Sectorial Code of Ethical Conduct

of Bradseg Participações S.A. and its subsidiaries



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Message

Message from Leadership



Message from Leadership



By means of Bradseg's Sectorial Code of Ethical Conduct, the main driver of conduct for managers, employees, interns, apprentices, employees and business partners, we are committed to high standards of integrity and ethics in all our activities, aiming at the sustainable devel we continuously reinforce our commitment to environmental, social and governance aspects, which are essential to promote a fairer and more equitable future.

We value trust, transparency and good faith in our relationships, both internal and external, promoting dignity and diversity. We are committed to fair and transparent business practices, rejecting any form of business conduct which is not in line with our values.

All of us, without exception, are responsible for following and enforcing this Code in our daily activities.

Focusing on the customer and innovation, we offer a wide range of solutions in various segments. We will continue to promote a culture of integrity and ethics, thus ensuring the reputation and continuity of our business at Bradseg.

We will continue to foster a culture based on integrity and ethical values, ensuring Bradseg's reputation and longevity are preserved.

May each of us be a multiplier agent of the integral and ethical principles permeating our Insurance Group.

Board Of Directors

Introduction



Introduction

Bradseg Participações S.A. and its subsidiaries, herein referred to as “Bradseg”, constantly seek the highest standards of integrity and ethical behavior and are committed to maintaining, with their various internal and external stakeholders, a relationship based on trust, transparency and good faith.

This Sectorial Code of Ethical Conduct of Bradseg Participações S.A. and its subsidiaries is the result of our constant commitment to promote and define the responsibilities and posture to guide the performance of our professionals. As for its fundamental role in strengthening culture, this Code integrates best practices, reaffirming, ensuring and reinforcing reputation and image, always focusing on business continuity and commitment to sustainability, we seek to ensure the integrity of actions. We do not condone morally objectionable forms of business behavior, we promote the fight against unfair commercial practices, as well as the abuse of power in production and consumption relations. We are all responsible for complying with and enforcing this Sector Code of Ethical Conduct.



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Bradseg

Bradseg



Bradseg

With a multiline performance differentiates us in the market, the solutions we offer to families and companies, of the most diverse profiles and needs, ensuring the peace of mind at each stage of our customers' life cycle.

The focus on the customer and the constant search for innovation mark our trajectory and are reflected in our diversified portfolio. We are present in different segments, such as: clinical network, real estate services, health services, auto insurance, home insurance, health plan, dental plan, capitalization, life insurance and private pension plans, as well as in several lines of insurance of elementary branches aimed at companies.



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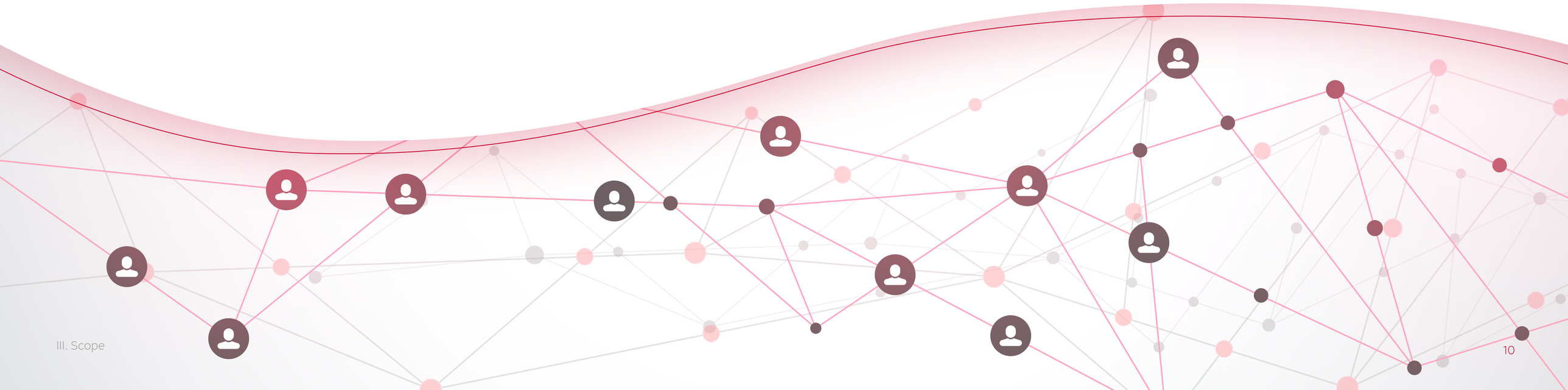
Scope

scope



Scope

This Sector Code of Ethical Conduct applies to all managers, employees, interns and apprentices, employees who work at Bradseg Participações S.A. and its subsidiaries. Employees and business partners who are rendering services on behalf of Bradseg or for Bradseg must also be responsible for monitoring compliance with and compliance with this Code by their respective employees and managers.



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Corporate Identity

Corporate Identity



Corporate Identity

1. **Purpose:** create opportunities to fulfill people and the sustainable development of companies and society.
2. **Mission:** be the best place for the insured to protect their life, their future, their health and their assets, the best place for brokers to produce and the best place for their employees to work.
3. **Vision:** be recognized as the largest, best and most efficient insurer in the country, with operations focused on sustainable development and a high standard of reliability and solidity of financial and equity protection.
4. **Values:** are the fundamental beliefs and the success factors serve as a guide to fulfill our purpose:

a. Customer as a reason for the existence of the company;
b. Ethics in all activities and relationships;
c. Transparency in the information required by the interested parties;
d. Belief in people's value and development capacity;
e. Respect for human being dignity and diversity; and
f. Socio-environmental responsibility, encouraging actions for sustainable development.



Corporate Identity

Additionally, our values as success factors in our business are:

a. Brand strength with a strong tradition in the financial, insurance, real estate and health services markets;
b. Solid culture and corporate governance with a focus on the continuity of the business associated with our commitment to sustainability;
c. One of the best distribution networks in the country, in terms of modernity and scope;
d. Wide portfolio of products, services and solutions for all sectors; and
e. High investments in technology.



