



CODE OF ETHICAL CONDUCT

FOR SUPPLIERS AND

SERVICE PROVIDERS

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SULAMÉRICA'S VALUES

1. What guides us is the satisfaction of our clients and our brokers;
2. We value our staff and encourage teamwork;
3. We aim at a healthy, and long-term relationship with our partners;
4. We always seek to achieve the best results and to constantly enhance the efficiency of our operations;
5. We fulfill our promises, and remain committed to sustainability.

1. SULAMÉRICA'S CODE OF ETHICAL CONDUCT FOR SUPPLIERS AND SERVICE PROVIDERS

SulAmérica applies the highest standards of ethics in its business. Our suppliers, service providers and business partners (together referred to as "Third Parties") must be sure that their activities are based on respect and transparency, complying fully with SulAmérica's values, with this Code of Ethical Conduct ("Code") and with the applicable laws and regulations.

It is therefore the duty of all Third Parties to be familiar with the recommendations of this Code, to understand them and apply them in their day-to-day activities, and the same goes for the laws and regulations that apply to SulAmérica's activities.

Third Parties must ensure that their staff are familiar with the provisions of this Code.

Failure by Third Parties to comply with this Code represents a violation of the terms of their agreements with SulAmérica, and can lead to the imposition of fines for contractual default, liability for loss and damage, and even to the termination of the agreement for cause.

THIRD PARTIES IN THE SERVICE OF SULAMÉRICA MUST ACT ON THE BASIS OF:

- **respect;**
- **transparency;**
- **compliance with the law.**

2. RELATIONSHIP WITH STAKEHOLDERS

2.1 WORK RELATIONSHIPS

Relationships in the work environment of Third Parties must be based on safety, respect for the individual, dignity and compliance with the law.

SulAmérica values diversity and will not tolerate any conduct that might be regarded as sexual or moral harassment or any form of discrimination, whether on the basis of color, origin, background, social class, party political preference, sex, religion, sexual orientation, age, physical aspect or special needs.

SULAMÉRICA WILL ALSO NOT TOLERATE ON THE PART OF THIRD PARTIES:

- **anticompetitive practices;**
- **corruption;**
- **practices damaging to the environment;**
- **child labor, compulsory or forced labor, or labor analogous to slavery.**



Third Parties are an extension of SulAmérica and must obey the Company's ethical standards and this Code, in particular in their relationships with the policyholders and clients of SulAmérica with whom they come into contact.

Third Parties may not subcontract the services for which they have been engaged, in whole or in part, except with the express prior consent of SulAmérica. If such consent is given, the subcontractor must understand the recommendations of this Code, and the laws and regulations applicable to SulAmérica's business, and abide by them in its day-to-day operations.

2.2 RELATIONSHIP WITH THE PUBLIC ADMINISTRATION

The relationship with representatives of the Public Administration must be based on ethics, integrity and transparency.

No offer, promise, payment or delivery of money, gifts, services, entertainment or any other benefit that might be seen as an undue advantage, or which might possibly appear to be improper, may be given directly or indirectly to any public agent.

SulAmérica demands transparency in relationships with public agents and we have a zero tolerance policy in respect of corruption.

EXAMPLES OF PUBLIC ADMINISTRATION ENTITIES:

- all governmental bodies operating in the Executive, Legislative or Judicial branches, at federal, state or municipal level;
- bodies or agencies responsible for regulating or supervising the activities of SulAmérica;
- federal, state and municipal foundations;
- state-owned and state-controlled companies.

2.3 RELATIONSHIP WITH THE MARKET AND ANTITRUST RULES

It is strictly forbidden for Third Parties to share commercial or operational data or information with others, in particular the competitors of SulAmérica or their representatives.

Free competition and free initiative must be basic elements in all transactions and relationships involving SulAmérica. Third Parties must therefore also comply with the antitrust laws.

Third Parties must not enter into any sort of agreement, arrangement, manipulation or accommodation with competitors of SulAmérica that involves prices, costs, demand, sales commissions, commercial strategy, or division of markets or territories, whether in relation to products or clients, market share, participation in tenders or any other type of activity that might restrict the free supply of products or services to the market.

