

Corporate Governance Policy from Caixa Seguridade Participações S.A.

09/06/2024

1 RESPONSIBLE AREA

National Management General Secretariat

2 COVERAGE

Statutory Members, Employees and Collaborators of Caixa Seguridade.

Indicated by Caixa Seguridade in Participated Companies.

3 REGULATION

Extract of the Board of Directors of Caixa Seguridade Participações S.A.
No. 206 of 08/20/2024.

Corporate Governance Best Practices Code – IBGC – 6th Edition, 2023.

Decree No. 8,945, of 12/27/2016

Law No. 6,404, of 12/15/1976, as amended.

Law No. 13,303, of 06/30/2016

4 GOAL

Establish the Corporate Governance Principles and Guidelines adopted by Caixa Seguridade Participações SA, reflecting the commitment to Good Corporate Governance Practices in order to add value to the Stakeholders.

It is expected that the Invested companies define their directions based on these guidelines, considering their specific needs and the legal and regulatory aspects to which they are subject.

5 CONCEPTS

- **Administrators** – Member(s) of the Board of Directors and Executive Board.

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- **Governance Agents** – Individuals who make up the governance system, such as partners, board members, fiscal advisors, auditors, directors, *Governance officers*, members of advisory committees.
- **Good Corporate Governance Practices** – convert basic principles into objective recommendations, aligning interests with the purpose of preserving and optimizing the organization's long-term economic value, facilitating its access to resources and contributing to the quality of the organization's management, its longevity and the common good.
- **B3** – is B3 SA - Brasil, Bolsa, Balcão, entity that manages the Stock Exchange market.
- **Caixa Seguridade or Company** – Caixa Seguridade Participações S.A.;
- **Manufactured Capital** – is the sum of the physical, material and technological structures made available to perform services and, consequently, the organization's purpose.
- **Natural Capital** – is the stock or reserve provided by nature that produces value for people (economy and well-being), including ecosystems, species, fresh water, minerals, air, oceans and natural processes. This value may be being produced in the present or constitute a reserve for the future. The term Natural Capital is a term based on the Principles of Economics.
- **Reputational Capital** – is symmetry between the image and identity of an organization.
- **Employees** – are Caixa Seguridade's service providers, suppliers, partners, interns and apprentices.
- **Associates** – are entities over which the Company has Significant Influence, but does not hold Control, in accordance with Law No. 6,404/76.
- **Statutory Committee** – independent, consultative and permanent body, advising the Board of Directors.
- **Conflict of Interest** – is the situation generated by the conflict between the interests of Caixa Seguridade and the personal interests of Board Members, Managers, Employees or shareholders, which may compromise the interests of the Company or influence the performance of the role of the Board Members, Managers, Employees or shareholders. It always

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occurs when personal interests influence or may influence, directly or indirectly, the analyses and decisions taken when carrying out activities at Caixa Seguridade. Personal interest is characterized by the will of the Directors, Officers, Employees or shareholders to obtain any advantage, immediate or not, material or not, in their own favor or in favor of relatives, friends or other people with whom the Directors, Officers, Employees or shareholders have or have had personal, commercial or political relationships, to the detriment of the Company.

- **Subsidiaries** – are companies in which the Company holds control power.
- **Controller** – is the person who has Control over the Company.
- **Control** – an investor controls an investee when it is exposed to, or has rights to, variable returns arising from its involvement with the investee and has the ability to affect those returns through its power over the investee.
- **Guidelines** – set of instructions or indications for dealing with and carrying out a plan, action or business.
- **Employee** – worker with a valid employment contract and employment relationship with CAIXA and who works in Caixa Seguridade units.
- **Corporate Governance** – is a system made up of principles, rules, structures and processes by which organizations are directed and monitored, with a view to generating sustainable value for the organization, its partners and society in general. This system guides the actions of governance agents and other individuals in an organization in the search for balance between the interests of all parties, contributing positively to society and the environment.
- **Economic Group** – the parent company and each Subsidiary are interrelated, and the entities under common Control are interrelated.
- **Nominees** – are those nominated by Caixa Seguridade for the positions of director, board member, fiscal advisor and committee member in the Subsidiaries. Refers to the person considered to assume positions of Administrator, Supervisory Board member and members of Committees in the Subsidiaries.
- **Significant Influence** – is the power, obtained through shareholding, statutory provisions or shareholders' agreement, to participate in the

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Company's financial and operational decisions, even without having individual or joint control over the financial and operational Policies.

