

COMPLIANCE AND INTEGRITY PROGRAM OF CAIXA SEGURIDADE

7th Edition



MESSAGE FROM THE GOVERNANCE AND RISK DIRECTOR

Caixa Seguridade had its first Code of Ethics and Conduct approved in 2015 and the Compliance and Integrity Program consolidated in 2017. During this period, the Company matured and evolved its processes, building an environment of robust integrity.

What reinforces Caixa Seguridade's anti-corruption environment is the set of policies, mechanisms, procedures and actions adopted by all employees as part of their commitment to good corporate governance practices, transparency and promotion of ethical, honest and responsible conduct in of its activities.

The 7th Edition of the Program demonstrates actions related to Integrity and Compliance Culture in the Company to maintain an anti-corruption environment, demonstrating the commitment of Senior Management in relation to the topic. The sustainable growth of our business is only possible thanks to daily actions and decisions based on ethical values and respect for current legislation, reflecting transparent, responsible and honest work that seeks to generate benefits for shareholders.

The Program is aligned with the Company's strategies and reinforces our commitment to contributing to the improvement of an honest and healthy environment, with absolute respect for human beings and with the determination to eliminate situations of provocation and embarrassment in the work environment that reduce self-esteem and moral integrity.

We are committed to promoting and strengthening an ethical environment and high standards of conduct in relationships and do not accept practices that weaken our image and/or compromise our workforce. We treat reports received with confidentiality and impartiality, in order to guarantee the anonymity of the complainant and their protection against any form of reprisal, intimidation or discrimination.

Therefore, we invite all our employees, administrators, advisors, committee members and collaborators to continue “doing the right thing” and to lead by example, recognizing that success is built by everyone with integrity.

SPONSORSHIP OF THE PROGRAM AND DELEGATED RESPONSIBILITIES IN THE SEARCH FOR ITS EFFECTIVENESS

The 7th Edition of Caixa Seguridade's Compliance and Integrity Program was approved by Management bodies, which sponsor actions that seek to make the Program effective.

BOARD OF DIRECTORS

Chairman	Humberto José Teófilo Magalhães
Board Members	Fernando Alcântara de Figueiredo Beda Ilana Trombka Inês da Silva Magalhães Karoline Busatto Monica dos Santos Monteiro Waldemir Bargieri

COLLEGIATE BOARD

Chief Executive Officer Felipe de Vasconcelos Soares Montenegro Mattos

Executives Officers	Edgar Vieira Soares Eduardo Costa Oliveira Herbert Luiz Gomide Filho
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The Compliance and Integrity Program is administered and coordinated by the Governance and Risk Directorate and the National Superintendence of Risks, Compliance and Internal Controls of Caixa Seguridade, which report periodically to collegiate bodies on topics surrounding the Program.

GOVERNANCE AND RISK DIRECTORATE

Executive Officer	Hebert Luiz Gomide Filho
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NATIONAL SUPERINTENDENCY OF RISKS, COMPLIANCE AND INTERNAL CONTROLS.

National Superintendent	Victor Fernando Noda
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PRESENTATION

This Compliance and Integrity Program consolidates the Compliance Management System, made up of the set of policies, mechanisms, procedures and actions conducted by Caixa Seguridade Participações S.A. (“Caixa Seguridade” or “Company”) as a commitment to good governance practices corporate governance, transparency and promotion of ethical, honest and responsible conduct in the conduct of its business.

The Program aims to strengthen the Company, directing actions towards conducting business appropriately, in relation to compliance with laws and regulations, ethics and conduct issues, competitive, social, environmental and climate aspects, contracts with suppliers and third parties, accounting standards, among others.

The purpose of the Program is to ensure the correct application of internal and external rules, prevent, detect and remedy inappropriate conduct by Administrators, members of Boards and committees, Managers, employees and collaborators, in order to consolidate its sustainability and ensure the expected results by stakeholders.¹²³

On April 29, 2021, Caixa Seguridade concluded its public offering of shares on B3 and began to be listed in the Novo Mercado segment with the ticker CXSE3. With control of CAIXA maintained, the Company now has 17.25% of its shares in Free-Float.

Considering the nature of a holding company in the insurance sector, the Company considers actions related to this Program in the activities it carries out with those appointed to act as advisors, committee members or managers in the companies in which it participates.

The measures adopted in the Program are in line with good governance practices and the provisions of Law No. 13,303/2016 and its regulation, complying with the legal requirements for preventing and combating corruption (Law No. 12,846/2013 and its regulatory Decree No. 11,129 /2022) and are a reference for all areas of the Company and Subsidiaries to maintain their processes in accordance with legislation and internal standards.

An effective Compliance and Integrity Program mitigates risks, prevents the occurrence of infractions and damages resulting from them, which, in addition to adding value, prevents the company from losing value. To achieve this, engagement from the entire Company is necessary.

Caixa Seguridade develops several actions, monitoring and controls that are consolidated in this Program and understands that it must be structured, applied, disclosed and updated periodically. In this way, it maintains a team dedicated to its constant improvement and adaptation in order to keep it adherent to the business.

The Program is structured into 4 Pillars: Compliance and Integrity Environment; Risk Management and Internal Controls; Compliance and Integrity Procedures; and Communication, Training and Monitoring, which will be detailed below.

Member(s) of the Board of Directors and Board of Directors.¹

Employees who occupy a managerial role and Directors.²

individual or group that may affect the Company, through their opinions or actions, or that may be affected by the Company.³

Example: Senior Management, internal public, suppliers, consumers, community, government, shareholders, among others.

1ST PILLAR: ENVIRONMENT OF COMPLIANCE AND INTEGRITY



It highlights the commitment and support of Senior Management with the Compliance and Integrity Program through actions, approval of policies and other internal standards, compliance with legal and regulatory standards, as well as instruments aimed at preventing, detecting and remediating acts harmful to the Administration Public and the Company, with the aim of promoting a culture of Compliance and integrity.

2ND PILLAR: RISK MANAGEMENT AND INTERNAL CONTROLS



Its premise is risk management, information security, internal controls, Compliance and integrity across the Company, defining policies on these topics with responsibilities for all employees, especially process managers. It highlights the process adopted by the Company to identify, evaluate and adopt responses to risk events in the units' processes, as well as instructs on the disclosure of information.

3RD PILLAR: COMPLIANCE AND INTEGRITY PROCEDURES



It highlights the internal Compliance and integrity procedures adopted, as well as the encouragement to report irregularities and the effective application of the code of ethics and conduct, policies and guidelines with the aim of preventing, detecting and resolving conflicts of interest, presence of nepotism, deviations, fraud, irregularities and illicit acts.

4TH PILLAR: COMMUNICATION, TRAINING AND MONITORING



It deals with transparency regarding matters that permeate the universe of Compliance and integrity, including the measures adopted to disseminate the objectives, standards, conduct, values and procedures that make up the Program. To this end, the Program has a Training and Communication Plan, in addition to evaluation actions to verify its effectiveness, including monitoring and indicators.

