1 Responsible Area

1.1 The Investor Relations department will be responsible for managing the content of this Policy and the IRO will be responsible for executing and monitoring it.

2 Scope

2.1 This Policy guides the behavior of BB Seguridade and its controlled companies. The affiliated companies are expected to define their practices, based on these guidelines, considering their specific needs and legal and regulatory aspects to which they are subject.

2.2 This policy applies to any trading based on the Company's securities: on or off the regulated market, directly or indirectly, either through controlled companies or third parties with whom is maintained a fiduciary or portfolio management contract; and by its own account or the third party.

2.2.1 The trades carried out through investment funds are not considered indirect or held by a third party, since the trading decisions of the portfolio manager can not be influenced by the holders.

2.2.2 It is assumed, admitting evidence to the contrary and subject to item 2.2.3, that the trading decisions of the administrator and the portfolio managers of exclusive funds are influenced by the holder of the fund.

2.2.3 The assumption mentioned in the item 2.2.2 does not apply to exclusive investment funds whose holders are insurance companies or pension fund entities and whose objective is to invest resources from the Free Benefit Generator Plan (PGBL) and the Free Benefit Generator Life Plan (VGBL), during the deferral period.

2.2.4 Notwithstanding other types of trading not provided herein, the investments, redemptions and negotiations of mutual funds quotas whose rules provide that its securities portfolio will be exclusively composed of shares issued by the Company are considered indirect trading.

3 Target

3.1 The rules of this Policy apply to all Related and Binding Persons, as defined in section 7.

4 Regulation

4.1 This Policy was written in addition to the CVM Rule #44, dated August 23rd, 2021 ("CVM 44"), and the Law 6,385/76. In case of doubt or divergence, the terms of the aforementioned rules of the Brazilian Securities and Exchange Commission ("CVM") or any other law or regulation that deals with the same subject will prevail over this Policy.

5 Frequency of Revision

5.1 The content of this Policy will be reviewed at least every three years, as of the date of the last approval by the Company's Board of Directors, or within a shorter period, if necessary due to regulatory changes or strategic needs.

6 Executive Summary

6.1 This Trading Policy for Securities Issued by BB Seguridade ("Policy") provide the guidelines and procedures to be followed by BB Seguridade Participações S.A. ("BB Seguridade") and by its Related Persons, Individuals or Companies, directly or indirectly, when trading its securities or any derivative referenced to them.

7 Concepts

7.1 For this Policy, the following definitions shall apply:

7.1.1 **Controlling Shareholder**: a shareholder or group of shareholders binded by a shareholder agreement, or under common control, direct or indirect, who holds the rights that permanently assures a majority of the votes in the deliberations of the general shareholders meeting and the power to elect the majority of the Company's Officers, and who effectively uses its power to drive the corporate activities and guide the Company's administrative structures.

7.1.2 **Directors:** members of the Board of Directors and of the Company's Executive Board.

7.1.3 **Material Fact:** any decision of the controlling shareholder, of the general meeting or of the Company's Management, or any other political, administrative, technical, negotial or economic fact occurred or related to its business and to its Controlled and Affiliated companies, which may materially impact: (i) the price of the securities issued by the Company or referred on it; (ii) the decision of investors to purchase, sell or hold such securities; or (iii) the decision of the investors to exert any rights inherent to the condition of holder of the securities issued by the Company or referred on it.

7.1.3.1 Notwithstanding other facts that fit into the definition provided in item 7.1.3, the examples of potentially material facts are those listed in section I to XXII, of the Article 2, of CVM Rule 44, which are carried out by the Company and its Controlled and Affiliated Companies.

7.1.3.2 The following activities are considered material facts since the beginning of the studies or analysis: merger, total or partial spin-off, transformation, or any other form of corporate reorganization or business combination; change of control, including through the execution, change or termination of shareholders' agreements; and decision to promote the cancellation of the Company's registration as a public traded company, or the change of the exchange and trading segment where its shares are listed, both within the scope of the Company and of its Controlled and Affiliated.

7.1.3.3 Information on requests for judicial or extrajudicial reorganization and bankruptcy filed by the Company, its Controlled and Affiliated Companies are material from the beginning of the studies or analyses related to such matters.

7.1.4 **Affiliated Companies:** companies in which the Company, directly or indirectly, participates with 20% (twenty percent) or more of the voting capital , without controlling it.

7.1.5 **Statutory Committees:** bodies with technical or advisory functions provided in the Company's bylaws.

7.1.6 **Company:** BB Seguridade Participações S.A.

7.1.7 **Board of Directors:** The Company's Board of Directors.

7.1.8 **Fiscal Council Members:** the members and alternate members of the Company's Fiscal Council.

7.1.9 **Fiscal Council:** the Company's Fiscal Council.

