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Code of Conduct for Business Partners

Seguradoras Unidas

2018



Preamble

Dear Business Partner

Respect for the highest ethical standards and for the applicable laws and regulations is one of the fundamental pillars on which our company's business operations are based.

We are strongly convinced that Ethics and Compliance are essential in order to ensure the trust and satisfaction of our customers and other stakeholders.

By setting an example, our aim is to lay the foundations for sustainable and profitable growth, which will be achieved through respect for human rights and employment rights and through the fight against money laundering, terrorism and corruption.

We seek to establish partnerships based on merit and professional ethics. For this reason we choose partners committed to the values of honesty, respect, responsibility and excellence, the yardstick we apply to ourselves.

The Code of Conduct for Business Partners describes the expectations of Seguradoras Unidas (the Company) in terms of Ethics and Compliance in relation to its Business Partners. We consider that the requirements set out here form the basis for successful commercial relations between the Company and its partners.

Our Partners should alert the Company whenever they learn of any situation, even if only potential, which conflicts with the provisions of this document.

Breach of this code or the applicable related legislation is deemed to be due cause for rescission of contract.

1) Our Values

We expect our Partners to act in alignment with our Values:

HONESTY

We act and communicate truthfully in all circumstances, not seeking to obtain personal or material benefits which are not due to us.

RESPECT

We act with consideration for people, for the environment and for the law and we seek to ensure that our internal and external actions transmit this respect.

RESPONSIBILITY

We recognise the importance and the impact of our activity on our clients, partners, employees, shareholders and society in general, and we therefore take decisions with care, consideration and good sense.

EXCELLENCE

We value quality. We abide by the highest standards of quality and efficiency, seeking to set the bar high.

In line with our Values, we expect from our Partners a commitment to:

- Ethical and honest behaviour;
- Fair and respectful treatment of employees;
- Fair conduct in the market;
- The highest standards of service;

- Compliance with the legislation applicable to the sector and in particular with anti-corruption and anti-money laundering legislation, as well as legislation on the protection of personal data.

2) Human Rights

We regard respect for internationally recognised human rights as the foundation for a healthy and sustainable business relationship, and we therefore require from our Partners special respect for the rights of workers, in particular:

- Non-discrimination

Promoting equal opportunities and treatment for employees working for you, irrespective of race, religion, political orientation, nationality, place of birth, colour, gender, sexual orientation, marital status, pregnancy, age, physical limitation or other factors

- Prohibition of harassment, forced labour and child labour

Not tolerating harassment, in particular sexual harassment, bullying, any type of verbal or physical violence, or any other behaviour considered disrespectful, humiliating or hostile.

Rejecting all and any use of forced labour, slavery or child labour, complying with the legislation applicable to the minimum employment age, working hours and pay.

- Health and Safety

Promoting appropriate health and safety conditions at work in compliance with the applicable legislation.

3) Anti-corruption

We have a policy of zero tolerance of any form of bribery or corruption.

We take no part in any act of corruption, we neither offer nor promise to grant any benefits to third parties which may amount to an offence against the law.

Our Partners must therefore:

- Comply with anti-corruption legislation and repudiate the granting or receiving of any bribes, facilitating payments or illegitimate benefits;
- Refrain from offering gifts to Employees of Seguradoras Unidas, such as may influence them in the exercise of their duties.

4) Prevention of Money Laundering and Terrorist Financing

Our Partners must only conduct business dealings with clients and partners when they are convinced of their integrity, refusing to do any business that breaches anti-money laundering and anti-terrorist financing legislation or economic and financial sanctions.

5) Conflicts of Interests

Our Partners must disclose any situations which may amount to a conflict of interests.

If a partner owns or is owned by a person or organisations whose interests may conflict with those of the Company, that partner has the duty to inform us.

6) Competition and Good Faith

It is fundamental that our business and that of our Partners should accord with the principles of good faith and loyalty, within a framework of mutual trust.

We also seek to preserve free competition, and condemn any agreements or concerted action that restricts or negatively affects competition.

7) Personal data

The processing of personal data, automated or otherwise, must be carried out in strict compliance with the applicable legal standards and the safety, technical and organisational rules appropriate to the risk presented by the processing of the data.

The personal data to which Partners and their employees have access under the contract concluded with the Company must be processed in absolute confidentiality, and may not be transferred or disclosed to third parties except in the situation expressly provided for in law or in the contract entered into.

Partners and their employees undertake not to use personal data or any confidential information to which they may have access for purposes other than those defined by contract and law, and also to process data in accordance with the instructions they receive from the Company.

8) Service Continuity and Quality

Our Partners assure the continuity and quality of the services provided on a permanent basis, and also that their employees hold adequate professional qualifications for provision of the services for which they are contracted.

9) Sustainability

At Seguradoras Unidas, we believe that sustainability means taking responsibility for our social, environment and governance practices.

We believe that sustainable and socially committed development adds Value to our customers and to the community to which we belong, at the same time as it strengthens our company and places us in a better position to meet the needs of future generations.

Our Partners play a fundamental role in promoting the values of respect for human life, and are guided by the values of heritage and environmental conservation and sustainability, among others.