- **Joint Venture** – association of two or more companies, without a definitive nature, to carry out a specific commercial venture, sharing their obligations, profits and responsibilities, aiming at a common commercial objective.
- **Statutory Members** – are the members of the Senior Management, the Supervisory Board and the Audit Committee of Caixa Seguridade and its Subsidiaries and other existing Statutory Bodies or those that may be created.
- **Statutory Bodies** – these are the Board of Directors, the Executive Board, the Supervisory Board, the Audit Committee and other bodies with technical or consultative functions of the Company, created by statutory provision.
- **Governance Bodies** – includes the General Assembly, Board of Directors, Executive Board, Supervisory Board and existing Committees of the Company, including the Audit Committee.
- **Interested Parties or Stakeholders** – are the individuals or groups that may affect the Company or its Subsidiaries, through their opinions or actions, or that may be affected by the Company or its Subsidiaries. Example: Senior management, internal public, suppliers, consumers, community, government, shareholders, civil society, among others.
- **Related Parties** – are the people or entities that are related to the Company, as specified below:
 - a) A person is related to the Company if that person or a close member of that person's family:
 - has full or shared control of the Company;
 - has Significant Influence over the Company; or
 - is a member of the Key Management Personnel of the Company or its Controller.
 - b) An entity is related to the Company if any of the following conditions are met:

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- the entity and the Company are members of the same economic group (which means that the Parent Company and each Subsidiary are interrelated, and the entities under common Control are related to each other);
 - the entity is an Associate or Jointly Controlled Entity (*Joint Venture*) of another entity (or an Associate or Jointly Controlled Entity of an entity that is a member of an economic group of which the other entity is a member);
 - both entities are under joint control (*Joint Venture*) of a third entity;
 - one entity is under joint control (*Joint Venture*) of a third entity and the other entity is an Associate of that third entity;
 - the entity is a post-employment benefit plan whose beneficiaries are the Employees of both entities, the Company and the one related to the Company;
 - the entity is controlled, either wholly or under joint control, by a person identified in the first bullet point of paragraph (a);
 - a person identified in the first bullet point of paragraph (a) has Significant Influence over the entity or is a member of the entity's Key Management Personnel (or the entity's Controller).
- c) In the definition of Related Party, an Associate includes Subsidiaries of that Associate and an entity under joint control (*Joint Venture*) includes Subsidiaries of an entity under shared control (*Joint Venture*). For example, the Subsidiary of an Associate and the investor that exercises Significant Influence over the Associate are Related Parties to each other.
- **Invested companies** – are Subsidiary companies and/or Private Companies in which Caixa Seguridade has a direct or indirect stake as a shareholder, partner or quota holder.
 - **Key Management Personnel or Key Management Person** – are the people who have authority and responsibility for planning, directing and controlling the Company's activities, directly or indirectly, including any administrator (executive or other).
 - **Policy** – set of Principles, Guidelines and responsibilities that guide the actions of all organizational levels. Policies form the basis for decisions

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and actions relating to the development of standards, programs, plans, projects, product and service development, customer service, among others.

- **Principles** – Elementary precepts or requirements that the organization must observe *a priori* when carrying out its activities, thus outlining the conduct required in any relationship, operation, service or activity of Caixa Seguridade in the internal and external spheres. Precept that underpins one or more Guidelines.
- **Segregation of Functions** – separation of authorization, execution, control, reporting and accounting functions of operations, in order to avoid Conflict of Interest.
- **Subsidiary** – company whose majority of voting shares belong directly or indirectly to Caixa Seguridade.

6 RULES

Caixa Seguridade adopts Good Corporate Governance Practices and is committed to the principles and respective Guidelines, listed below, supported by the use of monitoring tools that align the behavior of Statutory Members and Employees with the interests of the shareholder, customers and society.

7 PRINCIPLES AND GUIDELINES

7.1 TRANSPARENCY:

Providing Interested Parties with true, timely, coherent, clear and relevant information, whether positive or negative, and not just that required by laws or regulations. It should not be restricted to economic and financial performance, but should also include environmental, social and governance factors. Promoting transparency favors business development and encourages an environment of trust for the relationships of all Interested Parties.

7.1.1 GUIDELINES

Caixa Seguridade adopts the Principle of Transparency in all its transactions, making information of general interest available in a timely,

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accurate, appropriate and clear manner, in order to provide understanding to the Interested Parties, which allows monitoring and supervising the actions of the administration, in addition to supporting decision-making.