The Pillars of the Compliance and Integrity Program support the guidelines related to compliance. They represent important and priority themes for the Company and Subsidiaries and receive special attention from leaders, who work with their teams to ensure the effectiveness of the Program.

1 ENVIRONMENT OF COMPLIANCE AND INTEGRITY

Caixa Seguridade structures actions, processes and instruments to constantly maintain and strengthen an ethical and honest environment.

1.1 Support from Senior Management

The commitment and support of Senior Management (Board of Directors and Board of Directors) is the basis for a successful Compliance and Integrity Program. Considering that its actions and decisions are models for the entire Company, Senior Management is primarily responsible for promoting the ethical culture and integrity of the organization.

The Company's Bylaws expressly express the Board's duty to observe good corporate governance practices and the Board of Directors' duty to establish general business guidelines and corporate governance guidelines.⁴ According to the Best Practices Guide of the Brazilian Institute of Corporate Governance (IBGC), governance agents must ensure that the organization has clear, effective, implemented and properly disseminated policies and processes and must promote the continuous improvement of the ethical culture, so that its actions are always consistent with the principles, values, laws and regulations to which it is subject.⁵

In this sense, Senior Management approved the guidelines for the standards of behavior to be adopted by everyone who is part of the Company and which are formalized in the Codes of Ethics and Conduct, in existing policies and in specific internal regulations, addressed in item 1.5 of this Program.

In addition, as a demonstration of its commitment to good corporate governance practices, transparency and the promotion of ethical, honest and responsible conduct, Senior Management approved this Compliance and Integrity Program.

Since December/2019, the Company has been a signatory to the Business Pact for Integrity and against corruption (Clean Company Pact), which includes a set of guidelines and procedures that must be adopted by signatory companies and entities in their relationship with public authorities.

Its principles are based on the Charter of Principles of Social Responsibility, the United Nations Convention against Corruption, the 10th principle of the Global Compact and the guidelines of the Organization for Economic Cooperation and Development. Among the main commitments expressed, the following stand out:

- Information about legislation: laws must be known internally to be fully complied with;
- Disclosure, guidance and responses on legal principles applicable to its activities;
- Prohibition against bribery;
- Transparent and lawful contribution to political campaigns;
- Propagation of the Pact's principles among its audiences;
- Open and transparent investigations;

Article 34, III: "The Board of Directors is fundamentally responsible for the general administration and executive management of the Company, and is responsible for ensuring the regular functioning of the company in accordance with the general guidelines drawn up by the Board of Directors, in particular: (...)⁴ III - observe good corporate governance practices;"

Article, 28, I: "It is the responsibility of the Board of Directors, in addition to other duties provided for in the Brazilian Corporation Law, Law No. 13,303/2016, Decree No. 8,945/2016, other applicable legislation and its Internal Regulations: I - establish the general business orientation and corporate governance guidelines of the Company;"

IBGC Guide available at <https://conhecimento.ibgc.org.br/Paginas/Publicacao.aspx?PubId=246405>

- Work with the production chain.

Currently, Caixa Seguridade's Board of Directors is made up of 01 Chief Executive Officer and 03 Executive Directors, 01 of whom are from Finance and IR, 01 from Commercial and Products and 01 from Governance and Risks.

The Board of Directors is made up of 7 effective members, with at least 1 member elected by minority shareholders, 1 appointed by the Ministry of Management and Innovation in Public Services, 1 appointed by the Ministry of Finance and up to 4 members appointed by CAIXA.

The Company also has a Supervisory Board, a permanent supervisory body, made up of 3 effective members and 3 alternates.

As auxiliary bodies of Administration, Caixa Seguridade has the following Statutory Committees installed:

- Audit Committee;
- Related Party Transactions Committee;
- People, Eligibility, Succession and Remuneration Committee.

1.1.1 Governance and Risk Department

The Governance and Risks Board is an independent and autonomous unit, directly subordinate to the Board of the Presidency of Caixa Seguridade and which has, in its structure, the National Superintendency of Risks, Compliance and Internal Controls, linked directly to the Director, with the following duties:

- Information Security Management of Caixa Seguridade and Subsidiaries;
- Management of the Internal Control System of Caixa Seguridade and Subsidiaries;
- Management of Compliance and Integrity of Caixa Seguridade and its Subsidiaries;
- Creation, updating and publication of policies, regulations and corporate documents.
- Training and qualification of people in Ethics and conduct;
- Reporting channel management
- Management of business continuity and contingency of Caixa Seguridade and Subsidiaries;
- Coordination of institutional relationships with control and inspection bodies;
- Management of the transaction process with related parties;
- Risk Management of Caixa Seguridade and Subsidiaries;
- Management of implementations arising from the LGPD.

In addition, the National Superintendence of Risks, Compliance and Internal Controls carries out activities to support Senior Management in fulfilling its obligations and works to raise awareness among statutory members, nominees, employees and collaborators of Caixa Seguridade and Subsidiaries in the proper conduct of their business, especially with regard to ethical and honest conduct.

The Board and its National Superintendence have obligations defined in the Legislation, Statute and implemented Policies.⁶ It is important to highlight that they carry out their duties independently in relation to other departments and areas of the Company, being able, when

Bylaws of Caixa Seguridade Participações S.A., Article 35, III and Article 52.⁶

necessary, to report directly to the Chief Executive Officer and the Board of Directors without the presence of members of the Collegiate Board of Directors.

1.2 Alignment with Strategic Planning

Caixa Seguridade adopts the COSO ERM 2017 framework for risk management.⁷ This model highlights the importance of risk management in defining and executing strategy and managing organizational performance and provides for the definition of a Risk Appetite Statement (RAS).

The Company has a Risk Appetite Statement reviewed and approved annually by the Board of Directors, which allows the alignment of risk management with Strategic Planning. In this way, Caixa Seguridade aligned risk management with strategy management, as risk management practices support the identification and assessment of risks that impact the strategy in a prior and integrated manner.

The guidelines, mechanisms and procedures consolidated in this document help the Company to achieve its strategic objectives since the program permeates the entire organization and plays an important role in its sustainability.

1.3 Code of Ethics and Conduct

The ethical values and standards of conduct that guide the conduct of business, actions and relationships with the Company's internal and external interlocutors, as well as the prevention of conflicts of interest and the prohibition against harassment, acts of corruption and fraud, are established in the Caixa Seguridade Code of Ethics and Conduct, a document approved by Senior Management and available to everyone on the Company's website, in addition to being accessible to employees and collaborators in an online tool on the intranet.

In 2023, the document was revised considering the reinterpretation of the regulatory framework, good market practices, alignment with the controlling company CAIXA and the search for harmonization of the Company's values with other documents, policies and internal standards.

