1 Responsible Area

1.1 Internal Controls and Integrity Superintendence.

2 Scope

2.1 This Policy governs the conduct of BB Seguridade and its controlled companies. Investee companies are expected to establish their own guidelines based on these directives, considering their specific needs and the legal and regulatory requirements to which they are subject.

3 Target Audience

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

4 Regulatory Framework

4.1 Law No. 12,846, dated August 1, 2013.

4.2 Decree No. 11,129, dated July 11, 2022.

5 Review Periodicity

5.1 This Policy shall be reviewed at least every two (2) 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 for the prevention and combating of corruption, in accordance with applicable laws and regulations.

7 Definitions

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

7.1.1 **Public Administration**: government bodies and entities that perform the administrative functions of the State at the Federal, State, or Municipal levels. This also includes foreign (international) public administration.

7.1.2 **Public Official**: any individual who performs, even temporarily or without remuneration, by election, appointment, designation, hiring, or any other form of investiture or legal relationship, a mandate, position, employment, or public function.

7.1.3 **Senior Management**: the highest hierarchical level responsible for strategic direction, oversight, and management of the organization's business. Pursuant to Article 11 of BB Seguridade's Bylaws, the Company's Senior Management comprises the Board of Directors and the Executive Board.

7.1.4 **Corruption**: harmful acts committed by legal entities against domestic or foreign public administration that harm public assets, violate principles of public administration, or breach international commitments undertaken by Brazil, as defined by Law No. 12,846/2013, including: promising, offering, or giving, directly or indirectly, an undue advantage to a public official or a related person; demonstrably financing, funding, sponsoring, or otherwise subsidizing the practice of unlawful acts set forth in the Law; demonstrably using an intermediary natural or legal person to conceal or disguise real interests or the identity of beneficiaries; frustrating or defrauding, through arrangement, combination, or any other means, the competitive nature of a public procurement procedure; preventing, disturbing, or defrauding any act of a public procurement procedure; removing or attempting to remove a bidder by fraud or by offering any type of advantage; defrauding a public bidding process or a contract arising therefrom; fraudulently or improperly creating a legal entity to participate in a public bidding process or to enter into an administrative contract; obtaining undue advantage or benefit, in a fraudulent manner, from amendments or extensions of contracts entered into with the public administration, without authorization in law, in the bidding notice, or in the respective contractual instruments; manipulating or defrauding the economic-financial balance of contracts entered into with the public administration; hindering investigative or supervisory activities of bodies, entities, or public officials, or interfering with their activities, including within regulatory agencies and financial system supervisory authorities.

7.1.5 **Extortion:** obtaining an undue advantage through threat, coercion, or moral pressure, compelling the victim to act against their will.

7.1.6 **Fraud**: any unlawful, dishonest, or deceptive act intended to mislead or deceive another party.

7.1.7 **Governance Bodies**: structures established to ensure alignment between the Company's management (agents) and the interests of shareholders, including, primarily: the General Meeting, Board of Directors, Fiscal Council, Audit Committee, Independent Audit, Internal Audit, Technical Committees, and Executive Board.

7.1.8 **Facilitation Payment**: payment of small sums of money or provision of other advantages for the personal benefit of a public official, typically at a lower hierarchical level, with the purpose of expediting a routine governmental action. It differs from bribery in that it seeks only to accelerate a process to which one is already entitled, whereas bribery aims to improperly influence a decision.

7.1.9 **Kickback**: the offering, promise, or transfer of an undue advantage to influence decisions or actions.

7.1.10 **Bribery**: the unlawful act of inducing a person to perform or refrain from performing an act by offering, promising, or giving money, goods, or other benefits, with the purpose of improperly influencing a decision.

7.1.11 **Third Parties**: natural persons who are not employees of the Company, and legal entities that maintain a relationship with the Company due to service provision, contractual arrangements, legal requirements, or as intermediaries of any nature.

8 Associated Values

8.1 Reliability, Customer Focus, and Ownership Mindset.

9 Guidelines

9.1 We are committed to integrity as a core pillar for achieving sustainable results.

9.2 We update the Code of Ethics and Conduct in accordance with the Company's specific characteristics, emphasizing the prevention and combating of corruption.

9.3 We select employees based on ethical and integrity-related criteria and condition the commencement of their activities on reading and agreeing to the current Code of Ethics and Conduct.

9.4 We prevent corrupt practices in business activities in compliance with national and international legislation.

9.5 We report to competent authorities any negotiations or investments that, under applicable law, may indicate corruption.

9.6 We act in accordance with international commitments undertaken by the Federal Government regarding corruption, in compliance with applicable legislation.

