

# SEG

## Integrity

Compliance and Integrity Program  
BB Seguridade

November 2025

# Message from Senior Management

BB Seguridade is committed to the principles and values of integrity, transparency, respect for diversity, and the best Environmental, Social, and Governance (ESG) practices, aiming to ensure the generation of sustainable results, the longevity of the company, and our social responsibility in building a more just, transparent, and secure society, with an emphasis on respect for human and labor rights.

Our Compliance and Integrity Program is aligned with the company's strategic drivers and seeks to contribute to achieving a state of compliance, security in business, processes, products, services, and channels, enabling reinforcement in the prevention of illegal acts, misconduct, and damage to reputation, contributing to the reduction of financial losses and assertive risk management.

Our tolerance for corruption or compliance risks is zero!



We have a firm commitment to the effectiveness of internal controls, the promotion of a culture of integrity, the strengthening of the state of compliance, and the unequivocal ethical conduct of all the company's employees (managers, staff, contractors, service providers).

**Board of  
Directors**

**Collegiate Board**

# Principles of the Compliance and Integrity Program

## Ethics

A set of principles and values that guide human behavior in relation to what is considered right or wrong within a specific society or context. The principles of our Code of Ethics are: **Honesty, Diversity, Responsibility, Respect, and Transparency.**

## Integrity

Ethical principle that helps in choosing actions that, besides being legal, are also honest and fair. Anyone who respects this principle is an individual with an ethical, incorruptible attitude. Due to this behavior, a high standard of planning, efficiency, and control of institutional actions is expected.

A system formed by principles, rules, structures, and processes by which organizations are directed and monitored, aiming at generating sustainable value for the organization, its partners, and society in general, seeking a balance between the interests of all parties, contributing positively to society and the environment.

## Regulatory Compliance

Ensures compliance with laws, regulations, and internal standards, as well as acting in guidance and awareness to prevent actions and behaviors that may result in sanctions by regulatory bodies, as well as legal or reputational risks to the institution.

Commitment to corporate sustainability through four pillars: social well-being, environmental preservation, addressing climate change, and the promotion of fundamental rights. These practices value human dignity, promote equity, and contribute to a more just and sustainable future.

## Corporate Governance

## Social, Environmental, and Climate Responsibility

# Compliance and Integrity Program

The Program consists of guidelines, processes, and procedures that enable the strengthening of corporate governance, data security, cost reduction, and the construction of an environment of trust, transparency, and regulatory compliance, contributing to risk management.

It is highlighted the adherence to Decree N°. 11.129/2022, regulator of Law N°. 12.846/2013, which defines the Program as a set of internal mechanisms and procedures for integrity, audit, and incentive to report irregularities and for the effective application of codes of ethics and conduct, policies, and guidelines, with the objective of preventing, detecting, and remedying deviations, fraud, irregularities, and unlawful acts committed against the public administration, national or foreign, in addition to fostering and maintaining a culture of integrity in the organizational environment.

Furthermore, the Program is aligned with the guidelines of Law N°. 13.303/2016, which establishes the obligation to prepare and disclose a Code of Conduct and Integrity.



## COMPLIANCE



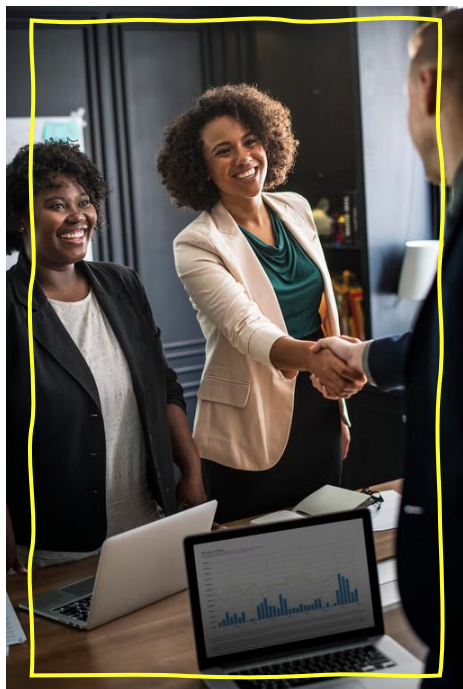
The Program has **ten integrated and complementary** Guiding Principles, which guide the Company's activities and business practices, promoting the development of best management practices.