Purpose

Purpose of the Sector Code of Ethical Conduct



Purpose

Raise the level of trust and solidarity among managers, employees, interns, apprentices, employees and business partners of Bradseg Participações S.A. and its subsidiaries, guiding them towards the best relationship with all our stakeholders. This Code has synergy with the provisions of the regulations on the Internal Control System, the Risk Management Structure and the Internal Audit activity, in addition to being a practical guide to personal and professional conduct with basic goals of:

a. Strengthen the ethical culture, raising trust, respect, transparency, truth and dignity in relationships;

b. Guide the conduct of all, promoting the adoption of high standards of integrity;

c. Prevent and manage conflicts of interest;

d. Be as a reference in the conduct of situations that may occur in daily life, this Code being a guide for evaluation and decision making, not limited to the content presented; and

e. Preserve Bradseg's reputation and image. In addition to Bradseg's Code of Ethical Conduct, the Code of Ethical Conduct of Bradesco Organization must also be respected and complied with.



Principles

Principles



Principles

1. Principle of Integrity

Integrity means upright and impartial conduct, honest and sincere, the willingness to make decisions based on what is right, without compromising ethical standards. It also means full respect for Law No. 12,846/13 (Anti-Corruption Law), the other laws of the countries where we operate and the rules governing the activities of our sector and Bradseg's internal standards, which provide on the direction to take and define concretely what is desired, allowed and prohibited.

Expected Conduct:

a) Know and respect the Sectorial Code of Ethical Conduct, acting in accordance with its provisions, inside and outside Bradseg, in addition to safeguarding personal conduct, in order to protect and strengthen the reputation and image of our institution. Refuse any type of advantages (monetary, material or immaterial, including gifts and hospitality), in any way, in its own favor or in favor of third parties, of anyone, which may represent an improper relationship, that is, in conflict with the precepts of this Code and other internal policies and standards regulating Bradseg's activities, or causing financial or image damage;

b) Use tangible (furniture, facilities, equipment, materials, etc.) and intangible resources (image, brand, reputation, business strategy, plans, information, concepts, technology, research, etc.) with professional goals, in accordance with internal and external standards, when applicable;

c) Communicate, in a complete and justified manner, to the immediate leadership or through the Reporting Channel, as described in Chapter XVII, any situation to be a violation of this Code; and

d) Not to practice or allow, under any circumstances, conduct constituting an attempt or practice of bribery or corruption, such as: to accept, obtain, finance, fund, grant, pay, promise, sponsor or authorize, directly or indirectly, any benefit, pecuniary or not, in any way, in its own favor or in favor of anyone, including, the concealment or dissimulation of the occurrence of such acts or hinder the investigation or inspection of these facts.

2. Principle of Transparency

Transparency means the disclosure to stakeholders, in a clear, objective and timely manner, Bradseg's information, whenever necessary, through open dialogue and complete clarifications.

Expected Conduct:

a. All information contained in the materials disclosed by Bradseg must be true and real, allowing the correct decision-making by all interested parties, as well as cooperating with supervisory authorities, not omitting or hindering the delivery of information necessary to evaluate the activities of internal controls, audits and regulators. We must also value the protection of Bradseg's information, its customers and its internal public, taking care that individual rights and confidentiality are protected, under the terms of the law;

b. Data protection, information and cyber security and privacy management are topics governed by specific corporate policies, directives and standards;

c. Keep all relevant plans and facts in absolute secrecy, ensuring the information disclosed to interested parties is made in time and in a symmetrical manner, duly approved according to the competent authorities. Any privileged information received in respect to the position or function must be safeguarded, strictly complying with the policies for disclosure and use of information on a material act or fact and trading of securities issued by Banco Bradesco S.A., and approved by it; and

d. Only authorized people must speak institutionally on behalf of Bradseg and deal in a timely manner with controversial news published by the press, as well as officially position themselves before the media, in accordance with internal policies and standards, preventing and mitigating any risk to our image and reputation.



3. . Principle of People Appreciation

It is to take care of the individual and human relations with equity, respect and transparency, contributing effectively to the development of people and to results. Discriminatory conduct and harassment are not allowed.

Expected Conduct:

a. Repudiate discrimination and abuse in all its forms, not practicing or admitting moral, sexual and/or sexual misconduct, whether in the workplace or in any relationship with the internal and external public, as well as any situation that may mean exploitation of people in distorted forms of work, such as forced or analogous activity to slavery or child labor. Never use or allow the use of the functions performed to obtain advantages, either directly or indirectly for yourself or for third parties. Reinforce the commitment, in the event of any situation mentioned, the facts are fully reported through our Complaints Channel;

Harassment is a conduct that causes psychological or physical embarrassment to the individual, and can be classified into two types: moral and sexual harassment.

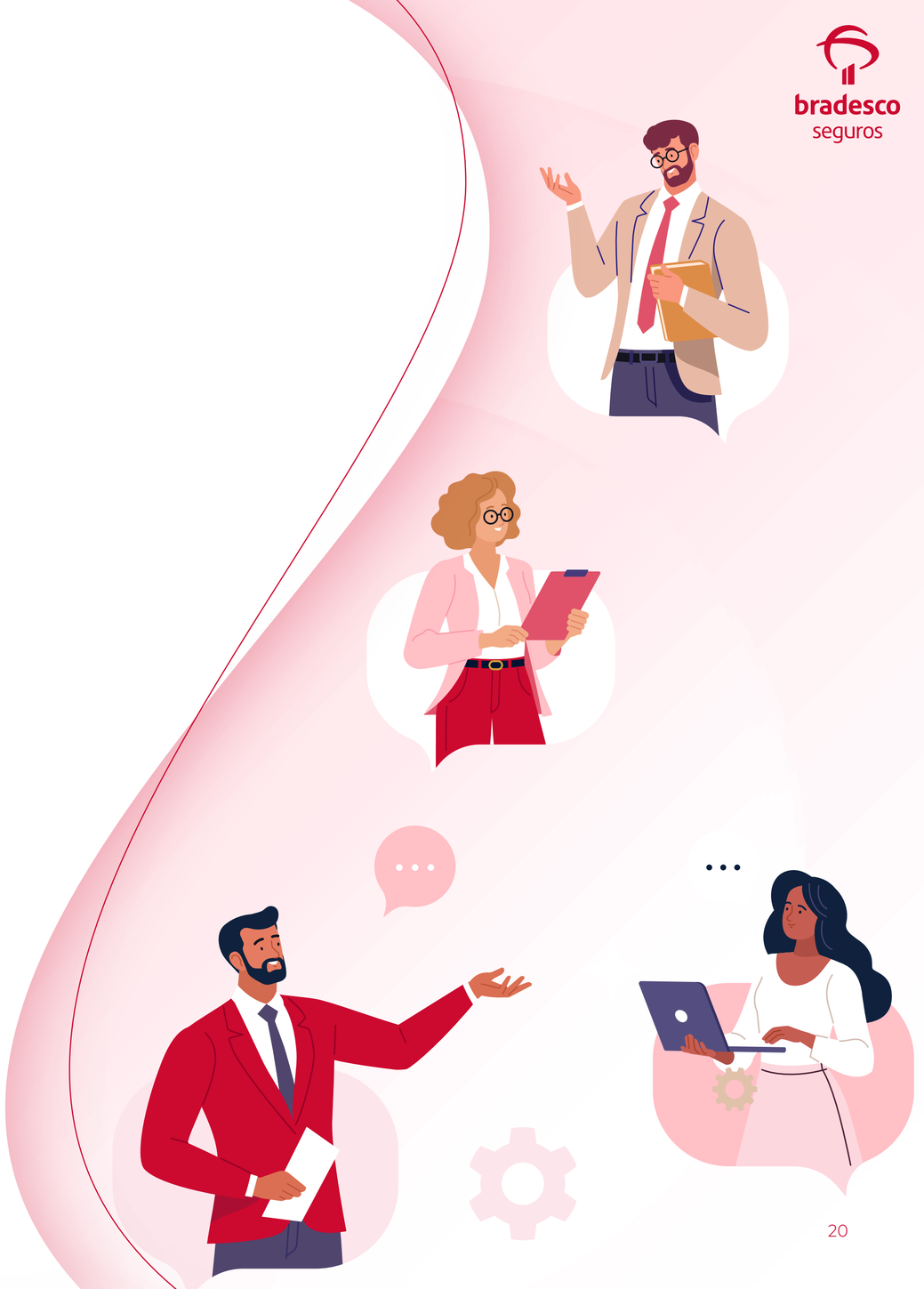
Moral harassment is the repetition of deliberate acts, gestures, words (spoken or written) or psychological behaviors which expose the victim to humiliating, uncomfortable and embarrassing situations, capable of offending their personality, dignity or psychological or physical integrity, aiming at excluding them from their activities or deteriorate the work environment. The habituality of the conduct and the intentionality (the discriminatory end) are essential for the characterization of moral harassment.

