

1. Introduction

Bradseg Participações S.A, its affiliates and subsidiaries committed to seeking the highest standards of ethical behavior and are determined to maintain a relationship with its various internal and external stakeholders based on trust, transparency and good faith.

This Sectorial Code of Ethical Conduct is the culmination of our ongoing commitment to promoting and defining the responsibilities and behavior that must guide the actions of our professionals.

Playing a fundamental role in strengthening the culture, this Code incorporates the best practices before the Brazilian society, reaffirming the rejection of morally objectionable forms of business behavior, the fight against unfair sales practices and against the abuse of power in production and consumption, seeking to ensure the integrity of actions, as well as guarantee and strengthen reputation and image, with a continual focus on the continuity of the business and a commitment to sustainability.

We are all responsible for complying with and enforcing this Sectorial Code of Ethical Conduct.

2. Concepts

Ethics: is defined as a set of values and principles that serves as a reference and is meant to guide how managers, employees, interns, apprentices, associates and business partners need to conduct themselves.

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

3. Purpose

To raise the level of trust and solidarity among the managers, employees, interns, apprentices, associates and business partners of Bradseg Participações SA, including its affiliates and subsidiaries, as well as to advise them on having the best relationships with all our stakeholders.

This code is aligned with the provisions of the regulation on Internal Controls System, Risk Management Structure and Internal Audit Activity.

4. Coverage

This Sectorial Code of Ethical Conduct applies to all managers, employees, interns, apprentices, associates and business partners who work at Bradseg Participações S.A., its affiliates and subsidiaries, hereinafter referred to as the company.

Employees and managers are responsible for making sure that professionals providing services on behalf of the company comply with this code.

5. Ethical Values and Principles

The company has values and principles within its culture that underlie this code, making compliance by managers, employees, interns, apprentices, associates and business partners mandatory. They are the following:

5.1. Values

Values are the fundamental beliefs, as well as the success factors that serve as a guide:

- a) The Client as the reason for the Organization's existence;
- b) Ethics in all activities and relationships;
- c) Transparency in the crucial information for the stakeholders;

- d) Belief in the value and development capacity of people;
- e) Respect for human dignity and diversity; and
- f) Social and environmental responsibility, with the promotion of actions for sustainable development.

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

- a) The strength of the brand, with a strong tradition in the financial, capital and insurance markets.
- b) Solid culture and corporate governance focused on the continuity of the business associated with our commitment to sustainability;
- c) One of the best distribution networks in the country in terms of modernity and scope;
- d) Broad portfolio of products, services and solutions for every segment; and
- e) High investments in technology.

5.2. Principles

5.2.1. Principle of Integrity

Integrity means the quality of righteous, upright and impartial conduct, the willingness to make decisions based on what is right, without compromising ethical standards. It also signifies the full compliance with the laws of the countries in which we operate, and the rules that govern our industry's activities and the internal standards. These rules stipulate the correct course to take and precisely define what is desired, permitted and prohibited.

Expected Behaviors:

- i. to act in strict accordance with the principles expressed in this code, inside and outside the company and with all stakeholders, in order to protect and strengthen the company's reputation and image;
- ii. to use the tangible (furniture, facilities, equipment, materials, etc.) and intangible (image, brand, reputation, business strategy, plans, information, concepts, technology, research, etc.) resources, with professional objectives, in accordance with the internal and external rules, when applicable;
- iii. to report to an immediate superior, or using one of the communication channels according to Chapter 6 of this code, any situation, practice or action that may be considered a violation of this code, regardless of the person involved, indicating the reasons and elements that allow the investigation;
- iv. to refuse cash benefits, material or immaterial, including invitations to events and entertainments, favors and benefits in any way, in their own favor or in favor of third parties, or whoever they are, which may represent an improper relationship, financial loss or damage to reputation. Gifts for promotional purposes and with no commercial value are excluded from this prohibition. Improper relationship means everything that conflicts with the provisions of this Code and of any other Policies and Internal Standards that regulate our activities; and
- v. not to practice or allow, under any circumstance, behavior that constitutes an attempt or a practice of bribery or corruption, such as: accepting, obtaining, financing, funding, granting, paying, promising, sponsoring or authorizing, directly or indirectly, any benefit, monetary or otherwise, in any way whatsoever, in their own favor or in favor of whoever, also including the concealment or disguise of an occurrence of such acts, or the obstruction of investigation or inspection of these facts.