In the Code of Ethics and Conduct, the Company communicates the ethical feeling of its Administrators, employees and other collaborators, and expresses its organizational identity through its business and mission statement which, added to the set of values, allows the Company to be aligned to achieve your goals. The document establishes the rights and obligations of statutory members, employees and representatives of Caixa Seguridade in its Affiliates and sets out standards of conduct to be observed by everyone in order to prevent dishonest and unethical conduct, focusing, among others, on the following topics:

- Prevention of conflict of interests;
- Parallel professional activities;
- Moral and sexual harassment;
- Prevention of corruption and bribery;
- Prevention of nepotism;
- Disclosure and confidentiality of information;
- Participation in external events;

⁷ COSO ERM 2017: *Enterprise Risk Management—Integrating with Strategy and Performance – Committee of Sponsoring Organization of the Treadway Commission.*

- Behavior on social networks, criticism of the reputation of employees and the Company and attention to private interests;
- Receiving and offering gifts, presents and hospitality; It is
- Use of the Company's assets and assets.

The Code of Ethics and Conduct also establishes behaviors regarding relationships with third parties, prohibiting the establishment of partnerships and hiring of suppliers that use child, slave or similar labor, and that adopt practices contrary to the International Bill of Human Rights and the Statutes of the Elderly and Children and Adolescents.

The document also has a specific topic on the expected and prohibited conduct of Senior Management, such as disclosing meeting agendas, relationships with other public and private bodies and disclosing information, among others.

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

It is important to highlight that the authority to approve the rules lies with the Board of Directors of Caixa Seguridade and that all employees, statutory members and members of the Company's committees are strongly encouraged to sign the Acknowledgment and Commitment Term, which must be renewed annually after reading and due knowledge.

The aforementioned Code is guided by the Code of Professional Ethics of Civil Servants of the Federal Executive Branch, approved by Decree No. 1,171/1994 and amended by Decree No. Target statutory members, employees, collaborators, committee members and nominees of Caixa Seguridade and its Subsidiaries. Furthermore, in order to maximize engagement and the values that surround them, all employees are invited to speak out and contribute to the constant evolution of the rules that are debated and approved by Senior Management.

Currently, Caixa Seguridade's staff is made up of employees from CAIXA, Caixa Seguridade's parent company. For this reason, the Company's employees also adhere to that institution's Code of Ethics, Conduct and Integrity.

The Company understands that ethical attitudes based on the values defined to guide the organization contribute as a competitive differentiator and an important tool in decision-making.

1.4 Ethics and Internal Affairs Committee

Within the scope of Caixa Seguridade, the Governance and Risk Department, through its National Superintendence of Risks, Compliance and Internal Controls, is the area responsible for Compliance and monitors and monitors ethical and disciplinary incidents, as well as the application of possible penalties. to administrators, employees and other collaborators, if they occur.

Any occurrences of violations of the Company's rules will be dealt with by the Ethics Committee and the CAIXA Internal Affairs Department, which may recommend the application of penalties to the Administrators, employees, members of boards and statutory committees of the

Company and its Subsidiaries, being monitored and monitored by the Board of Directors and Superintendence responsible for Caixa Seguridade Compliance.⁸

CAIXA's operations occur through an agreement to share structure and execution of activities, and are based on: a) the prerogative granted by Decree No. 8,945/2016 to Subsidiaries, which can share costs, structures, policies and disclosure mechanisms with its controlling company, and b) in the fact that the composition of Caixa Seguridade's staff is made up of employees available from the controlling company CAIXA.

The Commission is an autonomous body of a deliberative nature with the purpose of acting in the management of professional ethics, as well as in the treatment of people and public property, and is also responsible for deliberating on unethical conduct and transgressions of ethical standards. brought to your attention.

CAIXA has an Ethics Committee formally established and active since 2002, made up of three full members and three substitutes chosen from among permanent employees and appointed by the President of CAIXA, one of whom is appointed as President.

The Commission meets, ordinarily, once a month and, extraordinarily, when called by its President to examine a specific matter.

Among other duties, the Ethics Committee is responsible, according to its regulations:

- ✓ Guide and advise on the professional ethics of managers and employees;
- ✓ Decide on complaints about unethical conduct by managers and employees;
- ✓ Apply ethical censorship to employees;
- ✓ Apply and ensure compliance with the Codes of Ethics, the Code of Professional Ethics for Civil Servants of the Federal Executive Branch, as well as apply and ensure compliance with the Code of Conduct of the Senior Federal Administration;
- ✓ Resolve doubts regarding the interpretation of standards;
- ✓ Deliberate on omitted cases;
- ✓ Act as a liaison with the Public Ethics Commission.

The CAIXA Internal Affairs Department is linked to the CAIXA Board of Directors and is responsible for managing the processes for determining disciplinary and civil liability, being responsible for carrying out the preliminary analysis, initiation and instruction of the processes, which may result in a warning, suspension and termination of the employment contract, as well as any liability provided for by law.

In the case of less complex disciplinary issues, a Conduct Adjustment Term – TAC may be signed, through which the employee recognizes the inadequacy of their behavior and commits to its adequacy.

With the exception of ethical transgressions committed by the Company's Management and Supervisory Board members, which are forwarded to the Public Ethics Commission (CEP).⁸

1.5 Internal Policies and Regulations

In addition to the Code of Ethics and Conduct, the Company has internal policies and standards that guide its actions and must be observed by all employees and members of Senior Management, among which the following stand out:

➤ **Policies:**

- ✓ Conflict of Interest Prevention Policy: Establishes principles, guidelines and responsibilities to mitigate the risk of involvement in situations that constitute a conflict of interest in the exercise of position and/or function of Statutory Members, committee members, Employees, Collaborators and Appointees working at Caixa Seguridade Participações S.A. and its Participated.
- ✓ Internal Controls Policy: establishes principles, guidelines and responsibilities to be observed to ensure the effectiveness of the Company's Internal Controls System, as well as strengthening the culture of internal controls, in order to guarantee the achievement of business objectives.
- ✓ Compliance and Integrity Policy: Provides guidance to Caixa Seguridade's statutory members, representatives and employees regarding the Company's Compliance and integrity rules in order to ensure compliance with laws, regulations, codes, policies, standards and procedures that govern its activities, aiming to promote prevention, detection and combating the occurrence of illegal acts and promoting an anti-corruption environment.
- ✓ Risk Management Policy: aims to promote the management of the risks to which the Company is exposed, aiming to maintain these risks at levels considered acceptable by management, ensuring its business model, future performance, solvency, liquidity and sustainability.
- ✓ Information Security Policy: establishes principles and guidelines for information and cyber security at Caixa Seguridade, with the purpose of ensuring the availability, integrity, confidentiality and authenticity of information.
- ✓ Securities Trading and Disclosure of Relevant Acts and Facts Policy: establishes rules and guidelines for the communication and disclosure of Relevant Acts or Facts or other information considered sensitive within the Company, for the protection of Privileged Information and for Securities Trading Company Furniture.
- ✓ Financial Investment Policy: establishes the guidelines and measures that guide the investment management of Caixa Seguridade's financial resources.
- ✓ Dividend Distribution Policy: establishes criteria and rules related to the distribution of dividends from Caixa Seguridade.
- ✓ Social, Environmental and Climate Responsibility Policy: aims to guide the Company's actions in incorporating Social, Environmental and Climate Responsibility into strategy, management, business, products, services, processes, operations, activities and in the

relationship with Stakeholders, with the aim of to promote Sustainability and Sustainable Development.

