

De gente
pra gente



Integrity Program



2024



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Introduction

CNP Seguros Holding Brasil remains active in the combat to illegal practices, and, throughout its trajectory, it has sought to improve and intensify action that aim at mitigating corruption acts and continues committed to implementing controls and initiatives that not only provide transparency and honesty in its activities but also show to the social environment that its brand and image are not associated to illegal activities or shady interests.

In this regard, the Compliance Board of CNP Seguros Holding Brasil and its controlled subsidiaries promotes the implementation of this Integrity Program, that presents, through its axes and pillars, the activities and initiatives performed to strengthen the actions and conducts expected in the Company, reinforcing the integrity culture.

Our Integrity Program has been based on Law No. 12,846 of 2013, in its regulatory Decree No. 11,129 of 2022, and in Resolution No. 416 of 2021 of the Conselho Nacional de Seguros Privados – CNSP (National Council of Private Insurance) to fully satisfy the requirements broadcast in these legal agreements.

Here, internal integrity mechanisms and procedures will be presented to promote broad and effective prevention of illicit acts, encourage the reporting of irregularities, and actively enforce the Code of Ethics and Conduct, policies, and internal regulations with the aim of fostering and maintaining a culture of integrity within the organizational environment..

Through the guiding axes of Prevention, Detection, Remediation and continuous Monitoring, it is reaffirmed the need for everybody, regardless of hierarchical position, to act diligently in the combat to corruption, detection and mitigation of embezzlement, frauds and irregularities.

The directions and guidelines of this program are reaffirmed in the Code of Ethics and Conduct, in the current normative acts and regulations, as well as in the values corporately established at CNP Seguros Holding Brasil.

The Program strengthens the Company and guides actions for an appropriate, responsible and sustainable way of handling businesses, always respecting the compliance with rules and regulations.

Body

**Responsible the for
Integrity Program**



The area responsible for the management, compliance and assessment of the Integrity Program is the Board of Compliance that has the autonomy to perform their attributions and is reinforced by the maximum support of the senior management of CNP Seguros Holding Brasil.

**Presidency
CSH**



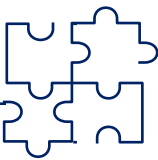
Compliance



The program applies to all people working at CNP Seguros Holding Brasil, temporary and outsourced employees, interns, directors, statutory employees, executives, members of the Administration Council, Fiscal Council, Committees, business partners and correlated.

Axis

Integrity Program



The Integrity Program consists of 4 axes.

With the objective of outlining the activities performed to keep the effectiveness of the compliance program, a model was developed based on **axis and pillars** that illustrate the actions already carried out by the Company that should be kept and continuously improved, to guarantee the completeness and success of the Program.

In this regard, we illustrate below the four main guiding axes that support the actions and measures that make up the Integrity Program at CNP Seguros Holding Brasil, which are: **(01) Prevention; (02) Detection; (03) Remediation; (04) Monitoring.**

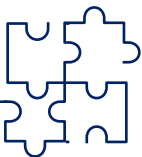
Axes of the Integrity Program



Picture 01 – Axes of the Integrity Program

Pillars

Integrity Program



The 4 axis previously presented unfold into **10 pillars** aligned with the Anticorruption Law, the best market practices and goals of our business!



Picture 02 – Pillars of the Integrity Program

The effectiveness of the Integrity Program foresees the engagement and use of various elements concerning the issue that range from the commitment of senior management to the participation of employees in the operational areas.

Axis 1

Prevention



Pillars

1. Senior Management Commitment.
2. Environmental, Social, and Governance.
3. Code of Ethics and Conduct, Policies.
4. Communication, Trainings and Organizational Culture.
5. Prevention of Illegal Activities.

Axis 1 - Prevention

1. Senior Management Commitment



Sany Silveira, CEO of CSH!

This pillar is based on the "**Tone at the Top**" concept. Thus, the ethical upright culture and behavior are defined and shown mainly by the leaders of CNP Seguros Holding Brasil since they will give the tone of what is expected and what is not tolerated in the organization, legitimizing the importance of the theme integrity.

The Senior Management, through example, commits to creating an ethical and incorruptible culture in the Company.

The commitment of the Senior Management is also recognized by the **unquestionable support to the present Integrity Program**, through the availability of resources that guarantee the proper implementation of the axes and pillars listed in this document and through the approval of the Compliance Board, formally constituted and sworn in the competence of the creation, application, monitoring, and review of this Program.

It is the obligation of the Senior Management

Be an example through your behavior as an individual, professional and business manager, acting in an ethical and transparent way;

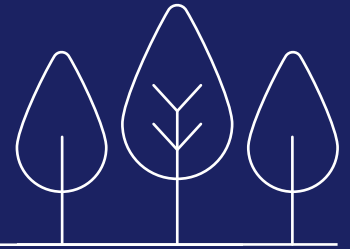
Follow and make sure that the employees and other collaborators respect the rules listed in the Code of Ethics and Conduct, Normative Manuals and Internal Procedures of the Company as well as correlated legislations;

Spread the organizational culture of continuous improvement of the compliance rules;

Ensure the sufficiency and adequacy of material and human resources involved in the compliance of the program.

Axis 1 - Prevention

2. Environmental, Social and Governance



Standards of Environmental and Social Conduct and Governance

Our company has a robust ESG (Environmental, Social and Governance) program structured to integrate ESG criteria into the core business. By involving all areas of the Company in the development of ESG initiatives aligned with the company's priority material themes, we annually implement several initiatives aimed at:

- ❖ Diversity, equity, and inclusion;
- ❖ Offering and distributing solutions with a positive social and environmental impact, focusing on the client.
- ❖ Investments with a positive socio-environmental impact;
- ❖ Social and environmental responsibility in administrative management and suppliers;
- ❖ Positive social and environmental impact;
- ❖ Sustainable technological efficiency and
- ❖ ESG governance and operating model

We believe that our success should be directly tied to the positive impact we create on society and the environment.



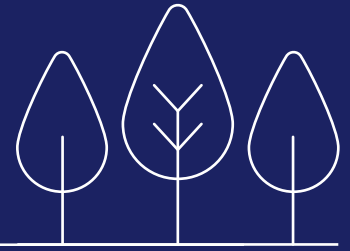
ESG

Juntos por um mundo melhor



Axis 1 - Prevention

2. Environmental, Social and Governance



To ensure that our operations remain ethical and sustainable, we have established the following environmental and social conduct standards:

Environmental preservation and efficiency

Our goal is to minimize the environmental impacts associated with our operations and promote practices that contribute to environmental protection. To that end, we adhere to principles that guide our actions toward environmental preservation and operational responsibility.

Responsible use of natural resources:

We prioritize the efficient use of energy, water, and raw materials, consistently striving to minimize waste and reduce negative environmental impacts.

Waste Management: We have implemented solid waste management practices that prioritize recycling, reuse, and the proper disposal of discarded materials, aiming to minimize environmental impact.

Emission Reduction: We have implemented actions and set goals to minimize our greenhouse gas and pollutant emissions by promoting clean technologies and pursuing more sustainable alternatives for transportation and the execution of our internal operations.

Compliance with Environmental Standards:

We ensure that our operations adhere to applicable environmental legislation and voluntary commitments that may exceed legal requirements.

