BB SECURITY
Related Party Transactions Policy

Corporate Governance Superintendency

BB SEGUROS
Pra tudo que importa

09/26/2025

1 Responsible Area

1.1 Corporate Governance Superintendency.

2 Scope

2.1 This Related Party Transactions policy ("Policy") guides the behavior of BB Seguridade Participações S.A. ("BB Seguridade" or "Company") and its subsidiaries BB Seguros Participações S.A. ("BB Seguros") and BB Corretora de Seguros e Administradora de Bens S.A. ("BB Corretora"). In addition, it is expected that affiliated companies define their guidelines based on these guidelines, considering the specific needs and the legal and regulatory aspects to which they are subject.

3 Target audience

3.1 The guidelines in this Policy are intended for BB Seguridade, its subsidiaries, employees, managers and shareholders with respect to Transactions with Related Parties, under the terms of the applicable laws and regulations.

4 Regulation

4.1 The main grounds of this Related Party Transactions Policy are Law No. 6,404/1976, Law No. 13,303/2016 and its regulatory Decree No. 8,945/2016, CVM Resolutions No. 44/2021, 80/2022, 81/2022 and 94/2022, the CVM/SEP Circular/Annual Letter-2025, the Novo Mercado Regulation of B3 S.A., the Brazilian Code of Corporate Governance for Publicly-Held Companies, the IBGC's Code of Best Corporate Governance Practices and CMN Resolution No. 4,818/2020, ensuring the transparency of transactions involving Related Parties and reaffirming the good Corporate Governance practices adopted by the Company.

4.2 The Company is required to disclose Transactions with Related Parties, in accordance with Article 247 of Law No. 6,404/76, CVM Resolutions No. 44/2021, 80/2022 and 94/2022.

4.3 Relevant information about Related Party Transactions, as defined by Exhibit F of CVM Resolution No. 80/2022, must be duly communicated within seven (7) business days of the formalization of the act in question, as described in the Company's Reference Form.

4.4 It should be noted that, in addition, the Company's subsidiaries that are subordinated to specific regulatory bodies must comply with the rules on Transactions with Related Parties of the respective regulators.

5 Periodicity of Review

5.1 This policy must be reviewed at least annually or, extraordinarily, at any time, and submitted to the Board of Directors for approval, with prior transit by the Related Party Transactions Committee.

6 Executive Summary

6.1 This policy sets out the principles and guidelines related to related party transactions.

7 Concepts

7.1 **Related Party:** Pursuant to the applicable regulations, in particular CVM Resolution No. 94/2022, the Related Party, for the purposes of this Policy, is considered to be the individuals or legal entities with whom BB Seguridade is able to contract under conditions other than those of independence that characterize the transactions carried out with the other parties that interact with the Company, as follows:

7.1.1 A person, or a close member of his or her family, is related to the Company if:

7.1.1.1 has full or shared control of the Company;

7.1.1.2 has Significant Influence (defined below) over the Company; or

7.1.1.3 is a member of the Company's or its parent company's key management personnel, and each of the members of the respective Boards of Directors and Executive Boards is understood to be key management personnel.

7.1.2 An entity is related to the Company if any of the following conditions are met:

7.1.2.1 the entity and the Company are members of the same economic group;

7.1.2.2 the entity is a parent, controlled or affiliated entity of the Company;

7.1.2.3 the entity is the Federal Government or other state-owned companies;

7.1.2.4 the entity and the Company are under joint control (joint venture) of a third company;

7.1.2.5 an entity is under the joint control (joint venture) of a third company and the Company is an affiliate of that third entity;

7.1.2.6 the entity is fully or jointly controlled by a person identified in paragraph 7.1.1 above; or

7.1.2.7 a person identified in paragraph 7.1.1.1 above has Significant Influence over the entity, or is a member of the entity's key management staff (or the entity's parent).

7.2 **Significant Influence:** For the purposes of item 7.1. above, "Significant Influence" is the power to participate in decisions about the financial and operational policies of an investee, without individual or joint control of those policies.

7.2.1 Indications of the existence of significant influence are:

7.2.1.1 representation on the board of directors or on the board of directors of the investee;

7.2.1.2 participation in policy-making processes, including decisions on dividends and other distributions;

7.2.1.3 material transactions between the investor and the investee;

7.2.1.4 provision of technical information essential for the institution's activity.

7.2.2 The existence of significant influence is presumed when the investing institution holds 20% (twenty percent) or more of the voting capital of the investee, without controlling it.