# 1. Commitment of Senior Management

**The Program is unequivocally sponsored and supported by Senior Management, which reinforces at all levels the importance of complying with the rules as one of the basic principles of good governance and adherence to the expected standards of behavior, described in the Company's Code of Ethics and Conduct.**

The Internal Controls and Integrity Superintendency (SCI) is the formally established area responsible for monitoring, assessing, and reporting on the Company's compliance status, appointed by the Board of Directors. Thus, the structure and authority of the internal body responsible for the application of the Program and the monitoring of its compliance is evident.



## The attributions of the SCI are:

- Acting directly or indirectly in the identification, assessment, and advising on the mitigation of compliance and integrity risks;
- Acting in clarifying doubts and promoting training activities related to compliance and integrity;
- Acting directly or in an auxiliary manner in the investigation of situations suspected of violating integrity standards, reporting to the competent bodies;
- Recommending, to management, measures necessary to correct deficiencies in the Program or remedy irregularities;
- Reporting to Senior Management about the integrity practices implemented or under implementation;
- Monitoring, assessing, and periodically revising the Program.

## For the exercise of its attributions, the SCI is assured of:

- Authorization for unrestricted access, observing any conflict of interest, and timely access to the information necessary to carry out their analyses;
- Complete and timely presentation of the requested information by all areas of the Company;
- Necessary material and human resources, whether in-house or outsourced, including experienced and trained staff in sufficient quantity;
- Setting of rules of objectivity and confidentiality required from intervening parties of the internal bodies responsible for the Program in the performance of their duties;
- Prior communication of the movements of its employees to the Audit Committee, for its opinion on the matter.



## 2. Risk Management

The guidelines for risk management are formalized through Policies and the Risk Appetite and Tolerance Statement, which are approved by the Board of Directors and reviewed periodically. The Policies are accessible to all audiences through the investor relations website.

Risk management at BB Seguridade refers to a set of activities aimed at identifying, analyzing, evaluating, and addressing the risks present in the Company through event mapping, continuous monitoring of indicators, and proprietary methodologies in order to keep the criticality of risks within defined appetite limits and ensure the achievement of strategic objectives.

The risk management, controls, and security model of BB Seguridade adopts IIA's\* structure of three lines:

- First line: business areas that directly manage risks and controls in their processes.
- Second line: composed of risk, internal controls, and institutional security areas, it provides advice and support to the first line, contributing with specialized analyses and strategic reports directed to Senior Management.
- Third line: internal audit, which independently evaluates the effectiveness of the model.

### Risk Appetite and Tolerance Statement

Instrument that guides the business strategy, with the definition of the maximum level of risk that the Company accepts to incur in order to achieve its objectives, guiding decision-making in a way to maximize value generation.



### 3. Code of Ethics and Conduct, Integrity Policies and Procedures

#### Code of Ethics and Conduct

It is the document that presents the Company's commitments and guidelines with regard to its stakeholders and society. It is formally approved by the Board of Directors and has accessible language and is applicable to Senior Management, members of governance bodies, employees and third parties acting on the Company's behalf or representing it.

This document, periodically revised, provides guidance about what is or is not acceptable to the Company and the expected standard of behavior.

All BB Seguridade suppliers are also aware of the Code of Ethics and Conduct, which is an integral part of the contracts signed.

As BB Seguridade's employees are exclusively from Banco do Brasil's staff, BB Seguridade's controller, adherence to that Institution's Code of Ethics and Standards of Conduct is also required.

The draft of the contracts establish clauses that provide that the contractors shall know the Company's Code of Ethics and Conduct and that they will be prevented from participating in any stage of the bidding process if they are declared disqualified in any sphere of Government.

