

**CAIXA**

seguridade

**Compliance and Integrity  
Program of Caixa Seguridade  
Participações S.A.**

## MESSAGE FROM THE RISK, INTEGRITY AND COMPLIANCE OFFICER

Caixa Seguridade had its first Code of Ethics and Conduct approved in 2015 and, over these 4 years, the Company has evolved and matured its processes for the construction and maintenance of an ethical and honest environment.

In 2017, the company consolidated in its Compliance and Integrity Program the set of policies, mechanisms, procedures and actions adopted by the company as a commitment to good corporate governance practices, transparency and the promotion of ethical, integral and responsible conduct in conducting its business.

The 3rd Edition of the Program demonstrates the maturity of the Company in maintaining an anti-corruption environment over these 4 years and demonstrates the commitment of Senior Management in relation to the topic. The sustainable growth of our business is only possible thanks to daily actions and decisions based on ethical values and in compliance with current legislation, reflecting a transparent, responsible and integral work that seeks to generate benefits for shareholders.

Thus, we invite all of our employees, managers, officers, committee members and collaborators to do the right thing and to lead by example, recognizing that success is built on integrity.

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

The collegiate bodies of Management who sponsor actions that seek the effectiveness of the Program approved the 3rd Edition of the Caixa Seguridade Compliance and Integrity Program (2019).

### BOARD OF DIRECTORS

<b>CEO</b>	Pedro Guimarães
<b>Board Members</b>	Adão Nunes da Silva Antônio Joaquim Gonzalez Rio Mayor Leonardo José Rolim Guimarães Júlio Cesar Volpp Sierra Thays Cintra Vieira

### COLLEGIATE BOARD

**Chief Executive Officer** Marco Antonio da Silva Barros

**Executive Officers** Gustavo de Moraes Fernandes  
Leonardo Giuberti Mattedi  
Rafael de Oliveira Morais

The Compliance and Integrity Program is administered and coordinated by the Board of Governance, Risks and Investor Relations and by the National Superintendence of Risks, Internal Controls and Compliance at Caixa Seguridade, which periodically report to the collegiate on issues surrounding the Program.

### BOARD OF GOVERNANCE, RISKS AND INVESTOR RELATIONS

**Executive Officer** Leonardo Giuberti Mattedi

### NATIONAL SUPERINTENDENCE OF RISKS, INTERNAL CONTROLS AND COMPLIANCE

**National Superintendent** Luiz Felipe Figueiredo de Andrade

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## PRESENTATION

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

The purpose of the Program is to ensure the correct application of internal and external regulations, prevent, detect and remedy inappropriate conduct by Managers<sup>1</sup>, members of boards and committees, managers, employees and employees of Caixa Seguridade and ensure the effective application of the Code of Ethics and Conduct, policies and guidelines of the Company, in order to consolidate its sustainability and ensure the results expected by the stakeholders.

Considering the nature of a holding company with interests in companies in the insurance industry, the Company considers actions related to this Program in the activities it carries out with the nominees to act as advisors, members of committees or officers in the companies in which it participates.

The measures adopted in the Program are in line with the best governance practices, with the provisions of Law No. 13,303/2016 and its regulations, observe the legal requirements for preventing and fighting corruption (Law No. 12,846/2013), and are a reference for all areas of the Company maintain their processes in accordance with the legislation and internal rules.

An effective Compliance and Integrity Program mitigates risks, prevents the occurrence of infractions and damages resulting from them, which, in addition to adding, prevents the loss of company value. For that, it is necessary to engage the entire Company.

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

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

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<sup>1</sup> Member(s) of the Board of Directors and Executive Board.

<sup>2</sup> Employees in management positions and Officers.

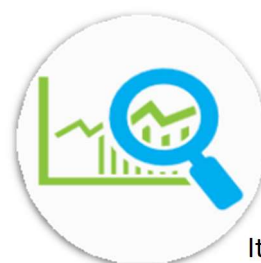
<sup>3</sup> the Company may affect individual or group that may affect the Company, through its opinions or actions, or that.  
Example: Senior Management, internal public, suppliers, consumers, community, government, shareholders, among others.

## 1st PILLAR: COMPLIANCE AND INTEGRITY ENVIRONMENT



It shows the commitment and support of the Company's Senior Management to the Compliance and Integrity Program through actions, approval of policies and other internal rules, compliance with legal and regulatory rules, in addition to instruments aimed at preventing, detecting and remedying harmful acts Public Administration and the Company, with the objective of fostering a culture of compliance and integrity.

## 2nd PILLAR: RISK MANAGEMENT AND INTERNAL CONTROLS



Its premise is risk management, information security, internal controls, compliance and integrity across the Company, defining policies on these topics with responsibilities for all collaborators, especially process managers.

It highlights the process adopted by the Company to identify, assess and adopt responses to risk events in the units' processes, as well as instructing on the disclosure of information.

## 3rd PILLAR: COMPLIANCE AND INTEGRITY PROCEDURES



It highlights the internal compliance and integrity procedures adopted, as well as the incentive to report irregularities and the effective application of codes of ethics and conduct, policies and guidelines in order to detect and remedy conflicts of interest, presence of nepotism, deviations, fraud, irregularities and illegal acts.