The antitrust laws provide for hefty sanctions on companies or individuals who ignore them.

3. CONFLICT OF INTEREST


Management or key staff of Third Parties may not include any Relatives of or Close Persons to staff of SulAmérica who exercise influence or effectively approve their engagement or transactions, so that independence is assured in the relationship and conflict of interest avoided.

FOR THE PURPOSES OF THE CODE, “RELATIVES” ARE TAKEN TO BE:

- spouse
- siblings
- parents
- children
- nephews and nieces
- partner
- others (parents-in-law, sons and daughters-in-law, brothers and sisters-in-law, stepfather, stepmother and stepchildren)
- grandchildren
- uncles and aunts
- cousins
- grandparents

FOR THE PURPOSES OF THE CODE “CLOSE PERSONS” ARE:

Those with whom there is a business partnership, affective relationship or regular cohabitation, whether as partners or friends, and where there may be a desire to benefit the other.

A close-up, low-angle shot of a man with a light-colored beard and mustache, wearing a dark blue button-down shirt. He is holding a white mobile phone to his ear with his right hand. The background is a bright, out-of-focus indoor setting with warm lighting. The image has a soft, slightly blurred quality, emphasizing the man's face and the phone.

Third Parties must act in a transparent manner and notify SulAmérica's Compliance department if any Relatives of or Close Persons to staff of SulAmérica could cause a conflict of interest.

Third Parties must not use their relationship with SulAmérica to obtain any sort of favor for themselves or for others. It is strictly forbidden for Third Parties to receive commissions, rebates or undue personal favors on the basis of their relationship with SulAmérica.

4. ANTICORRUPTION AND ANTI-MONEY LAUNDERING PRACTICES

4.1 CORRUPTION

SulAmérica does not tolerate corruption in any form, whether by act or omission of its staff or of Third Parties.

SulAmérica complies with the anticorruption laws and supports measures to promote integrity. We also ensure that our business partners share this commitment.

Accordingly any suspicious situation must be reported to SulAmérica's Compliance department.

- **Do not offer or accept bribes, commissions or any other type of undue advantage.**
- **Do not allow company resources to be used for illegal purposes, whether directly or indirectly.**

4.2 MONEY LAUNDERING

SulAmérica is aware of the risks that the insurance market may be used to conceal funds obtained from illegal activities, and we are committed to preventing and combating the crimes of Money Laundering and financing of terrorism. We comply with the law and the regulations of the supervisory and regulatory authorities.

Third Parties must be diligent in monitoring and detecting transactions with indications of Money Laundering and the financing of terrorism. SulAmérica's Compliance department must be informed of any suspicious situation.

Money laundering is the transformation of funds obtained from illegal activities to give them the appearance of legality.

5. ACCEPTING OR OFFERING GIFTS AND FAVORS

SulAmérica does not accept or offers gifts. This would be a violation of this Code and of the agreements between Third Parties and SulAmérica.

The offer of Giveaways by Third Parties to staff of SulAmérica does not constitute a violation of this Code, provided that it is done in good faith, without any intention of exercising undue influence, and that the giveaway is worth less than R\$ 350.00.

Giveaways are promotional items, sometimes bearing an institutional logo or message, widely distributed as a courtesy, for promotional purposes or to commemorate a historical or cultural event.

6. PROTECTION OF PROPERTY AND INFORMATION

6.1 PROPERTY

SulAmérica's physical and intellectual property may be used by Third Parties, when express authorization has been granted, solely in related activities, and it may not be used to obtain an advantage or otherwise than as expressly provided for in the agreement, or when not authorized.

Misappropriation of SulAmérica property is illegal and anyone guilty of this will be subject to the applicable legal sanctions.

It is strictly forbidden to copy, sell or distribute information, computer programs, applications, software or other type of intellectual property belonging to SulAmérica.

