Capital requirement for other financial sectors (Non-insurance capital requirements) — Institutions for occupational retirement provisions	R0520			
Capital requirement for other financial sectors (Non-insurance capital requirements) — Capital requirement for non-regulated entities carrying out financial activities	R0530			
Capital requirement for non-controlled participation requirements	R0540			
Capital requirement for residual undertakings	R0550	36,381		
Overall SCR	0	0		
SCR for undertakings included via D&A	R0560			
Solvency capital requirement	R0570	1,784,936		
		, , , ,		



Annex I S.32.01.22 Undertakings within the scope of the group

	roup									Influencing	g criteria			the so	on within cope of oup vision	Group solvency calculation	
Country	Identification code of the undertaking	Type of identification code of the undertaking	Legal name of undertaking	Type of undertaking	Legal form	Category (mutual/non- mutual)	Supervisory Authority	% of share capital	% used to draw up consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional part used to calculate group solvency	Yes /No	Date of decision if art.214 is applied	Method used and, under Method 1, treatment of the undertaking	
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260	
PT	LEI/529900FNLE8ZOPUOT704	LEI	Fidelidade - Companhia de Seguros, S.A.	4	SA	2	ASF	85.00%	100.00%	85.00%		1	100.00%			1	
PT	LEI/9598005TTT45GTVTB854	LEI	COMPANHIA PORTUGUESA DE RESSEGUROS, S.A.	3	SA	2	ASF	100.00%	100.00%	100.00%		1	100.00%			1	
PT	LEI/959800J9FJW7L435TD92	LEI	FIDELIDADE ASSISTENCIA - COMPANHIA DE SEGUROS, S.A.	2	SA	2	ASF	100.00%	100.00%	100.00%		1	100.00%			1	
PT	LEI/959800XGKSDYTU6HVV17	LEI	VIA DIRECTA - COMPANHIA DE SEGUROS, S.A.	2	SA	2	ASF	100.00%	100.00%	100.00%		1	100.00%			1	
PT	LEI/95980038LJ194K38XP93	LEI	MULTICARE - SEGUROS DE SAUDE, S.A.	2	SA	2	ASF	100.00%	100.00%	100.00%		1	100.00%			1	
PT	SC/1002	SC	FIDELIDADE - PROPERTY EUROPE, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1003	SC	GEP - GESTAO DE PERITAGENS, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			1	
PT	SC/1004	SC	EAPS - EMPRESA DE ANALISE, PREVENCAO E SEGURANCA, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			1	
PT	SC/1007	SC	Audatex Portugal S.A.	10	SA	2		34.78%	34.78%	34.78%		2	34.78%			3	
PT	SC/1040	SC	CETRA - CENTRO TECNICO DE REPARACAO AUTOMOVEL, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			1	
PT	SC/1053	SC	FIIF IMOFID	99		2		49.73%	100.00%	49.73%		2	100.00%			3	
PT	SC/1060	SC	FIDELIDADE - SERVICOS DE ASSISTENCIA, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			1	
PT	SC/1061	SC	CARES MULTIASSISTANCE, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			1	
AO	SC/1072	SC	FIDELIDADE ANGOLA - COMPANHIA DE SEGUROS, S.A.	4	SA	2	ARSEG	70.03%	100.00%	70.03%		1	100.00%			1	
PT	SC/1075	SC	Luz Saude	99		2		99.86%	100.00%	99.86%		1	100.00%			3	
PT	SC/1096	SC	FIDELIDADE - PROPERTY INTERNATIONAL, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
HK	SC/1100	SC	FID III (HK) LIMITED	99	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3	
RU	SC/1101	SC	FPI (UK) 1 LIMITED	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3	
IT	SC/1113	SC	FPE (IT) Societa per Azioni	10	SA	2		95.76%	100.00%	95.76%		1	100.00%			3	
MZ	SC/1115	SC	FIDELIDADE - ASSISTENCIA E SERVICOS, LIMITADA	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			1	
MO	SC/1116	SC	FIDELIDADE MACAU - COMPANHIA DE SEGUROS, S.A.	2	SA	2	AMCM	100.00%	100.00%	100.00%		1	100.00%			1	
LU	SC/1124	SC	FPE (Lux) Holding S.a r.l.	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3	
LU	SC/1125	SC	Thomas More Square (Lux) Sarl	10	LLC	2		99.30%	100.00%	99.30%		1	100.00%			3	
LU	SC/1126	SC	Thomas More Square (Lux) Holdings Sarl	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3	
IT	SC/1130	SC	Fundo Broggi	99		2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1131	SC	Fidelidade - Sociedade Gestora de Org. de Investimento Imobiliari	15	SA	2		100.00%	100.00%	100.00%		1	100.00%			4	
IE	SC/1134	SC	Fid Loans 1 (Ireland) Limited	99	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3	



