

1 RESPONSIBLE AREA

SUGRC - National Superintendence of Risks, Compliance and Internal Controls

2 COVERAGE

Statutory Members, Employees, Collaborators and Nominees by Caixa Seguridade in Invested Companies.

3 REGULATION

Extract of the Board of Directors of Caixa Seguridade Participações S.A.
nº 225 of 06/23/2025

Code of Conduct for Senior Federal Administration, 08/21/2000

Federal Constitution, 10/05/1988

Decree No. 1,171, of 06/22/1994

Decree No. 6,029, of 02/01/2007

Decree No. 7,203, of 06/04/2010

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

Decree No. 10,889, of 12/09/2021

Decree No. 11,129, of 07/11/2022

Bylaws of Caixa Seguridade Participações S.A., dated 09/15/2020

Joint Normative Instruction CGU-CEP No. 01, dated 06/05/2016

Law No. 11,340, of 08/07/2006

Law No. 12,529, of 11/30/2011

Law No. 12,813, of 05/16/2013

Law No. 12,846, of 11/01/2013

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

Decree No. 14,188, of 07/28/2021

Interministerial Ordinance of the Ministry of Planning, Budget and Management No. 333, of 09/19/2013.

Caixa Seguridade Compliance and Integrity Program

CEP Resolution No. 8, of 09/25/2003

CNSP Resolution No. 416, of 07/20/2021

4 PURPOSE

- 4.1 Systematize ethical standards that guide the conduct and interactions of Statutory Members, Employees, Collaborators and Nominees, based on respect, ethical behavior, transparency and a commitment to morality and truth.
- 4.2 Provide objectivity and clarity in the interpretation of principles of ethical conduct, assisting in everyday decision-making.
- 4.3 Establish basic guidelines so that Statutory Members, Employees, Collaborators and Nominees can, in each area of activity, conduct business based on ethics.
- 4.4 Guide the behavior of Statutory Members, Employees, Collaborators and Nominees in the execution of administrative activities and in conducting business on behalf of Caixa Seguridade or Subsidiaries, on or off their premises.
- 4.5 Protect the institutional image and reputation of Statutory Members, Employees and Nominees, whose conduct is in accordance with the standards established in these Codes and other regulations.
- 4.6 Serve as a reference tool designed to enable the prior and prompt clarification of doubts regarding the required ethical conduct.
- 4.7 Make the ethical and conduct rules of Senior Management clear, so that society can assess the integrity and fairness of the decision-making process.
- 4.8 Contribute to the improvement of ethical standards based on the example set by Statutory Members.

- 4.9 Establish basic rules to prevent situations that may give rise to conflicts between public and private interests and limitations on parallel and subsequent professional activities.
- 4.10 Establish rules and regulations that enable the Ethics Committee to substantiate its decisions.
- 4.11 Promote the strengthening of Caixa Seguridade's Compliance and Integrity Program.

5 DEFINITIONS

- **Public Agent:** the political agent, the public servant and anyone who exercises, even if temporarily or without remuneration, by election, nomination, designation, hiring, fixed-term contract, or any other form of investiture or bond, mandate, position, employment or function in the CAIXA Conglomerate, even if licensed, assigned, requested, released or made available to another body or to Caixa Seguridade;
- **Senior Management** – refers to the Board of Directors and the Executive Board;
- **Moral Harassment:** continuous and repeated process of abusive behavior that, regardless of intentionality, undermines the integrity, identity and human dignity of the worker, through the degradation of socio-professional relationships and the work environment, demand to perform unnecessary or exorbitant tasks, discrimination, humiliation, embarrassment, isolation, social exclusion, defamation or psychological distress;
- **Sexual Harassment:** conduct with a sexual connotation practiced against someone's will, in verbal, non-verbal or physical form, expressed through words, gestures, physical contact or other means, with the effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment;
- **Parallel Professional Activity:** understood as any activity carried out as a service provision activity, with or without an employment relationship,

- free of charge or for a fee, routine or occasional, and professional or sponsored sports activity;
- **Promotional Items:** item of low economic value and distributed in a generalized manner, as a courtesy, advertising or regular publicity;
 - **Caixa Seguridade or Company:** Caixa Seguridade Participações S.A.;
 - **Collaborators** – service providers, suppliers, partners, interns and apprentices;
 - **Conflict of Interest** – situation generated by the confrontation between public and private interests, which may compromise the collective interest or improperly influence the performance of public functions. The occurrence of a Conflict of Interest does not depend on the existence of damage to public property, as well as the effective scope of the benefit, economic or otherwise, by the public agent or third party;
 - **Controller:** is the person who holds control over the Company;
 - **Director(s):** Chief Executive Officer and Executive Directors of the Company;
 - **Employee** – worker with a valid employment contract and employment relationship with CAIXA and who works in Caixa Seguridade units;
 - **Manager** – Employee who holds a managerial or director position;
 - **Hospitality:** provision of services or expenses for transportation, food, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted by a private agent to a Public Agent in the institutional interest of the body or entity in which he/she operates;
 - **Nominees** – are those nominated by Caixa Seguridade for the positions of director, board member, supervisory member and committee member in the Invested Companies;
 - **Privileged Information:** information relating to confidential matters or information relevant to the decision-making process within the Federal Executive Branch that has economic or financial repercussions and is not widely known to the public;

- **Statutory Members** – are the members of the Senior Management, the Supervisory Board and the Audit Committee of Caixa Seguridade and other existing Statutory Bodies or those that may be created;
- **Interested Parties or Stakeholders:** individual or group that may affect the Company, through their opinions or actions, or that may be affected by the Company. Example: Senior Management, internal public, suppliers, consumers, community, government, shareholders, among others;
- **Related Parties** – related parties of Caixa Seguridade are considered to be individuals or legal entities with which the Company has a relationship and may exercise or suffer direct or indirect influence on decision-making, in accordance with current regulations;
- **Invested Companies** – companies in which Caixa Seguridade has a direct or indirect stake as a shareholder, partner or quotaholder;
- **Gift:** good, service or advantage of any kind received from someone who has an interest in the decision of the Public Agent or of a collegiate body in which he/she participates, and which does not constitute a Gift or Hospitality;
- **Subsidiary** – company whose majority of voting shares belong directly or indirectly to Caixa Seguridade;
- **Transaction with Related Parties or TRP** – is the transfer of goods, rights, resources, services or obligations, directly or indirectly, between the Company and a Related Party, regardless of whether a price is charged in return.