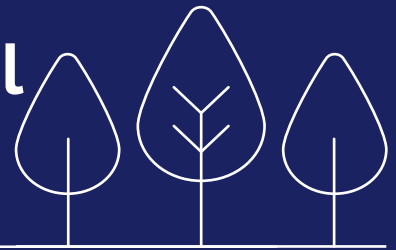
Respect and appreciation for humanity

We are committed to fostering an ethical, inclusive, and safe work environment while positively contributing to the communities in which we operate. Our social conduct practices include:

- ❖ **Respect for human rights:** we value the dignity of all individuals and are committed to protecting human rights across all our operations. We do not tolerate abusive practices such as forced labor, child labor, or labor in degrading conditions.
- ❖ **Diversity and inclusion:** We promote diversity and inclusion in the workplace, ensuring that all decisions are based on merit, without discrimination based on gender, ethnicity, sexual orientation, religion, or any other personal characteristic.
- ❖ **Health and safety at work:** We ensure a safe and healthy working environment for all our employees, investing in continuous training and adopting preventive measures to avoid accidents and occupational illnesses.
- ❖ **Community engagement:** we support local initiatives that promote socio-economic development in the communities where we operate, seeking to create a positive long-term impact.
- ❖ **Volunteering practices:** we encourage volunteering among our employees, promoting actions with a socio-environmental impact during working hours, generating a positive impact on people's lives and contributing to a fairer and more sustainable society.

Axis 1 - Prevention

2. Environmental, Social and Governance



Business Ethics

Environmental and social responsibility is directly linked to the way we conduct our business. Therefore, we require that all our activities be conducted with the highest standards of integrity, transparency, and compliance with applicable laws and regulations.

- ❖ **Transparency:** We maintain clear and honest communication with our stakeholders, transparently reporting our actions and results related to sustainability.
- ❖ **Partners and Suppliers:** We expect our partners and suppliers to uphold environmental and social conduct standards aligned with ours, fostering a responsible and sustainable value chain.
- ❖ **Anti-Corruption:** We have zero tolerance for corrupt practices and enforce a strict policy against bribery or any form of undue advantage.

Monitoring and Continuous Improvement

We are committed to continuously improving our environmental, social, and governance practices by regularly monitoring our impacts and setting targets to improve our performance.

We encourage our employees, partners, and suppliers to actively contribute to the advancement of these practices, constantly seeking new ways to minimize negative impacts and maximize social and environmental well-being.

Commitment to Sustainability and Transparent Governance

Through our Sustainability Policy, we provide guidance across the entire Company, emphasizing the need for responsible and sustainable practices in all our operations. It directs our actions toward economic, social, and environmental development, seeking solutions that reduce negative impacts and enhance benefits for communities and the environment.

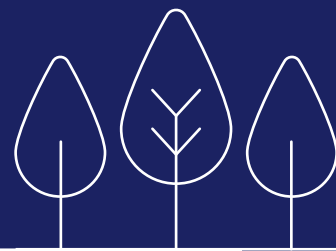
Each year, we publish our financial and non-financial indicators in the Sustainability Report. This report provides a clear view of our performance, reinforcing our commitment to ethics and sustainability.

Explore our policy and our sustainability report on our website:



Link to the [Sustainability Policy](#)

2. Environmental, Social and Governance



Corporate governance

Corporate governance involves a set of practices, policies, and processes that guide the control and direction of an organization, based on ethics, transparency, security, growth, and value creation.

The aim of these processes is to ensure that business strategies are being followed properly. Corporate governance is built upon **four principles of best practices**, fostering greater trust among clients, suppliers, employees and the market.

Transparency

It reflects the commitment to providing stakeholders with information of interest to them, going beyond what is mandated by laws or regulations. It should not be limited to economic and financial performance but should also encompass other factors (including intangible ones) that guide managerial actions and lead to the preservation and optimization of the organization's value.

Fairness

It is characterized by the fair and equitable treatment of all partners and other stakeholders, considering their rights, duties, needs, interests, and expectations.

Accountability

Governance agents must account for their actions in a clear, concise, understandable, and timely manner, fully assuming the consequences of their acts and omissions, acting diligently and responsibly within the scope of their roles.

Corporate responsibility

Governance agents must ensure the economic and financial viability of organizations, reduce the negative externalities of their businesses and operations, and enhance the positive ones, taking into account various capitals (financial, manufactured, intellectual, human, social, environmental, reputational, etc.) in the short, medium, and long term within their business models.

In the context of **insurance companies**, good corporate governance is even more relevant due to the nature of the business, which involves managing large volumes of third-party resources and the need to protect the interests of policyholders. Insurance companies operate in a highly regulated environment and are exposed to significant risks, such as operational, market, and regulatory risks, making efficient control and a culture of integrity indispensable.

You can find key governance practices of CNP Seguros Holding Brasil in our Sustainability Report!



Axis 1 - Prevention

3. Code of Ethics and Conduct, Policies.

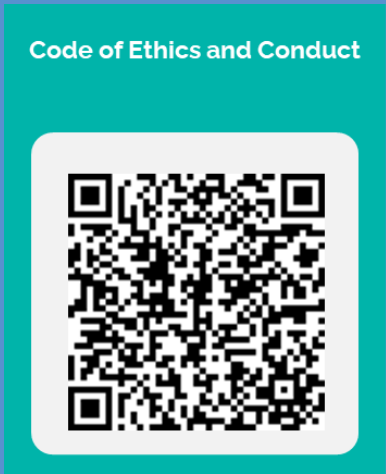
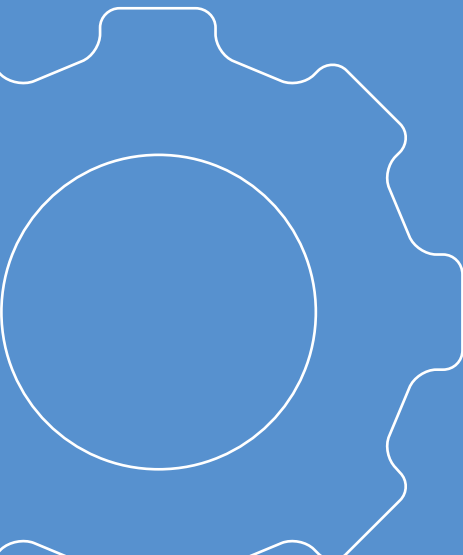


The present Integrity Program is supported by a range of **Policies, manuals and procedures** that regulate this matter and by a strong **Code of Ethics and Conduct** disseminated through the collaborators and service providers.

Code of Ethics & Conduct

The manual is published and revised every two years, and the Company encourages reading, using and applying the values stated in that document, highlighting topics such as:

Values, Attitudes and non attitudes;	Commitments and Responsibilities;
Ethical relationships with business partners;	Guidelines about gifts, treats and hospitalities;



Picture 03 – Link of Access to CEC

Axis 1 - Prevention

3. Code of Ethics and Conduct, Policies.



Policies

The policies of CNP Seguros Holding Brasil present, in a clear and directing way, the rules, guidelines and procedures that must be followed by all collaborators, creating standardization, safety and compliance with the recommendations coming from the corporate strategies, legislations and regulatory bodies.



Do you know where to find these policies?

In our intranet page, we publish and make available access to the CSH policies and the document framework of the company.

Link for access: Policies

Normative Instruments



Picture 04 – Normative Framework of CSH

Axis 1 - Prevention

4. Communication, Training and Organizational Culture



The Compliance department is responsible for communication and training initiatives on this topic, in partnership with the People department, which annually develops a corporate training calendar covering various topics for different levels of the organization.

Accordingly, Compliance department actively participates in the planning, content creation, delivery of training, and supervision of activities to promote ethics, positive conduct, respect for human rights, diversity, and sustainable environmental practices, while also fostering initiatives to reinforce the behavioral standards expected by the Company.