7.1.10 **Controlled Companies:** companies in which the Company, directly or through other subsidiaries, holds rights that permanently assures the preponderance in the corporate resolutions and the power to elect the majority of the management members.

7.1.11 **Investor Relations Officer (IRO):** the Executive Officer who holds a specific designation provided in the Bylaws to represent the Company with the regulatory agencies and exchanges where its securities are traded, in addition to complying with the applicable regulations.

7.1.12 **Executive Officers:** the Officers elected pursuant to the Company's Bylaws, including the IRO.

7.1.13 **Inside Information:** any information related to the Company or its Controlled and Affiliated companies that may be classified as a Material Fact and that has not yet been disclosed to the market.

7.1.14 **Lock-up Period:** any and all periods in which the trading of securities is not allowed by regulatory provisions or by the IRO determination.

7.1.15 **Binding Persons:** individuals or enterprises who have the following relationship with the Related Persons as defined below: (i) spouse, from whom they are not separated, officially or not; (ii) life partner; (iii) any dependent included in the annual income tax statement; and (iv) companies directly or indirectly controlled by the Related Persons.

7.1.16 **Related Persons:** persons subject to complying with this Policy when trading securities issued by the Company or referred on it, as follow: (i) the Company itself; (ii) Controlling Shareholders; (iii) Directors, Executive Officers, Fiscal Council, Statutory Committees Members and all the Company's employees; (iv) any other person who holds a title, function, position or temporary employment in the Company, its Parent Company, its Controlled or Affiliated companies, and is aware of Inside Information; (v) any person who has a commercial, professional or trustful relationship with the Company, and who has knowledge of Inside Information; (vi) any Related Persons listed on item (iii) who leaves the position held, keeping this condition for three (3) months after leaving; and (vii) any Related Persons listed on items (iv) to (v) who leaves the position held prior to the disclosure of a Inside Information accessed during its term of office, keeping this condition for three (3) months after leaving or until the Inside Information becomes public, what happens first.

7.1.17 **Investment Plan:** Individual Investment or Divestment Plan executed by Related Persons which details the Securities trading intentions, contemplating its own negotiations and the negotiations of Related Persons..

7.1.18 **Term of Adherence:** term of adherence to this Policy, according to the model in Attachment I, which shall be formalized by the Related Persons.

7.1.19 **Securities:** any shares, debentures, ADRs (American Depositary Receipt), real state receivables certificates, subscription warrants, receipts and subscription rights, commercial papers, call and put options or derivatives of any kind, quotes of mutual funds which decision of the portfolio manager can be influenced by the investor or which invests only in shares issued by the Company, or any other securities issued by the Company or referred on it, which, by legal requirement, are considered securities.

8 Guidelines

Adherence to the Policy

8.1 The Related Persons, with the exception of the Controlling Shareholder and the Company itself, shall adhere to this Policy by signing the Term of Adherence in printed form (attachment II for service providers and attachment I for all other Related Persons) or by digital means that allows their identification and is accepted by the Company, in the act of taking office, function or position or the beginning of temporary work which makes them Related Persons as defined on item 7.1.16.

8.1.1 The Related Persons must also inform, in the act of taking office, function or position, or beginning of the temporary work which makes her a Related Persons, the amount, characteristics and form of acquisition of the securities they hold or owned by Binding Persons which are linked to them.

8.1.2 The Company itself and the Controlling Shareholder automatically adhere to this Policy.

Prohibitions on Trading Securities

8.2 We forbid the use of Inside Information by any of the Related and Binding Persons who have had access to it, with the purpose of obtaining advantage, for themselves or other, through the negotiation of Securities.

8.3 We forbid the Related Persons listed on item 7.1.16, sub-item (iii) to (vii), as well as the Binding Persons related to them to trade Securities prior to the formalization of an Investment Plan, observed the provisions on item 9.

8.4 We forbid the Related and Binding Persons from carrying out operations of rental of any Securities, as well as launching call or put options backed by shares issued by the Company or negotiating shares issued by the Company both in the Forward Market and in the Future Market, regardless of the Investment Plan formalization.

8.5 The prohibitions provided for herein do not apply to subscriptions of new Securities issued by the Company, in which case the prior formalization of an Investment Plan, as provided for in item 9, is not required, without prejudice to the application of the rules about the disclosure of information in the context of the issuance of an offer of these Securities.

8.6 For characterizing knowledge and use of Inside Information when trading Securities, it is presumed, safeguarding the rights to the adversary system and the full defense, which:

8.6.1 the Related Person who traded Securities having Inside Information made use of such information in the trading;

8.6.2 Managers and Fiscal Council Members, as well as those who hold an equivalent position in Controlled and Affiliated Companies, have access to all Inside Information related to the business of the company where they carry out their functions, as do the Company itself and the Controlling Shareholders;

8.6.3 the persons listed in item 8.6.2, as well as those who have commercial, professional and trust relationship with the Company or with one of its Controlled and Affiliated Companies, when accessing a Material Fact not yet disclosed, know that it is Inside Information; and

8.6.4 the Related Persons listed in item 7.1.16, sub-items (iii), (iv) and (v), who leave their functions and have Inside Information, make use of such information if they trade Securities within 3 (three) months from their dismissal.