6 RULES

- 6.1 The Code of Ethics and Conduct is the document contained in Annex I.
- 6.2 The rules contained in the Code apply to Statutory Members, Employees, Collaborators and Nominees.
- 6.3 Professional practice at Caixa Seguridade and its Subsidiaries is equivalent to public service.

- 6.4 Participation in tenders promoted by Caixa Seguridade is prohibited, as is the hiring, by Caixa Seguridade, of a company whose administrator or partner is a Public Agent.
- 6.5 All meetings with Public Agents involving people outside the Company must be recorded in minutes, except in cases of confidentiality, containing at least: date, location, participants and a summary of the matters discussed.
- 6.6 Caixa Seguridade transactions are carried out under market conditions and, regarding Transactions with Related Parties, the guidelines set out in ZS013 are followed.
- 6.7 Employees, Collaborators, Statutory Members and Nominees have the duty to report any known violations.
- 6.8 Anyone who fails to comply with the guidelines set forth in this Code will be subject to the penalties stipulated in disciplinary rules shared by the controlling company CAIXA and may receive sanctions and penalties.
- 6.9 The sanctions and penalties provided for in the Controller's rules, depending on the severity of the offense, include: ethical censure, conduct adjustment agreement, warning, suspension or termination of the employment contract, without prejudice to the imputation of civil liability for compensation for damages caused to the Company or its Controller.
- 6.10 The competent area ensures that any conduct that may constitute a violation of the guidelines established herein is duly investigated and handled appropriately, whether ex officio or as a result of complaints, provided that they have the necessary information to initiate an investigation process.
- 6.11 The Code of Ethics and Conduct Acknowledgement is signed electronically by Statutory Members and Employees via the Caixa Seguridade Intranet at the electronic address <https://intranet.caixaseguridade.com.br/> and is renewed annually.
- 6.12 If it is not possible to access the Acknowledgement Form on the Caixa Seguridade Intranet, this (Annex II) must be completed, signed and delivered to the Compliance and Integrity area.

- 6.13** It is the responsibility of Managers to ensure that Employees and Collaborators are duly informed and aware of the content of this policy, guiding them on the need for constant reading and reflecting on the provisions established herein.
- 6.14** Periodic training is provided, at least annually, on the Code of Ethics and Conduct for employees and Statutory Members.
- 6.15** The Company is committed to national and international anti-corruption laws, does not tolerate any form of fraud or corruption, and advises Statutory Members, Employees, Collaborators and Nominees to reject any practice of active or passive corruption, bribery, facilitation payments and influence peddling.

Each individual is challenged to make the ethical values set forth in this Code into an essential part of their conduct, as the values guide decision-making, especially when facing ethical dilemmas that require alignment with the expectations of the Company and its Controller, even if not explicitly addressed in specific standards.

7 WHISTLEBLOWER CHANNEL

- 7.1** The Company provides its Employees and society in general with a reporting channel, regulated in ZS608, which allows for the receipt of internal and external reports regarding non-compliance with this Code and other internal ethics and obligation standards.
- 7.2** The whistleblower channel is available full time to receive statements and reports from any citizen regarding non-compliance with this Code and other internal ethics and compliance standards.
- 7.3** Complaints received are treated confidentially and impartially, in order to guarantee anonymity and protect the complainant against any form of retaliation, intimidation or discrimination.
- 7.4** Caixa Seguridade ensures protection mechanisms that prevent any type of retaliation against anyone who uses the reporting channel.
- 7.5** Any form of retaliation against an individual who participates in good faith in any investigation of behavior that does not comply with the standard of conduct is prohibited, and those responsible will be subject

to applicable legal and administrative sanctions, as provided for in civil, administrative, criminal and labor legislation.

7.6 Queries, suggestions, complaints, compliments or reports of violations of the Codes, including anonymous ones, may be submitted through the following channel:

- Website: BeCompliance - Ethics Channel
- <https://caixaseguridade/becompliance.com/canal-etica/canal-denuncias>

8 CODE OF ETHICS AND CONDUCT

8.1 GENERAL PROVISIONS

8.1.1 This Code defines the purpose and vision of Caixa Seguridade, as well as the values of the code and guidelines on preventing Conflict of Interest and prohibiting acts of corruption and fraud, in addition to other expected and prohibited conduct.

8.1.2 The provisions contained in this Code must be observed, without affecting the applicability of the provisions of the Code of Professional Ethics for Civil Servants of the Federal Executive Branch and, where applicable, the Code of Conduct for Senior Management.

8.1.3 When exercising professional duties, conduct must be guided by high ethical standards, based on respect, integrity, commitment, transparency, responsibility and morality.

8.1.4 Dignity, decorum, zeal, efficiency and awareness of moral principles must guide any and all conduct, whether in the exercise of professional duties or outside of them.

8.1.5 Conduct must take into account not only the legal and the illegal, the fair and the unfair, the convenient and the inconvenient, the timely and the untimely, but mainly the honest and the dishonest, with the common good as the end.

8.1.6 Relationships with bodies, entities and companies must be guided by the principles of legality, impartiality, morality, publicity and efficiency, ensuring broad transparency of information to society.

8.1.7 In order to guide the conduct of suppliers, this code must be made available in service contracts.

8.1.8 This Code is disclosed to Invested Companies to guide the conduct of their Statutory Members, Employees, Collaborators and Nominees.