Annex I S.32.01.22 Undertakings within the scope of the group (Cont.)

(Cont.)										Influencing	g criteria			the s	ion within scope of roup ervision	Group solvency calculation
Country	Identification code of the undertaking	Type of identification code of the undertaking	Legal name of undertaking	Type of undertaking	Legal form	Category (mutual/non- mutual)	Supervisory Authority	% of share capital	% used to draw up consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional part used to calculate group solvency	Yes /No	Date of decision if art.214 is applied	Method used and, under Method 1, treatment of the undertaking
IT	SC/1137	SC	Broggi Retail S.R.L.	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3
AO	SC/1142	SC	UNIVERSAL - ASSISTENCIA E SERVICOS, LIMITADA	10	LLC	2		80.00%	100.00%	80.00%		1	100.00%			1
PT	SC/1143	SC	Fid Latam, SGPS S.A	5	SA	2		100.00%	100.00%	100.00%		1	100.00%			1
CV	SC/1144	SC	GEP Cabo Verde, Gestao de Peritagens limitada	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			1
PE	LEI/894500HTWOOGIHLLSF74	LEI	FID PERU S.A.	5	SA	2		100.00%	100.00%	100.00%		1	100.00%			1
CL	LEI/894500RKO0QCJQUNWV10	LEI	Fid Chile SpA	5	SpA	2		100.00%	100.00%	100.00%		1	100.00%			1
PT	SC/1152	SC	SERFUN PORTUGAL, SGPS, S.A.	10	SA	2		49.00%	49.00%	49.00%		2	49.00%			3
CL	SC/1153	SC	FID CHILE & MT JV SpA	5	SpA	2		99.28%	100.00%	99.28%		1	100.00%			1
PE	LEI/254900BKMWO80YKNK926	LEI	Positiva Seguros y Reaseguros S.A.A	2	SAA	2	SBS	93.93%	100.00%	93.93%		1	100.00%			1
BE	SC/1155	SC	FPE (BE) HOLDING S.a.r.l.	99	SA	2		100.00%	100.00%	100.00%		1	100.00%			3
PE	LEI/254900FORTUDSQNBDB73	LEI	LA POSITIVA VIDA SEGUROS Y REASEGUROS, S.A.A.	4	SA	2	SBS	59.24%	100.00%	59.24%		1	100.00%			1
ВО	SC/1166	SC	Alianza Vida Seguros y Reaseguros S.A.	4	SA	2	APS	66.69%	100.00%	66.69%		1	100.00%			1
ВО	SC/1167	SC	Alianza Compania de Seguros y Reaseguros E.M.A. S.A.	2	SA	2	APS	72.39%	100.00%	72.39%		1	100.00%			1
ВО	SC/1170	SC	Alianza SAFI, S.A.	99	SA	2		51.00%	100.00%	51.00%		1	100.00%			4
PY	SC/1171	SC	Alianza Garantia	4		2		52.35%	100.00%	52.35%		1	100.00%			1
PE	SC/1172	SC	La Positiva S.A Entidad Prestadora de Salud	2	SA	2	SBS	100.00%	100.00%	100.00%		1	100.00%			1
ВО	SC/1173	SC	Full Assistance S.R.L.	99	SRL	2		100.00%	100.00%	100.00%		1	100.00%			1
BO	SC/1175	SC	Worldwide Security Corporation S.A.	99	SA	2		100.00%	100.00%	100.00%		1	100.00%			1
CL	SC/1176	SC	FID CHILE SEGUROS GENERALES, S.A.	2	SA	2	CMF	100.00%	100.00%	100.00%		1	100.00%			1
PT	SC/1177	SC	FID I & D, S.A.	99	SA	2		100.00%	100.00%	100.00%		1	100.00%			3
US	SC/1178	SC	EA One Holding, Inc.	10	LLC	2		57.00%	100.00%	57.00%		1	100.00%			3
PT	SC/1179	SC	FPE (PT), S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3
MO	SC/1180	SC	Fidelidade Macau Vida	1	SA	2	AMCM	100.00%	100.00%	100.00%		1	100.00%			1
GB	SC/1181	SC	Tenax Capital Ltd	15	LLC	2		80.00%	100.00%	80.00%		1	100.00%			4
HU	SC/1182	SC	FPE (HU) Kft	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3
PT	SC/1183	SC	FSG Saude - Fundo de Investimento Imobiliario Fechado	99		2		100.00%	100.00%	100.00%		1	100.00%			3
GB	SC/1184	SC	FPE (UK) 1 LIMITED	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3
LU	SC/1185	SC	FPE (Lux) 1	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			3