9.7 We conduct due diligence procedures prior to strategic investments and contracting processes to mitigate corruption risks.

9.8 We adopt restrictive measures regarding business relationships with suppliers and partners when evidence of involvement in corruption-related acts is identified, in compliance with applicable legislation.

9.9 We condition the engagement and continuation of business relationships with partners or suppliers on the absence of administrative or judicial sanctions under Law No. 12,846, dated 08/01/2013.

9.10 In maintaining business relationships with third parties, we consider the existence of mechanisms for preventing and combating corruption within such entities.

9.11 We include specific anti-corruption clauses in contracts, agreements, and similar instruments, requiring third parties to comply with our integrity standards and providing for suspension or termination in the event of acts qualifying as corruption under Law No. 12,846, dated 08/01/2013.

9.12 We conduct targeted training and periodic internal communications on the prevention and combating of corruption, seeking to reach all relevant stakeholders.

9.13 We adopt legally established parameters for customer identification, transaction recording, and detection of transactions that may indicate corruption.

9.14 We maintain a Compliance and Integrity Program in accordance with Decree No. 11,129/2022.

9.15 We reject and do not tolerate any form of corruption, whether domestic or transnational, including bribery, kickbacks, extortion, and fraud, as well as illegal practices such as money laundering, terrorism financing, or any other unlawful acts.

9.16 We prohibit any form of facilitation payment.

9.17 We implement procedures in interactions with public entities to prevent corrupt practices.

9.18 We ensure that the offering of gifts and hospitality on behalf of BB Seguridade to public officials complies with constitutional provisions, applicable local laws, transnational anti-bribery legislation, and the rules of the recipient institution.

9.19 We periodically assess the risk of corruption associated with corporate processes.

9.20 We apply parameters to monitor the Company's financial transactions and those between related parties that may indicate corruption.

9.21 We maintain an Ethics and Whistleblowing Channel for receiving reports of suspected or actual misconduct, including corruption, fraud, ethical violations, or breaches of internal rules and applicable laws, ensuring confidentiality, the possibility of anonymous reporting, and protection against retaliation.

9.22 We conduct, on a confidential basis, investigations into alleged acts of corruption.

9.23 We reject any acts of reprisal or retaliation against good-faith whistleblowers who choose to identify themselves.

9.24 We adopt protective measures for employee whistleblowers regarding facts arising from their reports.

9.25 We encourage members of governance bodies, employees, and third parties to report any ethical misconduct or irregularity.

9.26 We investigate indications and reports of corruption committed by members of governance bodies, employees, or third parties, for the benefit or interest of the Company and its controlled entities, against domestic or foreign public administration, in accordance with applicable legislation.

9.27 We investigate indications and reports of corruption committed by members of governance bodies, employees, or third parties against the assets, principles, and commitments undertaken by the Company and its controlled entities, in accordance with applicable legislation.

9.28 We cooperate with public authorities in investigations related to acts harmful to public administration, domestic or foreign, arising from our activities, in compliance with applicable legislation.

9.29 We publicly declare our commitment to integrity, ethics, and anti-corruption in the corporate environment.

9.30 We periodically assess compliance with this Policy, as well as with internal procedures aimed at preventing and combating corruption, prioritizing the remediation of any identified weaknesses.

9.31 We maintain a zero-tolerance stance toward corruption.

9.32 We ensure the commitment and support of Senior Management in combating corruption in all its forms through the Compliance and Integrity Program.

Governance of Investee Companies regarding the Prevention and Combating of Corruption

9.33 We recognize that the Company's exposure to risks arising from illicit practices also stems from the operations of Investee companies.

9.34 We safeguard the Company's interests by guiding our appointees in the governance bodies of Investee companies, particularly in the Board of Directors, its advisory committees, and the Fiscal Council, on preventive and detective aspects related to corruption.

9.35 We promote technical exchanges among Investee companies, BB Seguridade, and Banco do Brasil.

9.36 We assess indicators and monitor reporting to governance bodies regarding anti-corruption practices.

10 Date of Last Approval by the Board of Directors

10.1 April 22, 2026.

11 Final Provisions

11.1 Any matters not covered by this Policy shall be submitted to the Board of Directors for deliberation.

12 Version Control Table

12.1

Effective Period	**04.22.2026 to 04.22.2028**
Version	3
Change History	V3 - Policy updated due to expiration and textual refinements. V2 - Policy updated due to expiration. V1 - Policy creation. The topic of prevention and combating of corruption was previously addressed within the Policy for Prevention and Combating of Money Laundering, Terrorism Financing, and Corruption.