8.2 PURPOSE AND VISION

8.2.1 Contribute to people's well-being and the achievement of their dreams by offering insurance products and services.

8.2.2 To be the main choice of Brazilians in the insurance market, with personalized and innovative service, returning profitability and value to society.

8.3 VALUES

8.3.1 RESPECT

- We treat people with ethics, justice, respect, diligence, courtesy, equity and dignity, always choosing the best option for the common good.
- We demand from our Statutory Members, Employees, Collaborators and Nominees absolute respect for human beings, public goods, society and the environment.
- We repudiate all prejudiced attitudes related to origin, race/color, gender identity, sexual orientation, color, age, religion, creed, social class, physical disability and any other forms of discrimination.
- We respect and value our Stakeholders and their rights, by providing correct information, meeting agreed deadlines and offering alternatives to satisfy their business needs.
- We preserve the dignity of our Statutory Members, Employees, Collaborators and Nominees, under any circumstances, with the

determination to eliminate situations that may cause any type of embarrassment in the work environment, harassment or that diminish their self-esteem and moral integrity.

- Our sponsorships and donations are guided by respect for social customs, traditions and values, as well as environmental preservation and sustainability.
- We do not tolerate violence against women and practices that violate their rights.
- Our practices do not violate human rights.
- We act with ethics and integrity in any environment, including digital channels, as well as in the handling of personal data.

8.3.2 INTEGRITY

- In the professional exercise of Statutory Members, Employees, Collaborators and Nominees, the interests of Caixa Seguridade, Subsidiaries and/or those of Invested Companies prevail over personal interests, groups or third parties, in order to protect the integrity of our processes and our image.
- We manage our business and resources with integrity, offering equal opportunities in transactions and employment relationships, encouraging the development of female leadership.
- We do not accept any relationship or unfair behavior that results in a Conflict of Interest and that is in disagreement with the highest ethical standards.
- We do not accept practices that weaken our image and/or compromise our staff.
- We promote an environment of integrity, uncontaminated by corruption, abuse and irregularities for the development of our activities.
- We condemn attitudes that favor suppliers and service providers, under any pretext, and we do not maintain commercial relations with companies and/or individuals that violate human rights.

- We condemn the solicitation of donations, contributions of material goods or financial resources from commercial or institutional partners, except for specific campaign initiatives for commercial purposes in accordance with applicable regulations.
- We do not practice or tolerate harassment that causes harm to the integrity of those who become targets.
- We prohibit inappropriate practices in the offering of products and services and in the conduct of our business, and all those subject to this Code must act in accordance with the laws, principles, standards and regulations. In case of doubt, we must consult the internal rules, departments and responsible areas to ensure appropriate action and compliance with applicable legislation.
- We adopt preventive, detective and corrective actions, with the aim of preventing our involvement and that of Statutory Members, Employees, Collaborators and Nominees in harmful acts.

8.3.3 COMMITMENT

- We are committed to uniform procedures, the highest ethical standards in the exercise of our professional duties and compliance with the laws, rules and internal and external regulations that govern our Company.
- We keep ourselves updated with the relevant instructions, standards and legislation for the proper exercise of our functions.
- We direct our actions to promote quality products and services in our businesses that meet or exceed customer expectations.
- We ensure that our clients receive correct guidance and information so that they can make informed decisions about their businesses.
- We preserve the confidentiality and security of information and act to guarantee the confidentiality, integrity, availability and authenticity of information.
- We seek to improve the safety and health conditions of the work environment, preserving the quality of life of those who work there.
- We combat all forms of discrimination and promote support for inclusion measures and the appreciation of diversity.

- We guarantee equal treatment to shareholders.
- We value the performance of work in an objective, agile and professional manner.
- We carry out our activities in a streamlined and continuous way, prioritizing the most efficient method for all Company units.
- We observe the principles of social and corporate responsibility and do not hire suppliers and partners who practice child, slave or similar labor or who adopt practices that are contrary to the International Bill of Human Rights, the Statute of the Elderly and the Statute of Children and Adolescents.
- We are committed to national and international anti-corruption legislation and do not tolerate any form of fraud and corruption, whether in the Company, Subsidiaries, Invested Companies or in interactions with public or private entities.
- We advise everyone to repudiate any practice of active or passive corruption, bribery, facilitation payments and influence peddling.

8.3.4 TRANSPARENCY:

- Our relations with segments of society are guided by transparency and the adoption of technical criteria.
- We are committed to the integrity of our controls and to accountability for our activities and the resources we manage.
- We provide, in an equitable manner, clear, pertinent and timely information, through authorized sources and in strict compliance with the legislation and regulations to which we are subject.
- We offer our Employees opportunities for professional development, with clear criteria that everyone is aware of.
- We value the internal communication process, disseminating relevant information related to business and corporate decisions.
- In order to prevent possible Conflict of Interest in the use of information and to protect Privileged Information, we have an Information Security

Policy (ZS006) and an information classification and processing standard (ZS601).

8.3.5 RESPONSIBILITY

- We base our actions on the ethical precepts and values of this Code to protect ourselves from actions and attitudes that are inappropriate to our purpose and image and to not harm or compromise Statutory Members, Employees, Collaborators and Nominees, directly or indirectly.
- We are committed to offering decent working conditions for our employees, with a productive, suitable and safe environment.
- We ensure the protection of public assets, with the appropriate use of information, assets, equipment and other resources made available to us for the effective management of our business.
- We seek environmental preservation in the projects we participate in, as we understand that life depends directly on the quality of the environment.
- We are committed to sustainable development so that people, now and in the future, achieve a satisfactory level of social and economic development while preserving natural resources.
- We handle reports confidentially and impartiality, ensuring the anonymity of the complainant and their protection against any form of reprisal, intimidation or discrimination.
- We are collectively and individually responsible for information security, cybersecurity and personal data privacy, to prevent the Company from suffering possible security incidents, resulting in financial, legal and reputational losses.
- We identify and monitor situations in our processes that may generate Conflict of Interest, as well as guiding the parties involved.
- The contractual instruments to which we are a contracting party contain a clause requiring the contractor to adopt mechanisms to prevent Conflict of Interest.