Annex I S.32.01.22 Undertakings within the scope of the group (Cont.)

										Influencing o	riteria			the sco	on within be of group ervision	solvency calculatio n	
Cou ntry	Identification code of the undertaking	Type of identification code of the undertaking	Legal name of undertaking	Type of undert aking	Legal form	Category (mutual/non- mutual)	Supervis ory Authority	% of share capital	% used to draw up consolida ted accounts	% voting rights	Other criteri a	Level of influence	Proportional part used to calculate group solvency	Yes /No	Date of decision if art.214 is applied	Method used and, under Method 1, treatment of the undertakin g	
PT	SC/1186	SC	FPE (PT), SGPS, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1187	SC	FPE (PT) OFFICE A, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1188	SC	FPE (PT) 2 OFFICE B, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1189	SC	FPE (PT) 3 RESIDENTIAL, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1190	SC	FPE (PT) 4 RET, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1191	SC	FPE (PT) 5 PARK, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1192	SC	CLINICA FISIATRICA DAS ANTAS,	10	LLC	2		100.00%	100.00%	100.00%		1	100.00%			1	
PT	SC/1193	SC	Cetra - Car Remarketing, S.A.	10	SA	2		51.00%	100.00%	51.00%		1	100.00%			1	
JP	SC/1194	SC	GK Lisbon	10		2		100.00%	100.00%	100.00%		1	100.00%			3	
JP	SC/1195	SC	TMK Lisbon	10	0.4	2	10014	97.00%	100.00%	97.00%		1	100.00%			3	
MZ	SC/1196	SC	Seguradora Internacional Moçambique, SA (SIM)	4	SA	2	ISSM	82.10%	100.00%	82.10%		1	100.00%			1	
LI	SC/1197 LEI/529900RMYJQQFOR4SP58	SC	The Prosperity Company AG Liechtenstein Life Assurance AG	1	AG	2	FMA	70.00%	100.00% 100.00%	70.00% 100.00%		1	100.00% 100.00%			1	
LI LI	LEI/529900RMYJQQFOR4SP58 SC/1199	LEI SC	Prosperity Brokershome AG	99	AG AG	2	FMA	100.00% 100.00%	100.00%	100.00%		1	100.00%			1	
LI	SC/1199 SC/1210	SC	prosperity solutions AG	99	AG	2		100.00%	100.00%	100.00%		1	100.00%			٠ ٠	
	SC/1210				GmB	2		100.00%	100.00%	100.00%		1	100.00%			2	
DE		SC	prosperity solutions GmbH	99		_						1				3	
LI	SC/1212	SC	cashyou AG	99	AG	2		100.00%	100.00%	100.00%		1	100.00%			3	
LI	LEI/529900ZFGE8IXEYVGM45	LEI	prosperity funds SICAV	99		2		100.00%	100.00%	100.00%		1	100.00%			3	
PT	SC/1216	SC	MULTI HEALTH, S.A.	10	SA	2		100.00%	100.00%	100.00%		1	100.00%			1	
PT	SC/1217	SC	FID REAL ASSETS, SGPS, S.A.	99	SA	2		100.00%	100.00%	100.00%		1	100.00%			3	
DE	SC/1218	SC	Prosperity Brokershome GmbH	99	GmB	2		100.00%	100.00%	100.00%		1	100.00%			3	
ES	SC/1219	SC	FID REAL ASSETS SPAIN, S.L.	10	SL	2		100.00%	100.00%	100.00%		1	100.00%			3	
CV	SC/201	SC	GARANTIA - COMPANHIA DE SEGUROS DE CABO VERDE, S.A.	4	SA	2	BCV	55.89%	100.00%	55.89%		1	100.00%			1	

