BB SEGURIDADE

Internal Controls, *Compliance* and Integrity Policy

Internal Controls and Integrity Superintendency

06/27/2025

1 Responsible Area

1.1 Internal Controls and Integrity 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 administration 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 This Policy covers all members of governance bodies, employees and third parties in the exercise of their professional activities related to the Company.

4 Regulations

4.1 Law No. 12.846/2013

4.2 Law No. 13.303/2016

4.3 Decree No. 8.945/2016

4.4 CNSP Resolution No. 416/2021

4.5 Decree No. 11.129/2022

4.6 CGPAR Resolution No. 48/2023

5 Frequency of Review

5.1 This Policy shall be reviewed every 2 (two) years or, exceptionally, at any time, and submitted to the Board of Directors for approval.

6 Executive Summary

6.1 This Policy provides guidelines for internal controls, *compliance* and integrity of BB Seguridade, BB Seguros, and BB Corretora, in accordance with applicable laws and regulations, covering two dimensions of action:

6.1.1 Management of internal controls, compliance and integrity at BB Seguridade, BB Seguros and BB Corretora; and

6.1.2 Governance of internal controls, compliance and integrity with regard to investees.

6.1.2.1 The investees have their own internal control, compliance and integrity management structures, which provide inputs for BB Seguridade's supervision.

7 Concepts

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

7.1.1 **Risk appetite**: Maximum level of risk that the organization accepts to incur in order to achieve its goals, materialized by guidelines and indicators that define an aggregate view of risk exposure.

7.1.2 **Compliance**: synonym for *"conformidade"* in Portuguese; it is an activity aimed at ensuring compliance with external and internal laws, regulations, and internal rules.

7.1.3 **Internal controls**: a coherent, comprehensive, and continuous set of processes and procedures carried out with the objective of ensuring at a minimum: a) the operational efficiency of its activities; b) the existence and disclosure of financial and non-financial information to internal and external stakeholders in a timely, reliable, and complete manner; c) the compliance of its operations with applicable laws and regulations, good practices, its own policies and internal rules; and d) the prudent conduct of business.

7.1.4 ***Framework***: Model that defines pre-established structures and functions that adapt to the situation and/or organization in question.

7.1.5 **Risk management:** processes and procedures employed in a coordinated manner to identify, assess, measure, treat, monitor, and report the organization's risks, based on an adequate understanding of risk types, their characteristics and interdependencies, risk sources, and their potential impact on the business.

7.1.6 **Process manager**: Person or entity responsible for one or more processes and that with the authority to manage a risk. The risk taker.

7.1.7 **Integrity**: Ethical principle that helps in the selection of actions that, besides being lawful, are also honest and fair. Anyone who respects this principle is an individual with an ethical, incorruptible attitude. Due to this behavior, a high standard of planning, performance, efficiency and control of institutional actions is expected.

7.1.8 **Investee**: Company in which the investor has significant influence (when the investor holds or exercises the power to participate in the decisions of the financial or operational policies of the investee, without controlling it). Significant influence is presumed when the investor holds twenty percent (20%) or more of the voting capital of the investee, without controlling it.

7.1.9 **Three lines model:** Refers to the Referenced Model for action in Lines, a good practice adopted by the institution for integrated and efficient risk management and internal controls. The Model establishes the roles and responsibilities of the different areas and processes that make up the lines, as well as their interaction. The goal is to ensure that activities are aligned with the company's strategic objectives.

7.1.10 **Governance bodies**: structures established to promote maximum alignment between the Company's management (agents) and the interests of shareholders, the main ones being: General Meeting, Board of Directors, Fiscal Council, People, Eligibility, Succession and Compensation Committee, Audit Committee, Risk and Capital Committee, Independent Audit, Internal Audit, Technical Committees, Ethics and Integrity Committee, and Executive Board.

7.1.11 **Compliance and Integrity Program**: Corporate governance instrument approved by the Board of Directors, consisting of advisors, both integrated and complementary, who guide the Company's operational activities and business practices. Aims to prevent, detect and remedy deviations, fraud, irregularities and unlawful acts committed against the public administration, whether domestic or foreign, in addition to fostering and maintaining a culture of integrity in the organizational environment.