CNP Seguros Holding Brasil is committed to promoting the education and development of our employees. To this end, the Company offers a catalog of online courses available through the Conecta+ school.

Portal Conecta+

Compliance Trail

Our World: The Insurance Market and Our Business	Risk Management: A shared responsibility	Practical Overview of the LGPD – General Data Protection Law
Information Security and Data Protection	Prevention of Social Crimes (Conflict of Interest, Corruption, Fraud, and Money Laundering)	Emotional Distress and Sexual Harassment

We are committed to encouraging the education and development of our employees.

The portal provides mandatory courses on compliance topics, organized into tracks such as the “**Essential for You**”, in which all employees are required to complete the training.

Axis 1 - Prevention

4. Communication, Training and Organizational Culture



Besides the trainings related to compliance, acculturation includes actions and campaigns of endomarketing, such as **"onboarding"** which is the orientation of newly-hired employees.

Ethics, combat to social crimes and encouragement of integrity are also reaffirmed through the annual accomplishment of the **"compliance month"** which is part of the program of actions for acculturation established by the Compliance area in partnership with the People department..

The assessment of the knowledge about integrity is carried out through questionnaires, courses attendance list, acceptance of documents, among others.

It is the Collaborators duties:

Carry out essential trainings, applying the knowledge about the Code of Ethics and Conduct, the Policies and other internal guidelines in their actions and responsibilities;

Seek knowledge about legislation related to compliance and, mainly, those related to their activity and business in their area;

Carry out recycling about themes related to Compliance and available in the corporate school.



Axis 1 – Prevention

5. Prevention of illegal acts



We invest in an efficient and solid Code of Ethics and Conduct.



To ensure the compliance and prevent illegal, corrupted and irregular acts, we adopt various preventive measures that include different areas of compliance risk.

Prevention and Combat to Corruption

CNP Seguros Holding Brasil does not tolerate and repudiates corruption acts! In this sense, preventing corruption is a duty for all of us, ensuring integrity and ethics inside the Organization. The Company follows the Anticorruption Law (Law No. 12846/2013) guidelines that make companies accountable for harmful acts against the public administration, both national and international, and encourages a preventive action in the combat to corruption.

We prioritize prevention over remediation, and it means that we invest in an efficient Code of Ethics and Conduct, solid internal policies, integrity trainings, a safe ethics channel and thorough due diligence procedures.

These actions anticipate problems and reduce the occurrence of illegal practices, aligning the company with the best compliance practices and strengthening our ethical commitment.

Prevention aligned with SAPIN II Guidelines

The **Sapin II Law (Law No 2016-1691)** is a French legislation approved in 2016 with the objective of reinforcing the combat to corruption and improving the transparency and ethics in business. It establishes strict obligations for French companies and its subsidiaries, demanding effective anticorruption compliance programs and preventive controls.

Axis 1 – Prevention

5. Prevention of illegal acts



Prevention Aligned with SAPIN II Guidelines

Multinational companies with branches or subsidiaries with French capital, or those that perform significant businesses in France, are subject to its guidelines which are monitored by the French Anticorruption Agency (AFA – Agência Francesa Anticorrupção).

Therefore, as a company affiliated to a French group, we are legally responsible for adopting the measures of the Sapin II law, even while operating in another jurisdiction.

Aligning with Sapin II Law is an essential preventive measure to ensure that our company is protected against corrupt and illegal practices. Prevention is always more efficient than remediation, and the adoption of these guidelines strengthens our reputation, protects against sanctions and demonstrates our commitment to ethical and transparent business practices.

Prevention against Money Laundering and Financing of Terrorism

Prevention of Money laundering (PML) and financing of terrorism (FT) is a priority and constant concern. For this reason and aware of the requirements of **Law No 9613/98** and **Law No 12683/13**, this Integrity Program sets practices, already carried out, capable of detecting and preventing suspect activities, such as monitoring, use of technology to follow national and international restrictive lists and Politically Exposed People – PEPs, prompt communication of suspect transactions to competent bodies, frequent training to collaborators about the best PML/FT practices.

CNP Seguros Holding Brasil monitors the those classified as PEP or other characteristics that have been identified as a compliance risk.

The monitoring conducted may be subject to audit analysis (internal or external) as part of the third line of defense. Based on its planning, the audit may review the work performed and identify areas for improvement in the procedures.

The relationships with the Company are also characterized by identification, evaluation and constant monitoring of individuals and companies connected to our ecosystem through controls, policies and practices that reinforce the risks management before all stakeholders, in accordance with the methodology 4Ks of Compliance

<i>KYC - Know Your Client</i>	<i>KYS - Know Your Supplier</i>
<i>KYP - Know Your Partner</i>	<i>KYE - Know Your Employee</i>

Axis 1 – Prevention

5. Prevention of illegal acts



Prevention through monitoring of treats, gifts and advantages

Aiming at preventing and combating corruption and bribery, in compliance with Law No. 12846/13, all gifts offers must be assessed according to the standards established by the internal policies. In case of discrepancies with defined internal rules, it is mandatory to have an analyses from Compliance department to have an opinion issued about the offer and monitoring of possible illegality.

Prevention through Due Diligence

Due diligence or “**previous diligence**” is a practice that can evaluate and mitigate risks before establishing relationships with either collaborators, clients, partners or suppliers. At CNP Seguros Holding Brasil, the connections take place after thorough analysis that aims at identifying possible risks related to integrity, conflict of interests and improper favoritism.

This process includes the verification of records, evaluation of criminal, financial and reputational records, verification of compliance with applicable rules and regulations, identification of possible relationship or business conflicts and risks of corruption for our connection to be performed in the most honest way.

Prevention through Anti-Competitive mechanisms

Aiming at fair competition and repudiation to anticompetitive practices, we have adopted antitrust mechanisms that include policies between the parts: Implementation of clear policies to promote fair competition, auditing to identify and correct anticompetitive practices or ones out of the market standards

Prevention of harmful acts against Public Administration

CNP Seguros Holding Brasil adopts a firm position against harmful acts against the public administration and the preventive actions are shielded by our Code of Ethics and Conduct that forbids any form of corruption, as well as through the availability of an Ethics Channel that is a safe and confidential contact for complaints related to irregularities. We also analyze any partnerships with public authorities or related to governmental bodies to ensure the compliance with the laws and the full isonomy of the processes.



Axis 2

Detection



Pillar

6. Ethics and Investigations Channel




Axis 2 - Detection

6. Ethics and Investigations Channel




We highlight the commitment of CNP Seguros Holding Brasil with the promotion of ethics and zero tolerance to any act of corruption, fraud, harassment, discrimination and noncompliance with internal rules.

The company has been building over the years an organizational culture that values integrity, respect and dignity among collaborators and, in this sense, offers a whistleblowing channel , called **Ethics Channel**, available in Portuguese, through Intranet, Company site, telephone and app for receiving internal and external reports




Is it safe?

Absolutely. When you make a report, your data and information are protected anonymously and confidentially. You are not at risk of any exposure.



When should you submit a report?

If you have experienced any unethical behavior, such as harassment, fraud, corruption, money laundering, or other actions that violate ethics, this is the place where you can safely reach out to us.



What happens?

Your report will be received and analyzed anonymously. It will be investigated, and you can follow it closely.

We are ready to listen to you.