Responsible Actuary's Report



# FIDELIDADE CONSOLIDATED

# **REPORT**

CERTIFICATION REPORT ON SOLVENCY AND FINANCIAL CONDITION AND INFORMATION TO BE DISCLOSED TO THE ASF FOR SUPERVISORY PURPOSES

CONDITION AT 31<sup>ST</sup> DECEMBER 2022

Lisbon, May 17, 2023

# **Actuarial - Consultadoria**

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3. Responsibilities	8
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# 1. Introduction

This report was written by the Appointed Actuary certified by the Insurance and Pension Funds Supervisory Authority, aiming to provide an independent opinion on the solvency and financial condition of Fidelidade Consolidated at December 31, 2022.

The company's situation is summarised in the following tables:

# **Technical Provisions**

1	-	•	n	
		1	-	n
	1			

Life	
Best Estimate (after Transitional Deduction to the Technical Provisions)	7,529,061,735
Risk Margin	161,573,994
	7,690,635,729
Non-Life	
Best Estimate	1,269,416,776
Risk Margin	29,355,420
	1,298,772,196
Health SLT	
Best Estimate (after Transitional Deduction to the Technical Provisions)	893,590,879
Risk Margin	90,637,114

Health NSLT	
Best Estimate	442,225,005
Risk Margin	24,340,336
	466,565,341

# **Index-linked and Unit-linked**

	2,752,797,259
Risk Margin	80,071,142
Best Estimate	305,532,089
Technical Provisions calculated as a whole	2,367,194,028

Total Technical Provisions	13,192,998,518

U: Euros

984,227,993

# Amounts Recoverable

Life		-74,352,218
Non-Life		399,331,719
Health SLT		0
Health NSLT		35,472,209
	<b>Total Amounts Recoverable</b>	360,451,710

U: Euros

# Future Discretionary Benefits

Future Discretionary Benefits	10,187,187

U: Euros

# Underwriting Risks

	Net Capital Requirement	Gross Capital Requirement
Life Underwriting Risks	431,823,510	433,628,081
Non-Life Underwriting Risks	302,259,289	302,259,289
Health Underwriting Risks	281,297,704	281,297,704

Technical Provisions Loss Adjustment -1,804,571

U: Euros

Using the company's information, we also concluded:

# Capital and Own Funds requirements

Total available own funds to meet the SCR <sup>(1)</sup> Total available own funds to meet the MCR	3,080,553,294 3,080,717,809
Total eligible own funds to meet the SCR <sup>(1)</sup> Total eligible own funds to meet the SCR <sup>(2)</sup> Total eligible own funds to meet the MCR	3,080,717,809 3,083,085,239 2,743,904,526
Solvency Capital Requirement (SCR) (1) Solvency Capital Requirement (SCR) (2) Minimum Capital Requirement (MCR)	1,784,936,418 1,784,936,418 628,884,288
Ratio of eligible own funds to SCR <sup>(1)</sup> Ratio of eligible own funds to SCR <sup>(2)</sup> Ratio of eligible own funds to MCR	173% 173% 436%

U: Euros

 $<sup>^{(1)}</sup>$  Excluding own funds from another financial sector and from companies included in D&A

 $<sup>^{(2)}</sup>$  Including own funds from another financial sector and from companies included in D&A

# 2. Scope

This report is the certification of the solvency and financial condition report and the information to be disclosed to the ASF for supervisory purposes, set out in regulatory Standard No.2/2017-R, of 24th March.