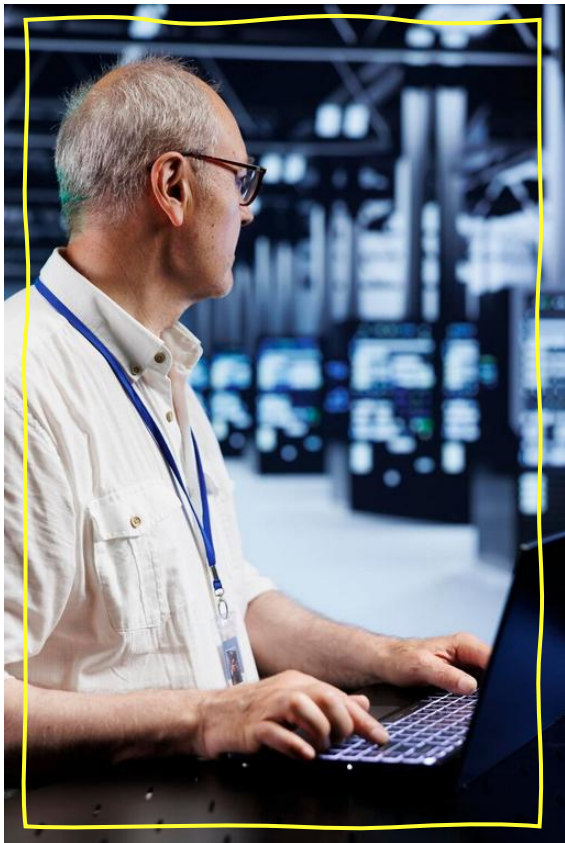
The same procedures apply when contracting or supervising politically exposed persons, as well as their family members, close collaborators and legal entities in which they participate, as well as when carrying out and supervising sponsorships and donations made by the Company.



### 3. Code of Ethics and Conduct, Integrity Policies and Procedures

#### Ethics in Artificial Intelligence

BB Seguridade is committed to ethics and integrity in its operations and in the processing of information under its custody. The ethical stance must be taken in any environment, including through new forms of interaction, such as the metaverse, and in data analysis, with the use of artificial intelligence.



#### Ethics and Integrity Committee

It is a board-level committee, non-statutory and permanent advisory body to the Board of Directors.

The Committee's responsibilities include:

- Monitoring and contributing to the improvement of training actions and the dissemination of a culture of ethics and integrity within the scope of the Compliance and Integrity Program;
- Receiving and forwarding to the competent bodies any incidents received for which the investigation flows have not been approved and/or standardized;
- Monitoring compliance with sanctions, including those determined by Banco do Brasil;
- Providing information to the Audit Committee, the Board of Directors and Banco do Brasil on the conduct of any demands made by the Committee;
- Submitting to the Board of Directors, whenever necessary, a proposal to amend the terms of its Regulations;
- Proposing to the decision-making bodies, if applicable, improvements in business processes involving corporate ethical principles, with the consequent promotion of cultural, process, and management improvements within the Company, based on the assessment of the causes of complaints received through the channels made available by the Company, whether shared with Banco do Brasil or not, the investigation, analysis, and judgment process of which has already been completed; and
- Following the guidelines issued by the Committee itself.

### 3. Code of Ethics and Conduct, Integrity Policies and Procedures

#### Receiving and offering hospitality, gifts and presents

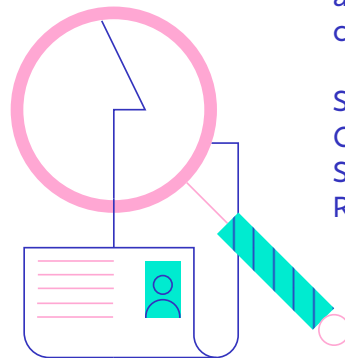
To provide transparency to the data related to offering and receiving hospitality, gifts and presents and to reduce the possibility of the occurrence of irregular acts, there are specific rules on the matter formalized in the Code of Ethics and Conduct, Internal Regulations for Relations with the Public Administration and Internal Regulations for the Distribution of Promotional Assets - Incentivized Resources.

#### Nepotism

The Code of Ethics and Conduct forbids keeping, under immediate subordination, in a position or office of trust, a spouse, partner, or relative up to the third degree in direct and collateral line.

Also excluded from any stage of the bidding process, as a bidder, is anyone who is related, up to the third civil degree, to any authority from the public entity to which BB Seguridade is bound, managers and employees of the Company, whose attributions involve acting in the area responsible for bidding or contracting.

