



Diversity, Equity, Inclusion and Belonging Policy

Identification of Responsibilities

Preparation : People and Organisation Division with contributions from the Legal Affairs Division and the Sustainability Division

Review: People and Organisation Division, with contributions from the Corporate Affairs Division and the Sustainability Division

Approval: Executive Committee

Approval

Executive Committee Meeting : 27/08/2024

Version History

| Version | Date | Summary of changes |
|---------|------------|---|
| 1.0 | 25/07/2023 | First version |
| 2.0 | 27/08/2024 | Improvements in the definition of responsibilities, addition of a section on the DEI Programme and occasional adjustments |

Summary of revision of chapters/schedules of the previous version

| Chapter/ schedule reviewed | Summary of changes |
|----------------------------|---|
| 2 | Time limit added for other locations to adapt this policy |
| 4.1 | Inclusion of ILO Conventions 87 and 98 in the references |
| 8 | Reference to the International Labour Organization added |
| 9 | Specification of the person responsible for dealing with DEIP matters |
| 10 | Additional section mentioning the DEI Programme |

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1. Background

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

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

Our mission at the Fidelidade Group is to protect people, their health, their property and their businesses. The Group not only accepts and values individuality, but also fosters the inclusion of every single person.

2. Scope

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

This Policy applies to all employees of the Fidelidade Group companies in Portugal, except for employees of the Luz Saúde Group.

The principles set out in this Policy also operate as guidelines for the Fidelidade Group companies located outside Portugal. By the end of 2025, the overseas companies should also develop their own policies and programmes, in accordance with their local legislation and culture, and aligned with the guidelines of this Policy.

All people who are part of the Group, whether in-house or as sub-contractors, business partners or suppliers, should be aware of, be committed to and act in accordance with the guidelines set out in this Policy.

3. Key concepts

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

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

Diversity: recognition of, respect for and valuing of differences between all people, including in particular those relating to sex, gender identity, sexual orientation, ethnicity, religion, beliefs, place of origin, culture, language, nationality, place of birth, descent, age, political and ideological orientation, social background, marital status, family situation, economic situation, health status, disability, personal style and education.

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

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

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

4. Legal framework, conventions and internal rules

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

4.1. National and international external references

European Union

- A Union of Equality: Gender Equality Strategy 2020-2025, European Commission, 5 March 2020;
- European Pact for Gender Equality (2011-2020), Council of the European Union, 7 March 2011;
- Directive (EU) 2019/882 of the European Parliament and of the Council, of 17 April 2019, on the accessibility requirements for products and services.

United Nations

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

Sustainable Development Goals (“SDG”)

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

Global Reporting Initiatives (“GRI”)

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

Other documents

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

4.2 Internal references

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

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

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

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

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

Priority areas may be changed or adjusted depending on circumstances.

- **Gender:** we are committed to enhancing equal opportunities, leading to diverse and global teams, in particular in selection and hiring processes, assessments, remuneration, growth and pay equity.

- **Social Background and Origin:** we are committed to improving the representation of different social backgrounds and origins in the Fidelidade Group companies.

Only then will we be able to better understand the needs of the people we work for.

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

- **Disability:** we recognise that having a disability, of any kind, creates added difficulty in terms of employability, so we want to work harder to reduce the stigmas that may be attached to disabilities, by:

- Promoting the recruitment of more people with disabilities;
- Adapting the workplace environment to the needs of each of these people to guarantee their full integration, and at the same time providing support to the teams they will join in terms of preparation, capacity building and training in order to receive them.

6. Our Principles and Key Commitments

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

analysing problems and finding solutions, as a result of their own professional, personal, social and cultural experiences.