This report has been produced in accordance with the structure presented in Annex II of Regulatory Standard No.2/2017-R, of 24th March.

It is the role of the appointed actuary to certify the adequacy with the legal, regulatory and technical regulations applicable to the calculation of the technical provisions, the amounts recoverable from reinsurance contracts and special purpose vehicles for securitisation of insurance risks and the capital requirement components related with those items.

The elements to be certified by the appointed actuary are defined in a regulatory standard of the Insurance and Pension Funds Supervisory Authority (ASF), which must also establish the content, terms, frequency, principles and presentation methods of the certification report and the terms and methods of reporting and publishing, as per the regulations in paragraphs 1, 3 and 11 a) to c) of Article 77 of Law No. 147/2015, of 9th September.

The certification covers confirmation of the adequacy with the legal, regulatory and technical regulations applicable to calculating the following elements:

- a) The technical provisions, including the application of the volatility adjustment, the matching adjustment and the transitional measures set out in Articles 24 and 25 of Law No. 147/2015, of 9th September;
- b) The amounts recoverable from insurance contracts and special purpose vehicles for securitisation of insurance risks;
- c) The categories of life insurance underwriting risk, non-life insurance underwriting risk, health underwriting risk, and adjustment for the loss-absorbing capacity of the

#### Actuarial - Consultadoria

technical provisions of the solvency capital requirement, disclosed in the solvency and financial condition report.

This report may only be analysed as a whole and considering the context and purpose for which it has been drawn up, and its conclusions cannot be used with other aims and/or within any other scope.

It must be understood that the results after applying statistical methods always have an implicit degree of uncertainty due to random factors, structural changes not yet reflected in the Company information system and possibly in the market, and legal, judicial and political changes which may have an impact on the models applied.

# 3. Responsibilities

This report has been written in line with the provisions of Regulatory Standard No. 2/2017-R, of 24th March.

Approval of the solvency and financial condition report is the responsibility of the Company's administration.

The issue of an independent actuarial opinion on the elements mentioned in the previous chapter is the responsibility of the appointed actuary.

On the date this statement is made, we do not have information from the external auditor on the conclusions it has reached on the risks which it is responsible for certifying. Our conclusions have been sent to the external auditors.

# 4. Opinion

The calculations of the technical provisions, amounts recoverable from reinsurance contracts, underwriting risks and solvency capital requirement components related with those risks are considered adequate, in line with the legal, regulatory and technical regulations applicable.

Lisbon, May 17, 2023

Actuarial - Consultadoria Lda.

Luís Portugal Partner-Director Statutory Auditor's Report





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(Translation from the original document in the Portuguese language. In case of doubt, the Portuguese version prevails)

Statutory Auditor's Opinion on Solvency and Financial Condition Annual Report in the terms set out in subparagraph a) of No. 1 of article  $3^\circ$  of Regulatory Standard No. 2/2017-R of 24 March issued by Supervisory Authority for Insurance and Pension Funds

To the Board of Directors of Fidelidade - Companhia de Seguros, S.A.

#### Introduction

Under the terms of subparagraph a) of No. 1 of article 3° of Regulatory Standard No. 2/2017-R, of 24 March ("Regulatory Standard"), issued by Supervisory Authority for Insurance and Pension Funds ("ASF"), we examined the Solvency and Financial Condition Annual Report ("Report"), established in subparagraph a) of article 27° from Regulatory Standard No. 8/2016-R, of 16 August (including subsequent updates) including the quantitative information to be disclosed with that Report ("Quantitative Information"), according to articles 4° and 5° of the Commission's Implementing Regulation (EU) No. 2015/2452, of 2 December 2015 of Fidelidade - Companhia de Seguros, S.A. ("The Entity"), with reference to 31 December 2022.