- ✓ Related Party Transactions Policy: establishes principles and guidelines for the decision process related to transactions involving related parties, considering the Company's strategies and current legislation and regulations.
- ✓ Equity Interest Policy: establishes principles, general guidelines and responsibilities regarding investments and/or disinvestments in equity interests in other companies, to guide corporate governance and the management of these investments.
- ✓ Spokesperson Policy: regulates Caixa Seguridade's communication with the press and Capital Market agents.
- ✓ Nomination and Eligibility Policy: establishes principles and guidelines that guide the process of nomination and eligibility of Administrators, Supervisory Board members, members of Statutory Committees, as well as defining the obligation to analyze the profile of the maximum non-statutory holders of internal audit and the area responsible for risk, internal control and Compliance.
- ✓ Privacy and Personal Data Protection Policy: establishes principles and guidelines for the management, processing and use of data as assets of Caixa Seguridade and its Subsidiaries or under its custody, observing the best governance practices, adaptation to the Company's strategy and compliance with General Personal Data Protection Law (LGPD).
- ✓ People Management and Remuneration Policy: establishes principles and guidelines that guide people management in the Company, to achieve organizational and individual objectives.
- ✓ Money Laundering and Terrorist Financing Policy: establishes guidelines to guide actions, in accordance with applicable legislation and regulations, and prevent Caixa Seguridade from being used in the practice of money laundering and terrorist financing crimes, mitigating the risks of contagion, Compliance, reputation or image and legal or legal.
- ✓ Corporate Governance Policy: establishes the Corporate Governance Principles and Guidelines adopted by Caixa Seguridade and its Subsidiaries, reflecting the commitment to good Corporate Governance practices in order to add value to interested parties.

➤ **Internal Regulations:**

Among the internal regulations, the following stand out:

- ✓ Authority Regime: establishes and discloses the set of values that define the jurisdictions to be observed when carrying out the activities of the Caixa Seguridade Units.

- ✓ Internal Regulations of Board and Committees: regulates the functioning of Caixa Seguridade's Councils and Committees in accordance with its Bylaws.
- ✓ Monitoring of Results of Invested Companies: aims to promote monitoring of the accounting results achieved by associated and jointly controlled companies belonging to Caixa Seguridade.
- ✓ Contracting of Goods and Services: regulates the contracting process for the acquisition of goods and provision of services that meet the needs of Caixa Seguridade.
- ✓ Constitution, Acquisition, Merger, Incorporation, Sale and Change of Corporate Interest: establishes guidelines and procedures for Caixa Seguridade's analysis and decision on constitution, merger, acquisition, incorporation, sale and change of corporate interest, including through the execution of Commercial Agreements and other forms of strategic partnerships.
- ✓ Monitoring of Caixa Seguridade Participations: establishes guidelines and procedures to monitor privately held companies in which Caixa Seguridade holds a shareholding, as well as a flow structure to support the decision-making process of Caixa Seguridade's nominees in the Governance Bodies of the Affiliates.
- ✓ Process for Appointing Administrators, Advisors and Members of the Audit Committee of Caixa Seguridade Affiliates: regulates the process for appointing administrators, advisors and members of the Audit Committee and the Financial Advisory Council of Caixa Seguridade subsidiaries.
- ✓ Training Program for Administrators, Fiscal Councilors and Committee Members: guides the operation of the Training Program for Administrators, Supervisory Board members and Members of Statutory Committees of Caixa Seguridade in training solutions, when the need is identified or considering the performance evaluation process.
- ✓ Assessment, Monitoring and Reporting on Risk Management, Internal Controls and Compliance of Affiliates: establishes the evaluation, monitoring and reporting process from the perspective of risk management, internal controls and Compliance of Caixa Seguridade Affiliates.
- ✓ Classification and Treatment of Information: defines the criteria for the appropriate classification and treatment of information in Caixa Seguridade, according to the degree of secrecy, regardless of the medium, support or form in which it is stored, transmitted or transported.
- ✓ Treatment of Information and Amounts Received from Affiliates as a result of Access to the Caixa Counter for the Sale of Security Products: details the operational procedures relating to information on payments and fees made by Partner Institutions.
- ✓ Caixa Seguridade Standards – General Rule: publishes normative, standardized and qualified guidelines, so that the Target Audience can comply with Caixa Seguridade standards when carrying out their tasks and responsibilities.

- ✓ Channel Management and Complaint Treatment: defines the guidelines for the management and treatment of manifestations that contain suggestions, complaints, compliments and denunciations with signs of irregular facts or illicit acts related to the conduct of Statutory Members, Employees and Collaborators, received through the reporting channel, in order to mitigate risks and strengthen the culture of integrity.
- ✓ Compliance Management System: Guides employees, Managers and Statutory Members to comply with the routines and activities that make up the Compliance Management System regarding the execution, monitoring and evaluation of Compliance processes and activities in the Company, with the purpose of ensuring compliance with internal and external regulations.

1.6 Internal Audit

Decree No. 8,945/2016, which regulates, within the scope of the Union, the Law on State-Owned Companies (Law No. 13,303/2016), establishes a series of transparency and governance mechanisms to be observed by public companies, mixed-capital companies and their subsidiaries, which includes the activities and obligations of internal auditing.

Internal Audit's activity is regulated by CGU Normative Instruction No. 03/2017, which approved the Technical Reference for the Governmental Internal Audit Activity of the Federal Executive Branch, and by CMN Resolution No. 4,588/2017, which regulates internal audit activities in financial institutions. authorized to operate by the Central Bank of Brazil.

In 2022, the Internal Audit Regulation was approved by the Board of Directors of Caixa Seguridade, which defines the mission, vision and principles of Caixa Seguridade's Internal Audit, its independence, responsibilities, regulation, scope of work, positioning in the company structure and the performance of the internal auditor, in compliance with current regulations, in particular the provisions of Decree 3,591/2001 and IN CGU 3/2017.

Internal Audit, due to regulation and the nature of its activities, is subject to the guidelines and determinations of federal control and inspection bodies.

Among the activities carried out by Internal Audit, we highlight:

- Preparation and implementation of the internal audit program;
- Execution of internal audit on administrative acts and facts related to processes, businesses, products and services;
- Proposing solutions to minimize risks;
- Assessment of the effectiveness of internal controls;
- Proposing improvements to operational procedures and internal controls as a result of audit work;
- Control of the regularization of pending issues arising from audit work.

2 RISK MANAGEMENT AND INTERNAL CONTROLS

Caixa Seguridade recognizes that the assumption and management of risks are integral and fundamental parts of its activities and that rigorous and comprehensive risk management produces stability in financial results and contributes to the generation of value and the consolidation of the image of a solid company, integrated, profitable, socially responsible and efficient.

