1 Area in charge

1.1 People and Management Superintendency.

2 Scope

2.1 This Policy serves as a guideline for the behavior of BB Seguridade and its subsidiaries. Investees are expected to structure their direction in accordance with these guidelines, considering their specific needs as well as the legal and regulatory aspects to which they are subject.

3 Target audience

3.1 The guidelines outlined herein are intended for all members of corporate governance bodies, officers, employees and third parties of BB Seguridade and its investees, in the exercise of their professional activities.

4 Regulations

4.1 Decree 9.283, of 02.07.2018.

4.2 BCB Joint Resolution 1, of 05.04.2020.

4.3 CVM Resolution 175, of 12.23.2022

4.4 CVM Resolution 185/2023.

4.5 Law 13.874/2019.

4.6 CNSP Resolution 459, of 01.23.2023.

4.7 SUSEP Circular Letter 693, of 07.28.2023.

5 Frequency of Review

5.1 This Policy shall be reviewed every three years or, exceptionally, at any time, and submitted to the Board of Directors for approval.

6 Executive Summary

6.1 This Policy presents the cross-cutting direction in which the Company applies innovation, both in its structuring actions and in its investments in innovation and its daily routines, permeating from processes to the products and services provided, demonstrating its commitment to the constant search for transparency of relevant information to *stakeholders*.

7 Concepts

7.1 For the purposes of this Policy, the following concepts are considered:

Scientific Chair: Special research projects, established by cooperative agreements between organizations and scientific institutions, aimed at investigating and understanding the market trends, scenarios and transformations, highly connected to the entities' demands.

Startup investment stages:

Pre-seed: Validation of the business thesis;

Seed: Validation of the product acceptance in the market;

Series A: Business model validation; and

Series B and subsequent: Gain of scale and acceleration of the company in all aspects.

Private Equity Investment Funds: Instrument for investment, made by means of a closed-end fund, the result of a pooling of resources intended to the acquisition of shares, subscription warrants, simple debentures, other bonds and securities convertible or exchangeable into shares issued by open or closed companies, as well as marketable bonds and securities representing holdings in limited liability companies, which shall be part of the investee's decision-making process, with effective influence in defining its strategy policy and management.

Innovation Governance: The system of structures and processes by which innovation and its strategic approach will be guided, promoted and monitored, aimed at pursuing the generation of value, the development of capabilities and the orchestration of innovation execution.

Innovation: Process of translating an idea into a solution that generates value for the customer and for which they are willing to pay, with money, time, effort or data.

Scientific Institutions: Bodies or entities of public administration or non-profit private entities whose institutional mission, among others, is to perform basic or applied research activities of a scientific or technological nature.

Territory Map: Shows the possible areas of opportunity for customized and relevant action for the company, which may be closer to or further away from the organization's core business. They are important inputs for Strategic Planning and innovation strategy, guiding innovation efforts in a clear and well-defined manner, within the innovation horizons (H1, H2 and H3).

Corporate Strategic Projects ("Projects"): Comprise the portfolio of structured actions, sponsored and monitored by the Collegiate Board, through which the Company seeks to improve and create processes, diversify channels, base new operating strategies and win more customers.

Startup: Technology-based company that creates innovative, highly scalable and replicable solutions.

Innovation Thesis: Document that is part of BB Seguridade's corporate strategy, in which the company states the focus of its innovation activities. Reviewed, at least annually, in each strategic cycle.

8 Guidelines

8.1 We act in line with current national policies, legislation and best practices.

8.2 We follow a decision-making process according to the responsibilities and related entities in our Articles of Incorporation.

8.3 We drive innovation based on the Long-Term Strategy, the Innovation Investment Policy and the definition of Corporate Strategic Projects.

Innovation Governance

8.4 We conduct our governance in a hybrid model: a) cross-cutting, with decentralization and autonomy for the areas, aimed at simplification of solutions, continuous improvement of processes, and renewal of products and services; and b) focused and comprehensively, by means of investment in *Corporate Venture Capital*- CVC and Scientific Chair.