5.2.1.1. Respect for Laws, Regulations and Internal Policies and Standards

The company's activities will faithfully comply with the prevailing laws in the country, with particular emphasis on those that govern our specific sector of activity, including the Consumer Defense Code.

Furthermore, the regulations issued by the supervisory agencies of each sector in which the company operates will be respected, as well as the internal standards that provide for relationships between companies, areas or people, with emphasis on the Code of Ethical Conduct of the Bradesco Group and the Code of Ethics of the trade associations that are involved with the company's activities.

5.2.1.2. Conflict of Interests

A conflict of interests arises when there is a possibility of a direct or indirect confrontation between the personal interests of managers, employees, interns, apprentices, associates and business partners of the company or its clients, which may compromise or negatively influence the performance of their duties and responsibilities. The interest is characterized by any advantage, material or not, for themselves or for others (relatives, friends, etc.) with whom they have, have had or intend to have personal, commercial or political relations. When a conflict has been detected, the manager or employee needs to submit the matter for consideration by his/her immediate superior, or report it in one of the communication channels.

5.2.1.3. Presents and Gifts

Managers, employees, interns, apprentices, associates and business partners involved in company business are not authorized to use their position, for either their own benefit or that of third parties, in order to accept gifts, benefits or advantages that may represent an improper relationship or financial or moral damage.

Improper relationship means everything that conflicts with the provisions of this Code and of any other Policies and Internal Standards that regulate our activities.

Promotional gifts with no commercial value are generally accepted. Invitations to events and entertainment may also be acceptable as long as they serve a customary business purpose, such as networking. However, if there is any doubt as to the acceptance of gift(s) or invitation(s), managers, employees, interns, apprentices, associates and business partners should speak to their superior. Likewise, managers, employees, interns, apprentices, associates and business partners are prohibited from accepting, obtaining, granting, financing, funding, paying, promising, sponsoring or authorizing, when relating to/or representing the company, directly or indirectly, any form of pecuniary benefit or otherwise on their behalf or for anyone else.

Therefore, any conduct that constitutes an attempt or practice of bribery or corruption is completely unacceptable, including the concealment or cover up of such acts, or even the creation of obstacles and difficulties in the investigation or inspection of these facts, including those conducted by public authorities, entities or agents.

In activities involving institutional and/or commercial relationships, the granting of presents and gifts by managers, employees, interns and apprentices, associates and business partners of the company is allowed, as long as it does not imply obtaining an undue advantage (as per the paragraph above), and the relevant internal standards must be observed, including the Anti-Corruption Standard.

5.2.1.4. Money Laundering and Terrorist Financing Prevention

Under existing laws, the crime of money laundering involves the process in which resources, values and assets originated from or linked to illegal transactions are transformed into assets of seemingly legal origin and incorporated into the formal economy. It consists of disguising resources so that they are used without identifying the criminal activity that generated them.

The company repudiates any act, interest, attempt or omission associated with money laundering, terrorist financing and corruption.

Managers, employees, interns, apprentices, associates and business partners must be diligent in monitoring to facilitate detection of the use of resources with indications of illicit origin or that could be classified as money laundering and terrorism financing, alerting the relevant areas by reporting to: prev-lavagem-dinheiro@bradescoseguros.com.br.

