


BB SEGURIDADE PARTICIPAÇÕES S.A.

# INTERNAL REGULATIONS

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ETHICS AND INTEGRITY  
COMMITTEE

08.30.2024



## ETHICS AND INTEGRITY COMMITTEE'S INTERNAL REGULATIONS

### CHAPTER I – PURPOSE AND ORGANIZATION

**Art. 1º** These Internal Regulations govern the functioning of the Ethics and Integrity Committee ("Committee") of BB Seguridade Participações S.A. ("BB Seguridade" or "Company"), defining its composition, the responsibilities and duties of its members, as well as its operation and functioning, in compliance with the provisions of the Articles of Incorporation and applicable law.

**Art. 2º** The Committee is a non-statutory advisory body to the Board of Directors, which operates on a permanent basis and whose purpose is to monitor and contribute to the improvement of training actions and the dissemination of the culture of ethics and integrity included in BB Seguridade's Integrity Program.

§ 1 The Committee's main purpose is to receive and conduct complaints that may not be supported by the approved and standardized flows from the Ethics and Integrity Channels, namely: Banco do Brasil's ("BB") Internal Ombudsman and Unlawful Acts Channel and/or through different channels to the Controller's Ethics and Integrity Channels.

§ 2 The Ethics and Integrity Committee shall also exercise its duties and responsibilities with the subsidiaries that adopt the single Ethics and Integrity Committee regime within the scope of BB Seguridade.

§ 3 The Ethics and Integrity Committee reports directly to the Board of Directors.

### CHAPTER II – COMPOSITION

**Art. 3º** The Ethics and Integrity Committee shall be made up of the following members:

- I. General Superintendent of Strategy, Marketing and Advisory Services;
- II. Executive Superintendent of Governance, Risk and Compliance;
- III. Executive Superintendent of Finance and Equity Management;
- IV. Executive Superintendent of Business and Clients; and
- V. Executive Superintendent of Technology, Portfolio and Analytical Intelligence.

§ 1 BB Seguridade's Lead Auditor shall be a permanent guest at the Committee's meetings, without voting rights.

§ 2 In the event of changes to the Company's organizational structure, the Committee shall assess the need to adjust its composition.

§ 3 The role of member of the Committee is non-compensated and non-delegable, a proxy being allowed to participate only in the cases provided for in the internal regulations for transitional provision.

§ 4 In the event of vacancy of any permanent member of the Committee, the composition of the Committee shall automatically be deemed to be reduced by the same number as long as the original position remains vacant.

§ 5 For the purposes of these Internal Regulations, a vacancy occurs when a member is removed from office, dies or is on leave for more than 30 days, taking into account the provisions of § 3 of this article on the replacement rule.

§ 6 Members of the Committee shall have full independence in the exercise of their assignments, and shall maintain confidentiality about relevant, privileged or strategic information received from the Company, being forbidden to use them for their own benefit or for the benefit of third parties.

§ 7 BB Seguridade's officers shall be invited to participate in the Committee's meetings, following a rotation system. Only one officer shall be present at each meeting, thus ensuring the alternating participation of all officers. The order of participation shall be established in advance by the coordinator and informed to all members of the committee and the board.

**Art. 4º** The Ethics and Integrity Committee shall have a Coordinator, who shall be the General Superintendent of Strategy, Marketing and Advisory Services.

§ 1 In the event of vacancy in the position of General Superintendent of Strategy, Marketing and Advisory Services, the position of Coordinator of the Committee shall be held on an interim basis by the Executive Superintendent of Governance, Risk and Compliance.

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### CHAPTER III – POWERS

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**Art. 5º** It is the responsibility of the Ethics and Integrity Committee:

- I. To monitor and contribute 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;
- II. To analyze and forward to the competent bodies any incidents received for which the investigation and accountability flows have not been approved and/or standardized;

- III. To monitor compliance with sanctions, including those determined by Banco do Brasil;
- IV. To provide information to the Audit Committee, the Board of Directors and Banco do Brasil on the conduct of any demands made by the Committee;
- V. To submit to the Board of Directors, whenever necessary, a proposal to amend the terms of these Internal Regulations.
- VI. To propose, if applicable, to the decision-making bodies, 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
- VII. To follow guidelines issued by the Committee itself.