The Risk Management Model was structured based on the best practices of the Enterprise Risk Management Framework – ERM, issued by the Committee of Sponsoring Organization of the Treadway Commission - COSO 2017 and has a set of institutional instruments that aim to ensure the achievement of objectives strategic, supporting decision-making, helping to improve processes and mitigating the occurrence of possible deviations through Compliance and integrity management, risks and internal controls of the Company's various processes.

Among the instruments of this Model, the following stand out:

- ✓ Risk Appetite Statement (RAS)
- ✓ Internal Controls Policy;
- ✓ Compliance and Integrity Policy;
- ✓ Conflict of Interest Policy
- ✓ Risk Management Policy;
- ✓ Information Security Policy;
- ✓ Privacy and Personal Data Protection Policy;
- ✓ Standard for the Treatment and Classification of Information in compliance with the Access to Information Law;
- ✓ Application of the Business Impact Analysis (BIA) Methodology – Supports the definition of Caixa Seguridade's critical activities;
- ✓ Crisis Management and Business Continuity Strategy with the Contingency Plan for identified critical activities;
- ✓ Methodology for evaluating, monitoring and reporting the Affiliates;
- ✓ Compliance Activities – Monitoring legislation and regulatory standards, among others;

The Company adopts a three-line model for risk management and internal controls, as detailed below:

- ✓ **First line:** identifies, evaluates and controls risks, comprising operational and internal controls. Managers who own business risks are responsible for managing them and implementing corrective measures in deficient processes and controls;
- ✓ **Second line:** comprises the Company's risk management and internal controls area, which is responsible for monitoring and contributing to the implementation of effective risk management practices. The Compliance risk monitoring function is also the responsibility of the second line;
- ✓ **Third line:** is carried out by internal audit, responsible for providing senior management, the Audit Committee and the Supervisory Board with an objective and independent assessment of the effectiveness of internal controls, risk management and governance.

The identification, evaluation and decision-making regarding the mitigation, transfer or assumption of risk are effectively carried out by the manager responsible for the process and, when it comes to relevant exposure, the decision is made by the competent governance body. The activities of the risk manager, Compliance and internal controls are segregated from the activities of process managers in order to preserve the impartiality of the work performed and avoid conflicts of interest.

In this way, the Risk Management Model adopted encourages joint action between the managers responsible for the processes and the risk manager, Compliance and internal controls, preserving the necessary independence between the three lines.

The principles of prudence, transparency, dynamicity, effectiveness, segregation of activities, prior validation, economy, legitimacy and integration are adopted by the Company's Risk Management Model, which considers four groups of risks of different natures in its activities and operations:

- ✓ **Strategic Risks:** composed of **Contagion, Strategy, Socio-environmental** and **Reputation or Image Risks**.
- ✓ **Financial Risks:** composed of **Capital, Credit, Liquidity** and **Market Risks**.
- ✓ **Operational Risks:** formed by **Operational Risk** itself and **Cyber Risk**.
- ✓ **Compliance Risks:** composed of Compliance Risk, Integrity Risk and Legal Risk.

Regarding the risks inherent to companies in which the Company holds a stake and which may affect Caixa Seguridade's business or results, despite the companies themselves having their own Risk Management, Internal Controls and Compliance (2nd line) and Internal Audit structure (3rd line) with its own corporate governance structure and periodic independent audit, monitoring and evaluation are carried out on an ongoing basis, as set out in the Company's Risk Management Policy. Furthermore, through the corporate governance of the Affiliates, companies are guided to adopt good practices in risk management, Compliance and internal controls.

The relevant risks identified in relation to the Affiliates are periodically reported to the collegial Board of Directors, the Administration and Supervisory Board and the Audit Committee.

Regarding the processing of information, the Company has mechanisms that regulate the care that must be observed when processing internal information, or in the Company's custody, in order to mitigate the risks inherent to this process.

Information Security seeks to protect information from various types of threats to minimize damage, maximize return on investment and ensure business continuity.

The Information Security Policy is aimed at all administrators, employees, collaborators and other users of Caixa Seguridade information, or in its custody, and guides the adoption of practices that guarantee the protection of information under its management against alteration, unauthorized destruction, disclosure and copying, whether accidental or intentional.).

With the entry into force of the General Data Protection Law (Law 13,709/2018) in 2020, Caixa Seguridade established the Privacy and Personal Data Protection Policy. Its objective is the processing and use of data as assets of Caixa Seguridade, based on 07 principles: purpose, necessity, quality of personal data, transparency, adequacy, security and prevention, with specific guidelines for its scope, in addition to the definition of responsibilities.

Furthermore, Caixa Seguridade is subject to the rules of the Securities and Exchange Commission (CVM), which provide guidelines for the appropriate treatment of information and penalties for cases of non-compliance, which can affect individuals within the company, such as its administrators and those responsible for protecting privileged information, among others.

Since it has shares traded on the organized OTC market, it follows the rules recommended by the Novo Mercado da Brasil, Bolsa e Balcão [B]3, as set out in its Statute, and seeks to be aligned with good market practices in matters of governance.⁹¹⁰

The Company also has three other rules that regulate information and communication in the company: 1) the Spokesperson Policy, which defines principles, guidelines and responsibilities for communications carried out on behalf of the Company; 2) the Securities Trading and Disclosure of Material Facts Policy, which provides guidance to prevent the misuse of privileged information in the securities market; and 3) Information Classification and Treatment Standard, which imposes the obligation to classify all Caixa Seguridade information and defines rules, responsibilities and penalties applicable in cases of non-compliance with the standard and is in compliance with the Access to Information Law (Law no. 12,527/2011).

With regard to the disclosure of information, Caixa Seguridade provides interested parties with pertinent information related to its operation, in compliance with legal and regulatory requirements, observing information security.

The Company understands that efforts towards market efficiency must aim to ensure that competition between stakeholders for better returns takes place through the analysis and interpretation of the information disclosed and never through privileged access to the same information.

In this sense, the disclosure of relevant acts or facts occurs whenever necessary. Its disclosure aims to ensure that stakeholders have the availability, in a timely, efficient and reasonable manner, of information that may influence their investment decisions, ensuring the best possible symmetry in the dissemination of information. In this way, we seek to avoid the improper use of privileged information in the securities market by people who have access to it, for their own benefit or that of third parties, to the detriment of investors in general, the market and the Company itself.

All users of Caixa Seguridade information sign a Confidentiality Agreement where they undertake to observe the strictest secrecy regarding any and all acts, facts and/or confidential information entrusted to them or to which they have access as a result of their professional activities and are aware of the possible penalties due to inadequate processing of information. Any incident must be promptly reported to the Risk, Compliance and Internal Controls area.