## 4th PILLAR: COMMUNICATION, TRAINING AND MONITORING



It deals with the transparency related to the subjects that permeate the universe of compliance and integrity, including the measures adopted to disseminate the objectives, standards, conducts, values and procedures that make up the Program, contemplating the Training and Communication Plan on compliance and integrity and evaluation actions to verify the Program's effectiveness.

The Pillars of the Compliance and Integrity Program support the guidelines for administrators, employees, collaborators, board members, committee members and Caixa Seguridade Managers regarding compliance. They represent important and priority themes for the Company and receive special attention from the leaders, who work with their teams to ensure the effectiveness of the Program.

## 1 COMPLIANCE AND INTEGRITY ENVIRONMENT

Caixa Seguridade structures actions, processes and instruments to constantly maintain and strengthen the ethical and upright environment.

### 1.1 Senior Management Support

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

The Company's Statute express the duty of the Executive Board to observe good corporate governance practices and that of the Board of Directors to set the general business guidelines and corporate governance guidelines<sup>4</sup>. According to the Best Practices Guide of the Brazilian Institute of Corporate Governance (IBGC)<sup>5</sup>, governance agents are responsible for ensuring that the entire organization is in compliance with its principles and values, reflected in internal policies, procedures and standards, and with laws and regulatory provisions to which it is subject.

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

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

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

Its principles are based on the Charter of Principles of Social Responsibility, the United Nations Convention against Corruption, the 10th principle of the Global Compact and the

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<sup>4</sup>Article 36, III: It is primarily the responsibility of the Board of Directors, the general management and the executive management of the Company, being responsible for ensuring the regular operation of the company in accordance with the general guidelines outlined by the Board of Directors, in particular: III - observe good corporate governance practices;"

Article, 30, I: "It is incumbent upon the Board of Directors, in addition to other duties provided for in the Brazilian Corporation Law, Law No. 13,303/2016, Decree No. 8,945/2016, other applicable laws and in its Internal Regulation: I - establish the general business guidelines and the corporate governance guidelines of the Company;"

<sup>5</sup> IBGC Guide available at [http://www.ibgc.org.br/userfiles/files/2014/files/codigoMP\\_5edicao\\_baixa%5b1%5d.pdf](http://www.ibgc.org.br/userfiles/files/2014/files/codigoMP_5edicao_baixa%5b1%5d.pdf).

guidelines of the Organization for Economic Cooperation and Development. Among the main commitments expressed are:

- Legislation information: laws must be known internally to be fully complied with;
- Disclosure, guidance and responses on legal principles applicable to its activities;
- Prohibition against bribery;
- Transparent and lawful contribution to political campaigns;
- Propagation of Pact principles among its audiences;
- Open and transparent investigations;
- Performance along the production chain

Currently, Caixa Seguridade's Collegiate Board is composed of 01 Chief Executive Officer and 03 Executive Directors, 01 of which is Administration and Finance, 01 Commercial and Products, 01 Governance, Risks and Investor Relations.

The Board of Directors is composed of 07 effective members, with 03 representatives from Caixa Econômica Federal (CAIXA), 02 from the Ministry of Economy and 02 Independent Members.

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

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

- Audit Committee;
- Transactions with Related Parties Committee;
- Eligibility Committee.

#### 1.1.1 Governance, Risk and Investor Relations Board

In 2019, the Company adapted its organizational structure by incorporating the activities of the Governance, Risks and Internal Controls Department to the activities of the Strategic and Corporate Governance Board, which came to be called the Governance, Risks and Investor Relations Board.

The change in structure resulted from Senior Management's decision in line with the strategic guidelines of the CAIXA Conglomerate, whose guideline is to rationalize costs, increase synergy and gain in efficiency.

In this way, the Governance, Risk and Investor Relations Board was established, an independent and autonomous unit, reporting directly to the Board of Directors of Caixa Seguridade and which, within its structure, has a National Risk Management, Internal Controls Superintendence and Compliance, directly linked to the Officer, with the following duties:

- Risk Management of Caixa Seguridade and subsidiaries.
- Business continuity and contingency of Caixa Seguridade and subsidiaries.



- Information Security of Caixa Seguridade and subsidiaries.
- Internal Control System of Caixa Seguridade and subsidiaries.
- Compliance and Integrity (Ombudsman and Internal Affairs) of Caixa Seguridade and its subsidiaries.
- Contagion Risk Management.
- Institutional relationship with control and inspection bodies.

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

The Executive Board and its National Superintendence exercise their duties independently in relation to the other executive boards and areas of the company and can report directly and without the presence of the members of the Collegiate Executive Board, to the Chief Executive Officer and the Board of Directors, when necessary and have obligations defined in the Legislation, Statute<sup>6</sup> and in the implemented Policies.

## 1.2 Alignment with Strategic Planning

In 2018, Caixa Seguridade adopted the COSO ERM 2017<sup>7</sup> framework in risk management. This model highlights the importance of risk management in the definition and execution of the strategy and in the management of organizational performance and provides for the definition of the Risk Appetite Statement (RAS).

In this context, the Company approved in 2019 its Risk Appetite Statement, which is transversal to the entire company and was integrated into its Strategic Planning. Thus, Caixa Seguridade aligned risk management with strategy management, insofar as risk management practices support the identification and assessment of risks that impact planning in a prior and integrated manner.