Sexual harassment is defined by the Penal Code, art. 216-A, as the act of “embarrassing someone, in order to obtain sexual advantage or favor, prevailing the agent of their condition of hierarchical superior or ascendancy inherent to the exercise of employment, position or function”. Sexual misconduct is defined by the Law, art. 215-A, as the practice against someone and without their consent, of libidinous acts (such as, but not limited to: touching, lewd kissing, voluptuous contacts, lewd contemplation, among others) whose purpose is their sexual satisfaction or a third party’s.

Principles

b. Stimulate cordiality and solidarity in the relationship between people. Solidarity, however, never implies connivance with acts in violation of Bradseg's ethical, legal or internal processes; and

c. To unconditionally prioritize the dignity and diversity of people, regardless of race, ethnicity, religion, age, sexual orientation and gender identity, guaranteeing equal opportunities for all, in a fair and free manner. Bradseg recognizes people for their performance, knowledge and skills (technical and behavioral), promoting respect for differences and the inclusion of all. We value the balance between professional and personal life and encourage the self-development and protagonism of our professionals, as well as the performance of voluntary actions to provide the dignified evolution of the human being.



Responsibilities

Responsibilities



Responsibilities

Bradseg values the development of its economic activities in line with social demands and issues and the conscious use of natural resources available in the environment. We take actions to meet the demands of the present, without compromising the opportunities of future generations. Through the combination of guidelines, governance, engagement and management of environmental, social and governance (ESG) aspects, we reinforce our contribution to sustainable development.

We seek to promote the exercise of citizens' rights and duties, providing access to insurance services and knowledge in a fair and equal manner, understanding their needs and interests, in order to leverage socioeconomic development and the well-being of society.

We recognize our role as a transforming agent of society, protecting people and their assets.

We value the conservation of the environment, through a rational management of natural resources (waste, energy and water), as well as the management of risks and opportunities for sustainability, including aspects related to climate change.

The search for continuous and sustainable evolution is based on high conduct and integrity standards, which guide our strategy for an increasingly integrated, customer-focused performance that generates benefits for society as a whole.



Responsibilities

1. Socio-environmental Responsibility

It means Bradseg's responsibility for the impacts of its decisions and activities on society and the environment. It implies corporate strategies, decisions and actions that:

- contribute to sustainable development, including the health and well-being of society;
- consider stakeholder's expectations;
- comply with the applicable legislation and are consistent with international standards;
- are integrated throughout the company and are practiced in its relations; and
- always seek sustainable innovation, including technology, based on the following pillars: intention, effort and result.

Expected Conduct:

a. Consider, in all decisions, the impacts they will bring to communities or the environment, aiming to preserve and/or recover them where possible. Always seek sustainable development in our direct and indirect activities or within our sphere of influence;

b. Support initiatives for the training and valuation of citizenship, eradication of poverty and reduction of social inequalities as a priority through education;

c. Promote environmental conservation, rationally use natural resources, especially non-renewable ones, avoiding any form of waste;

d. Comply with internal rules in order to reduce exposure to socio-environmental and climate risks; and

e. Consider the stakeholders' interests, even those who do not have an active role in the company's governance.

The entire company must dedicate itself to the expansion and improvement and innovation of products, services, solutions, systems and mechanisms to enable improvements in accessibility, social inclusion and insurance, democratizing access to our services and products.

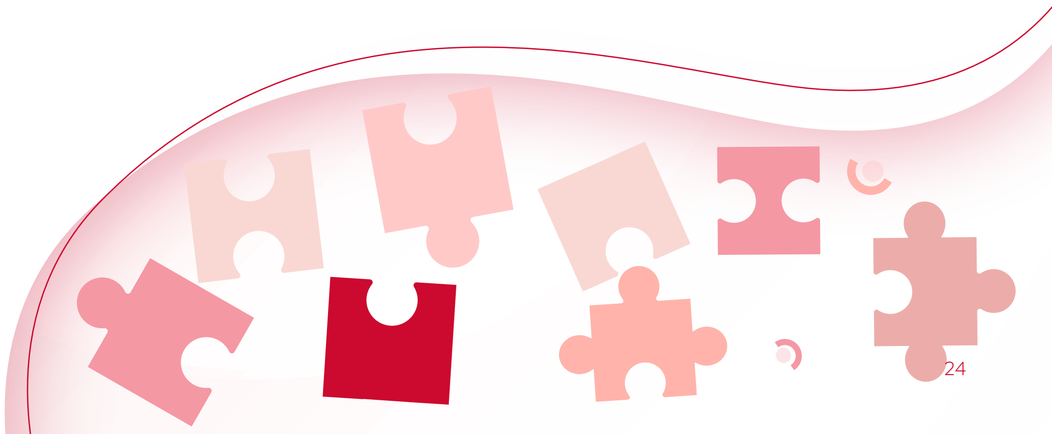
Responsibilities

2. The responsibility of Bradseg Participações S.A. and of its subsidiaries

Relationships between Bradseg and stakeholders are reciprocal and must be built on our purpose, values and principles.