7.1.12 **Risk**: Effect of an uncertainty, on the organization's goals, which can be expressed in terms of a combination of consequences of an event and the associated likelihood of occurrence.

7.1.13 **Internal control system**: a set of components that provide the foundations and organizational arrangements for the design, implementation, operation, monitoring, critical analysis, and continuous improvement of internal controls throughout the organization.

7.1.14 **Third parties:** Individuals who are not employees of the Company and legal entities that establish a relationship with the Company for the sake of service, contractual provision, legal imposition or who are intermediaries of any nature.

8 Related Values

8.1 Generating Sustainable Value for All Stakeholders.

9 Guidelines

9.1 **Internal controls, compliance and integrity management at BB Seguridade and its subsidiaries BB Seguros and BB Corretora**

9.1.1 We have an area dedicated to internal controls, compliance and integrity management, called the Internal Controls and Integrity Superintendency, part of the Executive Governance, Risks and Compliance Superintendency, which ensures the independence and autonomy of action and the link to the Company's Chief Executive Officer, appointed by the Board of Directors.

9.1.2 We count on the firm support of Senior Management in the effective implementation of internal controls, the promotion of a culture of integrity, and the reinforcement of the importance of the company's compliance status. These are fundamental aspects for good governance and for maintaining the expected standards of behavior, in accordance with our Code of Ethics and Conduct.

9.1.3 We adopt the Three Lines Model, which includes integrated action between the business, operations and support areas (first line), risk management, internal controls and security areas (second line), and Internal Audit (third line).

9.1.3.1 The first line is directly responsible for managing the risks inherent to the processes and, consequently, for ensuring the existence of internal controls to keep risk exposures at levels considered acceptable, in addition to implementing corrective measures for the proper treatment of risks.

9.1.3.2 In the second line, the Internal Controls and Integrity Superintendency, with the necessary autonomy and segregation from the business and audit areas, supervises, advises, and evaluates the first line in the management of internal controls and compliance.

9.1.3.3 As the third line, the Internal Audit, with a high level of independence, provides governance bodies with assessments of the effectiveness of the internal controls and compliance management.

9.1.4 We use the COSO ICIF *framework*, which presents internal control as a process consisting of five interrelated components that operate in an integrated manner: Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring Activities.

9.1.5 We operate in synergy with BB Seguros and BB Corretora, companies that make up the *Holding* structure, in risk and control management, considering the corporate purpose and specificities of the companies, through cost, structure, policy and disclosure mechanism sharing.

9.1.6 We maintain an internal controls, compliance and integrity management structure compatible with the nature and complexity of operations carried out by BB Seguridade, BB Seguros and BB Corretora.

9.1.7 We carry out the prospecting and periodic monitoring of legislation, as well as its proper internalization, related to the *Holding's* processes, products, and business sectors of the investee companies.

9.1.8 We analyze regulatory impact to identify the need for adjustment actions and monitor their implementation, ensuring the corporate compliance status, which is periodically reported to the governance bodies, including any identified weaknesses and improvement actions.

9.1.9 We formalized the Risk Internal Controls and Security Management Model, through specific documents, approved by the competent authorities of BB Seguridade, BB Seguros and BB Corretora.

9.1.10 We periodically review the Integrated Risk, Internal Controls and Security Management Model, and implement the necessary corrections.

9.1.11 We carry out monitoring activities to determine the level of operational and regulatory compliance and assess the effectiveness of internal controls.

9.1.12 We report to Senior Management any identified deficiencies in internal controls and non-compliances, in a timely manner, according to procedures described in internal regulations, to those responsible for adopting corrective measures, as well as monitor the fulfillment of mitigation actions.

9.1.13 We integrate the internal controls management into the strategy, supporting the governance process and providing advice on the internal controls and compliance management, aimed at ensuring, in a reasonable manner, the execution of the corporate strategy.

9.1.14 We seek continuous improvement of the internal controls and compliance management process, developing models, tools and processes suited to the needs of BB Seguridade, BB Seguros and BB Corretora, according to the best corporate governance practices and using theoretical references recognized by the market.

