

INTERIM EVALUATION REPORT - OCTOBER 2024

PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED OFFENCES

Framework

The entry into force of the General Regime for the Prevention of Corruption (RGPC), approved by Decree-Law no. 109-E/2021 of 9 December, obliged the entities covered to adopt a compliance program that includes various measures to prevent corruption.

The plan for the prevention of risks of corruption and related offences (PPR) is one of these measures and its implementation is subject to control through the drawing up of interim and annual assessment reports.

Under these terms and in accordance with the provisions of Article 6(4)(a) of the RGPC, COSEC - Companhia de Seguro de Créditos, S.A (hereinafter Allianz Trade¹, in Portugal), as an entity covered by the aforementioned regime, must draw up the interim assessment report in October in *situations identified as high or maximum risk*.

Identified situations

To date, no situations of high or maximum residual risk related to corruption or related offences have been identified.

Conclusion

Allianz Trade in Portugal has internal regulations aimed at preventing the risk of corruption and related offences, namely the Code of Conduct, the Anti-Corruption Policy and the Irregularity Reporting Policy. The existence of and compliance with these regulations demonstrates its commitment to ensuring that it does not engage in or facilitate any form of corruption.

The risk of corruption is identified by the departments that consider they are most exposed to this phenomenon, taking into account all situations that could jeopardize action in accordance with the principles and rules defined by the company.

The lack of identified situations of high or maximum risk of corruption is related to the nature of the company's activity. Nevertheless, as part of the application and assessment of the PPR, the measures will be reinforced or revised if situations of high or maximum risk of corruption or related offences are detected.

Disclosure

This Report, after approval by the Executive Committee of COSEC - Companhia de Seguro de Créditos, S.A., will be disclosed to all employees via the *intranet* and published on its official website.

October 29th of 2024

¹ Allianz Trade is the brand that designates a range of services provided by COSEC - Companhia de Seguro de Créditos, S.A.