5.2.1.5. Fraud Combat and Prevention

Any intentional act meant for receiving compensation or a benefit of which one would not otherwise be entitled, that is practiced during contractual negotiations or in the course of the event provided for in the contract, even after its occurrence, is considered fraud. Therefore, anyone who attempts to deceive the insurer in order to obtain an undue advantage is committing fraud.

The company has undertaken some measures to prevent and mitigate fraud throughout all its activities by means of communications, training and internal controls. Any fraudulent act/fact that may discredit one's reputation and/or cause damage is not accepted for any reason.

Managers, employees, interns, apprentices, associates and business partners need to remain vigilant to possible occurrences of fraud and make every effort to combat it.

Everyone is responsible for reporting any suspected fraud or inappropriate, illegal and inconsistent situations or circumstances through the following channels:

Fraud Hotline: 0800 701 27 88

E-mail: prevencaoafraude@bradescoseguros.com.br

E-mail: etica@bradescoseguros.com.br

www.bradescoseguros.com.br/clientes/atendimento/denuncie-a-fraude

5.2.1.6. Confidentiality and Information Security

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

Documents and information related to the day-to-day activities linked to each company are considered confidential. These include: proposals, policies, securities, records, contracts, reports, campaigns and actions, manuals, training and/or operational materials, which must be treated and used, solely and exclusively, within their applicability and can only be disclosed with the prior authorization of the Management Area.

Lectures, seminars, training materials or academic works involving processes and the Company's business also subject to prior authorization;

The confidentiality referred to in the previous item must be respected by our managers, employees, interns, apprentices, associates and business partners not only during their employment period, but also afterward, in the event of dismissal for any reason.

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

- allow others to gain access to computer systems through the use of proprietary passwords and other security codes;
- send harassing, discriminatory, threatening or obscene messages;

- send chain letters;
- access the internet or e-mail for inappropriate use;
- upload or download copyrighted documents or other media that is not authorized for reproduction;
- download software, programs and other data without the authorization of the Information Technology department of the company;
- conduct personal business;
- perform illegal activities.

5.2.1.7. Intellectual Property

All information, technologies and intellectual property, including but not limited to all creative materials, programs, design, inventions, developments, processes, strategies, including all related or incorporation materials, developed or requested by a manager, employee, intern and apprentice, associate and business partner belong to the company, and all rights it may have over the Intellectual Property are attributed to the company.

All Intellectual Property will be retained by the company after the relationship with the manager, employee, intern, apprentice, associate and business partner is terminated, and the improvement and maintenance of the title to such property are authorized. To this end, they transfer all copyright and moral rights on behalf of the company.

Managers, employees, interns, apprentices, associates or business partners may not reproduce, distribute or alter materials without prior authorization.

All software used in connection with business produced in conjunction with the company must be properly licensed and used only in accordance with such license.

5.2.2. Principle of Social and Environmental Responsibility

This means the responsibility of an organization for the impacts of their decisions and activities in the company and in the environment. Implies the strategies, decisions and corporate actions that:

- contribute towards sustainable development, including the health and well-being of the company;
- consider the expectations of the stakeholders;
- are in compliance with the applicable legislation and are consistent with international standards;
- are integrated across the company and are practiced in its relations; and
- always seek sustainable innovation, including technology, based on the following pillars: intention, effort and results.

Expected Behaviors:

- i. to consider, in every decision, the impacts that they will bring to the communities or the environment, in order to preserve them and/or recover them wherever possible. Always seek sustainable development in our direct and indirect participation or within our sphere of influence;
- ii. to support initiatives for the training and development of citizenship, eradicating poverty and reducing social inequalities as a priority through education;
- iii. to promote environmental conservation, the rational use of natural resources, especially of non-renewable resources, and avoiding any form of waste; and
- iv. to comply with the internal standards in order to reduce exposure to risks of a social and environmental nature;

- v. to consider the interests of stakeholders, even those who do not have an active role in the governance of the company.

Through their respective managers, employees, apprentices and interns, the entire company needs to be focused on expanding, improving and innovating products, services, solutions, systems and mechanisms that enable improvements in accessibility, social and insurance inclusion.