The Company understands that compliance with Information Security and Data Privacy in its activities and processes allows it to reduce the risk of losses and is of fundamental importance to achieve the objectives defined by Senior Management. Therefore, it is the duty of all advisors, managers and employees of Caixa Seguridade, or those appointed by it to form its Affiliates, to

According to Article 1, sole paragraph of the Bylaws of Caixa Seguridade Participações S.A.⁹

In 2019, Caixa Seguridade achieved the Level 1 seal of the State-Owned Companies Governance Indicator – IG-SEST, which is a continuous monitoring instrument developed by the Secretariat for Coordination and Governance of State-Owned Companies –SEST, of the Ministry of Economy, with the aim of evaluate compliance with the requirements of Law No. 13,303/2016 and guidelines established in the Resolutions of the Interministerial Commission for Corporate Governance and Administration of Corporate Interests of the Union – CGPAR, which seeks to implement in state-owned companies the best market practices and a higher level of excellence in corporate governance..¹⁰

preserve the availability, integrity, confidentiality and authenticity of information and ensure that access is obtained only by authorized people.

Finally, the Reference Form, the financial statements and the minutes of collegiate meetings are disclosed, when relevant, within the scope of information to the market. The integrity of these instruments is verified both by those responsible for the risks inherent to each process and by other lines, independent audit, Supervisory Board and Audit Committee.

Risk Management is essential for the Company to achieve its objectives, meet the requirements of Interested Parties (stakeholders), remain profitable and with a positive perception of the high degree of responsibility of its employees, statutory members and nominees, which contributes with its perpetuity. Mitigation, control, monitoring and disclosure of risks lead to greater confidence and reduce the likelihood of losses and exposure to financial catastrophes that could harm the Company.

3 COMPLIANCE AND INTEGRITY PROCEDURES

3.1 Compliance Management System

Caixa Seguridade implemented the Compliance Management System (SGC), which organizes the set of elements necessary to achieve the Company's objectives, focusing on compliance, acculturation, identification and mitigation of risks.

The implementation of the Compliance Management System follows the guidelines provided mainly in ABNT NBR ISO 37301:2021 Compliance Management Systems – Requirements with guidelines for use, published on June 3, 2021 by the International Organization for Standardization (from the original in English: ISO 37301:2021 - *Compliance Management Systems – Requirements with guidance for use - International Organization for Standardization*).

From this perspective, ISO 37301 states that “Compliance is a continuous process and the result of an organization that fulfills its obligations. Compliance becomes sustainable when it is incorporated into the organization’s culture, behavior and attitude of the people who work for it.” While still maintaining its independence, it is appropriate for Compliance management to be integrated with the organization's other management processes, its requirements and operational procedures.

Caixa Seguridade, with the aim of strengthening everyone's commitment to Integrity and the culture of Compliance, consolidated the Compliance Management System into its own regulations always guided by ethical conduct and established values, ensuring the Company's reputation.

The Compliance Management System was established considering the context of Caixa Seguridade, the business model, the Strategic Compliance Planning, the regulatory scenario, the internal structure, the policies, the processes, the risk management and the organizational culture.

The structuring of the Company's Compliance Management System aims to meet the requirements of ISO 37.301. In this way, the Strategic Compliance Planning (PEC) was prepared with the aim of solidifying ethical and moral practices, strengthening values, fairness in relationships and the excellence of procedures aligned with Caixa Seguridade's Institutional Strategic Planning (PEI 2023-2027).

3.2 Code of Ethics and Conduct, Policies and Internal Standards

Conduct that goes against the provisions of this Program must be immediately reported to the Risks, Compliance and Internal Controls area and can be reported by any interested party. To this end, the Company has a specific channel for receiving internal and external complaints, which is published and available on the Company's website, guaranteeing confidentiality and protection of the complainant against any form of reprisal, intimidation or discrimination.

Any reports received, with signs of materiality, are forwarded to the relevant bodies for continued investigation and accountability, if applicable. Those responsible have instruments to take appropriate and timely measures and to stop illegal acts, as well as to repair damages resulting from acts that do not comply with the laws, regulations, codes, policies, standards and procedures that govern the Company's operations.

Likewise, any reports of violations of the rules of conduct committed by Statutory Members have a rite of submission for consideration by the Board of Directors.

Failure to comply with the rules of conduct is subject to the penalties stipulated in disciplinary rules shared with the controlling company CAIXA, which may result in a warning, suspension and termination of the employment contract, as well as the signing of a Conduct Adjustment Term and possible liability provided for by law.

In addition, employees, statutory members and nominees adhere to the Code of Ethics and Conduct, the Risk Management, Internal Controls, Compliance and Integrity, Conflict of Interest Prevention, Privacy and Protection of Personal Data, Prevention of Money Laundering and Terrorist Financing and Information Security, through the signing of an Acknowledgment and Commitment Term.

3.3 Compliance Matrix and Calendar

Caixa Seguridade has a **Compliance Matrix** that consolidates the regulations applicable to the Company, allowing monitoring and compliance with regulatory requirements.

The **Compliance Calendar** (Legal Obligations) has information on regulations, deadlines, penalties and compliance regarding compliance with the obligation and aims to help monitor the 1st line (process managers) and the 2nd line, in compliance with regulatory demands, helping to mitigate of regulatory risk.

The Compliance Matrix and Calendar are constantly updated, with analysis of regulations carried out periodically.

3.4 Compliance Identifications

Compliance identifications relate to new legislation, standards and other regulations arising from the regulatory environment in which the Company operates.

In this sense, the process of operationalizing Compliance identifications includes monitoring and monitoring the regulatory environment in order to verify new rules that may impact Caixa Seguridade and Subsidiaries. When impacts are identified, the responsible Units are urged to define actions for adaptation and compliance, keeping the Company in legal and regulatory compliance.

3.5 Monitoring and monitoring of Internal Compliance Obligations

Internal Compliance Obligations are those internal obligations of the Company, that is, those established in internal Policies and regulations. A mapping of such obligations is carried out annually based on the analysis of the Company's internal policies and standards and evidence of compliance.

First-line controls are maintained over related processes, to ensure their full compliance, aiming for the Company's compliance with standards.

3.6 Accounting Records and Controls

In relation to accounting records and controls, the Company uses accounting practices adopted in Brazil, especially Law No. 6,404/76, the Technical Pronouncements of the Accounting Pronouncements Committee (CPC), when endorsed by the Securities and Exchange Commission (CVM), and the International Financial Reporting Standards (IFRS) issued by the IFRS Foundation.

Caixa Seguridade has an Accounting Management Unit responsible for accounting and financial statements in accordance with current legislation and national and international accounting practices applicable to the Company.

This Unit also observes the internal policies and standards for accounting for information originating from Managers of the Company's other processes, maintaining first-line controls throughout the accounting cycle (receiving information, recording, consolidation and disclosure).

The financial reports and annual and interim financial statements produced are approved by Senior Management, reviewed by an Independent Audit, monitored by the Audit Committee

and receive an opinion from the Supervisory Board, in accordance with the Company's Bylaws and applicable legislation.

3.7 Integrity Due Diligence

Integrity Due Diligence aims to verify risk situations to which the Company may be exposed in its relationships with suppliers, partners and also counterparties in mergers, acquisitions, divestments or corporate restructuring processes.