For the period from 2020 to 2025, Caixa Seguridade revised its Strategic Planning, consolidating its mission as follows:

### MISSION

- **Operate in the insurance market, guaranteeing the satisfaction of our customers, generating sustainable results and shareholder value**

The Company also reformulated the values that guide its ideals of behavior and results that must be present in the actions and relationships of statutory members, representatives and collaborators of Caixa Seguridade with its customers, suppliers and partners, as follows:

<sup>6</sup> Caixa Seguridade Participações S.A. Statute, Article 37, III and Article 56.

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



- **CUSTOMER FOCUS:** Continuously improve the customer experience.
- **INNOVATION:** Generate new ideas and digitally transform our business.
- **TRANSPARENCY:** Disclose information in a clear and timely manner, in order to provide its understanding by interested parties.
- **INTEGRITY:** Act on respecting the Company's ethical and moral values and principles, observing the laws and regulations.
- **COMMITMENT:** Act as owner of the company, focused on the effectiveness of the actions.
- **SIMPLICITY:** Uncomplicated work to gain agility and do more with less resources

Based on the definition of its values and its strategic identity, Caixa Seguridade prepared a strategic map with strategic initiatives from the perspectives of Business, Customers and Market, Governance and Risk, People and Technology.

This Program is, therefore, in line with the Mission “Operate in the insurance market, generating sustainable results and shareholder value”; to all Values, namely "Customer Focus", "Innovation", "Transparency", "Integrity", "Commitment" and "Simplicity" and the Company's Strategic Planning, which it defined as a strategic initiative from the Governance and Risk perspective "Strengthen the governance, risk management and integrity environment".

In addition, the guidelines, mechanisms and procedures consolidated in this document help the Company to achieve its strategic objectives to the extent that the program permeates the entire organization, encompasses all processes, involves all people and plays an important role for its sustainability.

### 1.3 Code of Ethics and Conduct

Ethical values and rules of conduct that should guide the conduct of business, actions and relationships with the Company's internal and external interlocutors, as well as the prevention of conflicts of interest and the prohibition of acts of corruption and fraud, are established in the Caixa Seguridade Codes of Ethics and Conduct, a document approved by senior management and available to everyone on the Company's website, in addition to being available to employees and collaborators in an online tool on the intranet.

In 2019, the document was updated with the current legislation as the norm, the best market practices and seeking harmonization with the CAIXA parent company Codes of Ethics and Conduct.

In terms of ethics, the Company communicates the ethical sentiment of its Managers, employees and other collaborators, and manifests its organizational identity through its business and mission statement which, added to the set of values, allow the Company to be aligned to the achieve its goals.

The conduct regulation establishes the rights and obligations of statutory members, employees and representatives of Caixa Seguridade in its subsidiaries and affiliates and provides standards of conduct to be observed by all in order to prevent dishonest conduct, focusing, among others, on the following topics:

- ✓ Prevention of conflict of interest;
- ✓ Fight against corruption;
- ✓ Nepotism;
- ✓ Disclosure and confidentiality of information;
- ✓ Participation in external events;
- ✓ Social networks;
- ✓ Gifts and Presents; and
- ✓ Use of the Company's assets and goods.

The Code of Conduct also establishes behaviors regarding the relationship with suppliers and partners and prohibits the establishment of partnerships and hiring of suppliers that use child labor, slave or similar labor and that adopt practices contrary to the International Charter of Human Rights, as well as the Statutes of the Elderly and Children and Adolescents.

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

Conduct must take into consideration not only the legal and the illegal, the just and the unjust, the convenient and the inconvenient, the opportune and the untimely, but especially the honest and the dishonest, with the common good in mind.

It is important to note that the competence for the approval of both regulations lies with the Board of Directors of Caixa Seguridade and that all employees, statutory members and members of committees of the Company are required to sign a Term of Awareness, which must be renewed annually.

These Codes are guided by the Code of Professional Ethics of the Civil Public Servant of the Federal Executive Branch, approved by Decree No. 1,171/1994 and amended by Decree No. 6,029/2007, and by the Code of Conduct of the High Federal Administration and are aimed at statutory members, employees, collaborators, committee members and nominees of Caixa Seguridade and its Subsidiaries. Also, in order to maximize the engagement and values that surround them, all employees are invited to express themselves and contribute to the constant evolution of the rules that are discussed and approved by the Senior Management.

Currently, Caixa Seguridade's staff consists of employees of CAIXA, parent company of Caixa Seguridade. For this reason, the Company's employees also adhere to that institution's Codes of Ethics and Conduct.

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

#### 1.4 Ethics and Internal Affairs Committee

Within Caixa Seguridade, the Board of Governance, Risks and Investor Relations / National Superintendence of Risk Management, Internal Controls and Compliance is the area responsible for Compliance and monitors and monitors all ethical and disciplinary events, as well as the applications of eventual penalties to the managers, employees and other collaborators, if it occurs.

Eventual violations of the Company's rules may be dealt with by the Ethics Committee and CAIXA's Internal Affairs Department<sup>8</sup>, which may recommend the application of penalties to its Managers, employees, board members and statutory committees of the Company and its Subsidiaries, being followed up and monitored by the Board and Compliance Superintendence of Caixa Seguridade.

CAIXA's performance in these cases is based on: a) the prerogative conferred by Decree No. 8,945/2016 to subsidiaries, which may share costs, structures, policies and disclosure mechanisms with their parent company, and b) the fact that the composition of the Caixa Seguridade employees must be employees of the CAIXA parent company.