5.2.3. Principle of Commitment to the Company

All managers and employees must be committed to the improvement of the results of the company, which depends on them for its sustainability and to fulfill their social role in generating and distributing wealth.

Because we manage our clients' capital (fiduciary responsibility), we must invest it with the best security conditions practiced by the market.

We have to avoid any actions that may directly or indirectly harm the company's image and reputation in our personal or professional lives, given that these duties are the main intangible assets of any entity in the market. We need to also show complete respect for the reputation of our competitors in the insurance market, rejecting criticisms or references that may, even remotely, cause moral damage to their image.

5.2.4. Principle of Constructive Relationship

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

5.2.4.1. Commitment to the client

We feel strongly that our clients are the main reason we exist and, as such, all the commitments made by us towards them must be fully respected. We also need to ensure that all information we disclose pertaining to the services and products we offer is clear and accurate and complies with applicable regulations and legislation.

We need to provide clients with extensive knowledge of the conditions and rules that govern the respective products and services, as well as the implicit risks, remembering to respect the rules of business.

It is our duty to provide service based on courtesy and promptness, efficiency, timeliness, responsibility, diligence and transparency when assessing proposals, in regulating and settling claims, when granting indemnities and benefits and in the payment of guaranteed rights, demonstrating our respect for the interests of our clients.

The company expects its clients to follow the same ethical standards of conduct that it does.

5.2.4.2. Suppliers of Products, Suppliers of Services and Business Partners, including Joint Ventures

We need to procure suppliers and establish business relationships with partners such as: Brokers, Insurance Reps, Union Reps, Dispatch Agents, Referenced Network and Hospitals, and that they

operate with ethical standards compatible with ours through a stringent selection process, and due diligence.

Pay strict attention to associates and business partners who either directly or indirectly represent us with government agencies or our customers in order to ensure that they will also act according to the principles contained in this code and other applicable internal policies.

Encouraging associates and business partners, including joint ventures, to adopt practices compatible with the provisions of this Sectorial Code of Ethical Conduct, whether commercial or labor-related.

5.2.4.3. Governmental and Regulatory Agencies

It is prohibited to directly or indirectly promise, offer or give an unfair advantage to either a national or foreign government agent, or a third party related to him/her, as well as receiving any benefit, whether on behalf of the company or anyone else.

We need to ensure compliance with the laws and regulations applicable to the activities performed by the company, and compliance with our policies, standards and controls, especially those related to matters of preventing and combating money laundering, financing of terrorism, corruption and illicit acts of any nature, in strict compliance with the laws applicable to the matter and in accordance with the best national and/or international practices, in all the locations where they are applicable.

5.2.4.4. Relationship with the Press

The company's relationship with the press must be grounded in transparency and credibility while respecting the ethical values of the marketing strategy.

Managers, employees, interns and apprentices may only speak on behalf of the company when authorized and must always express the institutional point of view.

5.2.4.5. Commitment to the Environment and the Community

We need to promote respect for the dignity of human beings while maintaining their individuality without practicing discriminatory or harassing acts of any nature.

We need to have a firm commitment to practice, encourage and value environmental preservation, seeking to align business objectives with the aspirations and interests of the community we do business in with an eye towards sustainable development.

Note: we voluntarily subscribe to the following international agreements:

- Global Pact;
- Sustainable Development Goals (SDGs);
- United Nations Environment Programme Finance Initiative – UNEP FI;
- Principles for Sustainability in Insurance (PSI);
- Principles for Responsible Investment (PRI); and
- Principles for Responsible Banking of the United Nations/UN.