7.3 **Unrelated Parties:** In considering each of the possible relationships with Related Parties, attention should be directed to the essence of the relationship and not merely to its legal form. In this sense, in the context of this Policy, the following are not Related Parties:

7.3.1 two companies simply because they have a director or other member of key management staff in common, or because a member of the company's key management staff exerts Significant Influence over the other company;

7.3.2 two investors simply because they share joint control over a jointly controlled venture (joint venture);

7.3.3 relationships where one of the parties is:

7.3.3.1 entities that provide financing;

7.3.3.2 trade unions;

7.3.3.3 public service providers; and

7.3.3.4 government departments or agencies that do not fully or jointly control or exercise Significant Influence over the Company simply by virtue of their normal dealings with the Company (even if they may affect the Company's freedom of action or participate in its decision-making process).

7.3.4 It is also a customer, supplier, franchisor, dealer, distributor or general agent with whom the Company maintains a significant volume of business, merely due to the resulting economic dependence.

7.4 **Conflict of Interest:** Conflict of interest arises when a person is involved in a decision-making process in which he has the power to influence the decision, ensuring a gain for himself, a family member, or a third party with whom he is involved, or even that may interfere in his ability to make an impartial judgment. In other words, there is a conflict of interest when someone can influence or make decisions motivated by interests other than those of the Company.

8 Guidelines

8.1 Related Party Transactions

8.1.1 For the purposes of this Policy, transactions with related parties are considered to be the transfer of resources, services or obligations considered significant between the Company, including its subsidiaries, and a Related Party or other situations with potential conflict of interest, regardless of whether a price is charged in return, applying, for the purpose of prior approval by the Related Party Transactions Committee, the provisions of item 8.3 below ("Related Party Transactions Committee").

8.1.2 In order for Related Party Transactions to be classified as market conditions, they must meet the requirements of:

8.1.2.1 competitiveness: prices and conditions of services compatible with those practiced in the market;

8.1.2.2 compliance: adherence to the contractual terms and responsibilities practiced by the Company;

8.1.2.3 transparency: adequate reporting of the agreed conditions, as well as the reflections on the Company's financial statements; are clearly reflected in the financial statements.

8.1.2.4 equity: establishment of mechanisms that prevent discrimination or privileges and adoption of practices that ensure the non-use of privileged information or business opportunities for the benefit of individuals or third parties; and

8.1.2.5 Commutativity: proportional installments for each contractor.

8.1.3 The Company, in particular through the Related Party Committee and the Audit Committee, as the case may be, will act to ensure that the Related Party Transactions:

8.1.3.1 are prepared in writing, specifying their main characteristics, such as: contracting parties, motivation, price, term, terms, conditions, risks and benefits expected for BB Seguridade and the Related Party(ies);

8.1.3.2 are carried out at the usual market prices, terms and rates or from previous negotiations that represent commutative conditions;

8.1.3.3 observe the institutional responsibilities, the decision-making process and the competencies and powers established for the negotiation, analysis and approval of Transactions with Related Parties;

8.1.3.4 are clearly reflected in the financial statements;

8.1.3.5 have the impact of their execution measured, including reputational risks; and

8.1.3.6 involving corporate restructuring, give equal treatment to all shareholders.

8.1.4 The Company shall make all necessary efforts to provide greater transparency to the terms and conditions of the Transactions with Related Parties, especially in relation to the current agreements and instruments entered into with Related Parties that regulate the payment of brokerage commissions and the reimbursement of expenses by BB Corretora to Banco do Brasil S.A. ("BB"), which must be kept in dismembered documents so that:

8.1.4.1 an instrument to regulate (i) the brokerage commissions paid by the companies affiliated to BB Corretora, as consideration for the activities related to the distribution of the products and (ii) the payment to BB, by the affiliated companies, as consideration for services provided by BB to them;

8.1.4.2 while the other instrument provides for the reimbursement of expenses by BB Corretora to BB.

8.1.5 The participation of managers and employees in business of a private or personal nature that interferes or conflicts with the interests of the Company or that results from the use of confidential information obtained from the exercise of the position or function they occupy is prohibited.

8.1.6 Members of the bodies responsible for negotiating, analyzing or approving Transactions with Related Parties who are in conflict of interest are advised to declare themselves impeded, explaining their involvement in the Transaction and even abstaining from discussing the topic.