Submit a report

Hotline Contato Seguro **(0800 900 9097)**
Site Contato Seguro:
<https://www.contatoseguro.com.br/cnpholdingbrasil>

Picture 05 – Contacts of Ethics Channel

Ethics Channel **can not be confused with Customer Service or Ombudsman**, and it is not the appropriate way to make complaints, compliments or suggestions, but the ideal mechanism to receive complaints related to noncompliance such as corruption, bribery, facilitation payment, fraud, money laundering, financing terrorism, psychological and sexual harassment, violations to human rights, conflict of interests, colluding, violation of labor rights, confidential or protected data leakage, among others.

Axis 2 - Detection

6. Ethics and Investigations Channel



The Ethics Channel assures the following guarantees:

Anonymity to the Complainant, if they so desire	Secrecy around the content of the complaint;	Protection and non-retaliation for complainants acting in good faith, meaning those who report in a lawful, ethical, and transparent manner, without the intent to pursue personal or third-party interests.	Collaborators who wish to contribute with the verifications will also be preserved, even if the report is eventually considered non founded or inconclusive, after due verification.
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Conducts that must be reported to the ethics channel of CNP Seguros Holding Brasil include, but are not limited to:

Corruption, bribery and facilitation payments: CNP Seguros Holding Brasil strongly forbids acts of corruption, bribery, payments of facilitation or any other action that violates the applicable laws, the code of ethics and conduct, and any other applicable regulations;	Fraud, Money laundering and financing of terrorism: CNP Seguros Holding Brasil does not tolerate acts of financial irregularity, such as fraud, Money laundering, financing of terrorism and other illegalities foreseen in the applicable legislations;	Psychological Harassment, sexual harassment, discriminations: CNP Seguros Holding Brasil forbids and does not tolerate any act of sexual harassment, sexual molestation or any other abusive conducts as well as it does not collude with or admit any kind of discrimination either against genre, race, sexual orientation, age, income etc;	Noncompliance with the code of ethics and conduct, policies and internal rules;	Other conducts forbidden in the work environment: CNP Seguros Holding Brasil does not tolerate any acts that harm the good work relationships, including adopting behaviors that may harm or jeopardize the physical and/or psychological integrity of collaborators and third-parties.
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It is everyone's duty to promptly inform, through the Ethics Channel, the acknowledgement or the event of any possibly illegal or anti-ethical conducts

Axis 2 - Detection

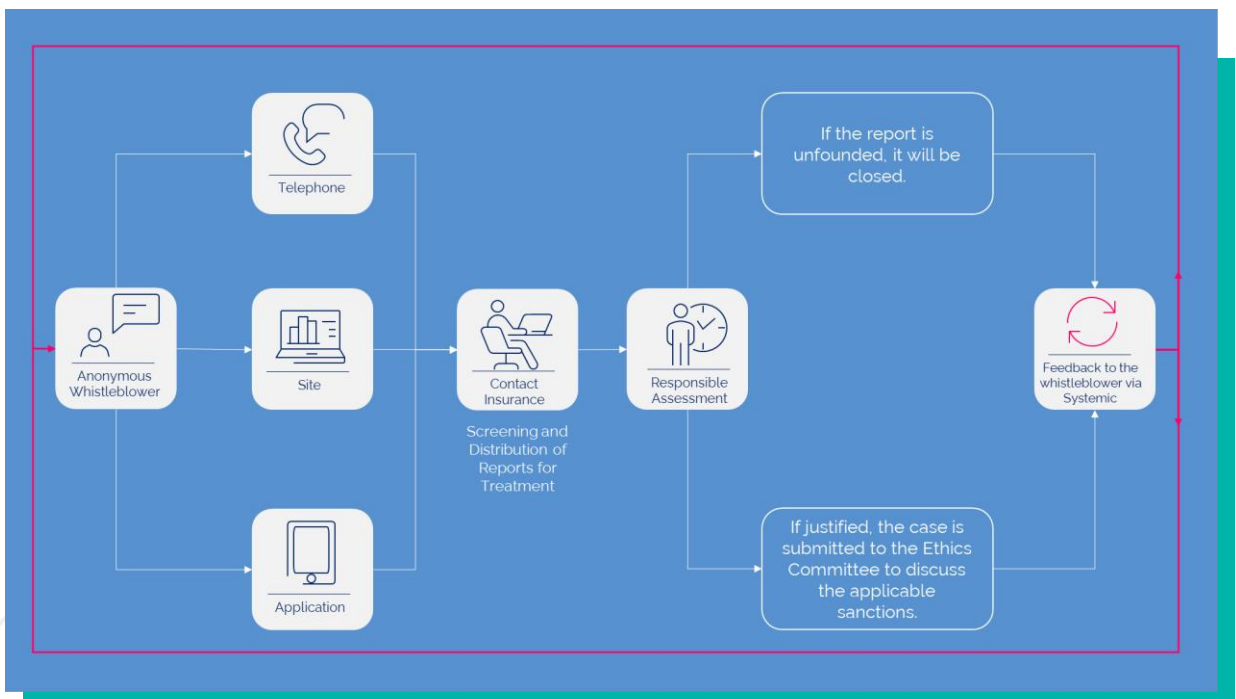
6. Ethics and Investigations Channel



Process of the Ethics Channel

All the reports received in the Ethics Channel go through a thorough verification and, when the report is considered founded, the application of set disciplinary measures takes place, which may include dismissal and even registration of criminal complaint with competent bodies, such as Public and Policial Authorities, for the purpose of investigation and the performance of the respective criminal and civil action, **independently from the hierarchical level** in the company.

Management Flow of Whistleblowing Channel



Picture 06 – Flow of management of the Ethics Channel

The Ethics Channel counts on a defined methodology and specific flows to receive, treat and verify the reports, besides the evaluation of the consequences. In cases considered founded, depending on the complexity or the positions involved in the complaint, the Compliance Director may invite additional members to cooperate in the verification of the report.

6. Ethics and Investigations Channel



Responsibility of the Complainant



The Ethics Channel is a serious and confidential tool, created to guarantee an ethical and integrated work environment for all. Its specificity is to enable the report of situations that may violate the values, rules and regulations of our organization, therefore, the responsibility of those using the Whistleblowing Channel is essential to ensure the efficacy and alternative of this resource.

It is fundamental that the complainant reports only real and pertinent information, being careful when reporting any situation.

Complaints made in an irresponsible or frivolous way, or with the intention of harming others, will not be tolerated and may be ground for disciplinary measures against those who make them.

We remind you that the Ethics Channel demands maturity and discernment to be used correctly, and the conscious use of this tool is an ethical commitment that benefits everyone.

We count on you!

Axis 3

Remediation



Pillar 7. Disciplinary Measures



Axis 3 - Remediation

7. Disciplinary Measures



The violation of the compliance principles will be informed to the appropriate internal and external bodies, which may result in administrative and/or legal sanctions without prejudice to the application of disciplinary corrections stated in the applicable legislation and in the Policy of Consequences Management.

The Consequences Policy states, in a detailed way, the principles, guidelines and responsibilities about corrective actions and disciplinary measures that may be applied, regardless of the position or hierarchical level, after verification and foundation of the facts, in cases of violation of the Code of Ethics and Conduct, the internal regulations and the applicable legislation, thus combating behaviors and violations that are not aligned with the ethical principles of CNP Seguros Holding Brasil and crimes typified in the Brazilian Penal Code.

For the application of disciplinary measures, all cases of misconduct must be clearly defined and thoroughly investigated beforehand to ensure the correct identification and application of appropriate consequences.

The application of any disciplinary measure must meet the criteria of **Immediacy** (for it to happen in a timely manner), **proportionality** (the consequence must be proportional to the seriousness of the conduct) and **unicity** (there must be only one consequence for each action).