Expected Conduct:

a. Encourage equity in our relationships and foster justice based on equal rights and opportunities and the impartial recognition of each other's rights;
b. Preserve the climate of trust and harmony in internal and external relations, seeking to avoid conflicts, disrespect or intimidation. Also fostering the maintenance of a safe and comfortable work environment;
c. Encourage and welcome relevant contributions, criticisms and/or suggestions aimed at improving Bradseg's processes and actions. Keep the media up to date, internally, allowing everyone to be informed about Bradseg's life, its goals, projects, plans, opportunities, campaigns or promotions;
d. Respect the privacy and keep the confidentiality of the transactions, data and information of Bradseg, our professionals and other interested parties to which we have access, having the commitment to protect and treat them in order to guarantee their integrity, confidentiality and availability. Confidentiality must be respected by all, even after Bradseg's dismissal; and
e. Comply with existing laws and regulations governing the activities of our industry and Bradseg's internal rules, which deal with privacy and protection of personal data. The use of this data will be exclusively for the purpose(s) for which it is intended in view of the activities developed by Bradseg. Such observation implies the collection and use of personal and sensitive data, necessary for the legitimate, specific purposes, as well as keeping records and reports in strict compliance with applicable standards and good market practices, so that all information contained therein is complete and accurate.



3. Responsibility to the Organization

Everyone must be committed and actively collaborate with the improvement of Bradseg's economic and financial results, which depend on them for their sustainability and for the fulfillment of the social function of generating and distributing wealth.

Expected Conduct:

a. Know, practice and disseminate the principles and commitments, policies, standards and laws applicable to Bradseg, in order to combat unlawful and unethical acts, of any order. Not obtaining any personal advantage from business opportunities within the work environment which are clearly identified with the Bradseg's interests and has full primacy in its realization;

b. Undertake practices to strengthen Bradseg's credibility, reputation and good image, preserving the attributes built over decades of its existence and devote special attention and commitment in dealing with matters related to customers and users of our products and services, promptly clarifying their doubts and dealing with any complaints with mutual interest;

c. Dedicate ourselves to the expansion and improvement of our products and services, also stimulating partnerships aligned with our purpose and values, ensuring the protection of Bradseg's intellectual property rights, whether developed internally or not, and of third parties in our possession. This includes, without being exhaustive, all information, technologies, creations, programs, systems, projects, inventions, processes, strategies, plans and related materials, which are for the Bradseg's exclusive use and property;

d. Not to market, carry, facilitate to others or make use of narcotics or illicit substances on the premises and/or when at the service of Bradseg; and

e. Not to practice any type of gambling, in disagreement with current legislation.

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Relationships

Constructive Relationships



Relationships

A constructive relationship with the internal or external public is ensured when our decisions, strategies and actions are guided by ethics, integrity, transparency and commitment to disseminate the necessary information and are taken to serve as many stakeholders as possible, in a balanced and equitable manner, focusing on the long term, promoting the sustainable development of this entire value chain.

1. Customers and Products and Services Users

We are convinced the customers are our own reason for existing, as a consequence, all commitments made by us to them must be fully respected. In addition, we must ensure all information disclosed by us regarding the services and products we offer is clear and accurate and complies with applicable regulations and legislation. We must give clients extensive knowledge of the conditions and rules governing the respective products and services, as well as the implied risks, always respecting the trading rules. Our duty is to render service based on courtesy and promptness, effectiveness, timeliness, responsibility, diligence and transparency in the analysis of proposals, in the regulation and settlement of claims, in the granting of indemnities and benefits and in the payment of assured rights, evidencing our respect for the interests of our customers. The company expects its customers to follow the same ethical standards of conduct under which it operates.



Relationships

Expected Conduct:

a. Have the customer as our inspiration and develop solutions so that they have a pleasant and complete experience, being the center of all our decisions and actions;

b. Value the service based on courtesy, effectiveness, timeliness, diligence and transparency in the operations carried out;

c. Maintain the confidentiality and integrity of the information received during business relationships, safeguarding the confidentiality, privacy and data protection of customers and users;

d. Meet the needs in a fair and equitable manner and be clear, aiming at quality in service, in order to ensure respect for the needs, interests, goals, profile of customers, their moment of life and their free choice. Quality in service must be ensured at all stages of relationship with customers and users; and

e. Pay special attention to vulnerable customers and ensure the adoption of necessary care, at all stages of the relationship, to ensure adequate treatment to this public.



2. Competition and Market

Competition carried out without abuse of power and in a fair manner is beneficial to consumers and essential for the proper operation of the market.

Expected Conduct:

a. Respect the initiatives of our competitors, rejecting the abuse of information or any form of espionage;

b. Repudiate any comment that may harm their image or reputation, or may contribute to the dissemination of untrue information;

c. Carry out the sending and/or receiving of information with the competition in accordance with the laws, policies, standards and principles established by the Organization;

d. Respect intellectual property which is not used without the competitors' proper authorization;

e. Do not allow retaliation arising from the loss of customers to the competition and do not offer undue advantages in bids, or in any situation;

f. Protect the Organization by not obtaining information from competitors through illicit means; and

g. Not contributing to the exchange of competitively sensitive information, which may compromise free competition.

To learn more about the topic, access the Competitive Compliance Program Standard.

3. Product Suppliers, Service Providers and Business Partners, including Joint Ventures

We must hire suppliers and establish business relationships with partners, such as: insurance brokers, insurance representatives, syndicating suppliers, agents, legal offices, referenced network and hospitals, which operate with ethical standards compatible with ours, through a strict selection and due diligence process. Dedicate strict attention to employees and business partners who represent us, directly or indirectly, before government agencies or our customers, in order to ensure they also act in accordance with the principles contained in this Code and other applicable internal policies. Encourage employees and business partners, including joint ventures, to adopt practices, whether commercial or labor, compatible with the provisions of this Sector Code of Ethical Conduct.