8.1.7 The conflict of interest declared by a member of the board or pointed out by any of those present, as well as their absence from the meeting at the time of the respective discussion and deliberation of the matter, shall be recorded in the minutes of the meeting that deals with a Transaction with a Related Party;

8.1.7.1 if the member of the body responsible for negotiating, analyzing or approving Transactions with Related Parties does not express his or her conflict of interest, any other member of the body who is aware of the situation must do so.

8.1.8 The Company observes the principles of transparency and equity in corporate restructurings involving related parties.

8.2 Related Party Identification

8.2.1 The Company's areas must, whenever they enter into any contracts, consult the List of Related Parties of BB Seguridade in advance. In cases where a transaction with a related party is configured, these areas must follow the procedures set forth in this Policy and in the Internal Regulations for Transactions with Related Parties.

8.2.2 BB Seguridade's List of Related Parties shall be updated at least quarterly, in accordance with the procedures detailed in the Internal Regulations for Transactions with Related Parties.

8.2.3 The classification of the transaction as between related parties is the responsibility of the area imbued with the formalization of the agreement and must be identified in the instrument to be submitted for approval by the Company's governance bodies.

8.2.4 It is incumbent upon the Audit Committee, as provided for in Article 31, paragraph 1, item "e" of the Bylaws, to periodically evaluate and monitor the policies and procedures related to transactions with related parties carried out by the Company and their respective disclosures.

8.3 Related Party Transactions Committee

8.3.1 The Company has a Related Party Transactions Committee ("Committee"), whose constitution and installation was decided by the Board of Directors ("Board of Directors"), at a meeting of the body.

8.3.2 The Committee shall be responsible for:

8.3.2.1 to approve in advance the execution of contracts as well as other instruments that have as their object Transactions with Related Parties and that have as signatory parties the Company and/or its subsidiaries on the one hand and one or more Related Parties on the other, as well as the revisions and terminations of contracts and instruments of this kind, whenever: i) the execution of such documents impacts, in the accumulated year, positively or negatively, the Company's results in an amount equal to or greater than 0.1% of the Company's Shareholders' Equity, or ii) regardless of the financial impact, the submission is required by any of the members of the Committee;

8.3.2.2 ensure, in relation to the Transactions with Related Parties considered material, that section 11 of the Reference Form ("Reference Form") contains the Collegiate Board's statement as to whether they were and remain signed under market conditions, as well as the Board of Directors' record and comments on any reservations, emphases or recommendations made by the independent auditing firm in the course of its work covering this topic; and

8.3.2.3 ensure the disclosure, in the Company's Reference Form, of the terms and conditions of this Policy, as well as the structure, purpose and duties of the Committee itself.

8.3.3 It is incumbent upon the Board of Executive Officers to submit to the Committee a proposal for the approval of contracts and other instruments involving Transactions with Related Parties, as well as their terminations and amendments, as referred to in item 8.3.2.1 above, whenever such acts meet the criteria established in the Committee's Internal Regulations as mandatory submission.

8.3.3.1 Any of the members of the Committee has the prerogative to request the Collegiate Board of Executive Officers to submit a certain Transaction with Related Parties for approval, even if such submission is not mandatory by the criteria established in the Internal Regulations.

8.3.4 The members of the Committee shall be elected and removed by the Board of Directors. Regarding its composition:

8.3.4.1 one (1) independent member, who shall be the independent member of the Board of Directors elected by the minority shareholders as set forth in Paragraph 3 of Article 15 of the Company's Bylaws;

8.3.4.1.1 If the member of the Board of Directors elected by the minority shareholders does not meet the independence requirements set forth in Paragraph 4 of Article 15 of the Bylaws, it shall be incumbent upon him to appoint a candidate who does, who shall be elected by the Board of Directors.

8.3.4.2 Two (2) members who shall be appointed by the other members of the Board of Directors, one (1) of the members appointed from among the Company's active employees or Statutory Officers and one (1) of the members appointed from among the active employees of Banco do Brasil, both with proven knowledge in the areas of finance, accounting and/or the Brazilian insurance market.

8.3.5 The execution of contracts and other instruments that have as their object Transactions with Related Parties, as well as the revisions and eventual terminations of documents already signed, as specified in item 8.3.4.1 above, will only be approved by the Committee with the favorable vote of an independent member of the Committee, who must certify that the act in question was carried out in accordance with market practices and without prejudice to minority shareholders, to the Company's corporate interest and creditors.