8.3.6 MORALITY

- We use morality to ensure order within the Company with reasonable assurance and to foster a culture of integrity, regulating actions among everyone.
- In the exercise of our duties, both public and private, we act according to the highest ethical standards, especially regarding integrity, morality, clarity of positions and decorum, aiming to inspire public trust and respect.
- Morality refers to a code, here composed of the other values described in this document: respect, integrity, commitment, transparency and responsibility.

8.4 RULES OF CONDUCT

8.4.1 PREVENTION OF CONFLICT OF INTEREST

- Conflict of Interest is the situation generated by the confrontation between public and private interests, which may compromise the collective interest or improperly influence the performance of public functions. It occurs when personal interests influence, directly or indirectly, the analyses and decisions taken when carrying out activities.
- The occurrence of a Conflict of Interest is independent of the existence of damage to public assets, as well as the effective scope of the benefit, economic or otherwise, by the Employee or by a third party.
- Pay attention to situations that may lead to Conflict of Interest in the relationship:
 - with/between Subsidiaries and Invested Companies, including when appointed to exercise positions and in the processes of acquiring companies;
 - with/between risk and business areas;
 - in the management of own resources;
 - with/between contracted companies, Collaborators and Employees.
- Maintain confidentiality regarding strategic matters or information that is crucial to the decision-making process, which may influence the business decisions of the Company's investors, cause economic,

institutional or financial repercussions, including their institutional disclosure, and must also ensure the security of the environment where the information is stored, preventing any unauthorized access.

- The following conduct is prohibited:
 - Carry out an activity that involves the provision of services or the maintenance of a business relationship with a natural or legal person who has an interest in the individual decision of the recipient of these rules of conduct or of a collegiate body of which the recipient is a member;
 - Receiving or offering a gift, outside the limits and conditions established by law, internal rules and this Code, from anyone who has an interest in the individual decision of the recipient of these rules of conduct or of a collegiate body in which the recipient participates;
 - Engaging in private activities that raise doubts regarding integrity, morality, clarity of positions and decorum;
 - Carry out a private activity that, directly or indirectly, is incompatible with their duties, including activities carried out in related areas or subjects;
 - Act, even informally, as a proxy, consultant, advisor or intermediary for private interests in bodies or entities of the direct or indirect public administration of any of the Powers of the Union, States, Federal District and Municipalities;
 - Perform an act in the interest of a legal entity in which he or she participates or in which his or her spouse, partner or relatives, whether consanguineous or related, in a direct or collateral line, up to the third degree, participates, and which may benefit such legal entity from such act or influence its management acts;
 - Provide services, even if occasional, to the Subsidiary, except when arising from its relationship with Caixa Seguridade;
 - Disclose or make use of Privileged Information, for one's own benefit or that of third parties, obtained as a result of the activities carried out;
 - Make personal investments whose remuneration or price may be affected by a decision or fact in which the person has had

- participation or knowledge or by privileged information obtained in the exercise of their duties;
- Nominate individuals and their relatives, blood relatives and relatives up to the third degree, who have or may have a Conflict of Interest with the political-administrative person controlling the state-owned company or with the company itself, to form the Board of Directors, Executive Board, Supervisory Board and other committees.
- To prevent or stop Conflict of Interest, considering the specific situation, one or more of the following measures must be adopted:
 - Give up private activity;
 - Request dismissal from the position, change of assignment or termination of employment with Caixa Seguridade;
 - Alienate assets and rights that are part of your assets and that may give rise to conflict.
- In the event of the adoption of measures, the Statutory Member, Employee or Collaborator must inform the situation and the measure adopted, in detail, to the area responsible for Compliance and Integrity of the Company, which will keep the information and respective documents in a sealed envelope classified as "#CONFIDENTIAL", giving the respective treatment as described in ZS601.
- In the event of a Conflict of Interest situation, including on a specific and temporary basis, Employees or Collaborators must report the occurrence to their hierarchical superior and to the Compliance and Integrity area, and members of Senior Management must report the occurrence to the Public Ethics Committee and to other members of the collegiate body of which they are a member, in the case of a collective decision, refraining from voting or participating in the discussion of the matter.
- If there is any doubt about how to prevent a situation that could potentially cause a Conflict of Interest, the Employee must consult/request authorization on the specific case, through the Electronic System for the Prevention of Conflict of Interest – SeCI, made available by the CGU at <https://seci.cgu.gov.br>.

- If the Statutory Member has any doubts about how to prevent or impede any situation that could potentially cause a Conflict of Interest, or about the possibility of exercising any parallel professional activity, he/she must formally consult the Public Ethics Committee, as well as inform it about the measures adopted.

8.4.2 PROFESSIONAL ACTIVITIES PARALLEL TO WORK AT CAIXA SEGURIDADE

- To prevent the occurrence of situations of Conflict of Interest when carrying out activities parallel to those at Caixa Seguridade, the Statutory Member and the Employee must adopt conduct such as:
 - Do not to provide advice/consultancy or other types of services to legal entities or individuals that may benefit from the internal and specific knowledge acquired in any area of Caixa Seguridade, except in cases authorized by Caixa Seguridade;
 - Do not to establish commercial or professional relations, directly or through third parties, with a Caixa Seguridade client, its controllers and companies in the same economic group, when the Statutory Member and Employee has decision-making power over the client's interests in the relationship with Caixa Seguridade;
 - Do not to carry out activities that violate the principle of full dedication by the person occupying the position of manager, ombudsman and inspector, which requires that the duties of the position or paid function take precedence over any other activities;
 - Do not carry out activities parallel to employment at Caixa Seguridade such as:
 - financial consultant, regardless of the function or unit of assignment, including in this concept investment agent, stockbroker, market analyst, financial coach and other professionals providing guidance on financial investments;
 - insurance broker, regardless of function or unit of assignment;
 - real estate broker, regardless of function or unit of employment;