Expected Conduct:

a. Pre-evaluate our partners, through a strict selection and approval process;

b. Contract suppliers of goods and services and establish business relationships with partners who operate with integrity and ethical standards compatible with ours;

c. Ensure the suppliers of goods and services and business partners, who represent us with government agencies, act in accordance with the principles contained in this Sector Code of Ethical Conduct and other applicable internal policies; and

d. Ensure any and all conduct, whether commercial or labor, by third parties who are rendering services on behalf of one of Bradseg's companies or for Bradseg, are compatible with the provisions of this Code.



4. Governments and Regulatory Agencies

It is forbidden to promise, offer or give, directly or indirectly, an undue advantage to a public official and politically exposed person, whether national or foreign, or the third person related to him, as well as to receive any benefit, whether on behalf of the company or anyone else. We must ensure compliance with the laws and regulations applicable to the activities carried out by the company and compliance with our policies, standards and controls, especially those related to matters of preventing and combating money laundering, financing terrorism, corruption and illegal acts of any nature, in strict compliance with applicable laws.

Expected Conduct:

a. Ensure absolute compliance with the laws and rules applicable to our activities, including those arising from self-regulation;

b. To strive for compliance with our policies, standards and controls to prevent and combat money laundering, financing of terrorism, corruption, bribery and illegal acts of any kind, in strict compliance with applicable laws and national and international best practices;

c. Pay special attention to Law no. 12,846/13 - Anti-corruption, in all processes and internal control systems of Bradseg;

d. Not to promise, offer or give, directly or indirectly, an undue advantage to a public official whether national or foreign, or the third person related to him, as well as to receive any benefit, whether on behalf of the Bradseg or anyone else.

e. Do not condone fraud, for example, but not limited to bids and contracts with national or foreign governments, in any sphere and level.

5. Press and Social Media

The company's relationship with the press must be guided by transparency and credibility, always observing ethical values.

Administrators, employees, trainees and apprentices may speak on behalf of the company only when authorized, always expressing the institutional point of view. The exposure of our image and aspects of our lives on social networks is quite common these days. However, we must take care of our image and reputation in our personal life and, in particular, in the work environment, avoiding the presentation of an equivocal message, without aligning with Bradseg's purpose and values.

Expected Conduct:

a. Ensure transparency and credibility, integrity and ethics in our strategies for all communications we make;

b. Any statement on behalf of Bradseg must be made by a previously designated representative, expressing the institutional position and never personal positions;

c. Pay attention to the proper use of social media made available by Bradseg;

d. Do not disclose, on social media, images, comments or submit to any type of exposure that may pose risks to Bradseg's image and reputation and never disseminate false information; and

e. Do not publish Bradseg's strategic information or any customer data without due legal protection.

6. Associations and Class Entities

Expected Conduct:

a. Recognize the important role of legally constituted associations and professional associations, seeking dialogue and the composition of common, legitimate and legal interests; and

b. Recognize the right to free collective bargaining, as well as freedom of association, observing the legal provisions, values and principles established in this Sector Code of Ethical Conduct and following the guidelines contained in the Bradesco's Integrity and Competitive Compliance Programs.

7. Political-Party Activities

There are no restrictions on the exercise, by everyone, of party-political rights, provided that they are strictly personal and do not interfere in the responsibilities before Bradseg, therefore:

a. Everyone is free to carry out, on a personal level, citizenship rights as voters, but individual opinions and positions should never be confused with our brand and positioning; and

b. Bradseg's image should not be linked to party-political activities, and such statements on its premises are strictly prohibited.



Conflict of Interests



Conflict of Interests

Conflict of interest is a potential situation, when there is the possibility of direct or indirect confrontation between the personal interests of Bradseg or our customers, which may compromise or influence, in any way, the performance of the duties and responsibilities of Bradseg and the individual himself. Business and transactions involving persons with a Potential Conflict of Interest must be conducted impartially, without any undue benefit to the interests of shareholders, controllers, managers or family members of any of them. The contracting of services, agreements, partnerships or suppliers of goods and services must occur impartially and transparently, without discrimination or privilege of any kind, in accordance with the criteria and standards of the Organization and Bradseg and respecting the applicable laws. The granting of donation and sponsorship must occur in an impartial and transparent manner, without privilege of any order or obtaining undue advantage, complying with the criteria and standards of the Organization and Bradseg, with due respect for applicable laws.

Even in a situation of divergence in which there is or may be a conflict of opinion, we must act and expose a frank, transparent, clear and coherent position, even if such a position is contested. In the event of a conflict of interest, anyone involved must inform, in a timely manner, the fact to their hierarchical superior and their peers, and stay away, including physically, from discussions and related deliberations. Also, in the event of a conflict at the time of discussion or resolution in any of the administrative or supervisory bodies, the removal of the person in conflict must be duly recorded in the minutes of the meeting of the respective body. If there is no statement by the person in conflict, any other person who is aware of the conflict must express it.



Leadership

Responsible leadership



Leadership

Leadership is the main inducer and example of integrity and ethical behavior, discipline, respectful relationships and the establishment of trust in all relationships. It must follow, with diligence and commitment, Bradseg's results and have expanded responsibility as it relates to sustainability and the construction and maintenance of a healthy and harmonious environment. In addition, it is responsible for managing and mitigating the risks that can, among other impacts, tarnish our image, reputation and purpose as Bradseg.

In this way, leadership should take the following actions:

a. Assist in the development of talents, opening paths to success, to balanced and enthusiastic work, aiming at the best goals and results, through team collaboration and knowledge sharing;

b. Fully strive so that all internal, accounting or tax information and records are the expression of the reality of our operations, and they are also transmitted in a transparent and adequate manner to all interested parties, in accordance with applicable laws, regulations, in addition to Bradseg's policies and standards;

c. Value transparency in the conduct of its team, informing Bradseg's goals, motivating and contributing to its growth and evolution, in addition to forming successors, receiving suggestions and ideas with wisdom. Giving and receiving feedback and striving to resolve the doubts of its subordinates, in search of greater learning and improvement of internal processes; and

d. Act to preserve the health, quality of life, well-being and safety of all, aiming at maintaining professional and personal balance. Therefore, we are concerned with offering a collaborative, diverse and welcoming environment in which we can fully perform activities, regardless of ethnicity, color, gender, age, marital status, sexual orientation, gender identity, religious choice, physical condition or socioeconomic class.



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Confidentiality

Information Confidentiality and Security



Confidentiality

Managers, employees, interns, apprentices, collaborators and business partners acting for or on behalf of the company must always act in accordance with internal Information Security policies and standards.