9.1.15 We assess the adequacy and effectiveness of the controls that support the issuance of the financial statements.

9.1.16 We provide the Internal Controls and Integrity Superintendency with free access to the information necessary for the exercise of its duties.

9.1.17 In our work, we consider the continuous monitoring of the main risks and internal and external factors that may adversely affect the achievement of the Company's strategic objectives, regulatory aspects, and sustainability requirements.

9.1.18 We maintain the Compliance and Integrity Program up to date, which aims to prevent, detect, and address deviations, fraud, irregularities, and illegal acts committed against the public administration, whether national or foreign, in addition to fostering and maintaining a culture of integrity within the organizational environment.

9.1.19 We develop, implement, evaluate, and recommend improvements to enhance the Compliance and Integrity Program of BB Seguridade, which is periodically reviewed and approved by the Board of Directors.

9.1.20 We periodically monitor the Compliance and Integrity Program to track its effectiveness.

9.1.21 We adopt and encourage the unequivocal ethical conduct of all the institution's employees (directors, employees, contractors, service providers), based on our Code of Ethics and Conduct.

9.2 Governance of internal controls and compliance with regard to investees

9.2.1 We continuously monitor and assess the level of maturity and effectiveness of the internal control system in investees.

9.2.2 We advise that every investee has, at least, at a level compatible with the nature, scale and complexity of its operations:

9.2.2.1 Internal Controls, Compliance and Integrity Management Policy, approved by the Board of Directors or equivalent body;

9.2.2.2 We analyze, prior to approval, the Policies and main proposals related to the management of internal controls, compliance, and integrity in the investee companies.

9.2.2.3 Management models and tools necessary for the internal controls, compliance and integrity management; and

9.2.2.4 Internal controls, compliance and integrity management structure proportional to its exposure to risks, segregated from the business and internal audit areas.

9.2.3 We appoint members to act on the governance bodies of the investees, in particular, on the risk management advisory committees, on the Board of Directors and Supervisory Board and on the Audit Committees.

9.2.4 We promote technical forums with the investee companies.

9.3 Integrated risk, internal controls and security management process

9.3.1 We maintain an Integrated Risk, Internal Controls and Security Management Model based on the stages of definition of context, identification, analysis, assessment, treatment, communication and monitoring.

9.3.2 We ensure that the previously defined corporate limits and authority are observed in the risk, internal controls and security management process.

9.4 Communication

9.4.1 We timely provide and disclose consistent, reliable and relevant information on internal controls, compliance and integrity management to the Senior Management and external inspection and control entities.

9.4.2 We report to Senior Management the actions carried out, within the scope of BB Seguridade, by the Internal Controls and Integrity Superintendency and other supervisory bodies.

9.4.3 We share with Banco do Brasil the Ethics and Whistleblowing Channel for reporting situations involving non-compliance with the Code of Ethics, misconduct, and signs of irregularities of any nature such as corruption, fraud, money laundering, harassment, and discrimination, ensuring confidentiality and anonymity for the whistleblower, as well as proper investigation. Through the Channel, we have an Internal Ombudsman to handle cases involving interpersonal relations.

9.4.4 We have mechanisms in place to protect good-faith whistleblowers, witnesses, and any person who has contributed to or participated in internal investigations of wrongdoing, in accordance with Banco do Brasil's Whistleblower Protection and Non-Retaliation Commitment and provisions for addressing retaliation situations.

9.4.5 We disseminate a culture of internal controls, compliance, and integrity, encouraging training and qualification of internal and third-party audiences on the relevance of these topics at all levels.

10 Date of Last Approval by the Board of Directors

10.1 June 27, 2025.

11 Final Provisions

11.1 Omissions in this Policy must be submitted for resolution by the Board of Directors.

12 Version Control Table

12.1

Term	06.27.2025 to 06.27.2027
Version	4
Previous Amendments	Textual adjustments and new inclusions aligned with BB Seguridade's Compliance and Integrity Program and the BB Internal Controls and Compliance Policy.