This procedure verifies information regarding suitability, reputation, relationships with public agents and anti-corruption practices.

3.8 Hiring

The bidding, contracting and contract management processes are carried out in accordance with applicable legislation, and with the recommendations of control and supervisory bodies. The Company adhered to CAIXA's Tenders and Contracts Regulations, in accordance with art. 40 of Law No. 13,303/16 and follows the rules established by the controlling company in contracts for the acquisition of goods and services.

An assessment is carried out prior to hiring suppliers and service providers to check for possible risks that could harm the Company's interests.

Due diligence activity is carried out for all of the Company's contracts, the dossier of which is structured by the Risks, Compliance and Internal Controls area, through a contracted due diligence intelligence technological solution.

The solution allows you to understand the situation of a person or company through a greater amount of information with the aim of strengthening the decision-making process, reducing risks and increasing the chances of correct choices involved.

In addition, Caixa Seguridade uses contractual instruments that include clauses aimed at ensuring the commitment of suppliers, service providers and partners to the adoption of mechanisms to prevent corruption and other illicit acts.

All Caixa Seguridade contracts must be authorized according to the authority defined in the Company's Authority Regime, which determines that, above a certain value, contracts must be preceded by a legal opinion.

Employees must be aware of the Code of Ethics and Conduct and the reporting channel, with specific guidelines for the Company's hiring area in the Compliance and Integrity Policy.

The hiring processes are periodically subjected to compliance tests and monitoring by the Company's Board, Audit Committee and Supervisory Board, and for the latter, quarterly information is presented on direct hiring due to non-requirement of bidding.

3.9 Transformation, Mergers, Incorporation, Spin-Off and Corporate Interests

As provided for in the Company's Bylaws, the General Meeting is responsible for deliberating on proposals for the transformation, merger, incorporation and spin-off of the Company.

In this way, in order to better support the Assembly's decision, Caixa Seguridade's Compliance and Integrity Policy provides for the obligation to carry out due diligence for the execution of strategic investments by the Company, in order to identify possible irregularities or illicit acts or the existence of vulnerabilities in the legal entities involved.¹¹

Carrying out due diligence involves, as a general rule, specialized technical advisory services whose contractors cannot have interests in the companies to be evaluated. To select the company, a published administrative process is carried out with the possibility of participation by everyone who meets the established conditions.

The Company has operational standards for the constitution, acquisition, merger, incorporation, sale and change of corporate interest, which establishes guidelines and procedures for the Company's analysis and decision, in addition to defining responsibilities.

In relation to corporate interests, Caixa Seguridade, represented by the Governance and Risks Department, guides the appointed advisors to work in their Affiliates, adopting procedures and monitoring to prevent and inhibit the practice of acts of corruption and other illicit acts.

3.10 Transactions with Related Parties

The Company has specific principles and guidelines that guide decision-making processes related to transactions with related parties, through its own Related Party Transaction Policy and operational standard.

The operational standard guides the procedures to be observed by the Company, employees, administrators and shareholders in transactions with related parties, in order to ensure competitiveness, commutativity, conformity, equity and transparency in transactions and avoid situations that could constitute a conflict of interest.

In order to reinforce its Governance structure and guarantee the applicability and effectiveness of the Policy, the Statutory Related Party Transactions Committee (CTPR), linked directly to the Board of Directors, analyzes and gives its opinion prior to approval by the Board of Directors and the Board of Directors, regarding the execution and contractual review of all Transactions with Related Parties, ensuring the maintenance of transparency in relationships.

The adequacy of transactions with related parties carried out by the Company and their respective disclosures, as determined by Law 13,303/2016, is also evaluated and monitored by the Audit Committee, together with the Related Party Transactions Committee, with the Company's Management and with the internal audit area.

Term in English that means the process of investigating and auditing company information, essential to confirm the data made available to potential commercial partners, with clear variations depending on the nature of the business and the size of the company but which, basically, refers to issues financial, accounting and tax aspects, in addition to corporate, labor, environmental, real estate, intellectual property and technological legal aspects.¹¹

3.11 People, Eligibility, Succession and Remuneration Committee

Caixa Seguridade has a Statutory People, Eligibility, Succession and Remuneration Committee which, among its main responsibilities, must assist shareholders in the appointment of administrators and supervisory board members of Caixa Seguridade; assist the Board of Directors in electing directors and members of Statutory Committees; assist the Board in appointing administrators, fiscal councilors and members of Audit Committees of the participating companies; and advise shareholders, the Board of Directors and the Board of Executive Officers in establishing requirements for nominations to the Company's and its affiliated bodies; It is composed of 3 (three) members elected and dismissed by the Board of Directors.

Therefore, the Committee issues an opinion on the fulfillment of the requirements and the absence of prohibitions for the elections of administrators, supervisory board members, directors, members of the Statutory Committees and members of the Audit Committees of the participating companies and verifies the compliance of the evaluation process and the training applied to these members.

3.12 Audit Committee

The Audit Committee is a collegiate body, with permanent operation, which reports to the Board of Directors, with independence in relation to other bodies, and its purpose is to advise the aforementioned Board regarding the exercise of its audit, supervision and inspection functions.

Composed of 4 (four) effective members, mostly independent, elected by the Board of Directors and observing the requirements and prohibitions imposed by current legislation, Bylaws and other applicable rules.

4 COMMUNICATION, TRAINING AND MONITORING

4.1 Communication Plan

Caixa Seguridade understands that the implementation of communication and training strategies is essential for creating an ethical and honest culture, in addition to being essential for the Program to be effective.

Therefore, the Company has a Compliance and Integrity Program Communication Plan, which formalizes the Program's communication planning between the Company itself and its internal public.

It is a management instrument whose objective is to translate and disseminate the Program and the instruments that comprise it into a set of coherent, orderly and participatory actions.

The Plan is structured into internal communication actions, and includes indicators and monitoring with defined frequency and forms, which include:

- ✓ Electronic communications (email messages containing reminders, videos, news and notices);
- ✓ Presentations of related topics at meetings of the Board of Directors, Board of Directors, Audit Committee and Supervisory Board;

- ✓ Awareness actions for the entire Company;
- ✓ Booklets;
- ✓ Reports on related topics;
- ✓ Training on Ethics and Conduct;
- ✓ Other types of training considered necessary.

4.2 Communication Channels

Access to reliable, complete and timely information is vital for making decisions that affect the Company's activities. To achieve this, the communication flow adopted allows information to flow in all directions and strategic directions from Senior Management reach all employees. Furthermore, external information relevant to work processes is also considered and shared in a timely manner.

Different internal communication instruments are used to disseminate knowledge about Compliance, integrity and risk management, such as emails, lectures, intranet news, dialogue circles, training videos and awareness actions.