8.3.6 It is incumbent upon the General Shareholders' Meeting, as provided for in Article 10, item "xix" of the Bylaws, to resolve on the execution of transactions with related parties, if the value of the transaction corresponds to more than 50% of the value of the Company's total assets included in the last approved balance sheet.

8.3.7 It is incumbent upon the Board of Directors, as provided for in Article 22, item "s" of the Bylaws, to set the general conditions and, subject to the powers of the Related Party Transactions Committee, to authorize the execution of agreements of any nature between the Company and any Subsidiary and Affiliate, its managers, its controlling shareholders and, also, between the Company and subsidiaries and affiliates of the managers and controlling shareholders, as well as with any other companies that with any of these persons are part of the same group in fact or in law, which reach, individually or jointly, in a period of one year, an amount equal to or greater than five percent (5%) of the Company's shareholders' equity, according to the last approved balance sheet.

8.3.8 It is incumbent upon the Executive Board, as provided for in Article 28, item "m" of the Bylaws, to set the general conditions and, subject to the competence of the Related Party Transactions Committee, to authorize the execution of agreements of any nature between the Company and any Subsidiary and Affiliate, its managers, its controlling shareholders and, also, between the Company and subsidiaries and affiliates of the managers and controlling shareholders, as well as with any other companies that with any of these persons are part of the same group in fact or in law, which reach, individually or jointly, in a period of one (1) year, the amount of a maximum of five percent (5%) of the Company's shareholders' equity, according to the last approved balance sheet;

8.3.9 Transactions with Related Parties whose approval is the responsibility of the Board of Directors under the terms of the Bylaws shall be submitted to the deliberation of that body only upon prior approval of the Committee. Transactions whose approval is not within the competence of the Board of Directors will be considered approved upon favorable resolution of the Committee, since they already have the approval of the Board of Executive Officers at the time of the proposal of the matter.

8.3.10 The other rules of composition, form of operation, structure, requirements and impediments of the Committee shall be defined in its Internal Regulations, subject to the provisions of the Bylaws.

8.3.11 The company has internal regulations containing, at least:

8.3.11.1 The procedures and those responsible for identifying the related parties;

8.3.11.2 The procedures and those responsible for identifying transactions with related parties;

8.3.11.3 The activities that can generate transactions between related parties;

8.3.11.4 The rules for classifying contracts signed between related parties; and

8.3.11.5 The form of reporting, at least annually, of transactions between related parties to the Audit Committee and to the Related Party Transactions Committee.

8.3.12 The Company, prior to the approval of specific transactions or guidelines for contracting transactions with related parties, evaluates market alternatives adjusted for the risk factors involved.

8.3.13 The Company annually evaluates recurring Related Party Transactions in order to verify the desirability of continuing these transactions.

8.4 Disclosure Obligation

8.4.1 The Company shall disclose information on the Transactions with Related Parties, through its periodic financial statements, the Company's Reference Form or, also, when the transaction constitutes a Material Fact ("Material Fact"), under the terms of the applicable legislation, in order to ensure the transparency of the process to shareholders, investors and the market.

8.4.2 It is the duty of the Committee, depending on the relevance of the Transaction signed with Related Parties, to suggest its publicity via Material Fact.

8.5 Prohibited Transactions

8.5.1 The following Transactions with Related Parties are prohibited:

8.5.1.1 those carried out under conditions other than those of the market in order to harm the interests of the Company;

8.5.1.2 granting of loans to its parent, managers and other Related Parties defined in item 7;

8.5.1.3 participation of managers and employees in business of a private or personal nature that interferes or conflicts with the interests of the Company or that results from the use of confidential information obtained due to the exercise of the position or function they hold in the Company; or

8.5.1.4 any form of remuneration of advisors, consultants or intermediaries that generate a conflict of interest with the company, managers, shareholders or classes of shareholders.

8.6 Penalties

8.6.1 Any violation of the provisions of this Policy will be submitted to the Audit Committee, and the appropriate penalties shall be adopted, without prejudice to the penalties provided for in the legislation in force.

9 Associated Values

9.1 Reliability and Feeling of Ownership.

10 Date of Last Approval by the Board of Directors

10.1 September 26, 2025.

11 Final Provisions

11.1 Exceptions to this Policy, as well as cases of omission, shall be resolved by the Company's Board of Directors.

12 Version Control Table

Duration	09/26/2025 to 09/30/2026
Version	10
Change History	Annual review of the Policy for Transactions with Related Parties, as required by Article 8 "VII" of Law 13,303/2016.