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

5.2.4.6 Competition

The competition that is promoted fairly, and without any abuse of power, is beneficial for consumers and is essential to the proper functioning of the market. Expected Behaviors:

- i. to promote environmental conservation, the rational use of natural resources, especially of non-renewable resources, and avoiding any form of waste; and
- ii. to respect the reputation of competitors;
- iii. to send and/or receive competitive information in a transparent and lawful manner in accordance with the principles of confidentiality and the interests of the company;
- iv. to respect the intellectual property rights of competitors and not use them without proper authorization;
- v. to reject any comments that may damage the image and reputation, or that may contribute to the spread of rumors about our competitors;
- vi. not to allow retaliation of any kind arising from the loss of clients to the competition, as well as not to provide undue advantage to a competitor bidder;
- vii. not to commit any act that may characterize or be considered espionage or obtain information from competitors by illicit means;
- viii. not to contribute to the exchange of sensitive information on other competitors, which may jeopardize the free competition, such as: business strategy, competitive advantages, pricing policies, terms of contract, market research, geographical operations, services or technology; and
- ix. to reject any form of espionage.

5.2.5. Principle of Transparency

Clear, objective and timely disclosure of information to stakeholders is required. Commitment to information goes beyond legal and statutory obligations, which facilitates decision making, provides an accurate assessment of our performance and value, and a correct understanding of the products and services sold, contributing to the creation and maintenance of an image of reliability. Through communication and open dialog, we seek to clarify issues that may affect stakeholders.

5.2.6. Principle of Valuing People

This means taking care of the individual and human relations with equity, respect and transparency, contributing effectively to the development of people and to the results. Discriminatory behaviors are not permitted.

6. Code Management

The Sectorial Code of Ethical Conduct is approved by the Board of Directors.

The management of this code falls under the responsibility of the Compliance Area at Grupo Bradesco Seguros. It also involves activities related to reporting, answering questions, training on conduct and the proper processing of complaints of violation received through the respective channel (etica@bradescoseguros.com.br).

6.1. Procedures in the event of questions and situations or actions that conflict with the principles of this Sectorial Code of Ethical Conduct

This Sectorial Code of Ethical Conduct provides validation to the policies and standards established by the Bradesco Organization, including those directly linked to the company's activities.

Because a code of ethical conduct can hardly cover all possible situations that could occur in practice, we trust the judgment of each manager, employee, intern, apprentice, associate and business partner and encourage them to refer to immediate supervisors in the event of any questions.

6.2. Violations of this Code of Ethical Conduct

Actions that constitute violations of the Codes of Ethical Conduct, policies and rules of the Bradesco Group, including those issued by the company, are subject to disciplinary consequences/measures, regardless of organizational level and without prejudice to applicable legal penalties.

The channels are available, respectively, on the Bradesco Seguros S.A. website (www.bradescoseguros.com.br) and are intended for registering complaints and reports by managers, employees, interns, apprentices and other stakeholders. They can be registered by email at: etica@bradescoseguros.com.br.

When the situation requires it and if it is in the best interest of the whistleblower, the right to report anonymously is guaranteed, always making sure to be careful in the presentation of the facts, attaching documents that prove their assertion whenever possible.

The content of the reports must always be as complete as possible to help the investigation of the facts.

Use the following codes available on the Internet and Intranet to get into contact:

- Bradesco Seguros website - www.bradescoseguros.com.br - Institutional - About Bradesco Seguros - Code of Ethical Conduct;
- Banco Bradesco S.A. website / Investor Relations - www.bradescori.com.br - Corporate Governance – Compliance and Ethics; and
- Intranet - www.bradseg.com.br - Risks, Internal Controls and Compliance Pages – Code of Ethical Conduct - Reporting Channels

We hereby declare that this is a faithful copy of the Bradesco Seguros Group Sectorial Code of Ethical Conduct, approved at the Bradseg Participações S.A. Board of Directors' Meeting held on December 21, 2021, with changes, including the scope and nomenclature, which is now called the Sectorial Code of Ethical Conduct of Bradseg Participações SA, its affiliates and subsidiaries.

Bradesco Seguros
Ivan Luiz Gontijo Júnior