- partner, employee, consultant or administrator of a construction/development company, regardless of position, professional career, function or unit of assignment.
 - Do not negotiate on your own behalf or on behalf of others, products or services that constitute an act of competition with Caixa Seguridade;
 - Do not to practice law against Caixa Seguridade or against the Union, its autonomous agencies, foundations and dependent state-owned companies, Invested Companies, as well as in actions involving Caixa Seguridade and its interests;
 - Do not act as a partner or work for a law firm that sponsors actions involving Caixa Seguridade;
 - Do not maintain an employment relationship or provide legal services in a banking organization or in a company competing with Caixa Seguridade;
 - Do not practice law or provide consultancy in defense of employees who are responding to disciplinary or ethical proceedings, in relation to such procedures or processes.
- Those holding/occupying management positions and functions at any management level at Caixa Seguridade are prohibited from practicing private law.
- The deadline for a Public Agent to disqualify themselves in situations involving the exercise of parallel activities prohibited by this Code is 6 months, from its publication, upon notification to the Ethics Committee for the employee and to the Public Ethics Committee for the Statutory Member.
- The teaching activity does not require consultation regarding the existence of a Conflict of Interest and the request for authorization to exercise a parallel activity, except for situations that may give rise to a conflict of interest, being permitted, including for managers, respecting, in addition to the provisions of Law No. 12,813:
 - the compatibility of schedules;
 - the rules relating to the accumulation of public positions and jobs; and

- the specific legislation applicable to the legal regime of the public office or job held.
- Teaching activity, even if carried out sporadically or unpaid, is understood as:
 - teaching in educational, research or science and technology institutions, public or private, national or foreign;
 - training or qualification, through courses, lectures or conferences for a specific audience or not;
 - other related functions, such as coordinator, monitor, evaluator, member of a student examination board, writer or debater.

8.4.3 MORAL AND SEXUAL HARASSMENT

- The harassment behaviors described below are exemplary and not restrictive and are not tolerated in the Company:
 - Threatening subordinates with dismissal, transfer or removal from office;
 - Imposing working conditions and rules that are different from those established for other employees with the intention of harming the employee;
 - Segregate the employee/collaborator in the work environment;
 - Impose vexatious punishments;
 - Repeatedly taking away the employee's autonomy, contradicting their competencies;
 - Making fun of and/or exposing the employee/collaborator's opinions in a humiliating way;
 - Emotionally destabilizing any person through accusations, offenses, shouting, nicknames, insults, jokes and/or humiliations;
 - Delegate impossible tasks and/or omit/manipulate information necessary to carry out the work;
 - Interacting through unwanted and offensive conversations about intimate topics;

- Making and insisting on unwanted romantic invitations;
- Harassing or stalking on the internet, on social media and/or in the streets;
- Making comments about physical attributes and clothing in a way that embarrasses, diminishes or intimidates;
- Promote inappropriate or unwanted physical contact;
- Offering an advantage of any nature, through blackmail or threats in order to obtain sexual favors or advantages.

8.4.4 PREVENTION OF CORRUPTION AND BRIBERY

- Corruption refers to any and all actions, whether negligent or intentional, that involve suggestions, offers, promises, concessions (active form) or requests, demands, acceptance or receipt (passive form) of undue advantages, whether financial or not, in exchange for the performance or omission of acts inherent to their duties or the facilitation of business, operations or activities in the Company with a view to benefiting oneself or third parties.
- Everyone must report, through the reporting channel made available by the Company, any acts contrary to the public interest and this Code, behaviors that reveal signs of corruption or bribery and irregular situations that favor corruption.
- The Company advises to repudiate any practice of active or passive corruption, bribery, payment of kickbacks/facilitation and influence peddling.
- The following conduct is prohibited:
 - Adopt practices that contribute to corruption, bribery, irregularities, fraud and money laundering;
 - Meeting alone with public officials from bodies and entities or politically exposed persons;
 - Make professional contacts with representatives of suppliers, service providers, sponsored entities and companies or clients, without being accompanied by a second employee, indicated by

- the immediate superior and, when a manager and Statutory Member, by another manager, Statutory Member or Employee;
- Act without impartiality and professionalism, accepting any attempt or even appearance of favoritism in dealing with suppliers;
 - Communicating with suppliers in a non-transparent manner or not using available corporate means and channels;
 - Attract customers or retain current ones by offering benefits not permitted by current legislation or other forms of imposition or constraint;
 - Offering or receiving bribes/kickbacks, including in international relationships, even if the practice is not prohibited in the country where the commercial relationship takes place;
 - Request, request, provoke, suggest or receive any type of financial assistance, gratification, prize, gift, commission, donation or advantage of any kind, for yourself, family members or any person, to fulfill your mission or influence another for the same purpose;
 - Promising, offering or giving, directly or indirectly, an undue advantage to a public agent, or to a third person related to him/her;
 - Receiving transportation, accommodation, meals or any favors from individuals, including clients, suppliers or service providers, in a way that could create a situation that could raise doubts about your probity or honorability.