The Company considers all information subject to disclosure, except that which is confidential, that puts the activity, strategy and institutional image at risk, or that which is protected by law.

The future vision, strategy and business objectives are clearly established and communicated throughout the organization.

The company's mission and values are communicated to any and all audiences.

In line with Good Corporate Governance Practices and in respect of its commitment to society, Caixa Seguridade subscribes to the Annual Letter of Public Policies and Corporate Governance, which includes:

- commitments to achieve public policy objectives established by the Company and its Subsidiaries, in response to the collective interest or the imperative of national security, with a clear definition of the resources to be used for this purpose, as well as the economic and financial impacts of achieving these objectives, measurable through indicators;
- internal control structures and management of risks and risks factors;
- Corporate Governance structure, composed of the General Assembly, Statutory Administration Bodies (Board of Directors and Executive Board), supervisory bodies (Supervisory Board) and auxiliary Administration bodies;
- remuneration of Administrators, fiscal advisors and members of Statutory Committees.

The Company publishes the Related Party Transactions Policy, which aims to establish Principles and Guidelines to support the decision-making process for transactions involving Related Parties, considering the Company's strategies and current legislation and regulations, as well as observing the Principles of competitiveness, compliance, transparency, equity and commutativity, in line with Good Corporate Governance Practices.

Caixa Seguridade publishes its Securities Trading and Disclosure Policies for Relevant Acts or Facts, which establish rules and Guidelines for the

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communication and disclosure of Relevant Acts or Facts or other information considered sensitive within the Company, for the protection of Privileged Information and for the Trading of the Company's Securities.

The Company publishes the Annual Internal Audit Activity Reports (RAINT), ensuring the protection of confidential information and personal information.

Caixa Seguridade makes available on its website a page that allows citizens to consult information such as: the Sustainability Report, the Financial Statements, the minutes of General Meetings and meetings of Statutory Bodies, the curriculum of the Administrators, the remuneration of the directors and other relevant information defined by senior management.

7.2 EQUITY

It is characterized by treating all partners and other Interested Parties fairly, taking into account their rights, duties, needs, interests and expectations, as individuals or collectively. Equity presupposes a differentiated approach according to the relationships and demands of each Stakeholder with the organization, motivated by a sense of justice, respect, diversity, inclusion, pluralism and equality of rights and opportunities.

7.2.1 GUIDELINES

Practices are encouraged that adopt as a Principle work as a source of well-being, diversity as a creative force, management by skills and merit, active listening, with people management being a practice shared by everyone in the Company: Employees, managers and administrators.

Caixa Seguridade repudiates operations carried out or acts performed based on privileged information, abusive negotiations and discriminatory attitudes or policies, under any pretext.

Our Statutory Members, Employees, Collaborators and Appointees are required to have absolute respect for human beings, public good, society and the environment, ethical and socially responsible principles, reflected in their respective codes of ethics and conduct.

7.3 ACCOUNTABILITY

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Governance Agents must perform their duties diligently, independently and with a view to generating sustainable value in the long term, assuming responsibility for the consequences of their acts and omissions. Furthermore, they must report on their actions in a clear, concise, understandable and timely manner, aware that their decisions may not only make them individually responsible, but also impact the organization, its Stakeholders and the environment.

7.3.1 GUIDELINES

Caixa Seguridade encourages the pursuit of maturity in Corporate Governance of the Company and its Subsidiaries, as well as its Affiliates, with the aim of improving the accountability process, ensuring transparency in its relationships, compliance with its corporate documents and the decisions of its Governance Bodies.

The Company recognizes the intrinsic responsibility and independence of the Statutory Members of its Governance Bodies and those appointed by Caixa Seguridade in its Affiliates.

The roles and responsibilities of all Caixa Seguridade decision-makers are clearly defined, ensuring appropriate segregation of functions, including the definition of the decision-making powers of each instance, in order to minimize possible sources of Conflicts of Interest.

In collegiate decisions, respect for the individual autonomy of Caixa Seguridade managers is observed, creating mechanisms for accountability for the decisions taken.

The Company monitors the performance of its Executive Board and Invested Companies, as well as its Affiliates, with regard to economic-financial, marketing, regulatory, administrative, operational, risk and corporate management, through the analysis of data made available periodically, in addition to specific information requested by representatives in Governance Bodies.

Caixa Seguridade values accountability for the performance of those appointed, in order to demonstrate the results obtained and justify any failures. Decision-makers conduct themselves in such a way as to prevent the occurrence of any situations that may, in any way, characterize a Conflict of Interest and affect the Company's business, services and other operations.