All internal policies, codes and standards are available to the internal public via the intranet. For information intended for the external public, publications are made on the Company's website, on the internet, such as the Code of Ethics and Conduct, the Corporate Participation Policy, the Risk Management Policy, the Compliance and Integrity Policy and the Policy Securities Trading and Disclosure of Material Facts, among others.¹²

The Company's website has a channel for communicating with data subjects to resolve doubts, receive complaints and clarifications and adopt measures regarding the privacy of personal data and compliance with the General Data Protection Law (LGPD).

The Company's website also has a specific link to the Reporting Channel, through which questions can also be sent about Compliance and integrity rules and procedures, suggestions for improvements and the formalization of reports of harassment, illicit and unethical acts.

In this way, our Reporting Channel allows employees, statutory members, collaborators and society in general to give a voice, whose commitment is the timely termination of irregular conduct.

The Channel is the instrument that allows the Company to receive suggestions, complaints, compliments and information about illegality, fraud and issues related to corruption, inappropriate conduct such as harassment, conflict of interest, nepotism and other situations.

4.3 Training and continuing education plan

Caixa Seguridade complies with the provisions of Law No. 13,303/2016 and its regulations regarding mandatory training. The legislation provides for training to be carried out, at least annually, on the Code of Ethics and Conduct for Employees and Administrators.

¹² www.caixaseguridade.com.br

With specific regard to Administrators and members of the Supervisory Board, the legislation indicates the obligation to carry out specific training, among which the following stand out:

- Internal controls;
- Code of Conduct;
- Introduction of corporate legislation and capital markets;
- Corporate Issues in Law 13,303;
- Disclosure of Information;
- Corporate governance
- Law No. 12,846 (anti-corruption law); It is
- Developments in Corporate Legislation and Capital Markets
- Other topics related to the activities of the state-owned company.

The Company offers periodic training to its Administrators and employees related to ethics and corruption, conducted by professionals with experience in the subject. In these forums, specific doubts about the procedures are clarified, which contributes to everyone's contribution to maintaining an intact environment in the Company's day-to-day activities. In addition, annual training is also provided to Administrators on the Company's Risk Management Policy.

In the search for training, both Administrators and employees are invited to participate in courses, meetings, forums, dialogue circles or seminars on the topic, in addition to receiving periodic reports on risks, Compliance, internal controls and information security. Such reports aim to increase contact between employees and Administrators with matters relating to the topics in an objective and didactic way.

In order to better manage qualification and training actions, the Company has an annual communication plan containing the actions and implementation schedule so that the learning process for Administrators, advisors, committee members and employees is continuous and permanent.

4.4 Monitoring

The continuous evaluation of the Compliance and Integrity Program allows the Company to verify its effectiveness, whether risks are being mitigated as planned, in addition to enabling the identification of new risks and responding in a timely manner through corrections and improvements.

The Governance and Risk Department, through the Risk, Compliance and Internal Control Superintendence, exercises the role of supervision of the Program, acting as an interlocutor and disseminating the culture of Compliance and integrity. The aforementioned Board/Superintendent issues periodic Reports and Reports to the Company's governance bodies (Collegiate Board, Board of Directors, Supervisory Board and Audit Committee), in addition to providing accounts on the Communication Plan of the Compliance and Integrity Program so that Senior Management monitors the Program's evolution.

The aforementioned Board/Superintendent is also responsible for implementing integrity and anti-corruption procedures, which achieve the identification, assessment and monitoring of integrity risks.

In addition to the periodic sending of reports and reports, there is also monitoring of the collection and analysis of information that can be obtained through the reporting channel or other channel that may be identified.

As already demonstrated in the 2nd Pillar of the Program, Risk Management and Internal Control, Caixa Seguridade observes the three-line model in its management, with a relevant role for the Risk, Compliance and Internal Controls area as the 2nd line and Internal Audit as the 3rd line.

It is worth highlighting the differences in the performance of Internal Audit and the area responsible for the Company's Compliance and Integrity through the explanation contained in the "Compliance Function" Booklet prepared by the Brazilian Association of International Banks (ABBI) in conjunction with the Brazilian Federation of Banks (FEBRABAN):

"While Internal Audit carries out its work in a random and temporal manner, through sampling to ensure compliance with the standards and processes established by Senior Management, Compliance carries out such activities routinely and permanently, monitoring them to ensure, corporate and timely manner, that the various units of the institution are respecting the rules applicable to each business, that is, complying with the internal rules and processes for preventing and controlling the risks involved in each activity. Compliance is an arm of regulatory bodies alongside management with regard to preserving a good image and reputation and standards and controls in the pursuit of compliance."

If a failure is identified in the process regarding compliance with rules or that makes it difficult to achieve the expected results, the National Superintendence of Risks, Compliance and Internal Controls issues recommendations and monitors the internal controls of the process management area, aiming to adopt the necessary measures to resolve the problems found.

This Program is reviewed at least every 3 years and whenever necessary considering the Company's external and internal context.

5 RESPONSIBILITIES

5.1 Individual

It is the individual responsibility of each Director, Director, committee member, employee, collaborator and nominee by Caixa Seguridade in companies in which they have a stake, to act in accordance with all applicable external and internal rules, especially laws, regulations, policies and standards internal affairs of each Company, as well as adopting, in all situations, ethical and honest conduct.

5.2 Managers

Each Manager is responsible for ensuring the engagement and commitment of their teams in complying with the legal and ethical obligations associated with the activities.

Furthermore, they must lead by example, ensuring that the culture of integrity is strengthened by reaching all of the Company's employees and collaborators.

Leadership support also involves awareness and communication, internally and externally, about Compliance Policies, this program and documents related to the Compliance Management System.

5.3 Senior Management

Senior Management plays a fundamental role in disseminating actions related to Compliance and Integrity and its example of conduct provides a favorable environment to foster a culture of Compliance.

It must structure the Compliance area independently and autonomously from other areas of the institution, designating those responsible for the Compliance function and providing them with an adequate administrative support structure, in order to ensure the functionality of Compliance management.

Furthermore, it must provide an internal control system appropriate to the risk of its business, in order to allow operational security and greater reliability for employees, partners, investors, customers and interested parties.

Final considerations

The implementation of routines that enable the management and monitoring of Compliance and integrity supports the Company's administration and good health, reduces costs, in addition to mitigating risks.

Caixa Seguridade's Compliance and Integrity Program, therefore, seeks to mitigate risks, especially the risk to integrity, through the mobilization and active participation of the Company's Board Members, Managers and other employees and collaborators.

The Company believes that the effectiveness of the Program is based on the dissemination of the culture of Compliance and integrity and, for this reason, it promotes acculturation actions through the Communication Plan of the Compliance and Integrity Program.

It is expected that with the set of measures adopted, Caixa Seguridade will ensure the results expected by the Interested Parties (stakeholders) and that the Program will allow the strengthening and improvement of the governance structure, risk management, controls, Compliance and other integrity procedures .

Everyone has a fundamental role in this process. Caixa Seguridade trusts that this Program strengthens guidance for responsible, ethical and honest conduct on the part of its Advisors, Directors, committee members, employees, collaborators and nominees, regardless of the circumstances.

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