Our report comprises the reporting of the following matters:

- A. Report on the adjustments between the statutory statement of financial position and the balance sheet for solvency purposes, the classification, availability and eligibility of own funds and on the calculation of the solvency capital requirement and minimum capital requirement;
- B. Report on the implementation and effective application of the governance system; and
- C. Report on the remaining information disclosed in the Solvency and Financial Condition Annual Report and the jointly submitted quantitative information.
- A. REPORT ON THE ADJUSTMENTS BETWEEN THE STATUTORY STATEMENT OF FINANCIAL POSITION AND THE BALANCE SHEET FOR SOLVENCY PURPOSES, THE CLASSIFICATION, AVALABILITY AND ELIGIBILITY OF OWN FUNDS AND ON THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

# Responsibilities of the Management Board

It is the responsibility of the Entity's Board of Directors the calculation of the adjustments between the statutory statement of financial position and the balance sheet for solvency purposes, the classification and the availability evaluation and eligibility of own funds and the calculation of the solvency capital requirement and minimum capital requirement submitted to ASF, under the terms of Commission Implementing Regulation (EU) No. 2015/35, of 10 October 2014, that completes the Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009, relating to the Taking-up and Pursuit of the Business of Insurance and Reinsurance ("Regulation").

#### Auditor's responsibilities

Our responsibility, as defined in subparagraph a) of No.1 of article 4° of Regulatory Standard, consists in expressing, based on the work performed, a reasonable assurance conclusion, as to whether the adjustments between the statutory statement of financial position and the balance sheet for solvency purposes and that classification, availability and eligibility of own funds and the calculation of the solvency capital requirement and minimum capital requirement, are free from material misstatements, are complete and reliable and, in all materially relevant respects, are presented in accordance with the applicable legal and regulatory requirements.



According to No. 2 of article 3° of Regulatory Standard, it is not our responsibility to verify the adequacy of legal requirements, applicable regulatory and calculation techniques (i) of the elements included within the certification by the Entity's responsible actuary, as established in the article 7° of same Regulatory Standard, and (ii) of the elements of solvency capital requirement included within the certification by the Entity's responsible actuary, as established in the article 10° of same Regulatory Standard.

### Scope of Work

Our procedures were carried out in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", and other applicable technical guidance of the Institute of Statutory Auditors (*Ordem dos Revisores Oficiais de Contas* - "OROC") and consists in obtaining sufficient and appropriate audit evidence to conclude, with reasonable assurance, as to whether the adjustments between the statutory financial position statement and the balance sheet for solvency purposes, and that the classification, availability and eligibility of own funds and the calculation of the solvency capital requirement and minimum capital requirement, are free of material misstatements, are complete and reliable and, in all materially relevant respects, are presented in accordance with applicable legal and regulatory requirements.

The procedures carried out included, among other procedures, the following:

- the reconciliation of the base information used for the calculation of the adjustments with the Entity's information systems and the respective statutory financial position statement as of 31 December of 2022, object of the Statutory Audit whose Report was issued on 13 March 2023 without qualifications or emphasis;
- the review of subsequent events that occurred between the date of the Statutory Audit Report and the date of this report;
- (iii) an understanding of the adopted criteria:
- (iv) the recalculation of the adjustments made by the Entity, except for those referred to in the next paragraph that are excluded from the scope of this certification;
- (v) the reconciliation of the base information used for the calculation of the solvency capital requirement and minimum capital requirement as of 31 December 2022, with the financial position statement for solvency purpose, with book records and other information maintained in the Entity's systems with reference to the same date;
- (vi) the review, on a sample basis, of the correct classification and characterization of assets in accordance with regulation requirements;
- (vii) the review of the calculation of the solvency capital requirement and minimum capital requirement as of 31 December 2022, performed by the Entity; and
- (viii) reading the documentation prepared by the Entity under the regulation requirements.

The procedures carried out did not include the examination of the adjustments to technical provisions and the amounts recoverable from reinsurance contracts which, according to article 7° of Regulatory Standard, were subject to actuarial certification by the Entity's responsible actuary.

Regarding the deferred taxes adjustments, as result of the adjustments referred to above, the procedures carried out only comprised the verification of the impact on deferred taxes, taking as the basis the referred adjustments made by the Entity.

The selection of the procedures performed depends on our professional judgment, including the procedures related to risk assessment of material misstatement on the information subject to analysis, due to fraud or error. In making these risk assessments we considered the internal control relevant for the preparation and presentation of the referred information, in order to plan and execute the appropriate procedures for the circumstances.