Misconducts subject the collaborators to the application of the following **consequences**, to be applied in accordance with the seriousness of the misconduct :

verbal warning;

written warning
and

termination of
employment
contract.

Corrective actions and disciplinary measures may be applied regardless the position of function.

Axis 4

Monitoring



Pillars

8. Internal Controls, Risk Management and Internal Audit.

9. Regulatory Monitoring.

10. Privacy and Data Protection.

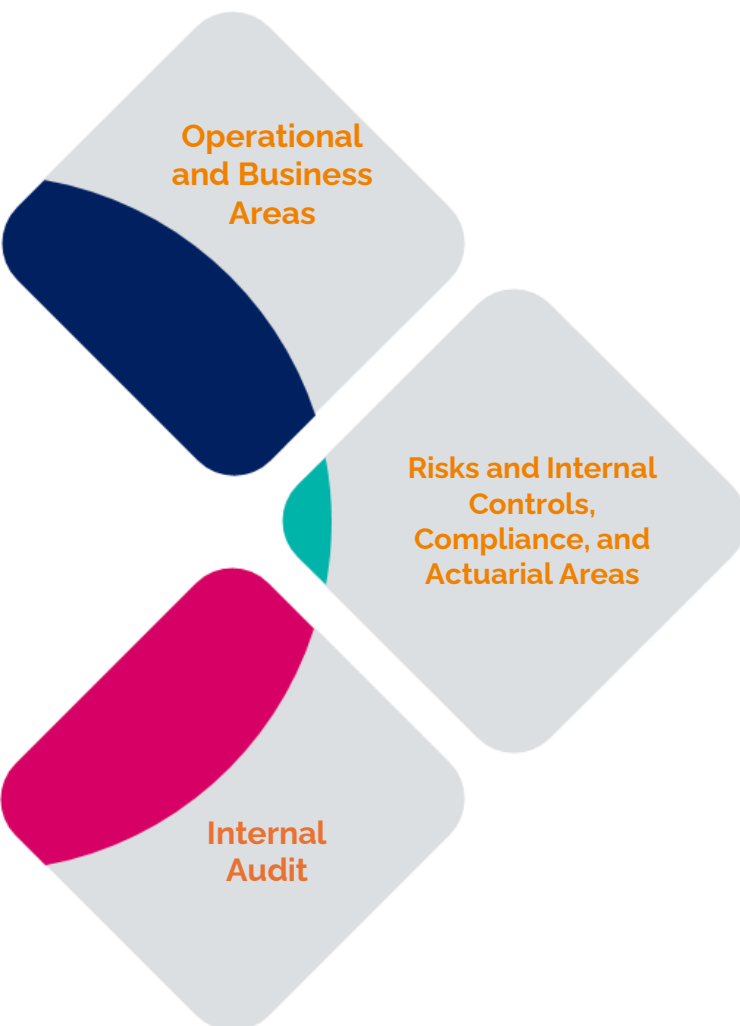


8. Internal Controls, Risk Management and Internal Audit



It is not possible to discuss internal controls, risk management, and internal auditing without understanding the **Three Lines of Defense**. Therefore, to manage in an organized and effective manner while promoting security, integrity, and compliance across all operations, we adopt this important model. In this framework, each "line" represents a distinct group with specific responsibilities for risk management, compliance, and governance. These are:

:



1st Line of Defense

Responsible for identifying, evaluating and mitigating risks in their processes and guaranteeing the compliance with internal policies and rules.

The professionals in this line apply controls and processes directly in their activities, being responsible for the first layer of control and the correct execution of processes.

2nd Line of Defense

It has the role of monitoring, supervising and guiding the first line of defense, helping establish policies, define rules and guarantee that the controls are appropriately implemented. This line acts in the identification and monitoring of corporate risks and in the supervision of the efficacy of the controls, without being directly involved in the operations.

3rd Line of Defense

The internal audit reports directly to the administration council, ensuring the independence of its operation.

It performs periodical audits to evaluate the efficacy of the Governance system and the Internal Controls, issuing reports and recommendations to correct deficiencies.

Picture 07 – Lines of Defense

8. Internal Controls, Risk Management and Internal Audit



Risks and Internal Controls

CNP Seguros Holding Brasil acknowledges that risk management is an integral and fundamental part of its business activities, and that the careful and comprehensive management of risks results in stability in financial results and contributes for the value generation and for the consolidation of the image of a company as solid, integrated, profitable, socially responsible, effective and efficient

It has an effective internal control system, made up by at least: effective administrative and accounting procedures, internal controls structure, a standard of information appropriate for all levels of the company and a compliance verification feature.

Guidelines

Risk management is a core element in strategic management.	Compliance with laws and regulations is not optional, it is mandatory.	The evaluation of risks and solvency is part of the business strategy and must be permanently taken into account in the strategic decisions of the Company.	The risk and solvency inventory must be reviewed annually, or immediately after and significant change in the risk profile of the Company.
Whenever required, the Company must present to the control bodies, both internal and external, information needed for supervision purposes.	ORSA (Own Risk and Solvency Assessment), defined in Solvency II, Must be reviewed and calculated annually, providing mechanisms to evaluate the adequacy of the risk management of the Company to guarantee that the strategic and business decisions are made taking into consideration, accordingly, the evaluation of risks associated and the impact of these decisions in the solvency, considering both the current situation and the forecast for the future, in different scenarios and taking into account the Risk Appetite of the Company or the Risk Appetite Statement (RAS)	The Sustainability Risk management is part of the Internal Controls System - Sistema de Controles Internos (SCI) - and the Risk Management Structure - Estrutura de Gestão de Riscos (EGR)-, and the risks related to it are considered, whenever possible, in the categories of underwriting, market, operational and liquidity risks, due to its effects.	

8. Internal Controls, Risk Management and Internal Audit



Process of Risks Management

Actions deriving from guidelines are implemented by the management, with the goal of promoting, with reasonable certainty, the accomplishment of the Company objectives. Based on COSO – ERM and ISO 31000 guidelines, the risk management is structured into five components:

1. Risks Identification

Aims at identifying, recognizing and describing the risks the company is exposed to.

2. Risks Assessment

After identifying the risks, qualitative and quantitative analysis are carried out, aiming at the definition of impact and vulnerability characteristics to be used in the prioritization of the risks being treated.

3. Risks Treatment

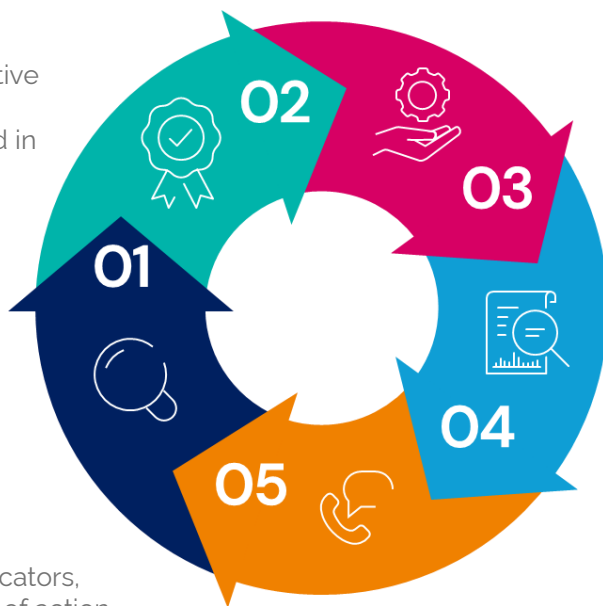
The treatment to be given to the risks is defined, as well as how they should be monitored and informed to the parts involved. Strategies adopted regarding risk: avoid, mitigate, transfer and/or share and accept.