**Art. 6º** It is the responsibility of the Coordinator of the Ethics and Integrity Committee:

- I. to ensure the efficacy and good performance of the Committee;
- II. to convene meetings of the Committee, assisted by the secretary;
- III. to prepare the agenda for the meetings, assisted by the secretary;
- IV. to authorize the inclusion of topics after the deadline for drawing up the meeting agenda;
- V. to coordinate the Committee's meetings;
- VI. to postpone the resolution of any matters and even determine its removal from the agenda;
- VII. to comply with and enforce the rules of these Internal Regulations;
- VIII. to request advice and information from the Company's bodies to support the Committee's decisions;
- IX. to report to the Board of Directors on the progress of the Committee's work;
- X. to decide on reliable situations in administrative and related matters;
- XI. to represent the Committee in its relationship with the Board of Directors, the Company's Executive Board, the other internal bodies of

BB Seguridade and Banco do Brasil, signing, when necessary, mail, invitations and reports;

- XII. to invite, on behalf of the Committee, guests to attend the meeting, without voting rights;
- XIII. to take the casting vote in the event of a tie, taking into account the provisions of Art. 12, § 4, of these Internal Regulations;
- XIV. to inform the members of the Committee of any temporary withdrawal of a member due to their involvement in complaints received;
- XV. to practice other technical or administrative acts necessary for the exercise of its functions;
- XVI. to forward the conclusive report to the People and Management Superintendence so that it can take the necessary measures; and
- XVII. to forward the conclusions of the work carried out to Banco do Brasil.

**Art. 7º** It is the responsibility of each member of the Committee:

- I. to attend the Committee's meetings;
- II. to take part in discussions and votes, asking for reviews of the matter, if necessary, during the discussion and before the vote;
- III. to avoid situations of conflict that could affect the interests of the Company and its shareholders;
- IV. to keep the information confidential;
- V. to draw up accountability reports on the matters dealt with by the Committee;
- VI. to comply with the deadlines established in the Company's internal regulations;
- VII. to request information on matters under consideration by the Committee; and
- VIII. to comply with and enforce these Internal Regulations, the Code of Ethics and internal rules.

**Art. 8º** It is the duty and responsibility of the members of the Ethics and Integrity Committee:

- I. to be guided by the guidelines set out by the Company;

- II. to act with integrity, impartiality and autonomy;
- III. to protect the identity of the whistleblower;
- IV. to ensure the confidentiality of information; and
- V. to report any conflict of interest in the exercise of their activities within the Committee.

## CHAPTER IV – MEETINGS

**Art. 9°** The Committee shall meet ordinarily on a quarterly basis, at a date, place and time previously set, or extraordinarily whenever convened by any of its members, for matters requiring an urgent decision.

§ 1 The Committee's meetings shall be preferably held at the Company's headquarters. Attendance via conference calls, videoconference or other means with instruments that ensure authenticity and that allows the member to effectively attend the meeting, interacting and manifesting their understanding, shall be allowed, and such participation shall be considered as personal attendance.

§ 2 Extraordinary virtual meetings may be held by email or other virtual electronic means only in the case of matters that have already been dealt with by the Committee.

§ 3 Meetings may be recorded, but the confidentiality of the information shall be safeguarded.

**Art. 10°** Ordinary meetings shall be convened by email, with the agenda and necessary documents sent at the same time, at least five (5) business days in advance, with the exception of matters requiring urgent consideration.

§ 1 Meetings are convened with the presence of at least a majority of its members, provided that the Coordinator of the Committee and the Executive Superintendent of Governance, Risk and Compliance are present.

§ 2 Regardless of whether a meeting has been convened, meetings attended by all its permanent members shall be valid, respecting the effects described in §§ 4 and 5 of Article 3 and § 2 of Article 14 of these Internal Regulations.

**Art. 11°** If the Committee deems it necessary for third parties to be present at a given meeting to contribute to the discussions, it may invite representatives of the Company, the controlling shareholder or other persons not connected with the Company with relevant information or whose matters on the agenda are related to its area of activity.

§ 1 Those invited to attend a meeting of the Committee shall remain only during the period in which the matter that originated their convening is being assessed.

§ 2 The record of attendance and clarifications provided by the third party(ies) called upon shall be included in the minutes.

**Art. 12º** The minutes shall be drawn up of the meeting, which shall be signed by all members present at the meeting, including those attending via teleconference, videoconference, whose vote shall be considered valid for all legal purposes and incorporated into the minutes of said meeting.