8.4.5 PREVENTION OF NEPOTISM

- Nepotism is the favoritism of one family member over others, especially with regard to nomination or promotion to positions.
- The following are considered family members: a spouse, partner or relative in a direct or collateral line, by consanguinity or affinity, up to the third degree:
 - Children, stepchildren, grandchildren, great-grandchildren, parents, grandparents and great-grandparents;

- Brothers, uncles and nephews;
- Siblings of the spouse or partner;
- In-laws, sons-in-law and daughters-in-law;
- Spouse of siblings, uncles, nephews, grandchildren and great-grandchildren.
- Therefore, to prevent nepotism, the following behaviors are prohibited:
 - Appoint to a position, paid role or indicate for representation, a family member of the authority or member of the collegiate body responsible for the designation/indication or a family member of the chain responsible for the hiring area;
 - Have a family employee with a paid role under your direct or indirect subordination, including in the eventuality;
 - Have a family employee assigned to the same Directorate and/or carry out activities that involve a relationship of dependency;
 - Hire a family member for an internship, apprenticeship or temporary contract, unless the hiring is preceded by a regular selection process;
 - Promote agreements or arrangements to circumvent restrictions on nepotism, especially through reciprocal appointments or designations;
 - To hire without bidding a legal entity in which there is an administrator or partner with management power who is a family member of a Statutory Member, Employee or Collaborator;
 - Influence the hiring of their family members by a third-party service provider or entity contracted by the Company or Subsidiaries.

8.4.6 DISCLOSURE AND CONFIDENTIALITY OF INFORMATION;

- Everyone has the obligation to observe the strictest confidentiality regarding any and all acts, facts and/or confidential information that are entrusted to them or to which they have access by any means or manner, as a result of their professional activities.

- The following conduct is prohibited:
 - Use for personal benefit or disclose confidential information to which you have access;
 - Record or copy confidential documentation and information to which you have access, for use other than in the strict fulfillment of your duties;
 - Appropriate for yourself or for someone else confidential and/or secret material that may be made available for the execution of activities;
 - Disseminate to the press or make available to third parties confidential, privileged information, of a relevant act or fact concerning Caixa Seguridade, Subsidiaries or Invested Companies, which has not yet been officially disclosed through the Company's channels, characterizing the leak of information;
 - Disseminate defamatory information, as well as transmit to public opinion doubts regarding the integrity, morality, clarity of positions and decorum of the Statutory Member and Employee;
 - Pass on knowledge of confidential information, undertaking to compensate for any damage and/or loss arising from a possible breach of confidentiality of the information provided;
 - Pass on or disclose information, programs, models, documents and methodologies developed or in use by the Company, even if you have participated in their development;
 - Discuss with third parties internal matters involving confidential information or that may anticipate market behavior;
 - Speak on behalf of the Company, Subsidiaries or Invested Companies, except in cases provided for in the Bylaws and internal regulations, as applicable;
 - Provide information, in legal cases and court orders, without guidance from the legal department;
 - Publish studies, opinions, research and other works of a private nature, involving Caixa Seguridade, Subsidiaries or Invested Companies, without prior and express authorization;

- Allow third parties to access information systems, operations and databases under the responsibility and/or property of Caixa Seguridade or a Subsidiary, unless expressly authorized by the competent authority.

8.4.7 PARTICIPATION IN EXTERNAL EVENTS

- The participation of Employees and Statutory Members in conferences, seminars, congresses, lectures or similar events, in Brazil or abroad, for personal reasons, cannot be carried out to the detriment of the performance of their duties in the Company.
- When participating in events of personal interest, the Employee and/or Statutory Member must refrain from commenting on facts or expressing opinions on matters related to Caixa Seguridade, Subsidiaries and Invested Companies.
- Invitations to participate in events organized or promoted by a private institution, for external representation of the Company, must be forwarded to the Investor Relations area, which will indicate, in case of acceptance, the appropriate representative, taking into account the nature and matters to be addressed at the event, in accordance with the Company's Spokesperson Policy (ZS015).
- When representing external parties, activities must be carried out in accordance with the purpose and institutional interests of the Company, Subsidiaries or Invested Companies.
- The Employee and/or Statutory Member cannot receive remuneration as a result of exercising institutional representation.
- The Employee and/or Statutory Member must not accept any type of Gift, souvenir, goods, rights or similar for participating in an event as an institutional representative.
- When the matter to be discussed is related to their institutional functions, the Employee and/or Statutory Member cannot accept invitations to dinners, lunches, breakfasts and activities of a similar nature paid for by third parties.
- Items or expenses for transportation, food, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted

by a private agent to a Public Agent, as a result of their duties, but not related to the exercise of institutional representation, are considered Gifts.

- Expenses related to participation in events that are related to the duties of the position held, promoted by a private institution, such as seminars, congresses, visits and technical meetings, in Brazil or abroad, must be covered by Caixa Seguridade.
- Exceptionally, in compliance with the public interest, the institution promoting the event may cover, in whole or in part, the expenses relating to transportation, food, accommodation and registration of the Public Agent, with the receipt of remuneration prohibited, provided that it is:
 - International Organization of which Brazil is a member;
 - Foreign government and its institutions;
 - Academic, scientific and cultural institution;
 - Company, entity or class association that does not maintain or intends to maintain a business relationship and that cannot be a beneficiary of a collegiate decision in which the Employee or Statutory Member participates, either individually or collectively;
 - By a natural or legal person with whom Caixa Seguridade or Subsidiaries maintain a business relationship, provided that it arises from a previously assumed contractual obligation.
- The Employee and/or Statutory Member must not receive any amount or value from third parties, even if as coverage for transportation or accommodation expenses, and payment of such expenses must be made directly by the institution or in accordance with specific applicable legislation.
- The invitation to participate in events funded by third parties must be forwarded to the Company's Compliance and Integrity area, which will provide a prior opinion on participation in compliance with current regulations, with the exception of events related to the Individual Development Plan (PDI) and those promoted by Subsidiaries and professional bodies.