We applied the International Standard on Quality Management 1 (ISQM 1), which requires that an extensive quality management system be designed, implemented and maintained, which includes policies and procedures related to the compliance of ethical requirements, professional standards and applicable legal and regulatory requirements.

We comply with the independence and other ethical requirements of the OROC Code of Ethics and the International Code of Ethics for Professional Accountants (including international standards of independence), (IESBA Code), which are based on fundamental principles of independence, integrity, objectivity, professional competence and duty of care, confidentiality and professional behaviour.



We believe that the audit evidence obtained is sufficient and appropriate to provide an acceptable basis for our conclusion.

#### Conclusion

Based on the procedures carried out and which are included in the previous section "Scope of Work", which were planned and performed in order to obtain a reasonable level of assurance, we concluded that the adjustments between the statutory statement of financial position and the balance sheet for solvency purposes and that the classification, availability and eligibility of own funds and the calculation of the solvency capital requirement and minimum capital requirement, with reference to the Solvency and Financial Condition Annual Report date (31 December 2022), are free from material misstatements, complete and reliable and, in all materially respects, are in accordance with the applicable legal and regulatory requirements.

#### B. REPORT ON THE IMPLEMENTATION AND EFECTIVE APPLICATION OF THE GOVERNANCE SYSTEM

#### Responsibilities of the Management Board

It is the responsibility of the Entity's Board of Directors to:

- Prepare Solvency and Financial Condition Annual Report and the information to report to ASF for regulatory purposes, under the terms of Regulatory Standard No. 8/2016-R, of 16 August, issued by ASF (republished in the Regulatory Standard No. 1/2018-R, of 11 January); and
- Define, approve, periodically review and document the main policies, strategies and processes that define and regulate the Entity governance, management and control, including the risk management and internal control systems ("Governance System"), which should be described on chapter B of the report, under the terms of article 294° of Commission Implementing Regulation (EU) No. 2015/35 of 10 October 2014.

#### Auditor's responsibilities

Our responsibility, as defined in subparagraph a) of No. 1 of article  $4^{\circ}$  of Regulatory Standard, consists in expressing, based on the work performed, a limited assurance conclusion about the implementation and effective application of the governance system.

#### Scope of Work

Our procedures were carried out in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) "Assurance Engagements Other than Audits or Reviews of Historical Financial Information ", and other applicable technical guidance of the Institute of Statutory Auditors (*Ordem dos Revisores Oficiais de Contas* - "OROC") consists in obtaining sufficient and appropriate audit evidence to conclude, with moderate assurance, as to whether the content of the "Governance System" chapter of the Solvency and Financial Condition Annual Report reflects, in all materially respects, the description of the implementation and effective application of the Governance System of the Entity at 31 December 2022.

The procedures were carried out included, among other procedures, the following:

- (i) the assessment of the information included on Entity's Report relating to the Governance System with respect to the following main aspects: general information; qualification and integrity requirements; risk management system with the inclusion of risk and solvency self-evaluation; internal control system; internal audit function; actuarial function; subcontracting and eventual additional information;
- (ii) reading and assessing of the documents which sustain the main policies, strategies and processes described in the Report, which regulate how Entity is governed, managed and controlled and obtaining supporting evidence of its implementation;
- (iii) discussing the conclusions with the Entity's management.

The selection of the procedures performed depends on our professional judgment, including the procedures related to risk assessment of material misstatement on the information subject to analysis, due to fraud or error. In making these risk assessments we considered the internal control relevant for the preparation and presentation of the referred information, in order to plan and execute the appropriate procedures for the circumstances.



We applied the International Standard on Quality Management 1 (ISQM 1), which requires that an extensive quality management system be designed, implemented and maintained, which includes policies and procedures related to the compliance of ethical requirements, professional standards and applicable legal and regulatory requirements.

We comply with the independence and other ethical requirements of the OROC Code of Ethics and the International Code of Ethics for Professional Accountants (including international standards of independence), (IESBA Code), which are based on fundamental principles of independence, integrity, objectivity, professional competence and duty of care, confidentiality and professional behaviour.

