1 Responsible Area

1.1 Institutional Security Management.

2 Scope

2.1 This Policy guides the behavior of BB Seguridade and its subsidiaries. Investees are expected to define their directions based on these guidelines, considering specific needs and legal and regulatory aspects to which they are subject.

3 Target

3.1 This Policy reaches all members of the governance bodies, employees and third parties in the exercise of their professional activities related to the Company.

4 Regulation

4.1 Law 9,613, dated March 03, 1998.

4.2 Law 13.260, dated March 16, 2016.

4.3 Law 13.810, dated March 8, 2019.

4.4 Susep Circular 612, dated August 18 2020, applicable to BB Corretora de Seguros e Administradora de Bens S.A.

5 Frequency of Revision

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

6 Executive Summary

6.1 This Policy aims to establish guidelines related to the prevention and combating of money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction, in accordance with applicable laws and regulations.

7 Concepts

7.1 For the purposes of this Policy, the following definitions shall apply:

7.1.1 **Financing of terrorism:** consists of the allocation of funds to terrorists, terrorist organizations or terrorist acts. Funds can be sourced legally or illegally.

7.1.2 **Fraud:** any illegal, dishonest or cunning action that seeks to mislead or deceive anyone.

7.1.3 **Money laundering:** consists of concealing or disguising the nature, origin, location, disposition, movement or ownership of assets, rights or amounts arising directly or indirectly from a criminal offense.

7.1.4 **Governance bodies**: structures established to promote maximum alignment between the Company's management (agents) and the interests of the shareholders (main ones): Shareholders Meeting, Board of Directors, Fiscal Council, Audit Committee, Independent Auditors, Internal Audit, Technical Committees and Executive Board.

7.1.5 **Third parties:** individuals who are not employees of the Company, and juristic persons who, for interests of the service and contractual provision or legal obligation, establish relationship with the Company or are intermediaries of any nature.

7.1.6 **Weapons of mass destruction:** devices capable of intentionally promoting large-scale harm, such as nuclear, chemical and biological weapons or toxin.

7.1.7 **Financing of the proliferation of weapons of mass destruction:** consists of the allocation of resources, directly or indirectly, by any means, to financially support, provide or raise funds intended for the proliferation of weapons of mass destruction.

8 Related Values

8.1 Reliability, Customer Focus and Owner Feeling.

9 Guidelines

9.1 We are committed to ethics and integrity as a central pillar in achieving sustainable results.

9.2 We maintain a Code of Ethics and Conduct updated with the specifics of the Company, highlighting the need to prevent and combat money laundering and other financial crimes.

9.3 We maintain a base of corporate processes, including all the activities necessary for the faithful compliance with all the guidelines of this Policy and all decisions are taken by the competent levels, in accordance with the current regulations.

9.4 We select employees taking into account aspects related to ethics and integrity and the beginning of their activities is conditioned to reading and agreement with the current Code of Ethics and Conduct.

9.5 We prevent money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction practices in conducting business in accordance with national and international laws.

9.6 We communicate the competent authorities of negotiations or investments that, in compliance with current legislation, characterize evidence of money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.7 We operate in accordance with the international commitments of the Federal Government regarding the prevention and combat to money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction, in compliance with current legislation.

9.8 We adopt due diligence procedures prior to making strategic investments in order to mitigate risk of money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.9 We consider aspects related to the prevention and combat to money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction, when hiring outsourced labors, according to the activities to be performed.

9.10 We adopt measures of restrictive nature on conducting business with suppliers and partners when the risk of money laundering is very high and/or any evidence of its involvement in acts related to money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction is revealed, in compliance with current legislation.

9.11 We consider, in maintaining business relationship with third parties, the existence, within these third parties of mechanisms for preventing and combating money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.12 We request that our suppliers adopt criteria for hiring and monitoring the conduct of employees, with a focus on preventing and combating money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.13 We adhere to our controller's specific training program for employees on preventing and combating money laundering and terrorist financing and request from our partners, training in preventing and combating money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.14 We carry out periodically internal communications regarding the prevention and fight against money laundering, the terrorist financing and the financing of the proliferation of weapons of mass destruction, aiming to serve all the Company's audiences.

9.15 We adopt parameters established by law, for the identification of customers, for the registration of transactions and the identification of those considered to be indications of money laundering and the terrorist financing.

9.16 We carry out internal risk assessment in order to identify and measure the risk of using our business for illegal practices of money laundering, terrorist financing and financing the proliferation of weapons of mass destruction, considering the risk profiles: of customers; of BB Seguridade institution, including the business model and geographic area of acting; of beneficiaries in accumulation products; operations, transactions and products, covering all distribution channels and the use of new technologies; of the activities carried out by the Employees, partners, and third-party contractors.

9.17 We base our operation on the identified risks, considering, at least, the profile of our customers, the characteristics of the transactions, the geographic region of operation and the activities performed by the company and we adopt diligence procedures appropriate to the levels of risks assessed.

9.18 We adopt procedures, in the development of products and services, as well as the development and / or use of new technologies, to inhibit their use for illicit practices related to money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction, in addition to assessing possible risks involved prior to any commercialization of products or availability of services.

9.19 We condition the beginning and maintenance of business relationship with Politically Exposed People customers, as well as other customers and/or third parties that are classified as having a high risk of money laundering, to upper authorities approval.

9.20 We assess, related to the commercial transactions involving insurance products with intermediation of BB Corretora de Seguros e Administradora de Bens S.A., the instruments used, the way they were performed, the frequency, the parties and amounts involved and any indications of irregularity or illegality in order to detect indications of money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.21 We conduct, in a confidentially way, processes of registration, analysis and reporting about evidences of money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction to the competent authorities.

9.22 We do not maintain relationships or conduct financial transactions with designated entities or individuals. Additionally, we take timely and discreet steps to make the assets of natural and legal persons sanctioned by the United Nations Security Council unavailable.

9.23 We periodically assess compliance with and effectiveness of this Policy, as well as internal procedures and controls aimed at preventing and combating money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction, including assessing the quality of the communications made, prioritizing the adequacy of any weaknesses that may be encountered.

9.24 We have adopted procedures to monitor the process of preventing and combating money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction by senior administration, guaranteeing their commitment to the effectiveness and continuous improvement of the required internal policies, procedures and controls, as defined in internal procedures and on a corporate basis of processes.

Governance of Investees on Preventing and Combating Money Laundering, Terrorist Financing and the Financing of the Proliferation of Weapons of Mass Destruction

9.25 We recognize that the Company’s exposure to the risks related to illegal practices also originates from Investees’ operation.

9.26 We look after the Company's interest advising our nominees in the corporate governance bodies of the Investees, mainly in boards of directors and it’s advisory committees, in the audit committee and fiscal councils, on detective aspects about preventing and combating money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.27 We advise our Investees to maintain a properly documented risk assessment model and forward to the Risk Committee.

9.28 We promote technical exchanges between Investees, BB Seguridade and Banco do Brasil.

9.29 We assess indicators and monitor the reports to the governance bodies related to practices for preventing and combating money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

9.30 We submit the process of preventing and combating money laundering and the financing of terrorism and financing of the proliferation of weapons of mass destruction to an independent auditing company on an annual basis.

10 Date of the Last Approval by the Board of Directors

10.1 April 25, 2025.

11 Final Statements

11.1 Omissions in this Policy shall be submitted for approval to the Board of Directors.

12 Version Control Table

Duration	04.25.2025 to 04.30.2027
Version	7
Change History	Inclusion of procedures related to the prevention of the financing of the proliferation of weapons of mass destruction and editorial adjustments.