- The consultation must indicate the grounds that demonstrate the institutional interest of the employee or statutory member's participation in the event and the existence of elements of common interest capable of eliminating, including, the risk of compromising the image of Caixa Seguridade and possible Conflict of Interest.
- Participation in activities at external events must be reported to the hierarchical superior through the Company's official communication channels.
- As an exception, transportation, food and accommodation expenses may be covered by the sponsor, provided that:
 - The event promoter has no interest in decisions that may be taken by the Employee and/or Statutory Member, whether individually or collectively;
 - There is no conflict of interest with the exercise of the position or function;
 - It is not an institution that maintains a relationship or commercial interest with Caixa Seguridade or Subsidiaries;
 - Do not rely on privileged information.
- Publicity of expenses will be ensured by recording the commitment in the respective work diary of the manager, with an explanation of the conditions of his/her participation.
- The rules contained in this item and sub-items apply to everyone, including during vacations and other paid leaves and absences.

8.4.8 SOCIAL MEDIA CONDUCT, CRITICISM OF EMPLOYEE REPUTATION AND CAIXA'S IMAGE, AND SERVICE OF PARTICULAR INTEREST

- To prevent situations that may damage the Company's image and/or reputation, or other situations of harm, the following conduct must be observed:
 - Do not publish any matter that is offensive to the image of Caixa Seguridade, Subsidiaries and Invested Companies, its Statutory Members, Employees, Collaborators and Nominees;

- Do not use the logos of Caixa Seguridade, its Subsidiaries or its Invested Companies, except under the conditions set out in the regulations;
- Do not comment/share any matters of a restricted or confidential nature involving your activities;
- Do not publish/share work routines and the operation of the Company's or Subsidiaries' units;
- Do not publish photos and images of the interior of units that weaken security and expose information;
- Do not speak on behalf of Caixa Seguridade, Subsidiaries or Invested Companies, except under the conditions provided for in the regulation (ZS015);
- Do not display behavior that harms the work environment or criticize the reputation of colleagues and superiors and Caixa Seguridade;
- Do not divert a colleague, service provider, intern or young apprentice to serve a personal interest;
- Do not engage in parallel activities that raise doubts about the integrity, morality, clarity of positions and decorum of the employee or manager;
- Do not registering a complaint and/or irregular fact against someone you know is innocent or whose fact is non-existent;
- Do not adopt discriminatory conduct related to origin, race/color, gender identity, color, age, religion, creed, social class or physical disability.

8.4.9 RECEIVING AND OFFERING GIFTS, PRESENTS AND HOSPITALITY

- It is forbidden to accept favors, commissions, gratuities, financial or material advantages, donations, gifts or presents of any nature, hospitality, invitations of a personal nature for trips, accommodations and other attractions, for oneself or for others, including a spouse, partner or relative by blood or affinity, in a direct or collateral line up to the third degree, directly or indirectly, resulting or not from relationships with Caixa Seguridade or Subsidiaries and which may influence decisions, facilitate business, benefit third parties, or cause damage to the image of the Company, Subsidiary or Invested company.

- The prohibition refers to the receipt of Gifts of any value, due to the position or function held, when the offeror is an individual or legal entity that:
 - Have a personal, professional or business interest in a decision that may be taken, individually or collectively, due to the position or function held;
 - May represent an improper relationship or financial or reputational damage to Caixa Seguridade or its Subsidiary;
 - Maintain a commercial relationship with Caixa Seguridade, Subsidiaries and Invested Companies; or
 - Represent the interests of third parties, as an attorney or representative of the individual or legal entity, included in the previous items.
- It is forbidden to accept invitations or tickets for entertainment activities such as concerts, plays, shows, presentations and sporting activities, except when exercising institutional representation, in which case the transfer of invitations or tickets to third parties outside the Company is prohibited.
- Public Agents are permitted to accept invitations or tickets for entertainment activities such as concerts, plays, shows, presentations and sporting activities when the invitations or tickets originate from public access promotions or raffles, or from a private consumer relationship, without any link, in any case, to the condition of Public Agent, as well as when the invitations or tickets are distributed by a public body or entity of any sphere of power, as long as the limit defined in Decree 10.889/21 is observed, which considers an item of low economic value to be one with a value less than one percent of the salary ceiling provided for in the Constitution.
- Public Agents are permitted to accept invitations or tickets for entertainment activities, such as shows, presentations, parties, carnival parades and sports activities promoted by CAIXA or resulting from sponsorship by Caixa Seguridade, provided that the unit promoting the event defines the criteria for distributing invitations and tickets among Public Agents.

- Caixa Seguridade managers must disclose in their agendas information regarding participation in events and activities paid for by third parties.
- The following is not considered a Gift:
 - Have no commercial value;
 - Be distributed by entities of any nature as a courtesy, advertising, regular publicity or on the occasion of special events or commemorative dates, as long as the limit defined in Decree 10.889/21 is observed, which considers an item of low economic value to be one with a value less than one percent of the salary ceiling provided for in the Constitution;
 - Received from a foreign authority in a protocol situation, when representing Caixa Seguridade and when there is reciprocity;
 - Represents a cash prize or goods granted by an academic, scientific or cultural entity, in recognition of your intellectual contribution;
 - Whether it is a prize received from Caixa Seguridade or its Subsidiaries, Invested Companies and partners, as recognition of performance in obtaining business results, provided that they are previously established in incentive campaigns and that they are approved by the Company's decision-making bodies, in accordance with current rules;
 - Represents a prize granted as a result of a public access competition for work of an academic, scientific, technological or cultural nature;
 - Whether it is a scholarship linked to professional or technical improvement, as long as the sponsor has no interest in any decision that may be taken, due to the position held by the recipient.
- For gifts that, for any reason, cannot be refused or returned free of charge, one of the following measures must be adopted, due to the nature of the item, under guidance from the Company's Compliance area:
 - In the case of an asset of historical, cultural or artistic value, allocate it to the collection of the National Institute of Historical

- and Artistic Heritage-IPHAN so that it may be given the appropriate legal destination;
- Promote your donation to an entity of a charitable or philanthropic nature, recognized as being of public utility, provided that, in the case of non-perishable goods, the entity undertakes to apply the good or the proceeds from its sale in its core activities;
- Incorporate it into the assets of Caixa Seguridade or the Subsidiary, as the case may be.
- The incorporation of gifts into the historical-cultural and artistic heritage, as well as their donation to a charitable or philanthropic entity, will be subject to specific registration with the Company for possible control purposes.