Documents and information related to the entire process of the daily development of the activities related to each company are considered confidential: proposals, policies, securities, registrations, contracts, reports, campaigns and actions, manuals, training and/or operational materials, which must be handled and used, solely and exclusively, within their applicability and can only be disclosed with prior authorization from the management area.

Lectures, seminars or academic work involving the company's processes and business are also subject to prior authorization. The confidentiality referred to in the previous item must be respected by our managers, employees, interns, apprentices, collaborators and business partners during the binding period, also later, in the event of termination, for any reason.

To preserve the security and confidentiality of information, the company's managers, employees, interns, apprentices, collaborators and business partners may not use the Information Technology available to:

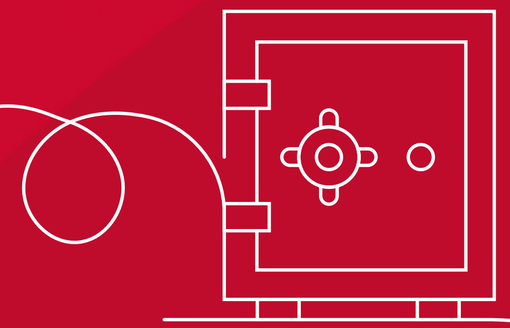
- allow others to gain access to computerized systems through the use of their passwords and other security codes;
- send messages of harassment, discrimination, threat or obscenity;
- send chain letters;
- access the internet or email for inappropriate use;
- send or download copyrighted documents or other media that is not authorized for reproduction;
- download software, programs and other data without proper authorization from the company's Information Technology Area;
- conduct personal business; and
- carry out illegal activities.



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Prevention

Money Laundering Prevention and Fighting and Terrorism Financing;



Prevention

According to current regulations, the crime of money laundering is the process by which funds, values and goods originated or linked to illegal transactions are transformed into assets of apparently legal origin and incorporated into the formal economy. It consists of concealing the funds so that they are used without identifying the criminal activity that generated them. Bradseg repudiates any act, interest, attempt or omission associated with money laundering, terrorist financing and corruption crimes. Administrators, employees, interns, apprentices, collaborators and business partners must be diligent in monitoring, in order to enable the detection of the use of resources with indications of illicit origin or may be classified as crimes of money laundering and terrorist financing, alerting the competent management, by reporting to e-mail: prev-lavagem-dinheiro@bradescoseguros.com.br.



Respect

Respect for Laws, Regulations and Internal Policies and Standards



Respect

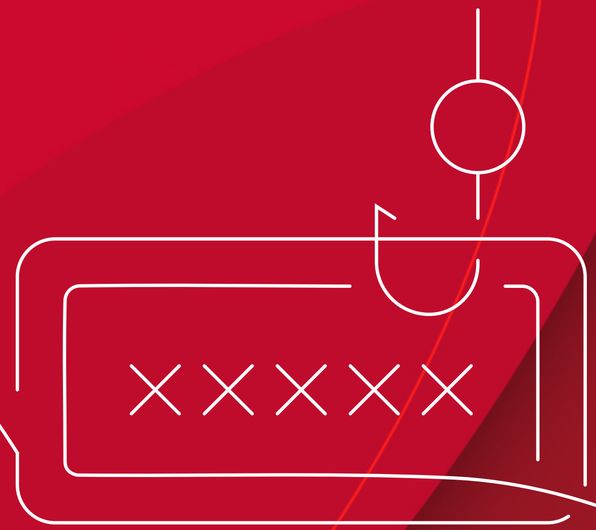
The company’s performance will faithfully obey the laws in force in the country, with particular emphasis on those governing our specific sector of activity, including the Consumer Protection Code. In addition, the regulations issued by the supervisory bodies of each sector of activity and the internal rules, which provide for relationships between companies, areas or people, with emphasis on the Code of Ethical Conduct of Bradesco Organization, the Sectorial Code of Ethical Conduct of Bradseg Participações S.A. and its subsidiaries and the Code of Ethics of the professional associations involved with the company’s activities, will be respected.



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Prevention

Fraud Prevention and Fighting



Prevention

Any intentional act intended to receive indemnity or benefit to which one would not be entitled otherwise, practiced in the contracting or in the course of the event provided for in the contract, and even after its occurrence is considered fraud. Therefore, fraud is committed by those who deceive the insurer to obtain an undue advantage. Bradseg develops actions aiming at preventing and mitigating fraud in all its activities, through communications, training and internal controls, and any fraudulent act/fact that may denigrate the reputation and/or cause damage is not accepted, under any justification. Administrators, employees, interns, apprentices, collaborators and business partners must be aware of possible occurrences of fraud, striving to combat it. It is everyone's responsibility to report any suspicions of fraud, inappropriate, illegal and inconsistent situations or circumstances through the following channels:

Reporting channel: 0800 701 27 88, service from Monday to Friday, from 8 am to 6 pm, except on national holidays.

E-mail: prevencaoafraude@bradescoseguros.com.br
Website: www.bradescoseguros.com.br/clientes/atendimento/canal-de-denuncias



Commitment

Commitment with the Environment and the Community



Commitment

We must promote respect for the dignity of the human being, preserving their individuality, not practicing discriminatory acts, molestation or harassment of any kind.
We must be firmly committed to practicing, encouraging and valuing environmental preservation, seeking to converge business goals with the desires and interests of the community in which we operate, always in line with sustainable development.

Note: We voluntarily adhere to the following international agreements:

- Global Compact;
- Sustainable Development Goals (DSG);
- United Nations Environment Programme Finance Initiative - UNEP FI;
- Principles for Sustainability in Insurance (PSI);
- Principles for Responsible Investment (PRI);
- United Nations (UN) Bradseg Principles for Banking Responsibility; and
- Task Force on Climate-Related Financial Disclosures (TCFD).

In addition to these international agreements, we are also signatories to commitments related to gender equality, violence against women and girls, female empowerment and the global movement for the inclusion of people with disabilities, among others.