Such prohibitions are listed in the Internal Purchasing and Contracting Regulations, which formalizes the adhesion of BB Seguridade and its subsidiaries to the Bids and Contracts Regulations of Banco do Brasil ("RLBB").



#### Conflict of Interest



In order to identify and provide information to prevent conflict between the interest of the Company and the particular interest of members of governance bodies, employees, third parties and intermediaries of any nature, in the exercise of their professional activities related to BB Seguridade and its Subsidiaries, the situations that characterize conflict of interests that can be analyzed and the guidelines for carrying out consultations about doubts related to the topic or requests for authorization to exercise private activities are described in the Code of Ethics and Conduct and in the Internal Regulations of Conflict of Interest.

### 3. Code of Ethics and Conduct, Integrity Policies and Procedures

#### Sponsorships

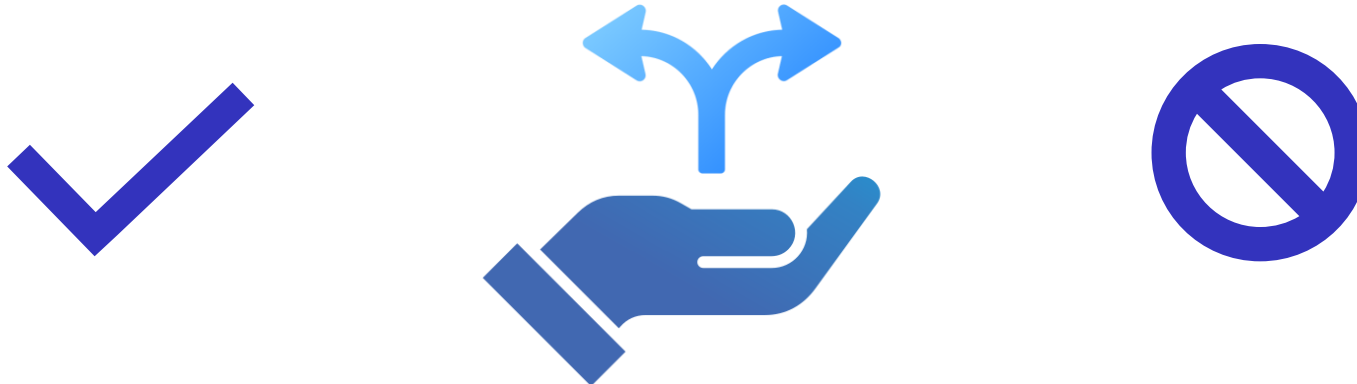
Promotion and sponsorship actions are planned in accordance with the ethical principles upheld by the Company. The guidelines, prohibitions and procedures for granting sponsorships are described in BB Seguridade's Promotions and Sponsorships Policy and Internal Regulations for Sponsorship, respectively.

#### Philanthropic Donations

The company makes donations and partnerships, observing the legal and regulatory aspects to which it is subject, in line with the expectations of the stakeholders and aligned with the strategic objectives of the company. Prior to the donation, the integrity of the entities to be benefited is verified.

#### Donations to Candidates and Political Parties

The Code of Ethics and Conduct forbids donations or financing to political parties or candidates for public office, in Brazil and abroad.



### 3. Code of Ethics and Conduct, Integrity Policies and Procedures

#### Relationship with public officials

In order to avoid committing acts of active corruption, the Company establishes rules for the relationship with public officials, which are set out in the Internal Regulations for Relationship with Public Officials.

The relationship and interactions with public officials must strictly observe the standards of the public administration, as well as the current legislation, applicable regulations, and the principles established in the Company's Code of Ethics and Conduct.

These relationships must be conducted with ethics, legality, and integrity, guided by transparency and publicity, with the commitment to ensure a business operation that is ethical and free from any practice of corruption.

#### Prevention of Acts of Corruption

The guidelines related to the prevention and fight against corruption, pursuant to the applicable legislation and regulations, are established in the Policy for the Prevention and Fight Against Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction, and in the Policy for the Prevention and Fight Against Corruption.



