

Treatment policy

This document defines the principles and bases on which COSEC's policy for relations with its clients is based.

The principles in this document, which embody COSEC's vision and values, must be reflected in the behavior of all its employees, including employees in the distribution channels used and all those who, on behalf of COSEC, provide services to its *clients* or enter into a relationship with risk entities, hereinafter called Employees.

For the purposes of this Policy, "Clients" are policyholders, insureds, beneficiaries, and interested third parties.

1. Equity, Diligence and Transparency

COSEC employees, including employees in the distribution channels used and all those who, on behalf of COSEC, provide services to its clients or enter into a relationship with risk entities, hereafter called employees, must ensure that clients and risk entities are treated in accordance with the rules and techniques applicable in each case, fairly, with diligence and transparency, and respect for their rights and for the principles set out in COSEC's Code of Conduct.

2. Information and Clarification

In the exercise of their functions, Employees must ensure the proper handling of Customers' information and clarification needs, taking into account their profile, requirements and the nature and complexity of the situation.

The provision of legally provided information must be made in a correct and detailed manner with the appropriate clarification for making an informed decision.

3. Secrecy

In relations with Clients and Risk Entities, COSEC employees will ensure strict compliance with the duties of confidentiality that the Company and all its employees are legally and contractually bound to respect.

4. Complaints Management

Clients may present complaints to COSEC with recourse to the Client's Ombudsman or to ASF, in the terms and through the means laid down in the Regulation on the Functioning of the Management of Complaints, and that relevant information on the Management of Complaints may be consulted on COSEC's site www.cosec.pt. There is no cost or charge to the claimant for filing a claim.

5. Personal Data

COSEC is the legal entity that, individually or together with others that help it to provide the services inherent to its activity, determines the purposes and means of processing the personal data of Employees, Insured Persons, Potential Insured Persons, Policyholders, Potential Policyholders and Potential Insureds and Intermediaries, and is required by law to ensure that policies, processes and procedures are implemented to safeguard this data and the rights of the data subjects, as defined by the applicable personal data protection laws and regulations and also in COSEC's Privacy Policy, accessible at www.cosec.co.uk, which sets out what categories of personal data we collect, how and why we do so, for what type of use and for how long. We also explain how the Holder of the Personal Data can access, correct or object to the processing of their data, to the extent permitted by law.

**COSEC - Companhia de Seguro de
Créditos, S.A.**

Customer Service:
Info.pt@allianz-trade.pt
Tel. +351 211 164 221

VAT Number and Register Number at Lisbon
Commercial Registry Office 500726000.
Share Capital: 7,500,000 EUR

Head office: Avenida da Liberdade 249, 6º piso, Oporto office: R. Gonçalo Sampaio, 329,
1250-143 Lisbon 3º piso, 4150-367 Oporto

www.allianz-trade.pt

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Allianz Trade is the trademark used to designate a range of services provided by COSEC - Companhia de Seguro de Créditos, S.A.

6. Prevention and Management of Conflicts of Interest

Employees must act in accordance with the interests of clients, in an honest, correct and professional way, and reveal to COSEC all situations that may create conflicts of interest, refraining from intervening in such situations.

Conflicts of interest are considered to exist whenever employees, their spouses, relatives or kin to the first degree, or even companies or other collective entities in which they directly or indirectly participate, are directly or indirectly interested in the situation or process underway.

7. Speed and Efficiency

Employees must perform their functions or tasks with rigor and quality, namely with a view to a swift and efficient management of the processes related to claims and complaints.

8. Adequate Qualification and Suitability

COSEC ensures the qualification and continuous professional training of its employees, namely those who have direct contact with Clients and Risk Entities, in order to guarantee the quality of service, both on-site and off-site. COSEC also ensures that those directly involved in the activity of insurance distribution meet adequate qualification and suitability requirements under the terms of the law.

9. Antifraud Policy

COSEC adopts a policy of prevention, detection and reporting of fraud practices to the insurance, and provides to Clients and Risk Entities, when requested, the generic information that it deems relevant.

COSEC may cooperate with other Insurance Companies, namely within the Portuguese Insurers Association, with a view to preventing, detecting or reporting suspected fraud.

10. Internal Handling Policy Report

The monitoring of compliance with the treatment policy and the respective reporting will be carried out within the scope of COSEC's risk management and internal control systems.

11. Compliance with Treatment Policy

COSEC ensures the necessary dissemination and explanation of the rules contained in this document, in order to guarantee its compliance.

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