8.7 Do not fall within the presumptions provided for in item 8.6:

8.7.1 the acquisitions of shares issued by the Company that are in treasury, through private trading carried out within the scope of stock options program, in addition to shares in the scope of stock compensation programs, both previously approved by the entitled governance body; and

8.7.2 trades involving fixed income securities, when performed by means of operations with joint repurchase commitments by the seller and resale by the buyer, for settlement on a pre-established date, prior to or equal to the maturity date of the securities that are the object of the operation, performed with pre-established profitability or remuneration parameters.

9 Investment Plan

9.1 We allow Related Persons to trade Securities upon prior formalization of the Investment Plan detailing their intentions and those of the Persons Related to them, provided that:

9.1.1 the Investment Plan must be executed with the agreement of the IRO, through the form Investment Plan in Securities Issued by BB Seguridade Participações S.A. (Attachment III) or by any digital means that allows the identification of the Related Persons and that is accepted by the Company.

9.1.2 establishes, irrevocably and irreversibly, the dates and quantities of trades to be carried out by the participants; and

9.1.3 provide a minimum term of 3 (three) months for the Investment Plan and its eventual changes and cancellation be effective.

9.2 We allow the IRO to reject the Investment Plan if it is in disagreement with this Policy or with the legislation in force at the time, and must communicate such condition to the Related Person.

9.3 We prohibit the Related and Binding Persons to:

9.3.1 simultaneously maintain in force more than one Investment Plan.

9.3.2 perform any operations that offsite or mitigate the economic effects of the trades determined in the Investment Plan.

9.4 The Related Persons must communicate the IRO, the trading information that they or the Persons Related to them may have performed, up to five days after, using the form Trading with Securities Issued by BB Seguridade Participações S.A. (Attachment IV) or by any digital means that allows the identification of the Related Persons and that is accepted by the Company.

9.5 We allow the Related and Binding Persons to trade Securities during the fifteen-day period prior to the disclosure of the Company's quarterly and annual results, provided that, in addition to the formalization of the Investment Plan in accordance with section 9: (i) the Company has disclosed a schedule defining specific dates for quarterly earnings release; and (ii) the Related Person reverts to Fundação Banco do Brasil any losses avoided or gains obtained due to any change in the earnings release.

9.5.1 The verification of the gains obtained and the losses avoided will only take place when the earnings disclosure date is anticipated, as follows: i) in Securities' sale operations, it will be the difference, if positive, between the sale price and the closing price of the day immediately prior to the disclosure of the results, multiplied by the quantity of assets traded, discounting the expenses with fees, rates, taxes, emoluments, charges, etc; ii) in purchasing operations, it will be the negative difference, if any, between the purchase price and the closing price on the day prior to the disclosure of the results, multiplied by the quantity of assets traded, net of expenses with fees, rates, taxes, emoluments, charges, etc.

9.5.2 The Related Person must provide all the documents that are requested by the Company to support the calculation of the gains obtained or losses avoided, and the reversal of the amounts calculated to Fundação Banco do Brasil must be carried out within 5 (five) business days after the calculation of the amounts involved.

9.6 The Board of Directors shall verify, at least every six months, the compliance of the trades of the Related and Binding Persons to their respective Investment Plans, upon a report of the Board of Executive Officers.

10 Corporate Values Associated

10.1 Reliability.

11 Penalties

11.1 The violation of the rules established herein constitutes a serious infraction and subject the offender to the penalties provided for in Law 6,385/76, in CVM Rules, Law 10,303/01, in the Company's internal rules, among others that may discipline the matter.

11.2 The use of Inside Information to which they have access and to which they must maintain confidentiality, capable of providing yourself or others with an undue advantage by trading Securities, to themselves or on behalf of third parties, is considered a criminal practice and subject the offenders to the penalties of the law.

11.3 Do not communicating the Company and, if applicable, the CVM and B3 – Brasil, Bolsa, Balcão, the quantity, characteristics and form of acquisition of the Securities in possession, immediately after the investiture in job, functions, positions or beginning of temporary work that has access to Inside Information, subject the Related and Binding Persons to the penalties determined by the regulatory agencies.

12 Date of the Last Approval by the Board of Directors

12.1 This version of the Trading Policy was approved by the Board of Directors of the Company on October 31st, 2025.

13 Version Control

Duration	10.31.2025 to 10.31.2028
Version	7
Change History	Item 5.1