### 3. Code of Ethics and Conduct, Integrity Policies and Procedures

#### Main policies related to compliance and integrity of BB Seguridade



All policies are available on the page [www.bbseguridaderi.com.br](http://www.bbseguridaderi.com.br)

- Policy for Relationship with Customers and Product and Service Users
- Promotions and Sponsorships Policy
- People Management Policy
- Innovation Policy
- Sustainability Policy
- Strategic Investment Policy
- Financial Investment Policy
- Securities Trading Policy
- Material Act or Fact Disclosure Policy
- Shareholder Compensation Policy
- Related-Party Transactions Policy
- Governance, Appointment and Succession Policy
- Information Security and Cybersecurity Policy
- Policy for the Prevention and Fight Against Money Laundering, Terrorism Financing, and Financing of the Proliferation of Weapons of Mass Destruction
- Risk and Capital Management Policy
- Policy for the Prevention and Fight Against Corruption
- Internal Controls, Compliance, and Integrity Policy
- Privacy and Personal Data Protection Policy

## 4. Internal Controls

**Internal Controls** are processes and practices by which the Company seeks to ensure that planned and approved actions are properly executed, aiming at the safeguarding of assets, proper management for mitigation of risks, accuracy and reliability of management information and financial records, promotion of operational efficiency and adherence to the organization's policies. BB Seguridade has an Internal Controls System suited to its size and complexity, meeting regulatory requirements and in line with the best governance practices.



To ensure the quality in the execution of the accounting records, as well as the reliability and reasonableness of the results disclosed to shareholders and stakeholders, examinations are conducted by the independent audit, Audit Committee and Supervisory Board, which issue opinions on the Financial Statements, Explanatory Notes and Management's Report.

BB Seguridade guides the disclosure of information to the market based on the needs of external users for the purposes of economic decisions, in compliance with the requirements of regulatory and supervisory bodies. Information is provided with transparency, truthfulness, completeness, consistency, fairness and timeliness, respecting the highest standards of corporate governance, in line with the guidelines contained in the Institutional Policies.

The accounting process is part of BB Seguridade's Corporate Governance structure through financial reports to the Board of Directors, Audit Committee, Internal and External Auditors, Collegiate Board, and to the Supervisory Board, among others.



## 5. Due Diligence – Proper, risk-based diligence to prevent unlawful acts

Prior due diligence and adequate monitoring mitigate inherent risks in the relationship with third parties and corporate transactions of BB Seguridade, including conduct, compliance, reputation, money laundering, terrorism financing, and corruption risks.

BB Seguridade extends the application of its Code of Ethics and Conduct in contracts and the establishment of partnerships, in addition to conducting a *background check\** process, previously considering aspects of the potential supplier's and partner's suitability and integrity, with records and traceability of the analyses carried out, in line with best practices and the anti-corruption law, ensuring transparency and security in the process.

The same process applies to carrying out and supervising sponsorships and donations made by the Company.

The draft of the contract used by the Company provides for sanctions and termination, if necessary, in the event of breach of any of the contractual clauses, or declaration of ineligibility. Furthermore, the contracts establish clauses and declarations that require third parties, including suppliers, to act legally, ethically, and in alignment with current legislation, the Code of Ethics, the Compliance and Integrity Program, the Policy for the Prevention of Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, and the Policy for the Prevention and Fight Against Corruption.



The purchases and contracts made by BB Seguridade and its Controlled Companies are carried out in accordance with the provisions of Law 13.303/2016.

\*Background check or verification to validate information about individuals or companies

## 6. Reporting Channel

To ensure the effectiveness of the Compliance and Integrity Program and mitigate the risk of actions in breach of the formally established standards, it is necessary to encourage reports of irregularities, fraud, deviations and unlawful acts.

In this regard, the Company shares with Banco do Brasil (BB) the Ethics and Reporting Channel for receiving and handling reports, ensuring confidentiality and anonymity for the whistleblower, as well as the proper management of consequences.

The Ethics and Reporting Channel is the communication channel through which employees, collaborators, customers, users, partners, or suppliers can report situations with signs of unlawfulness, of any nature, such as corruption, fraud, money laundering, harassment, and discrimination, related to the Institution's activities. The Channel offers an option for service exclusively provided by women, in order to provide an even safer and more empathetic environment for whistleblowers.