4. Risks Monitoring

Consists of following the performance of risks indicators, supervising the implementation and maintenance of action plans and the achievement of objectives set, through continuous managerial activities and/or independent evaluations.

5. Risks Communication

The communication is directed to all parts of interest, mainly the Board of Directors, the Auditing Committee, the Risks Committee, the Fiscal Council, the Administration Council and the Shareholders, being performed in a clear and objective way, as set in the Corporate Governance.



Picture 08 – Risks Management Process

8. Internal Controls, Risk Management and Internal Audit



Internal Audit

Our Internal Audit is linked in a functional way to the Administration Council and in an administrative way to the Presidency, exercising its activities with Independence and free of any internal and/or external influence.

The Internal Audit has the **target of assessing the efficacy of the processes of governance, risks management, information systems, internal controls and operation**, in order to identify possible flaws, inefficiencies and noncompliance, with the objective of helping the Company achieve its strategic goals and providing comfort to the Shareholders concerning the effectiveness of the controls assessed. These assessments are essential to guarantee the protection of the Company assets, the compliance with internal and external rules and regulations, and the prevention of frauds and mistakes that may jeopardize the financial strength and the reputation of the Company.

Additionally, the Internal Audit provides guidance that may help Senior Management continuously improve the processes and strengthen the corporate governance, contributing to the sustainability and trustworthiness of the Organization in the market.



Axis 4 - Monitoring

9. Regulatory Monitoring



The regulatory monitoring guarantees that the company is informed about changes that may impact our businesses!

In the Brazilian context, insurance companies face a regulatory environment that is complex and in constant evolution. **The Superintendência de Seguros Privados (SUSEP) – Superintendence of Private Insurance – is the body responsible for the supervision and regulation of the segment** and often updates the rules to follow the best international practices.

Having a good regulatory monitoring is crucial for insurance companies in Brazil, since it guarantees stability in the market, protects the clients and promotes trust in the segment.

This process involves constant monitoring and adaptation to changes in laws and regulations the rule the insurance segment, making sure that the company operates in compliance with established legal and ethical standards.

At CNP Seguros Holding Brasil the regulatory monitoring reflects the controls that guarantee that the Company is informed about the changes that may impact our businesses, besides promoting promptness in the identification and implementation of normative changes, in which the lack of adequacy may result in fines, sanctions, noncompliance and reputational damages.

For an efficient regulatory monitoring, the Company counts on:

Regulatory Monitoring:

Daily, a normative monitoring is performed which ensures the compliance with all legal requirements, including the implementation of policies and actions plans, answers to internal and external audits, answer to external letters and continuous update of operational procedures.

Axis 4 - Monitoring

9. Regulatory Monitoring



Action Plans

Monitoring that is performed in face of action plans that are open with set deadlines aiming at adequacy, correction or creation of processes, flows, documents or any other action that may be necessary for the improvement of procedures.

Reports and Records

CNP Seguros Holding Brasil, through its Compliance area, regularly presents **regulatory and internal reports**, with the objective of showing important indicators to the Company and the main conclusions taken from the monitoring.

The following reports are presented:

- Annual Compliance Report
- Quarterly Compliance Report presented to the Risks Board pursuant to resolution n° 416/2021 from CNSP (National Council for Private Insurance).
- Specific reports presented to strategic areas, councils and directors according to demand.

The monitoring of the Compliance area has a direct relationship with the regulatory monitoring, since it guarantees that the organization is constantly updated, prevents deviations, reduces reputational risks and creates evidence for the Audits.

In this sense, the process of monitoring and recycling of axes and pillars of this Integrity Program may be observed in the following list of exemplified actions:

Monitoring of the Ethics Channel

Information is daily monitored by collaborators specialized in the treatment and verification of reports.

Monitoring and review of Risks

The Company performs a risks analyzes that includes specifically risks related to corruption and fraud;

Monitoring of Accounting records

The Company has a manual for accounting closing and the document of Procedure for Accounting Controls that are listed as the main information about how the accounting closing happens in the group.

Document framework

All internal documents, such as policies, Code of Ethics and Conduct, manuals, forms, programs and rules, are revised before their expiry date. Documents related to regulation themes are submitted to analyzes and approval of Senior Management. Additionally, it is verified periodically the need to revoke documents that are outdated or inadequate according to regulatory changes.

Monitoring of Third Parties and suppliers

It is based on the Normative Manual for Diligence and Compliance of Third Parties and the Manual for Evaluation and Monitoring of Critical Third Parties, that classifies the risks as low, moderate, high and critical with based on the preventive Due Diligence methodology, besides new diligences performed over the period of the contract;

Axis 4 - Monitoring

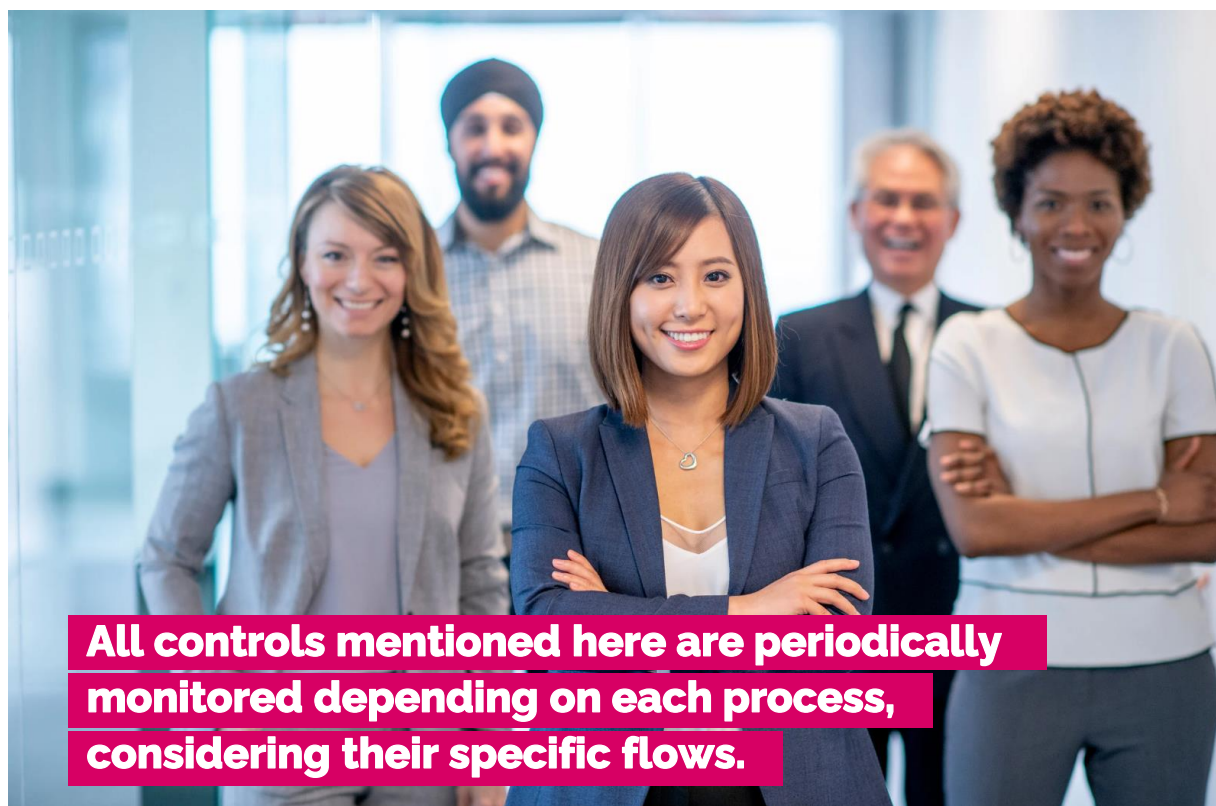
9. Regulatory Monitoring



Monitoring of Diligences

The monitoring of individuals vetted for strategic or non-strategic positions within Senior Management is conducted periodically.