8.5 We consider innovation and sustainability to be essential and inseparable pillars of Strategic Planning, when establishing drivers, objectives and key results.

8.6 In developing our solutions, we take into account the multiplicity of our clients and employees, meeting different needs in a customized manner, because we understand that diversity, equity and inclusion are essential parts of the innovation process.

8.7 We assess the Corporate Strategic Projects in the instrument for monitoring strategic execution and use them as one of the parameters of the Variable Compensation for Directors and the Profit Sharing Program for employees.

8.8 We foster a culture of innovation in all our employees, disseminating good practices, providing ongoing training and encouraging an innovative mindset.

8.9 We foster a culture of innovation, diversity and inclusion throughout the company, promoting a safe, respectful, collaborative and diverse working environment by recognizing conduct that inspires dialogue, mutual tolerance and fair treatment.

Private Equity Investment Funds (FIPs) – Selection of Funds/Managers

8.10 We invest in innovation through the Private Equity Investment Funds (FIPs) and the Scientific Chair.

8.11 We select market managers with proven experience, unblemished reputation and signatories to the PRI *(Principles for Responsible Investment*).

8.12 We select funds whose investment approach is in line with the current Innovation Thesis.

8.13 We use the following parameters to verify the alignment between the fund's investment approach and the Innovation Thesis: business maturity/investment stage, target themes and technologies, business model and location of the investee.

8.14 For the selection of FIPs, we consider the composition of shareholders, the existence of an IT technical consultant, active prospecting, a selection/investment committee, a *due diligence* process and an acceleration plan for the investee.

8.15 We prioritize investments of up to 15 years.

Risk exposure limits

8.16 We give preference to investment funds in which the shareholder's liability is limited, in accordance with CVM Resolution 185/2023.

8.17 We also use the following specific limits:

8.17.1 Per Manager: The investment is limited to up to two FIPs under the same manager;

8.17.2 Per Fund: BB Seguridade's interest is limited to 25% of the capital committed during the investment period.

8.17.3 Per Company: Indirect interest is limited to 25%.

Management

8.18 We acknowledge the quality of the decision-making processes and availability of information for monitoring the portfolio and resolving in the Fund's collegiate bodies.

8.19 We monitor the investments, the governance of the *startups* and support the development of the investees.

8.20 We conduct *due diligence* on the manager before the first investment.

8.21 We periodically assess the manager's performance and, if not satisfactory, we will act to replace them.

8.22 We are looking to include a "*first refusal*" clause.

8.23 We report the progress of investments every six months to the Collegiate Board and to the Board of Directors.

Scientific Chair

8.24 We select scientific institutions with an unblemished reputation and expertise in the company's areas of interest.

8.25 We follow the research progress, encourage cooperation and promote the management of the acquired knowledge and technology.

8.26 We report results, at least annually, to the Collegiate Board and to the Board of Directors.

8.27 We foster diversity, equity and inclusion in scientific research by considering partnerships with research groups led by women, black people and people from other underrepresented ethnic groups, people with disabilities, people from different generations, among other minority populations.

Seals

8.28 We do not invest with Fund Managers and Scientific Institutions whose teams comprise members in litigation with BB Seguridade or the conglomerate; or are or have been employees, officers or directors of BB Seguridade in the last 180 days, or their respective spouses or blood relatives up to the third degree.

9 Related Values

9.1 Innovation and Sense of Ownership.

10 Date of Last Approval by the Board of Directors

10.1 June 21, 2024.

11 Final Provisions

11.1 Exceptions to this Policy shall be referred to the Board of Directors for resolution.

12 Version Control Table

12.1

Term	06.21.2024 to 06.21.2027
Version	3
History of Changes	Revision of the Policy to change the name and include diversity guidelines