The Commission is an autonomous body of a deliberative nature with the purpose of acting in the management of professional ethics, as well as in the treatment of people and public assets, and it is also incumbent upon it to deliberate on unethical conduct and on violations of ethical norms brought to your attention.

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

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

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

- ✓ Guide and advise on the professional ethics of managers and employees;
- ✓ Investigate and deliberate on complaints about unethical conduct by managers and employees;
- ✓ Apply ethical censorship to employees;
- ✓ Apply and ensure compliance with the Codes of Ethics, the Code of Professional Ethics of the Civil Public Servant of the Federal Executive Branch, as well as apply and ensure compliance with the Code of Conduct for Senior Federal Administration, reporting situations to the Public Ethics Committee (CEP) that may constitute non-compliance with its rules;
- ✓ Settle doubts regarding the interpretation of ethical standards;
- ✓ Mediate and reconcile situations that involve ethical issues for which the Code of Ethics is silent.

CAIXA's Internal Affairs Department is linked to the Presidency of the Financial Institution and is responsible for managing the disciplinary and civil liability verification processes, and is responsible for carrying out the preliminary analysis, initiation and instruction of the processes, which may result in warning, suspension and termination of the case, employment contract, as well as any liability provided for by law.

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<sup>8</sup> Except for the ethical violations committed by the Company's Board of Directors and Supervisory Board members, which are referred to the Public Ethics Committee (CEP).

In the case of less complex disciplinary issues, the Conduct Adjustment Term (TAC) may be signed, whereby the employee recognizes the inadequacy of his/her behavior.

## 1.5 Internal Policies and Regulations

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

### ➤ **Policies:**

- ✓ Conflict of Interest Prevention Policy: establishes principles, guidelines and responsibilities to mitigate the risk of involvement in situations that constitute conflict of interest in the exercise of the position and/or function of the Statutory Members, committee members, Employees, Collaborators and Nominees in activity at Caixa Seguridade Participações S.A. and its Affiliates.
- ✓ Internal Controls Policy: establishes principles, guidelines and responsibilities to be observed to ensure the effectiveness of the Company's Internal Controls System, as well as to disseminate the culture of internal controls, in order to guarantee the achievement of the Company's objectives.
- ✓ Compliance and Integrity Policy: it guides the statutory members, representatives and employees of Caixa Seguridade regarding the Company's compliance and integrity rules in order to ensure compliance with the laws, regulations, codes, policies, rules and procedures that govern its activities in order to promote the prevention, detection and combating the occurrence of illegal acts and fostering an anti-corruption environment.
- ✓ Risk Management Policy: aims to promote the management of risks to which the Company is exposed, aiming to maintain these risks at levels considered acceptable by the institution's management, ensuring its business model, future performance, solvency, liquidity and sustainability.
- ✓ Information Security Policy: establishes principles and guidelines for the protection and discipline of the use of the CAIXA Seguridade's information assets or in its custody, ensuring the availability, integrity, confidentiality and authenticity.
- ✓ Securities Trading Policy and Disclosure of Material Facts: disciplines the use and disclosure of information within the scope of the Company, its affiliates and controlled companies, also contemplating the procedures for maintaining confidentiality about undisclosed information and the policy of trading of the Company's Securities.
- ✓ Financial Investment Policy: establishes the guidelines and measures that guide the investment management of Caixa Seguridade's financial resources.
- ✓ Dividend Distribution Policy: establishes criteria and rules related to the distribution of dividends from Caixa Seguridade.

- ✓ Social Environmental Responsibility Policy: aims to ensure Caixa Seguridade's sustainable performance through the integration of the social and environmental dimensions in its strategy, ensuring the incorporation of the principles and guidelines of this policy in business, processes and relationships with stakeholders.
  - ✓ Policy for the Appointment of Managers, Supervisory Board members and Committee Members in Caixa Seguridade's Subsidiaries: establishes principles, general guidelines and responsibilities that guide the process of appointing Directors, Supervisory Board members and Committee members of the Company's subsidiary companies.
  - ✓ Transactions with Related Parties Policy: establishes principles and guidelines for the decision process related to transactions involving Caixa Seguridade related parties, guiding the procedures to be observed by the Company, its subsidiaries, employees, administrators and shareholders on transactions with related parties.
  - ✓ Corporate Equity Policy: establish principles, general guidelines and responsibilities on investments and/or divestitures in equity interests in other companies, to guide corporate governance and the management of these investments.
  - ✓ Spokesperson Policy: disciplines Caixa Seguridade's communication with the press and with capital market agents.
  - ✓ Nomination and Eligibility Policy: establishes principles and guidelines that guide the nomination and eligibility process for Managers, Supervisory Board members, members of Statutory Committees, as well as defines the mandatory analysis of the profile of the maximum non-statutory members of the internal audit and the area responsible for the risk, internal control and compliance.
- **Internal Regulations:**
- Among the internal regulations, the following stand out:
- ✓ Scope Regime: establishes and discloses the set of values that define the scopes of employees to be observed in the execution of activities under the responsibility of Caixa Seguridade.
  - ✓ Boards and Committees: regulates the functioning of Caixa Seguridade Boards and Committees in accordance with its Statute.
  - ✓ Monitoring of Results of Invested Companies: aims to monitor the accounting results achieved by the affiliated and jointly controlled companies belonging to the Caixa Seguridade Participações S.A.
  - ✓ Contracting of Goods and Services: regulates the contracting process for the acquisition of goods and provision of services that meet the needs of Caixa Seguridade.