In summary, the regulatory tracking through continuous monitoring is an essential practice for our Company. It not only ensures the legal compliance, but it also strengthens the prevention to illegal and unethical acts, contributing for a safer and more reliable business environment.



10. Privacy and Data Protection



The implementation of a robust privacy and data protection program is essential to guarantee the compliance with laws and regulations, such as the Lei Geral de Proteção de Dados (LGPD) – General Data Protection Law - in Brazil and the General Data Protection Regulation (GDPR) in the European Union. In addition to meeting the legal requirements, this protection strengthens the trust of our clients, partners and stakeholders.



We follow the Lei Geral de Proteção de Dados (LGPD) in Brasil and the General Data Protection Regulation (GDPR) in the European Union.

What is Personal Data?

Personal Data is all the information related to an identified or identifiable individual. It includes direct data such as name, CPF (social security), ID, email, and indirect data, such as IP address and geo-localization. Some data is classified as sensitive, demanding more protection, since it involves aspects such as racial or ethnic origin, political opinion, health information, biometry and genetic data.

Importance of Personal Data Protection

Personal data protection is not just about legal compliance, but it is also a matter of organizational ethics and trust. Organizations that process Personal Data in an inadequate way or that undergo security violations can face severe sanctions, both financial and reputational. Therefore, data protection is a crucial factor to avoid operational risks, as well as guarantee that the Company acts in a responsible and transparent way.

Axis 4 - Monitoring

10. Privacy and Data Protection



Principles of Personal Data Protection

Personal data protection is based on essential principals that guide all the activities related to data processing. Among the main ones, we can highlight:

	Purpose: Personal Data must be collected with a specific, legitimate and clear purpose, known by the Data Subject.	Adequacy : Personal data processing must be compatible with the informed purpose.	Need: Data collection must be limited to the minimum necessary for the performance of their purpose.
	Security: Data must be processed with adequate measures to protect them against non-authorized access and leakage..	Transparency: The Data Subjects have the right to know how their data is being handled.	Prevention: Proactive measures must be adopted to avoid privacy incidents.
			Accountability: The organization must show that it adopts efficient measures for data protection.

At CNP Seguros Holding Brasil, in accordance with the market standards, we have established the following components for the Privacy and Data Protection Program:

1. Data Mapping and Inventory:

The Company carries out identification of which personal data is collected, processed and stored. It also includes the monitoring of who has access to this information and the purpose.

2. Privacy Policies and Procedures

Clear and objective policies, that guide the treatment of data in all areas, have already been developed and they are continuously monitored and updated. The policies range from the collection to the safe disposal of personal data.

3. Data Governance

Structure of a model of governance that ensures the continuous supervision of the data treatment activities through the nomination of a Data Protection Officer (DPO).

4. Training and Awareness

The Company seeks to capacitate all collaborators about applicable regulations and best practices regarding data protection. The awareness and the acculturation are continuous, considering the technological and regulatory evolution.

5. Security Incidents Management

Processes have been established to identify, investigate and respond quickly to occasional data violations. The Company has a response plan for incidents, with mechanisms to notify the authorities and Data Subjects.

6. Continuous Monitoring and Auditing

Performance of periodical audits to check the compliance with laws and internal privacy policies. The Company must be prepared to fit their practices according to new regulatory demands and changes in the business environment.

De gente
pra gente



Conclusion



Aware of our role in the society, it is everyone's responsibility to make our Integrity Program happen!.

The practices, results, and adherence to the guidelines outlined in this program must be a commitment shared by everyone who is part of CNP Seguros Holding Brasil and its subsidiaries, for us to reach complete integrity in our businesses, sustainability in our actions, value in our established relationships, and ethics doing what is right every day!

The connection between the axis and the pillars of this Program represents our day-by-day as an organic structure.

The Compliance area reports promptly to competent governance bodies the prevention action, the detections and the penalties that have been applied after the verification of illegal acts performed by employees and directors of the Company, in order to assess the effectiveness, implement improvements to the Program and evolve in the Integrity Ecosystem.

This program involves the compliance of the activities of CNP Seguros Holding Brasil to the laws, regulations, rules, internal rules and guidelines and orientations given to shareholders.

Following the guidelines of this document must be a constant compromise of all who are part of this ecosystem and seek integrity in the relationships established by the Company.

This program is updated every two years or when there is need of adequacy to external applicable guidelines and approved by the High Administration in the Executive Board, in compliance with the current regulation.



Glossary

ABR - Abordagem Baseada em Risco (Risk Based Approach) is a strategy or methodology that involves evaluation and management of activities, processes, projects or systems based on the probability of the occurrence of adverse events and the impact these events may have. It is specially used in the combat to frauds, as Money Laundering and Financing of Terrorism.

Accountability in a corporate integrity program refers to the responsibility and account report of all involved in the implementation and maintenance of the program

AIR - Avaliação Interna de Riscos (Internal Risk Assessment) is a procedure that aims at identifying and measuring the risks of using the products, services and new technologies for Money Laundering and Financing of Terrorism (ML/FT)

Senior Management– the High Administration is made up by the Executive Board, which includes the CEO, CFO and COO, and by the Administration Council. This group of Professional and Bodies have the responsibility of managing and determining the direction of our Company.

Collaborators – are all the employees, direct and indirect, and interns that make up the staff of the company.

Conduct – it refers to the human behavior in daily actions, as means to reach a certain end. It corresponds to the behavior adopted by a person in their social interactions.

Compliance – it refers to our duty of following internal and external rules in the daily life at the Company. It is an obligation to be in compliance with our internal rules and the law.

Potential Conflict of Interest – when there is an extraprofessional personal or commercial interest, in one's benefit or a relative or close person, but where there has been no involvement in the decision making. It may or may not become a real conflict of interest.

Real Conflict of Interest – when there has effectively been an attitude in the decision making, participation in the decision or power to influence a decision where there is an extraprofessional personal or commercial interest, in one's benefit or a relative or close person.

Corruption – it is an illegal act and, according to Law n° 12.846/2013, corresponds to harmful acts against public administration, national or international, that undermine the national or international public patrimony, against the principles of public administration and against the international commitments undertaken by Brazil.

Passive Corruption – it is a crime committed by a public servant against the public administration, typified when a public servant asks or receives, for themselves or others, improper advantage in exchange for facilitation for an individual. The punishment is two to twelve years of prison and payment of fine.

Glossary

School Conecta + - Corporate platform that has courses, trails, lives and content aiming the knowledge and development for the collaborators, aiming at continuous learning and strengthening of the company culture.

Ethics - set of values and standards considered correct by a certain social group. It corresponds to the human behavior in compliance with the rules and good morals. It is characteristic of those who value what is correct, what is right, honesty, good-faith in daily actions.

Fraud - act or omission, intentional or deliberate, with the aim of getting direct or indirect advantage for themselves or for others through illegal or improper ways.

Integrity - Integrity is understood as a set of values, rules and behaviors that give to an individual or company the characteristic of unity and completeness in the compliance with the rules. Likewise, integrity can be considered as something that is upright, which is, with a good reputation.