§ 1 The minutes shall be drawn up in summary form, indicating the agenda number, date and place, the most important points of the discussions, record of those present, reasons for absences, possible irregularities, any divergence points and requested measures.

§ 2 Dissenting votes and abstentions shall be recorded in minutes.

§ 3 Before the vote is closed and the result announced, any member who has already cast their vote may ask the Coordinator to reconsider the vote.

§ 4 In the event of a tie, the coordinator of the Committee shall cast the casting vote, except in cases where the meeting is held with the minimum quorum, in which case decisions shall be taken unanimously.

**Art. 13º** The minutes shall be referred to the Board of Directors for acknowledgment after being signed by all members.

**Art. 14º** At meetings of the Ethics and Integrity Committee, any member who is not independent in relation to the matter under consideration shall declare their conflict of interest or particular interest before the meeting begins.

§ 1 If the provisions of the head provision of this article are not complied with, any other person, whether a member or not of the Committee, may state the conflict, if aware of it.

§ 2 Any member of the Committee who is involved in a complaint received by the Company shall be temporarily removed from the meeting or the specific agenda.

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## CHAPTER V – PROCEDURES

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**Art. 15º** The Ethics and Integrity Committee shall use Banco do Brasil's Internal Disciplinary Control Regulations and Normative Instructions as guidelines for assessing the complaint received. In the event of predictability in the standardized flow, the request shall be redirected, as established in the regulations.

§ 1 In the case of demands not foreseen in the approved flows, it shall be up to the Committee to define how to best deal with them, respecting the normative instructions in force at BB and BB Seguridade.

§ 2 In the absence of internal regulations regarding the occurrence recorded, it shall be up to this Committee to decide how to deal with it, making use, whenever possible, of Banco do Brasil's normative instructions.

## CHAPTER VI – ADVISORY SERVICES AND SECRETARIAT

**Art. 16º** The Ethics and Integrity Committee shall have the special advice of BB Seguridade's People and Management Superintendent, who shall:

- I. advise and provide inputs that help members of the Committee to comply with the provisions of Art. 5 of these Internal Regulations;
- II. to work together with the other areas of the Company to meet the Committee's demands and Work Plan;
- III. to assist the members of the Committee in analyzing the information provided in the materials made available by other areas of the Company; and
- IV. to carry out any other duties of a technical nature defined by the Committee.

**Art. 17º** The Committee shall be secreted by the People and Management Superintendent or whoever is replacing them pursuant to Art. 3, § 3, of these Internal Regulations, who shall:

- I. communicate the convening of Committee meetings;
- II. organize non-face-to-face meetings, as well as enable the remote participation of members in face-to-face meetings, defining the method for holding the meeting and the deadline for submitting the resolutions by the members of the committee;
- III. organize, under guidance of the Coordinator, the agenda of the matters to be dealt with at each meeting, gathering the necessary documents and distributing them in advance, whenever possible;



- IV. distribute the agenda, preparing, drawing up and filing the respective minutes in the proper book and collecting the signatures of the members;
- V. adopt measures to monitor the work carried out by the committee;
- VI. organize and keep, in their custody, the documentation relating to the activities carried out by the Committee;
- VII. draw up the "Statement of Meeting Not Held" of the meeting, stating the reasons why it was not held;
- VIII. forward the minutes to the Committee for approval and for the attention of the Board of Directors;
- IX. propose its annual schedule of meetings to the Committee;
- X. coordinate the review process of these Internal Regulations;
- XI. perform all other acts necessary for the functioning of the Committee, including being able to issue certificates, statements, dispatches, copies of minutes, among others; and
- XII. prepare the mail to be signed by the Coordinator and the other members of the Committee.

## CHAPTER VII – FINAL PROVISIONS

**Art. 18º** It is the responsibility of the Board of Directors to resolve any existing doubts and cases omitted from these Internal Regulations.

**Art. 19º** The Board of Directors shall be responsible for assessing, reviewing and adapting these Internal Regulations, on its own initiative or on the recommendation of the Ethics and Integrity Committee.

**Art. 20º** These Internal Regulations shall come into force as of the date of its approval by the Board of Directors and shall be filed in the Company's headquarters.

Brasília (DF), August 30, 2024.