SULAMÉRICA'S PHYSICAL AND INTELLECTUAL PROPERTY INCLUDES:

- buildings and facilities;
- vehicles;
- equipment;
- trademarks and logos;
- inventory, plans and products;
- technology, business and sales strategies, information, researche and data.

6.2 INSIDER INFORMATION

During their activities, Third Parties may have access to information about SulAmérica or other parties which is not common knowledge. Third Parties and all their staff are bound to keep this Insider Information, and they may not use it for any purpose other than the strict performance of their obligations, as provided for in their agreement.

Third Parties are forbidden to disclose information or data received or obtained, without SulAmérica's express prior consent.

INSIDER INFORMATION IS ANY INFORMATION THAT IS NOT PUBLIC KNOWLEDGE.

SOME EXAMPLES:

- **details of products, clients, staff and other stakeholders;**
- **business and sales strategies;**
- **annual budgets and short and long-term plans;**
- **details of sales volumes, survey results, financial data and procedures; and**
- **results not yet announced to the market.**

7. ACCOUNTING AND DOCUMENTARY RECORDS

All transactions undertaken by Third Parties must be supported by the proper documentation and must be duly entered in the books and in the appropriate accounts immediately, as required by law. No payment or receipt may be made by Third Parties other than for the purpose for which it was authorized, or to a person other than the recipient.

Third Parties must prepare their financial statements in accordance with the law and with accounting principles, so as to accurately represent their transactions with SulAmérica.

IN THEIR RELATIONS WITH SULAMÉRICA, THIRD PARTIES:

- must keep accurate, complete and easily analyzed records of all costs and revenues related to SulAmérica, irrespective of the amount or purpose;
- may not under any circumstances alter or conceal accounting data, or supply or register in their books any false or inaccurate information;
- must protect and retain all documents related to their agreement with SulAmérica, for the period required by law; and
- must reject and not produce or use false or incomplete documents.

8. COMMITMENT TO THE ENVIRONMENT AND TO SOCIAL RESPONSIBILITY

SulAmérica has adopted and, within its sphere of operations and influence, supports a set of values for the defense of human rights, working conditions and the environment, in line with the ten principles of the United Nations Global Compact.

THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT ARE:

- the protection of human rights;
- freedom of association and the right to collective bargaining;
- the elimination of all forms of forced and compulsory labor;
- the effective abolition of child labor;
- the prevention of sexual exploitation of children and teenagers;
- the elimination of discrimination in employment and occupation;
- a precautionary approach to environmental challenges;
- the promotion of environmental responsibility;
- the development and diffusion of environmentally friendly technologies; and
- combating corruption in all its forms.

SulAmérica is firmly committed to protecting the environment and we require Third Parties to comply with all the applicable environmental laws and regulations.

**SULAMÉRICA SUPPORTS AND ENCOURAGES
THIRD PARTIES TO:**

- prevent potential risks to the environment from their activities;
- implement sustainable practices to minimize the environmental damage caused by their activities;
- conserve natural resources and reduce waste.

9. COMMUNICATION CHANNEL

SulAmérica provides communication channels that can be used by Third Parties, either to report suspicions related to the standards of conduct and ethical principles contained in this Code or in the law, or to clear up any doubts related to Compliance.

As much detail as possible must be included in these reports, so that they can be fully investigated if necessary.

Whenever a Third Party becomes aware of or is involved in a situation that could represent a violation of this code, or suspects or becomes aware of facts which could be detrimental to SulAmérica, they must immediately report them to SulAmérica's compliance department, directly or through the reporting channel.

The contact with the SulAmérica's Compliance department can be done:

on the website: www.contatoseguro.com.br/sulamerica or

by telephone: 0800 512 7713

If you have any questions regarding compliance, please email us compliance@sulamerica.com.br.

When using the reporting channel, Third Parties can choose to make an anonymous report if they wish.

No one who reports in good faith a suspicion of violation of the law, the regulations or the internal rules of SulAmérica will suffer any reprisal or retaliation.

USING THE REPORTING CHANNEL GUARANTEES YOU:

- the option to remain anonymous;
- confidentiality;
- freedom from reprisals.