- **Promote equal opportunities for growth and development within the Group:** alongside an inclusive recruitment process, with the aim of ensuring that all people, regardless of their sex, gender identity, sexual orientation, ethnicity, religion, place of origin, culture, language, nationality, place of birth, descent, age, political and ideological orientation, social background, marital status, family situation, economic situation, health status, disability, personal style, have equal access to integration, to progression of their work and to their progression within the Group.
- **Promote pay equity:** the Fidelidade Group is committed to assessing, monitoring and eliminating all situations of potential unjustified pay discrimination and inequality, in particular on the basis of sex, in line with the legislation in force at any given time on the promotion of equal pay for men and women.
- **Promote behaviour that, in addition to a sense of belonging to the organisation, fosters a sense of mental and physical well-being:** a sense of belonging leads to positive interpersonal relationships, reduces stress and anxiety and increases people's overall satisfaction. Therefore, we will continue to mitigate psychosocial risks, and, at the same, promote initiatives to improve the well-being and health of our people, and encourage work-life balance.

7. Responsibility

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

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

8. We respect, defend and promote Human Rights

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

The Fidelidade Group is committed to respecting all nationally and internationally recognised human rights and labour rights, and is especially committed, in the context of diversity, equity, inclusion and belonging, to:

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

9. Governance Model

Implementation of the commitments of this Policy and the Programmes associated with it, and also its monitoring, reporting and continuous improvement, are the responsibility of the Chairman of the Executive Committee of Fidelidade, who is also responsible for dealing with the issue of Diversity, Equity, Inclusion and Belonging, in conjunction with the Senior Director of the People and Organisation Division for the whole Group.

In addition, the executive board members, managers with responsibility for people matters, and the corporate heads of each geographical location have the following responsibilities:

- Ensuring and validating the implementation, monitoring, reporting and continuous improvement of the commitments established in the Policy and of the associated programmes;
- Promoting global alignment discussions to advance the implementation of the Group companies' Diversity, Equity, Inclusion and Belonging Strategy;
- Promoting discussion of the results and taking decisions on strategic next steps;
- Providing information on implementation in each geographical location and fostering implementation of the commitments with goals and clear targets;

- Sharing internal and external knowledge benchmarks, experiences and best practice, which ensure good decision-making and continuous improvement;
- Promoting sharing, learning and networking between the different geographical locations.

A periodic survey is conducted by an external body to assess our people's perceptions regarding Diversity, Equity, Inclusion and Belonging. This survey also aids in the subsequent definition of future actions to be carried out on this topic within the Fidelidade Group.

10. Diversity, Equity, Inclusion and Belonging Programme

Within the scope of this Policy, Fidelidade is committed to setting up and detailing goals and targets aligned with the defined strategy.

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

11. Reporting channels

The following channels are provided, adapted to each country in the Group, to aid the scrutinising, transparency and effective applicability of this Policy and its continuous improvement:

1. **Feedback, suggestions and queries channel:** channel open internally for the Group companies in the different geographical locations, so that all our people can have a voice and share feedback, suggestions and any matters they wish to have clarified on topics related to this Policy. This channel is managed by the People and Organisation Division (DPE), which, in conjunction with the Employment Department of the Corporate Legal Division, will analyse, monitor, deal with and reply to all communications received.
2. **Whistleblowing channels:** each geographical location, following its specific domestic regulations, will have its own Whistleblowing System, including a Whistleblowing Channel, with both of these being managed, dealt with and resolved in line with the Reporting of Irregularities Policy, which guarantees anonymity, confidentiality and protection of data of all persons involved in a whistleblowing event.

12. Review, update and monitoring of the Policy

This Policy comes into force on the date it is approved by the Executive Committee. The People and Organisation Division (DPE), of the Fidelidade Group in Portugal, is responsible for reviewing it, with the support of the Corporate Affairs Division and the Sustainability Division, whenever this proves appropriate and particularly if any of the following occur:

- A change or modification to the specific aspects included in this document: scope, procedures, frequency or other relevant aspects;
- A change or modification to the applicable rules (legal, regulatory or internal)
- A change to the organisational structure of the Fidelidade Group.

The People and Organisation Division in Portugal monitors the matters set out in this Policy, and any reporting of irregularities that may occur.