- ✓ Incorporation, Acquisition, Merger, Incorporation, Sale And Alteration Of Equity Interest: establishes guidelines and procedures for the analysis and decision of Caixa Seguridade on the constitution, merger, acquisition, incorporation, disposal and alteration of equity interest.
- ✓ Monitoring of Caixa Seguridade's Holdings: establishes guidelines and procedures to monitor privately held companies in which Caixa Seguridade holds equity interest.
- ✓ Appointment Process for Managers, Officers and Audit Committee Members of the Caixa Seguridade Affiliates: regulates the process for appointing managers, officers and members of the Audit Committee and the Financial Advisory Board of Caixa Seguridade's affiliates.
- ✓ Training Program for Managers, Supervisory board members and Committee Members: guides training solutions aimed at developing and improving the skills of the members of the Company's statutory bodies to achieve the effectiveness of the corporate governance system.
- ✓ Evaluation, Monitoring and Reporting on Risk Management, Internal Controls and Compliance of Associated Companies: establishes the process of evaluation, monitoring and reporting from the perspective of risk management, internal controls and compliance of Caixa Seguridade's associated companies.
- ✓ Classification and Treatment of Information: standardizes the appropriate classification and treatment of information at Caixa Seguridade.
- ✓ Treatment of Information and Values Received from Subsidiaries Due to Access to the Caixa Counter for the Sale of Insurance Products: details the operational procedures relating to information on payments and Fees made by Partner Institutions.
- ✓ Caixa Seguridade Standards - General Rule: discloses normative, standardized and qualified guidelines, so that they can be complied with by the Target Audience of Caixa Seguridade standards in the performance of their tasks and responsibilities.

## 1.6 Internal Audit

Decree nº 8.945/2016 that regulates, within the scope of the Union, the Law of State-owned companies (Law nº 13.303/2016), establishes a series of transparency and governance mechanisms to be observed by public companies, mixed-capital companies and their subsidiaries, in which the activities and obligations of the internal audit are inserted.

Internal Audit is regulated by CGU Normative Instruction No. 03/2017, which approved the Technical Reference for Government Internal Audit Activity by the Federal Executive Branch, and by CMN Resolution No. 4588/2017, which regulates internal audit activities in financial institutions authorized to operate by the Central Bank of Brazil.

Considering that Article 14 of the aforementioned Decree provides that the subsidiaries may share costs, structures, policies and mechanisms for disclosure with their parent company, Caixa Seguridade and CAIXA, represented by its General Audit, signed a Structure Sharing and Execution Agreement. Operational Activities, where they established the Internal Audit activities to be developed and the respective areas of operation.

Among the activities developed by the Internal Audit we highlight:

- Coordinate and execute Caixa Seguridade's operational, financial, accounting and information technology audit work; and
- Submit to the Caixa Seguridade Board of Directors the proposed Internal Audit Activities Annual Plan - PAINT for the following year.

In this way, the internal audit work is performed by CAIXA's Internal Audit through a Structure Sharing and Execution of Operational Activities Agreement that extends to Caixa Seguridade the internal audit operational rules applicable to the parent company with respect to the roles and work of audit.

It is noted that the Internal Audit contracted is directly linked to the Board of Directors of Caixa Seguridade, with autonomy and sponsorship from Senior Management to carry out its activities.

## 2 RISK MANAGEMENT AND INTERNAL CONTROLS

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

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

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

- ✓ Risk Appetite Statement – RAS;
- ✓ Internal Controls Policies;
- ✓ Compliance and Integrity Policy;
- ✓ Conflict of Interest Policy;
- ✓ Risk Management Policy;
- ✓ Information Security Policy;
- ✓ Standard for the Treatment and Classification of Information in compliance with the Access to Information Law;



- ✓ Application of the Business Impact Analysis (BIA) Methodology - Subsidiaries the definition of Caixa Seguridade's critical activities;
- ✓ Crisis Management Strategy and Business Continuity with the Contingency Plan for the identified critical activities;
- ✓ Methodology for assessing, monitoring and reporting Affiliates;
- ✓ Compliance activities - Monitoring of legislation and regulatory standards.

The Company adopts the model of **three lines of defense** in risk management and internal controls, as detailed below:

- ✓ **First line of defense:** identifies, assesses and controls risks and is comprised of operational and internal controls. Managers who hold business risks are responsible for managing them and implementing corrective measures in poor processes and controls;
- ✓ **Second line of defense:** comprises the Company's risk management, internal controls, and is responsible for monitoring and contributing to the implementation of effective risk management practices. The Compliance Risk Monitoring function is also the responsibility of the second line of defense;
- ✓ **Third line of defense:** is exercised by internal audit, which is responsible for providing governance bodies with objective and independent assessments of the effectiveness of internal controls, risk management and governance.

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

Thus, the Risk Management Model adopted encourages joint action between the managers responsible for the processes and the risk manager, internal controls and Compliance, preserving the necessary independence between the lines of defense.

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

- ✓ **Strategic Risks:** composed of **Contagion, Strategy, Social Environmental and Reputation or Image** risks.
- ✓ **Financial Risks:** composed of **Capital, Credit, Liquidity and Market**.
- ✓ **Operational Risks:** formed exclusively by the **Operational Risk** itself and by the **Cyber Risk**, its levels being established in standard.
- ✓ **Regulatory Risks:** consists of **Compliance and Legal Risks**.