Additionally, BB Seguridade also shares with BB the Internal Ombudsman service of the Bank, which handles occurrences from the Ethics and Reporting Channel related to interpersonal conflicts in the workplace, inappropriate conduct of a moral nature, and disrespect for privacy or diversity. It also includes handling reports, complaints, compliments, and suggestions involving employees and members of BB Seguridade's governance bodies.

Reports can be tracked using the "Track report" button available on the Channel's website, through the protocol number.



Website:

<https://canalconfidencial.com.br/bancodobrasil/>

Telephone: **0800 300 4455**

free service, available 7 days a week uninterruptedly, in Portuguese, English, and Spanish.

**BB App:** Just access "**Service**" in the main menu and select the "**Ethics and Reporting Channel**" option.



The Company has mechanisms for the protection of whistleblowers, witnesses, and any person who has contributed to or acted in internal investigations of misconduct, as well as devices for dealing with situations of retaliation, in accordance with the Whistleblower Protection and Non-Retaliation Commitment of its controller.

## 7. Inquiries and Consequence Management

The verification of occurrences and investigation of irregularities, when applicable, are conducted by the Company and/or BB as established in internal regulations.

The investigations, within BB Seguridade, in the exercise of a non-statutory position, observe the flows, channels, and structure shared and defined with its controller.

In cases involving indications of non-compliance with duties by employees holding statutory positions and in cases of sexual harassment reports (both for statutory and non-statutory ones), the occurrences are forwarded directly to the Internal Audit of BB Seguridade.



## 8. Training and Communication

Training programs and communication actions are essential to promote a culture of compliance, ethics and integrity. For this reason, as part of the Program and inducer of transformation and cultural strengthening, training and communication actions are structured focused on content that deepens knowledge on compliance, ethics and integrity issues, as well as their applicability in business, process management and relationships with the various audiences.



One of the practices observed for Senior Management to reinforce and demonstrate its commitment to Compliance, Ethics, and Integrity management is the participation of its members in training related to the topics.

All employees of the Company have access to the courses offered by the Universidade Corporativa do Banco do Brasil (UniBB), which provides a range of courses related to the areas of Compliance, Ethics, and Integrity.

Within the scope of UniBB, the Trilha Ética (Ethics Trail) gathers courses that encourage reflection on ethical and moral values in personal and professional life and, given their relevance, the courses that comprise it **are prerequisites for advancement and internal mobility within BB Seguridade.**

Moreover, Forums or Technical Meetings on the subject of integrity are held periodically, with the participation of senior management, members of governance bodies, employees and representatives of investees.

Internal communication channels are used to disseminate the culture of Compliance, through pieces with a relaxed layout to convey clear and direct messages, in order to arouse the interest of employees.



## 9. Program Monitoring

The monitoring process of the Program is carried out through **specific controls**, embedded in the Company's processes, focusing on the prevention, detection, and combating of unlawful acts, misconduct, and reputational risks.

The SCI is responsible, in the second line, for verifying the effectiveness of the Program's structure; assessing its adequacy in the face of new risks and the obsolescence of controls; collecting and analyzing information and indicators, and promptly reporting any identified deficiencies to the Collegiate Board. This monitoring enables **following up on the effectiveness of the program** and is carried out through the collection and analysis of information and specific indicators.

The Internal Audit, as the third line, directly provides governance bodies with assessments of the effectiveness of the monitoring carried out by the first and second lines.



