

	<b>Institutional Policy on Corporate Governance, Risk Management and Internal Controls</b>	<b>Issue Date</b> 03/05/2020
<b>Prepared by:</b> Administrative and Financial Board Legal and Compliance, Internal Audit and Controllershship	<b>Approved by:</b> Board of Directors (03/05/2020)	<b>4<sup>th</sup> version</b>

The **Institutional Policy on Corporate Governance, Risk Management and Internal Controls (“Policy”)** of Odontoprev S.A. and its controlled companies (“Company”) is based on the following guidelines:

## 1. PURPOSE

Set the guidelines on the practices for corporate governance, risk management and internal controls stipulated in terms of the applicable laws and regulations, effective corporate documents and good practices in the Company’s governance, risk management and internal control processes.

## 2. GENERAL PRINCIPLE

The practices and structures for governance, risk management and internal controls implemented by the Company must be effective and consistent with the nature, scope and complexity of its activities, its products and services, respecting the characteristics and structures laid out in its articles of incorporation and internal rules.

## 3. CORPORATE GOVERNANCE

The Company’s governance structure must be formalized and maintained clearly and objectively in the articles of incorporation, organizational chart, policies, bylaws and/or internal regulations, submitted to the review and approval of the Company’s top decision-making instances, and broadly disseminated to the stakeholders.

## 4. RISK MANAGEMENT

The Company’s risk management must:

- I - Make uniform the knowledge among the risk managers about the chief risks to their activities, particularly those regarding strategic, image, legal, subscription, credit, market, liquidity, and operational risks;
- II - Make decisions that can treat and monitor risks and thereby improve the organizational and internal control processes;
- III - Secure the accomplishment of the Company’ mission, its continuity and sustainability, aligned with its goals;

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### PUBLIC POLICY

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IV - Ensure that the internal processes will protect the Company from relevant losses ensuing from risky events;

V - Ensure the separation and definition of duties, assignment of responsibilities, limits and exposure to risks and authority that support the effective risk management; and

VI - Guarantee the establishment of processes, methodologies and tools to identify, assess, measure, treat and monitor, both on an individual and combined level, all the exposure to current and emerging risks, viewed as material or a priority, brought about by internal or external sources.

After identifying and categorizing the risks, an analysis of their impacts must be conducted, at least annually, to check whether those are within the risk tolerance levels set by Management.

## 5. INTERNAL CONTROLS

The Company's control environment must ensure the existence of internal policy, procedure manuals and organizational structures that lay the foundation for all the other components of the Company's risk management structure.

The internal controls must be evaluated at least annually, particularly those regarding processes as to the information that is laid out in the financial statements.

Management must check the recommended improvements or corrections to procedures described by the control bodies, including the Internal Audit, actuary in charge, independent audit and regulatory or inspectional bodies; and designate the person/people in charge of implementing the necessary actions, setting deadlines for completion and periods to assess progress.

## 6. FINAL CONSIDERATIONS

This Policy will give support to the Company's internal policies and the risk and internal control procedure manuals, to be compulsorily observed by those in charge of risk management and internal controls. The laws and standards issued by the regulatory bodies must also be observed.

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