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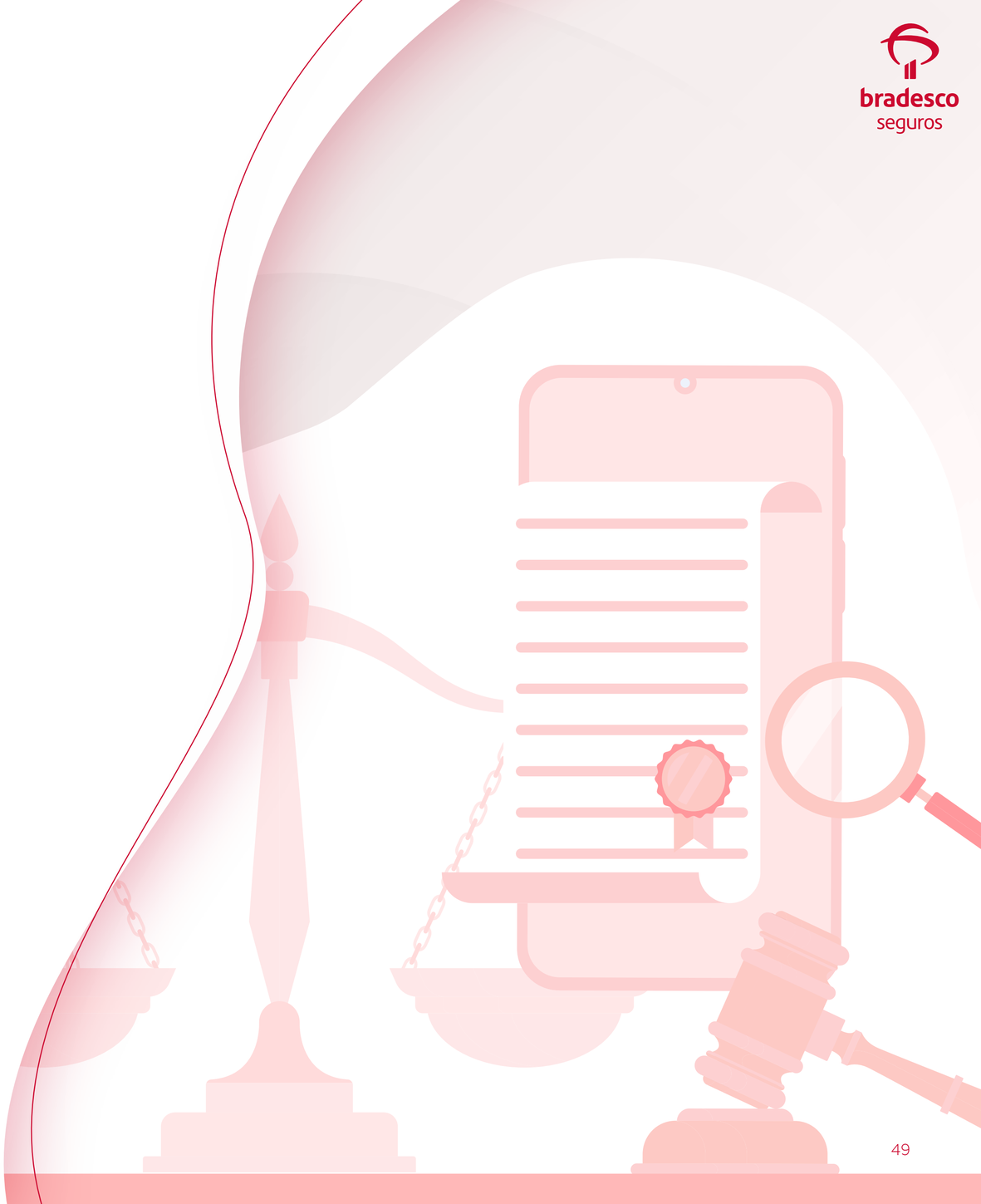
Property

Intellectual Property



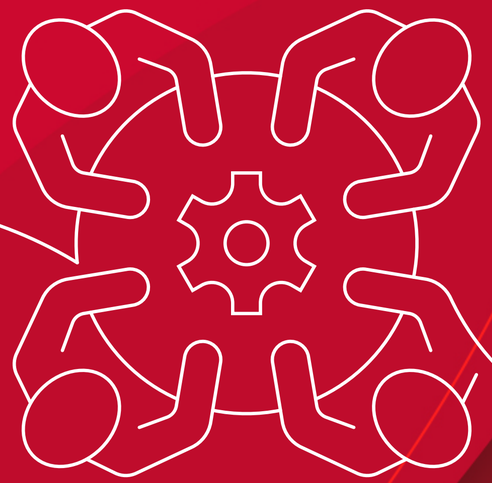
Property

All information, technologies and intellectual property, including, but not limited to, all creative materials, programs, designs, inventions, developments, processes, strategies, including all related or incorporation materials, developed or requested by a manager, employee, trainee and apprentice, collaborator and business partner belong to the company and it is assigned all the rights it may have over the Intellectual Property. All Intellectual Property will remain with the company after the termination of the relationship with the administrator, employee, trainee, apprentice, collaborator and business partner, and the improvement and maintenance of the title to such property is authorized. To do this, they transfer all copyright and moral rights to the company. Administrators, employees, trainees, apprentices, collaborators or business partners may not reproduce, distribute or alter materials without prior authorization. All software used in connection with business carried out by the company must be properly licensed and used only in accordance with such license.