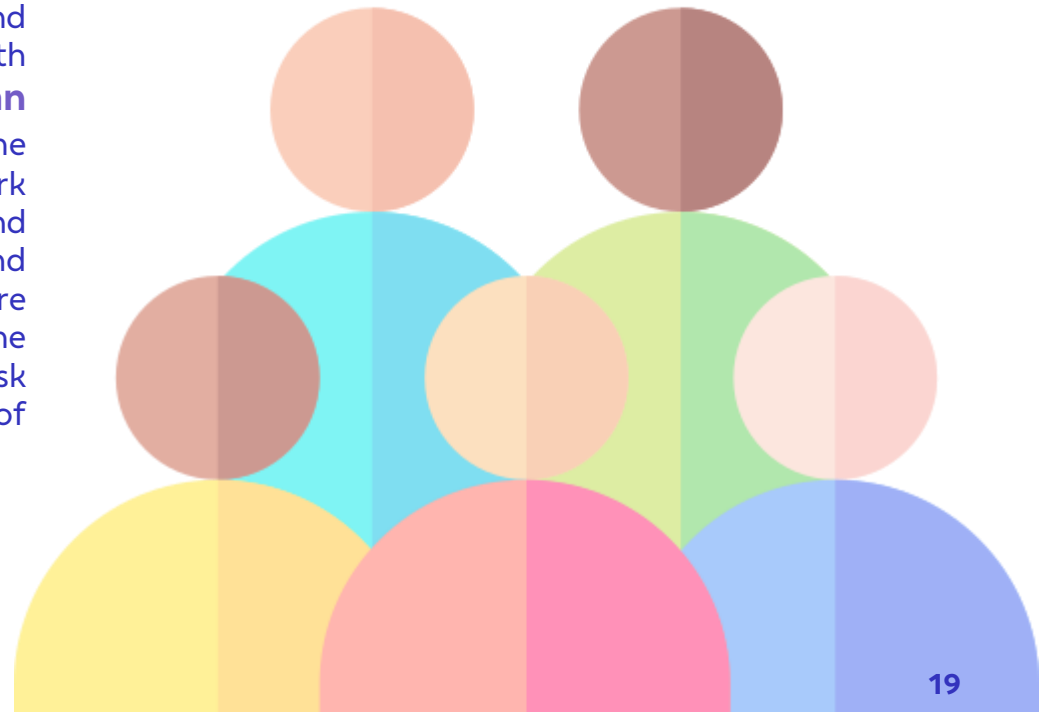
## 10. Social, Environmental, and Governance Aspects

### Diversity, Equity, & Inclusion

BB Seguridade respects and encourages the diversity and plurality of the group of people with whom it has relationships. The strengthening of an inclusive culture, free from prejudice and discrimination, is part of the path the Company follows, seeking to expand the collaborative, innovative, and stimulating spirit adopted. As part of this commitment, the Company adheres to and is committed to BB's **Anti-Discrimination Protocol**, reinforcing its role in promoting a more just, equitable, and respectful corporate environment for all people.

The Code of Ethics presents the Company's commitments and guidelines in relation to its stakeholders and society. In line with BB Seguridade's formal commitment to respecting **Human Rights**, the company **does not tolerate** disrespect for the dignity, equality, diversity, and privacy of individuals. The work environment is a safe place, where different cultures and worldviews are respected and where respect for the laws and our internal regulations and those of our Controller are priorities, providing fair and equal opportunities for all. The topic is so relevant that it is mentioned in the Company's Risk Appetite Statement, a document approved by the Board of Directors.

We recognize that diversity  
makes us stronger as a company!





# 10. Social, Environmental, and Governance Aspects

## ESG Agenda

The ESG Agenda aims to promote the continuous evolution of BB Seguridade's ability to integrate environmental, social, and governance aspects into its strategy, processes, and businesses. This integration seeks to ensure the Company's resilience and sustainable growth through active management of risks, opportunities, and impacts generated for society and the environment. Given its relevance, it is an indicator monitored within the scope of the Company's corporate strategy.

The actions described in the ESG Agenda are aligned with BB's sustainability agenda (Agenda 30) and are based on diagnostics that the Company observes regarding analyses from MSCI (*Morgan Stanley Capital International*)\* and the B3 Sustainability Index.



\*MSCI conducts ESG assessments of publicly traded companies around the world. BB Seguridade uses this assessment to identify areas for improvement in its sustainability strategy.

## Governance of Investees in relation to the Program

BB Seguridade reaffirms its commitment to promoting the integration of the Compliance and Integrity Program guidelines among controlled companies and investees, aligning with the principles of Banco do Brasil and applicable regulatory requirements.

The Company advises its representatives in the governance bodies of the investees, especially in the Board of Directors and the Advisory Committees, on aspects related to the Program.

Additionally, technical exchanges are promoted between the investees, BB Seguridade, and Banco do Brasil, strengthening the integration and dissemination of best practices.

### **Update**

The Program is revised at least every two (2) years, or extraordinarily at any time.

### **Count on Us**

Questions and suggestions about the Compliance and Integrity Program can be forwarded to:

[controles@bbseg.com.br](mailto:controles@bbseg.com.br)