With regard to the risks inherent in the companies in which the Company holds interests and which may affect Caixa Seguridade's business or results, despite the companies themselves have their own Risk Management structure (2nd line of defense) and Internal Audit (3rd line of defense) with their own corporate governance structure and periodic independent auditing, continuous monitoring and evaluation are carried out, as stated in the Management Policy Company risks.

In addition, through the corporate governance of the subsidiaries, companies are guided to adopt the best risk management practices, internal controls and compliance.

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

With regard to the treatment of information, the Company has mechanisms that regulate the care that must be observed in the treatment of internal information, or in the custody of the Company, in order to mitigate the risks inherent to this process.

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

In this context, Caixa Seguridade has an Information Security Policy that was structured in line with the best practices of Law No. 12,527/11 and the Institutional Security Office of the Presidency of the Republic<sup>9</sup>. It aims to protect the company's information assets, based on 4 principles: Availability, Integrity, Confidentiality and Authenticity, with specific guidelines for their reach, in addition to the definition of responsibilities.

The standard is aimed at all administrators, employees, collaborators and other users of Caixa Seguridade's information, or in their custody, and advises that practices be adopted to ensure the protection of the information under its management against alteration, destruction, disclosure and copying unauthorized, accidental or intentional. As an example, we can mention the practice of a clean table, a clean screen and a clean printer, which is disseminated in the Company, and which advises that papers and media should be kept in safe places, personal computers and printers should not be left on when not in use (must be protected by passwords or other controls in the absence of the user).

As a publicly held company, Caixa Seguridade is subject to the rules of the Brazilian Securities and Exchange Commission (CVM), which provides guidelines for the appropriate treatment of information and penalties for non-compliance, which can reach individuals of the company, such as its administrators and those responsible for safeguarding privileged information, among others.

In addition, although it does not have shares traded on the organized over-the-counter market, it follows the rules recommended by the Novo Mercado da Brasil, Bolsa e Balcão [B]3, as provided in its Statute<sup>10</sup>, and seeks to be in line with the best market practices in matters of governance<sup>11</sup>.

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<sup>9</sup> Normative Instruction GSI/PR No. 1, of 06/13/2008 and Complementary Norm GSI/PR No. 03, of 06/30/2009.

<sup>10</sup> Pursuant to Article 1, Paragraph 1 of the Statute of Caixa Seguridade Participações S.A.

<sup>11</sup> In 2019, Caixa Seguridade won the Level 1 seal of the State-Owned Companies Governance Indicator - IG-SEST, which is a continuous monitoring tool developed by the State-Owned Companies' Coordination and Governance Secretariat - SEST, of the Ministry of Economy, in order to evaluate compliance with the requirements of Law No. 13,303/2016 and guidelines established in the Resolutions of the Interministerial Committee on Corporate Governance and Administration of Corporate Participation of the Union - CGPAR, which seeks to implement in state-owned companies the best market practices and a higher level of excellence in governance

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

With regard to the disclosure of information, Caixa Seguridade makes available to interested parties relevant information related to its operation, in compliance with legal and regulatory requirements, with due regard for information security.

The Company understands that efforts to promote market efficiency should aim at ensuring that competition among stakeholders for better returns occurs in the analysis and interpretation of the information disclosed and never in privileged access to the same information. Thus, it instituted the Governance, Risk and Investor Relations Department, which is responsible for identifying, evaluating and disclosing information that can be communicated to the market.

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

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

The Company understands that the observance of Information Security in its activities and processes allows reducing the risks of losses and is of fundamental importance to achieve the objectives defined by the Senior Management. Thus, it is the duty of all advisors, officers and employees of the security fund, or indicated by it to compose its subsidiaries, preserve the availability, integrity, confidentiality and authenticity of the information and ensure that only authorized persons obtain access.

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

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corporate companies that were certified in 2019 can be consulted at <http://www.planejamento.gov.br/empresas-estataisigsest/certificacoes-ig-sest/4o-ciclo-certificacao-ig-sest>.

Risk management is essential for the Company to achieve its objectives, meet the requirements of stakeholders, and remain profitable, of high quality and with a positive perception of the high degree of responsibility of its employees, statutory and appointed members, which contributes to its perpetuity. The mitigation, control, monitoring and disclosure of risks lead to greater confidence and reduce the likelihood of losses and subject to catastrophes of the financial order that could harm the Company.

## 3 COMPLIANCE AND INTEGRITY PROCEDURES

### 3.1 Code of Ethics and Conduct, Policies and Internal Standards

Conducts that go against the provisions of this Program must be immediately reported to the Risks, Internal Controls and Compliance area of Caixa Seguridade and can be reported by any stakeholder. To this end, the Company has a specific channel for receiving internal and external complaints that is disclosed and available on the Company's website, guaranteeing the whistleblower's secrecy and protection against any form of reprisal, intimidation or discrimination.

Denunciations eventually received, have a rite of analysis and, if there are signs of materiality, they are forwarded to the pertinent instances, for further investigation and accountability, if applicable. Those responsible have instruments for taking appropriate, timely and applicable measures to interrupt unlawful acts, as well as for the repair of damages resulting from acts in disagreement with the laws, regulations, codes, policies, norms and procedures that govern the Company's activities.