We believe that the audit evidence obtained is sufficient and appropriate to provide an acceptable basis for our conclusion.

#### Conclusion

Based on the procedures carried out and described in the previous section "Scope of Work", which were planned and performed t in order to obtain a moderate degree of assurance, nothing has come to our attention which causes us to believe that at the date to which Solvency and Financial Condition Annual Report refers to (31 December 2022), the content of the chapter "Governance System", is not fairly present, in all materially respects, the description of the implementation and effective application of the Entity's Governance System.

# C. REPORT ON THE REMAINING INFORMATION DISCLOSED IN THE SOLVENCY AND FINANCIAL CONDITION REPORT AND THE JOINTLY DISCLOSED QUANTITAVE INFORMATION

#### Responsibilities of the Management Board

It is the responsibility of the Board of Directors to prepare the Solvency and Financial Condition Annual Report and the information to report to ASF for supervisory purposes, under the terms of Regulatory Standard No. 8/2016-R, of 16 August, issued by ASF (republished by Regulatory Standard No. 1/2018, of 11 January), including the quantitative information to be jointly disclosed with that report, as established in the articles 4° e 5° of the Commission's Implementing Regulation (UE) No. 2015/2452, of 2 December 2015.

#### Auditor's responsibilities

Our responsibility, as defined in subparagraph c) of No. 1 of article 4° of Regulatory Standard, consists in expressing, based on the procedures carried out, a limited assurance conclusion as to whether the remaining disclosed information in the report and in the jointly disclosed quantitative information, is in agreement with the information subject to the work carried out and with the knowledge we obtained during its execution.

# Scope of Work

Our procedures were carried out in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) "Assurance Engagements Other than Audits or Reviews of Historical Financial Information ", and other applicable technical guidance of the Institute of Statutory Auditors (*Ordem dos Revisores Oficiais de Contas -* "OROC") and consists in obtaining sufficient and appropriate audit evidence to conclude, with moderate assurance, that the remaining disclosed information in Solvency and Financial Condition Annual Report is in agreement with the information that was subject to auditor review and with the knowledge obtained during the certification.

The procedures carried out included, among other procedures, the complete reading of the referred report and the evaluation of the agreement as referred above.

The selection of the procedures performed depends on our professional judgment, including the procedures related to risk assessment of material misstatement on the information subject to analysis, due to fraud or error. In making these risk assessments we considered the internal control relevant for the preparation and presentation of the referred information, in order to plan and execute the appropriate procedures for the circumstances.

We applied the International Standard on Quality Management 1 (ISQM 1), which requires that an extensive quality management system be designed, implemented and maintained, which includes policies and procedures related to the compliance of ethical requirements, professional standards and applicable legal and regulatory requirements.



We comply with the independence and other ethical requirements of the OROC Code of Ethics and the International Code of Ethics for Professional Accountants (including international standards of independence), (IESBA Code), which are based on fundamental principles of independence, integrity, objectivity, professional competence and duty of care, confidentiality and professional behaviour.

We believe that the audit evidence obtained is sufficient and appropriate to provide an acceptable basis for our conclusion.

#### Conclusion

Based on the procedures carried out and described in the previous section "Scope of Work", which were planned and performed in order to obtain a moderate degree of assurance, nothing has come to our attention which causes us to believe that, with reference to the Solvency and Financial Condition Annual Report date (31 December 2022), the information disclosed in Report is not in agreement with the information which was subject to the work carried out by us with the knowledge obtained during its execution.

#### **D. OTHERS MATTERS**

Considering the normal dynamics of any internal control system, the conclusions presented related to the governance system of the Entity should not be used for any projection of future periods, since there could be changes of the processes and controls analysed and their degree of efficiency. On the other hand, given the limitations of the internal control system, there could be undetected irregularities, frauds or mistakes.

Lisbon, 19 May 2023

Ernst & Young Audit & Associados – SROC, S.A. Sociedade de Revisores Oficiais de Contas Represented by:

(Signed)

Ricardo Nuno Lopes Pinto - ROC No. 1579 Registered with the Portuguese Securities Market Commission under license No. 20161189

# Fidelidade 2 Consolidado