Governance

Governance



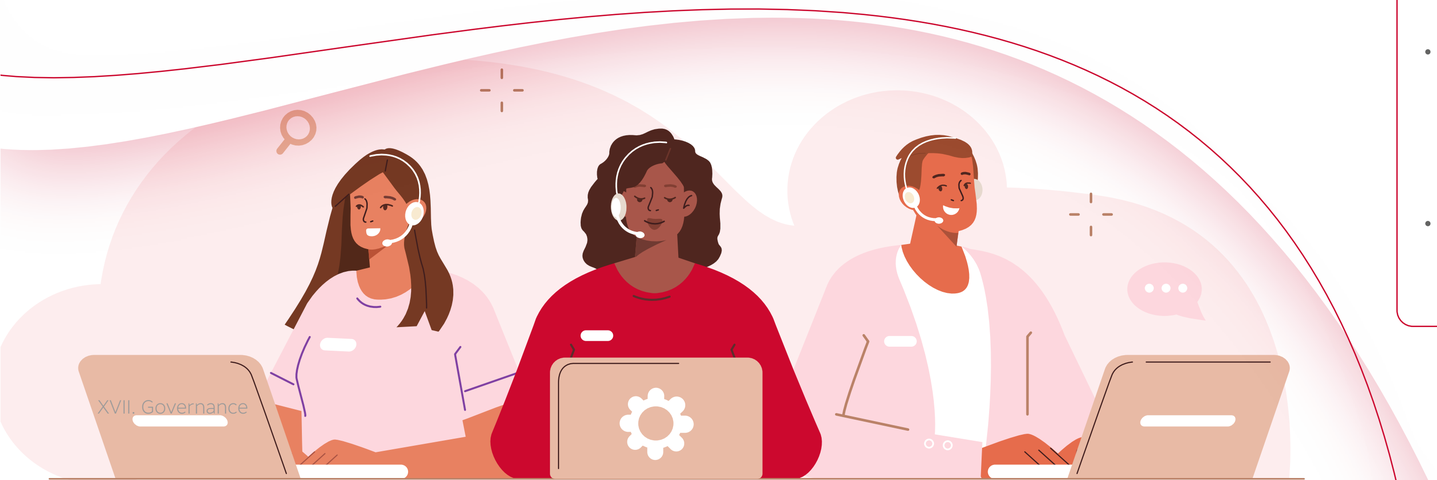
Governance

Our Corporate Governance is based on the best market practices, comprising a set of guidelines and management structures dedicated to managing all aspects of the economic, social and environmental transformations in which Bradseg operates. For any aspects related to integrity, ethics and compliance with the guidelines set out in this Sector Code of Ethical Conduct, we have a corresponding governance structure responsible for mitigating, preventing and responding to any potential violations. Banco Bradesco's Integrity and Ethical Conduct Committee, which reports to Banco Bradesco's Board of Directors, is the body whose purpose is to propose actions regarding the dissemination of and compliance with the corporate and sector Codes of Ethical Conduct, and the rules of conduct related to anti-corruption and competition issues, in order to ensure their efficacy and effectiveness. Bradseg's Board of Directors is responsible for approving the Sector Code of Conduct of Bradseg Participações and its subsidiaries. The management and periodic review of our Sector Code and the processing of complaints regarding possible violations received through the Whistleblowing Channel are the responsibility of the Compliance, Conduct and Ethics Management of the Bradesco Seguros Group, which also carries out various activities relating to dissemination, acculturation, training and clarification of doubts regarding its scope and application. The Code is adhered to via the internal training platform. Whenever there is a revision substantially changing the guidelines contained in this document, adherence must take place again.



1. Complaints Channel

In the event of any doubts and/or ethical dilemmas about the content of this document or when situations arise in which a violation of Bradseg's Sector Code of Ethical Conduct is suspected, this should be reported in a timely and complete manner to your immediate supervisor or to the Whistleblowing Channel. In order to formalize complaints, the whistleblower, whether identified or not, must provide as much information as possible on the subject, if possible accompanied by evidence or other elements to help to ascertain the facts reported. We guarantee the right to anonymous reporting, ensuring no retaliation is tolerated for reports made in good faith. Our channel is also available to third parties and other interested parties.
We would like to stress, in our daily lives, dilemmas or situations may arise which are not covered by this Code and which require an individual assessment. In doubt, question.



The Whistleblowing Channel is available at:

https://www.bradescoseguros.com.br/clientes/atendimento/canal-de-denuncias

Call Service: 0800 701 27 88, service from Monday to Friday, from 8 am to 6 pm, except on national holidays.

E-mail: etica@bradescoseguros.com.br

E-mail: prevencaoafraude@bradescoseguros.com.br

Our codes are available at:

- Website of Bradesco Seguros - www.bradescoseguros.com.br - Institucional - About Bradesco Seguros - Code of Ethic Conduct;
- Website of Banco Bradesco S.A. / Relações com Investidores - www.bradescori.com.br - Corporate Governance - Compliance and Ethics; and
- Intranet - www.bradseg.com.br - Risks, Internal Controls and Compliance page - Code of Ethical Conduct - Whistleblowing Channels

2. Consequences/Disciplinary Measures

Those who carry out actions that constitute violations of the Code and the internal standards on the subject are subject to disciplinary consequences/ measures, regardless of their hierarchical level and without prejudice to the applicable legal penalties.



Concepts

General Concepts



General Concepts

a. Ethics: is defined as a set of values and principles as a reference and should guide everyone's conduct;

b. Conduct: corresponds to any act, action, omission, decision, attitude or behavior, which must always be guided by ethical standards;

c. Principles: present the guidelines to guide our decision-making process, in any activity, related to any stakeholder and in all relationships;

d. Commitments: present the way in which we must act and our commitment to all the guidelines established in this Code;

e. Stakeholders: these are all those with whom we have a relationship; they are the individuals or entities interested in or affected, positively or negatively, by Bradseg's business: shareholders, investors, customers, suppliers, service providers, regulatory bodies, competitors, the government, society in general and, of course, our internal public, made up of managers, employees, trainees and apprentices. In short, they are those who assume or bear some kind of direct or indirect risk related to Bradseg's activities;

f. Persons with a Potential Conflict of Interest: for the purposes of this Code, these are all individuals or legal persons who have a certain degree of relationship with Bradseg:

Related Parties:

I. Its parent companies, individuals or legal entity according to art. 116 of Law no. 6.404/76;

II. Its officers and members of the statutory or contractual bodies;

III. The spouse, partner, children and stepchildren of the persons mentioned in items I and II;

IV. Individuals with equity interest qualified in its capital;

V. Legal entities:

i. with equity interest qualified in its capital;

ii. whose capital, directly or indirectly, there is a qualifying shareholding;

iii. in which there is effective operational control or a preponderance in resolutions, regardless of the shareholding; and

iv. have an officer or member of the board of directors in common.

General Concepts

Other Degrees of Relationship: relatives, blood relative or related, up to the second degree, of the individuals mentioned in items I and II, who are not mentioned in item III, of the item “Related Parties”;

g. Privileged Information: privileged information is that relating to relevant acts or facts undisclosed to regulatory bodies, stock exchanges or other similar entities and, simultaneously, to shareholders and investors in general, by means of wide dissemination and publication by the press. Its improper use can lead to penalties, since there are legal and sublegal standards; and

h. Intellectual Property: refers to the legal protection and recognition of authorship of works of intellectual production, such as inventions, patents, trademarks, industrial designs, geographical indications and artistic creations. In short, any goods that is immaterial or incorporeal, according to Law 9,279/96.

We represent this is a true copy of the Sector Code of Ethical Conduct of Bradseg Participações S.A., its affiliates and subsidiaries, approved at the Meeting of the Board of Directors of Bradseg Participações S.A., held on 05/20/2025, with amendments, including the scope and nomenclature, which has been renamed the Sector Code of Ethical Conduct of Bradseg Participações and its subsidiaries.



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Com Você. Sempre.

bradescoseguros.com.br

Versão setembro/2025.