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

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

In addition, employees, statutory and appointed members of Caixa Seguridade adhere to the Codes of Ethics and Conduct, the Risk Management, Internal Controls, Compliance and Integrity and Information Security Policies, as well as the Compliance and Compliance Program by signing the Term of Awareness.

### 3.2 Compliance Matrix and Calendar

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

The **Compliance Calendar** (Legal Obligations) has information on regulations, deadlines, penalties and compliance regarding compliance with the obligation and aims to assist the monitoring of the 1st line of defense (process managers) and the 2nd line of defense, in meeting demands regulations by the Company's units helping to mitigate regulatory risk.

### 3.3 Accounting Records and Controls

In relation to accounting records and controls, the Company uses accounting practices adopted in Brazil, especially Law 6,404/76, as amended, the Technical Pronouncements of the Accounting Pronouncements Committee (CPC), when endorsed by the Brazilian Securities Commission (CVM), and the International Financial Reporting Standards (IFRS) issued by the IFRS Foundation.

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

Said Unit also observes the internal policies and rules for accounting of information from the Managers of the other processes of the Company, maintaining first line of defense controls throughout the accounting cycle (receipt of information, registration, consolidation and disclosure).

The annual and interim financial reports and financial statements produced are approved by Senior Management, audited by the Internal Audit and Independent Auditors, monitored by the Audit Committee and receive an opinion from the Supervisory Board, in accordance with the Company's Statute and applicable legislation.

### 3.3 Hiring

The bidding, contracting and contract management processes are carried out in accordance with the applicable legislation, as well as with the recommendations of the control and inspection bodies. The Company adhered to the CAIXA Bidding and Contracts Regulation, pursuant to art. 40 of Law No. 13,303/16 and follows the rules established by the parent company in the contracting for the acquisition of goods and services.

An assessment is carried out prior to contracting suppliers and service providers to check for possible risks that could harm the Company's interests. In addition, Caixa Seguridade uses contractual instruments that include clauses aimed at ensuring the commitment of suppliers, service providers and partners with the adoption of mechanisms to prevent corruption and other illegal acts.

All hiring of Caixa Seguridade must be authorized in accordance with the scope defined in the Company's Responsibility Regime, which determines that, above a certain amount, the hiring must be preceded by a legal opinion.

Collaborators must be made aware of the Codes of Ethics and Conduct and the whistleblowing channel, with specific guidelines for the Company's hiring area in the Compliance and Integrity Policy.

The Executive Board, the Audit Committee, periodically monitors all contracting processes and the Fiscal Council of the Company and for the latter, quarterly information on direct contracts is presented due to the unenforceable bidding process.

### 3.4 Transformation, Mergers, Incorporation, Spin-off and Equity

As provided for in the Company's Statute, it is incumbent upon the General Meeting to resolve on proposals for transformation, merger, incorporation and spin-off of the Company.

Thus, in order to better subsidize the decision of the Meeting, Caixa Seguridade's Compliance and Integrity Policy provides for the obligation to carry out due diligence<sup>12</sup> for the realization of strategic investments by the Company, in order to ensure the identification of possible irregularities or illicit activities or the existence of vulnerabilities in the legal entities involved.

The conduct of due diligence involves, as a general rule, specialized technical advisory services whose contractors cannot have interests in the companies to be evaluated. For the selection of the company, all who meet the established conditions carry out a publicized administrative process with the possibility of participation.

The Company has an operational rule for the constitution, acquisition, merger, incorporation, sale and alteration of equity interest, which establishes guidelines and procedures for the analysis and decision of the Company, in addition to defining responsibilities.

Regarding equity interests, Caixa Seguridade, represented by the Strategic and Corporate Governance Department, advises the members appointed to act in its Subsidiaries to adopt procedures and monitoring to prevent and inhibit the practice of acts of corruption and other illegal acts.

### 3.5 Transactions with Related Parties

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

The standard guides the procedures to be followed by the Company, its subsidiaries, employees, administrators and shareholders in transactions with related parties, in order to ensure competitiveness, commutativity, compliance, equity and transparency in transactions and to rule out situations that may constitute a conflict of interest.

In addition, in order to reinforce its Governance structure and ensure the applicability and effectiveness of the Policy, the Company approved the installation of the Statutory Committee on Transactions with Related Parties (CTPR), directly linked to the Board of Directors, which is responsible for the analysis and deliberation on the execution of a transaction with a related party, as well as an opinion on the revisions and terminations of contracts between related parties.

CTPR is responsible for reporting quarterly transactions with approved related parties to the Audit Committee, informing the Board of Directors.

### 3.6 Eligibility Committee

Caixa Seguridade has a Statutory Eligibility Committee whose function is to assist shareholders in verifying the conformity of the nomination and assessment process of Caixa Seguridade's managers and supervisory board members and the Nominees to compose the companies in which the Company holds a participation with the right to nomination. It is composed of 3 (three) members elected and removed by the Board of Directors.

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<sup>12</sup>Term for the business information investigation and audit process, which is fundamental for confirming the data made available to potential business partners, with clear variations depending on the nature of the business and the size of the company, but which basically refers to financial, accounting and tax issues, as well as corporate, labor, environmental, real estate, intellectual property and technological aspects.

Thus, the Committee issues an opinion on the fulfillment of the requirements and the absence of restrictions on the election of managers and supervisory board members and verifies the conformity of the evaluation process of the same.