7.4 SUSTAINABILITY

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Governance Agents must ensure the company's economic and financial viability, reduce the negative externalities of its business and operations, and increase the positive ones, taking into account, in its business model, the various capitals (financial, manufactured, intellectual, human, social, natural, reputational) in the short, medium and long term. From this perspective, understanding that organizations operate in a relationship of interdependence with the social, economic and environmental ecosystems, strengthening their protagonism and their responsibilities towards society.

7.4.1 GUIDELINES

Caixa Seguridade is committed to ethical principles and values, in order to protect the Company and/or Subsidiaries and Participating Companies from actions and attitudes that are inappropriate to its mission and image, directing its Agents to adopt practices that contribute to economic, sustainable, social and environmental development. Adopts fair treatment when there is a need to hold Agents administratively accountable whose conduct demonstrably characterizes a Conflict of Interest.

The Company and its Subsidiaries' operations are guided by legislation, corporate policies and internal rules, relevant to the companies' corporate purpose.

Corporate Governance rules prioritize collegial deliberation, minimizing potential Conflicts of Interest and protecting the interests of Caixa Seguridade.

The powers and decision-making powers are formalized in corporate documents and internal regulations, which observe the Principle of segregation of functions, mitigating business risks.

The administrative bodies use technical opinions and advisory committees, which provide agility, quality and security in decision-making, formally recording the deliberations.

Caixa Seguridade is a publicly traded company and, in line with good market practices in terms of governance, observes the rules recommended by the B3 Novo Mercado segment.

Caixa Seguridade and its Subsidiaries observe the Social, Environmental and Climate Responsibility Policy in the management of their business and relationships and adopt management practices based on actions that seek their consolidation as socially responsible, environmentally correct and economically viable companies, committed to people, the environment,

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economic development and sustainability, and work to ensure that the Sustainability agenda occupies a central space in the Company's Strategy.

Caixa Seguridade supports the development of Social, Environmental and Climate-related skills of Statutory Members and Employees, and the development of products, services and investment in innovation in security, considering Social, Environmental and Climate-related aspects, including in the processes of purchasing and contracting goods and services.

In carrying out its business and operations, Caixa Seguridade respects competitive standards and seeks return conditions compatible with those of the market.

The Company recognizes that the use of Good Corporate Governance Practices in the Company and its Subsidiaries, as well as in Affiliates, generates sustainable value for partners and other Interested Parties, respecting the defined risk parameters.

Caixa Seguridade defines performance indicators that adhere to its long-term strategy and the remuneration models for its Directors, enabling the achievement of business objectives.

Caixa Seguridade has a cooperative relationship with its Affiliates, through proactive action in its Governance Bodies, fostering the development and sustainability of the Company, its Subsidiaries and Affiliates.

7.5 INTEGRITY

Practice and promote the continuous improvement of the ethical culture in the organization, avoiding decisions under the influence of Conflicts of Interest, maintaining coherence between speech and action and preserving loyalty to the organization and care for its Stakeholders, society in general and the environment.

7.5.1 GUIDELINES

Caixa Seguridade adopts clear and timely guidelines and actions related to Statutory Members, Appointees, Employees, Collaborators in order to prevent conduct and events of breach of integrity, fraud, corruption or any other illegal acts that impact the Company.

The Company has a formal and clear definition of authority and responsibility as well as adequate physical and material structure for the best performance of activities related to the *Compliance* function.

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Caixa Seguridade has a *Compliance* and Integrity Program aligned with good market practices, which is reviewed and updated periodically with a view to improving its prevention, detection and combating the occurrence of violations, especially with regard to Corruption practices.

Caixa Seguridade promotes training that addresses the topic of ethics and integrity, with the aim of qualifying and acculturating its staff and Statutory Members.

The Company maintains a specific, widely publicized channel for clarifying doubts, suggesting improvements and receiving internal and external complaints, with the guarantee of confidentiality of the identity and protection of the whistleblower.

8 RESPONSIBILITIES

GESEG – National Management General Secretariat

Monitor Good Corporate Governance Practices, in order to assess the need for updates to the Corporate Governance Policy of Caixa Seguridade and Subsidiaries.

9 APPROVAL

Review this Policy at most every 3 years or when the need for improvement or adaptation to new legal, regulatory, statutory or strategic requirements is identified, and submitted to the Board of Directors for approval.