8.4.10 USE OF ASSETS AND ASSETS

- Everyone must ensure the protection of the Company's assets, with the appropriate use of information, assets, equipment and other resources made available for the effective management of the business carried out.
- The material resources, means of communication and facilities made available must not be used for purposes unrelated to their professional activities.
- Technologies, methodologies, models, know-how and other information owned by Caixa Seguridade and Subsidiaries or developed or obtained by them must not be used for private purposes or for third parties, even if there was participation in their development.

8.4.11 OTHER CONDUCT

- The following conduct must also be observed:
- Maintain good relationships between Caixa Seguridade units and other parties involved by creating an atmosphere of professionalism, courtesy and cooperation.
- Act to combat any type of moral and sexual harassment in professional relationships.

- Protect shareholders from misappropriation of assets by individuals with the power to influence and/or make decisions on behalf of the Company.
- Guide relationships with all Stakeholders with complete independence and exemption from ideological, political and religious convictions.
- Ensure compliance with legislation that deals with free competition in relationships with competitors, customers, suppliers and service providers.
- Do not adopt actions that may harm free competition in any way.

8.5 STATUTORY MEMBERS

8.5.1 Statutory Members, aware of all the terms and consequences of this Code, must base their actions on an example of honest, efficient, ethical and moral conduct.

8.5.2 In the event of any administrative procedure intended to investigate situations of possible Conflict of Interest or non-compliance with rules or laws, Statutory Members authorize access to their tax, banking, telephone and other data pertinent to the subject of the investigation, whenever the authority responsible for instituting the administrative procedure so determines, within the strict limits of what is necessary to clarify the facts.

8.5.3 The information obtained will remain confidential and will not be disclosed without the consent of the interested parties, except in cases provided for by law.

8.5.4 The duties of Statutory Members are:

- Inform the Public Ethics Committee about relevant changes in assets and make them public in the event of a stake exceeding five percent of the capital of any company;
- Inform the Public Ethics Committee about the receipt of salary or any other remuneration from a private source, except remuneration from participation in the boards of companies in which the Company holds an equity interest and/or the right to appoint representatives;

- Refuse offers of transportation, accommodation or any favors from individuals in order to avoid a situation that could raise doubts about your probity or honorability;
- Disclose and keep up to date the agenda of meetings and gatherings with individuals and legal entities that have any type of interest in the Company or Subsidiaries, keeping a summary record of the matters discussed, as well as necessarily informing the name of the companion and list of people present;
- In relationships with other public and private bodies, companies and other entities, clarify the existence of any Conflict of Interest, as well as communicate any circumstance or fact that impedes their participation in collective decisions or in a collegiate body.
- Regarding your private investments, with the exception of investments in banking or financial products with pre-established standards and norms and offered to the general public:
- Keep their positions unchanged from the date of their nomination, subjecting any change to prior and substantiated communication to the Public Ethics Committee;
- Hire an independent administrator to manage these investments, in a manner equivalent to a blind trust.

8.5.5 Statutory Members are prohibited from:

- Disclose information that may impact the price of the Company's or Subsidiaries' securities and their relations with the market or with consumers and suppliers;
- Use or disclose, at any time, for your own benefit or that of third parties, privileged information obtained as a result of the activities performed, even after leaving the administrator's activities;
- Give a public opinion on the merits of a matter that will be submitted for individual decision or in a collegiate body;
- Proposals for future work or business in the private sector, as well as any negotiation involving a Conflict of Interest, must be immediately

reported to the Public Ethics Committee, regardless of whether they are accepted or rejected;

- Within a period of six months after leaving the position of Statutory Member, you may not carry out any type of professional activity that could eventually give rise to a Conflict of Interest with the activities of Caixa Seguridade or its Subsidiaries;
- Within a period of six months from the date of dismissal, exoneration, removal, resignation from a position of a member of the Senior Management or his/her retirement, a Conflict of Interest is configured, except when expressly authorized by the Public Ethics Committee:
- Provide, directly or indirectly, any type of service to an individual or legal entity with whom he/she has established a relevant relationship due to the exercise of the position;
- Accepting a position as administrator or advisor or establishing a professional relationship with an individual or legal entity that performs an activity related to the area of expertise of the previously held management position;
- Enter into service, consultancy, advisory or similar activity contracts with the CAIXA conglomerate;
- Intervene, directly or indirectly, in favor of private interests before Caixa Seguridade or any body with which the person has established a relevant relationship due to the exercise of the position of director.

8.5.6 Every act of inauguration or investiture of managers must be accompanied by the signing of the term of knowledge and agreement with the rules established by the Code of Conduct of the Senior Federal Administration and by this Code.

8.5.7 In case of doubt, the Statutory Member must request additional information and clarifications from the Company's Compliance and Integrity area.

9 PROCEDURES

9.1 THE SUPERINTENDENCE OF RISKS, COMPLIANCE AND INTERNAL CONTROLS IS RESPONSIBLE FOR

- Disclose, review and update the Code of Ethics and Conduct every 2 years or earlier, if necessary;
- Verify compliance with the Code of Ethics and Conduct;
- Provide training to Employees and Statutory Members on the topic, at least annually;
- Promote institutional guidance actions on preventing Conflict of Interest;
- Provide a reporting channel;
- Manage and process complaints, making the appropriate referrals.

10 ANNEX I – CODE OF ETHICS AND CONDUCT ACKNOWLEDGEMENT

I, _____, registration _____, declare that I have read and understood the terms of this Code of Ethics and Conduct, committing to act in accordance with it and I am aware that failure to comply may result in the application of applicable penalties and/or sanctions.

In ____/____/_____

Signature