## 4 COMMUNICATION, TRAINING AND MONITORING

### 4.1 Communication Plan

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

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

It is a management instrument whose objective is to translate and disseminate the Program and the instruments that comprise it in a set of coherent and ordered actions.

The Plan is structured in internal communication actions that include:

- ✓ Electronic communications (e-mail messages containing reminders, news and notices);
- ✓ Presentations of related topics in the meetings of the Executive Board, Board of Directors, Audit Committee and Supervisory Board;
- ✓ Awareness actions for the entire Company;
- ✓ Reports on related topics;
- ✓ Training on Ethics and Conduct;
- ✓ Other types of training understood as necessary.

### 4.2 Communication Channels

Access to reliable, complete and timely information is vital for making decisions that affect the Company's activities. To this end, the communications flow adopted by Caixa Seguridade allows information to flow in all directions and for strategic directions from senior management to reach all employees. In addition, external information relevant to work processes is also considered and shared on a timely basis.

Different internal communication tools are used to disseminate knowledge about compliance, integrity and risk management, such as e-mails, lectures, news on the intranet, dialogue circles and awareness actions.

All internal policies, codes and standards are available to the internal public through the intranet. For information intended for the external public, publications are made on the Company's website<sup>13</sup>, on the internet, such as the Codes of Ethics and Conduct, the Corporate Participation Policy, the Risk Management Policy, the Compliance Policy and

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<sup>13</sup> www.caixaseguridade.com.br

Integrity and Securities Trading Policy and Disclosure of Material Facts, among others.

The Company's website also has a specific link to the Ombudsman's Office, through which doubts about compliance and integrity rules and procedures, suggestions for improvements and the formalization of reports of illegal and unethical acts can be forwarded.

### 4.3 Training and continuing education plan

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

With specific regard to the Managers and S, the legislation points out the obligation to carry out specific training, among which the following stand out:

- Internal controls;
- Code of conduct;
- Risk Management Policy (Managers);
- Law 12.846 (anti-corruption law); and
- Other topics related to the activities of the state company.

The Company offers periodic training to its Managers and employees related to ethics and corruption, conducted by professionals with experience in the subject. In these forums, there are clarifications of specific doubts about the procedures, which contributes to the contribution of all in maintaining a healthy environment in the Company's day-to-day activities. In addition, annual training is also given to Managers on the Company's Risk Management Policy.

In the search for training, both Managers and employees are invited to participate in courses, meetings, forums, dialogues or seminars on the topic, in addition to receiving periodic reports on risks, compliance, internal controls and information security. Such reports aim to increase the contact of employees and managers with the subjects related to the themes in an objective and didactic way.

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

### 4.3 Monitoring

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

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



It is also incumbent on the aforementioned Board/Superintendence to implement integrity and anti-corruption procedures and to improve the Program.

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

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

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

*“While the Internal Audit carries out its work in a random and temporal manner, through sampling to make sure that the rules and processes instituted by the Senior Management are complied with, Compliance performs such activities on a routine and permanent basis, monitoring them to ensure, in a corporate and timely manner, that the various units of the institution are respecting the rules applicable to each business, that is, complying with the internal rules and processes for the prevention and control of the risks involved in each activity. Compliance is an arm of Organs regulatory bodies with the administration in terms of preserving the good image and reputation and the rules and controls in the search for compliance.”*

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

This Program is revised whenever necessary and considering the context of the Company. Risk Management Policies; Internal Controls; and Compliance and Integrity are reviewed annually.

## 5 RESPONSIBILITIES

### 5.1 Individual

It is the individual responsibility of each Advisor, Officer, committee member, employee, and collaborator and appointed by Caixa Seguridade in companies in which he/she participates, to act in accordance with all applicable external and internal regulations, especially laws, regulations, policies and standards of each Company, as well as to adopt, in all situations, ethical and integral conduct.

## 5.2 Leaderships

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

In addition, they must lead by example, ensuring that the culture of integrity is strengthened and reaches all employees and collaborators of the Company.

## Final Considerations

The implementation of routines that make it possible to manage and monitor compliance and integrity corroborates with the company's management and health, reduces costs, in addition to mitigating risks, especially Operational<sup>14</sup>, Legal<sup>15</sup>, Compliance<sup>16</sup> and Reputation or Image<sup>17</sup> risks and strengthening the Company's image.

The Caixa Seguridade Compliance and Integrity Program, therefore, seeks to mitigate risks, especially the risk of incidents of corruption and ethical deviations through the mobilization and active participation of the Advisors, Managers and other employees and collaborators of the Company.

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

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

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

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<sup>14</sup> Operational Risk - Possibility of losses resulting from external events or failure, deficiency or inadequacy of internal processes, people or systems.

<sup>15</sup> Legal Risk - Possibility of losses arising from the inadequacy or deficiency of contracts signed by the Company, penalties for noncompliance with legal or regulatory provisions and indemnities for damages to third parties due to the Company's activities.

<sup>16</sup> Compliance Risk - Risk of legal or regulatory sanctions, financial losses or reputational losses (image risk) resulting from the lack of compliance with legal and regulatory provisions, standards and codes of conduct and ethics.

<sup>17</sup> Reputation or image risk - Possibility of losses resulting from a negative perception of the Company by interested parties (stakeholders) such as customers, counterparties, shareholders, investors or supervisors.

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