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1. PURPOSE

The objective of this Policy for Hiring Independent Audit and Non-Audit Services is to outline the conditions for hiring independent audit services and to specify under what circumstances the firm providing Independent Audit Services to Grupo Fleury can be contracted by the Group, its subsidiaries, or controlled entities to provide additional services beyond the review of financial statements

2. SCOPE

The rules established in this document are applicable to the entire Grupo Fleury. The documents created based on the premises established in this policy are fully applied to the controlled and subsidiary companies to ensure adherence to the governance and quality standards set for the entire Group.

3. REFERENCES

- Code of Trust
- CVM (Securities and Exchange Commission) Instruction 308/99
- CVM (Securities and Exchange Commission) Instruction 381/03
- Integrity Policy
- Risk Management Policy
- Business Continuity Policy
- Strategic Planning Policy
- Normative Governance Policy
- Bylaws and Regulations


4. DEFINITIONS

CVM – Securities and Exchange Commission

ICVM – "CVM Instruction

CFC – Federal Accounting Council in English.

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5. GUIDELINES

5.1. Hiring Independent Auditors

- Only independent audit firms, duly registered and compliant with the regulations defined by the CVM, will be considered for the audit of financial statements.
- Any change of audit firm must be communicated to the CVM within the deadlines specified by the legislation, whether or not there is termination of the audit services contract. The change must be justified, including the consent of the replaced auditor.
- The independent audit firm may not be contracted for a period exceeding five consecutive years, with a minimum interval of three years required before re-engagement
- Independent audit firms that have violated the CFC norms related to independence in their dealings with Grupo Fleury, its subsidiaries, parent companies, or members of the same economic group, will not be eligible to perform Independent Audits
- In the hiring process of the Independent Auditor, preference should be given primarily to firms that do not hold similar roles in direct competitors of Grupo Fleury.
- The hiring or replacement of Independent Auditors must be approved by the Executive Board, Internal Audit, Audit Committee, and ultimately, by the Company's Board of Directors.
- Furthermore, the entire process of hiring an Independent Auditor must adhere to the guidelines set forth by the Company's Procurement Policy.
- Contracts will be formalized annually with the contracted firm, and their renewal will be evaluated by the Audit Committee, considering, among other aspects, changes in regulations, corporate reorganization, and/or business matters.
- The performance of the Independent Auditor will be monitored by Internal Audit and evaluated at least annually by the Audit Committee and the Board of Directors.
- Every service provided by the Independent Auditor must have a documented deliverable evidencing the results of the services rendered.

5.2. Hiring of Non-Audit Services

- The Independent Auditor contracted by Grupo Fleury may not concurrently provide consulting services to the Company, its subsidiaries, or other related entities that could compromise their

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objectivity and independence.

- According to ICVM 308/99, examples of consulting services that may fall under this situation include:
 - I - Organizational restructuring advisory;
 - II - Business valuation;
 - III - Asset revaluation;
 - IV - Determination of values for provisions or technical reserves and provisions for contingencies;
 - V - Tax planning;
 - VI - Redesign of accounting, information, and internal control systems; or
 - VII - Any other product or service that could influence or potentially influence decisions made by the management of the audited institution.
- In case of hiring non-audit services from the Independent Auditor, this must be reported to the CVM, provided that it meets the conditions outlined in ICVM 381/03.
- All engagements for non-audit services with the Independent Audit firm must be submitted for evaluation by the Audit Committee. The Audit Committee will be responsible for assessing the relevance of the engagement and the level of independence required for the execution of the work, regardless of any assessments conducted by the prospective contracting firm.

5.3. Hiring of Team Members from the Independent Audit Firm

- The Group should avoid hiring employees from the team responsible for auditing its financial statements.
- However, if the organization is interested in hiring a professional under these circumstances, such hiring must be submitted to the Board of Directors for evaluation, with support from the Audit Committee, to assess any potential impacts on independence. This determination is particularly crucial when the role for which the professional is being hired is related to the process of preparing the Group's financial statements.

6. RESPONSIBILITIES

6.1 Controller's Office

- Atuar junto à Auditoria Independente fornecendo todas as informações que são solicitadas e intermediando as relações da Auditoria Independente junto às demais áreas da empresa.

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6.2 Executive Board

- Evaluate and recommend to the Audit Committee and the Board of Directors the firms that will perform the Independent Audit work.

6.3 Internal Audit

- Monitor the work of the Independent Audit team with the Controller's Office, providing support with assessments previously conducted by the Internal Audit

6.4 Audit Committee

- Periodically evaluate the performance and quality of the work conducted by the Independent Auditor.
- Evaluate and recommend approval or rejection of any engagements for non-audit services with the firm performing the Independent Audit.
- Evaluate and recommend to the Board of Directors the hiring or replacement of the firm that will act as the Independent Auditor.

6.5 Board of Directors

- Approve the hiring or replacement of the firm that will act as the Independent Auditor.
- Periodically evaluate the quality of the work performed by the Independent Auditor.

7. ATTACHMENTS

N/A (Not Applicable)

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Approval History			
Policy Version	Validation Date by Compliance/Integrity	Approval Date by Executive Board	Approval Date by Board of Directors (if applicable)
Version 01			29/06/2018
Version 02			
Version 03			

These requirements will become mandatory starting from the 2022 cycle.

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