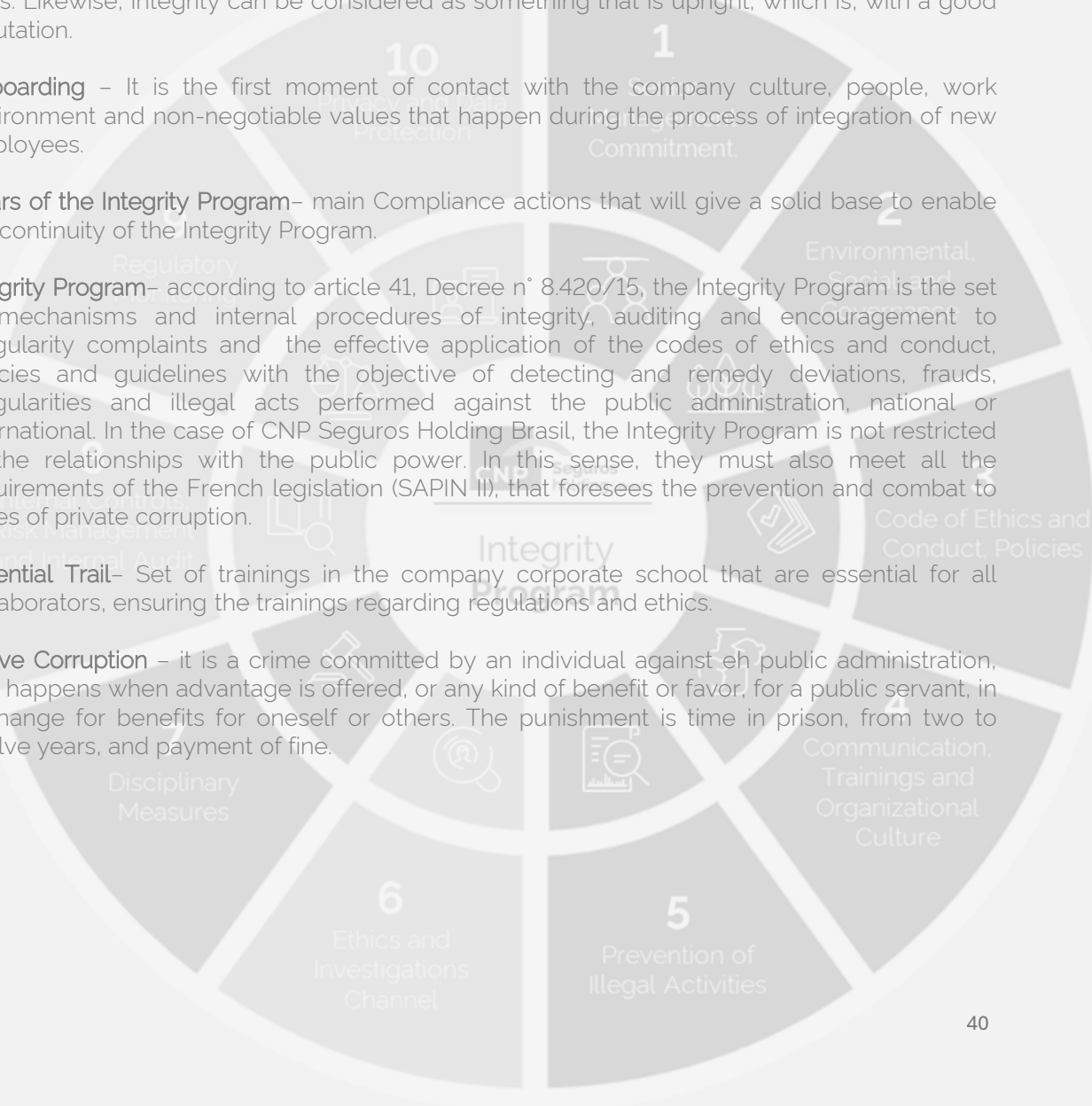
Onboarding - It is the first moment of contact with the company culture, people, work environment and non-negotiable values that happen during the process of integration of new employees.

Pillars of the Integrity Program- main Compliance actions that will give a solid base to enable the continuity of the Integrity Program.

Integrity Program- according to article 41, Decree n° 8.420/15, the Integrity Program is the set of mechanisms and internal procedures of integrity, auditing and encouragement to irregularity complaints and the effective application of the codes of ethics and conduct, policies and guidelines with the objective of detecting and remedy deviations, frauds, irregularities and illegal acts performed against the public administration, national or international. In the case of CNP Seguros Holding Brasil, the Integrity Program is not restricted to the relationships with the public power. In this sense, they must also meet all the requirements of the French legislation (SAPIN II), that foresees the prevention and combat to cases of private corruption.

Essential Trail- Set of trainings in the company corporate school that are essential for all collaborators, ensuring the trainings regarding regulations and ethics.

Active Corruption - it is a crime committed by an individual against the public administration, that happens when advantage is offered, or any kind of benefit or favor, for a public servant, in exchange for benefits for oneself or others. The punishment is time in prison, from two to twelve years, and payment of fine.



References

CEC – Code of Ethics and Conduct

PO 006 – Money Laundering and Financing of Terrorism

PO 007 – Policy of Prevention and Combat to Frauds

PO 014 – Compliance

PO 024 – Policy of Personal Data Protection

PO 025 – Prevention to Conflict of Interests

PO 028 – Anticorruption

PO 029 – Treats and Presents

PO 031 – Transactions between Related Parts

PO 040 – Policy of Treatment of Complaints of the Ethics Channel

MN AES 080 – Compliance Management

MN AES 071 – Evaluation of Compliance Risk

MN AES 084 – Reception and Treatment of Reports

MN AES 031 – Management of Regulatory Compliance

MN AES 089 – Manual of Consequences Management

MN AES 083 – Office for Personal Data Protection

MN AES 082 – DPIA Execution – Data Privacy Impact Assessment

PROC AES 083.a – Personal Data Violation Management

PROC AES 083.b – Legitimate Interest Management

PROC AES 083.c – Holders Request Management

PROC AES 083.d – ROPA Management



Normative References

CODE./ORG.	Description
GOVERNMENT	Law nº 13.709, August 14th, 2018
GOVERNMENT	Law nº 12.846, from 2013
GOVERNMENT	Decree nº 11.129, July 12th, 2022
SUSEP	Resolution CNSP nº 416, from 2021
ANS	Normative Resolution ANS nº 518 from 2022
ANPD	Resolution CD/ANPD nº 1, October 28th, 2021
ANPD	Resolution CD/ANPD nº 4, February 24th, 2023
ANPD	Resolution CD/ANPD nº 15, April 24th, 2024
ANPD	Resolution CD/ANPD nº 18, July 16th, 2024
ANPD	Resolution CD/ANPD nº 19, August 23rd, 2024
CGU	Guide of Orientations for Private Companies 2024

Pictures

- Picture 01 – Axes of the Integrity Program
- Picture 02 – Pillars of the Integrity Program
- Picture 03 – Link of Access to CEC
- Picture 04 – Normative Framework of CSH
- Picture 05 – Contacts of the Ethics Channel
- Picture 06 – Flow of Management of the Ethics Channel
- Picture 07 – Lines of Defense
- Picture 08 – Process of Risks Management



Program Management

Program Approved by the High Administration in the Executive Board meeting held on Nov 22nd, 2024.

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Integrity Program



2024

Development:

Board of Compliance and Data Protection
Management of Compliance and Regulatory
Center of Managerial Information ®
Version 1

Body of Approval

Approved on 22/ november / 2024 by DIREX

Update date: November 22, 2024

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