



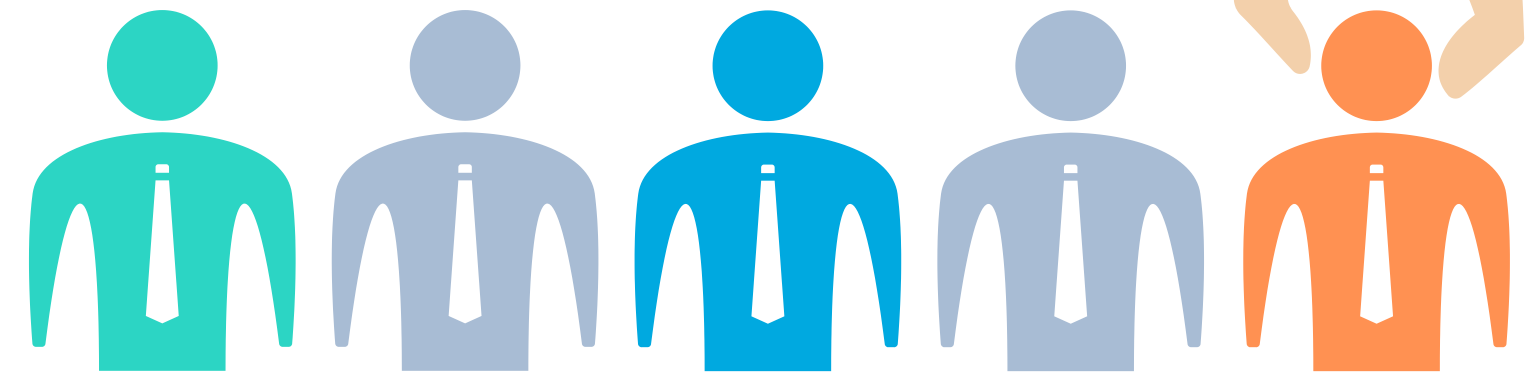
ETHICS

AUSTRAL
HOLDING

Austral Group Values

Austral Group Values

We work horizontally, creatively, transparently and safely, ensuring the union of skills and knowledge along with autonomy and independence of action.



It brings solutions in corporate risks, through the purpose of expanding the sense of security of the people with whom we relate, simplifying interactions and creating, side by side, the best solutions. We are more than an Insurance Company:

- We are **Strategy**: commitment to your business.
- We are **People**: team of specialists.
- We are **Flexibility**: your way.
- We are **Agility**: at the right time.

AUSTRAL / Re

A Brazilian reinsurer that spares no effort to seek solutions to all types of challenges of our clients in Brazil and Latin America, always with:

- **Entrepreneurial attitude** - We have body and capacity and we are agile, bold and focused on results. We do all this responsibly and following principles and processes.
- **Creative knowledge** - Inside and out, we invest in knowledge, technology and the best professionals to actually innovate.
- **True partnerships** - Our service is close, proactive and flexible.

Austral Group Values



Horizontality

We invest in partnership relationships, with respectful and equal communication. We recognize the equity of knowledge and practices and encourage frank conversations and simple, truthful relationships.



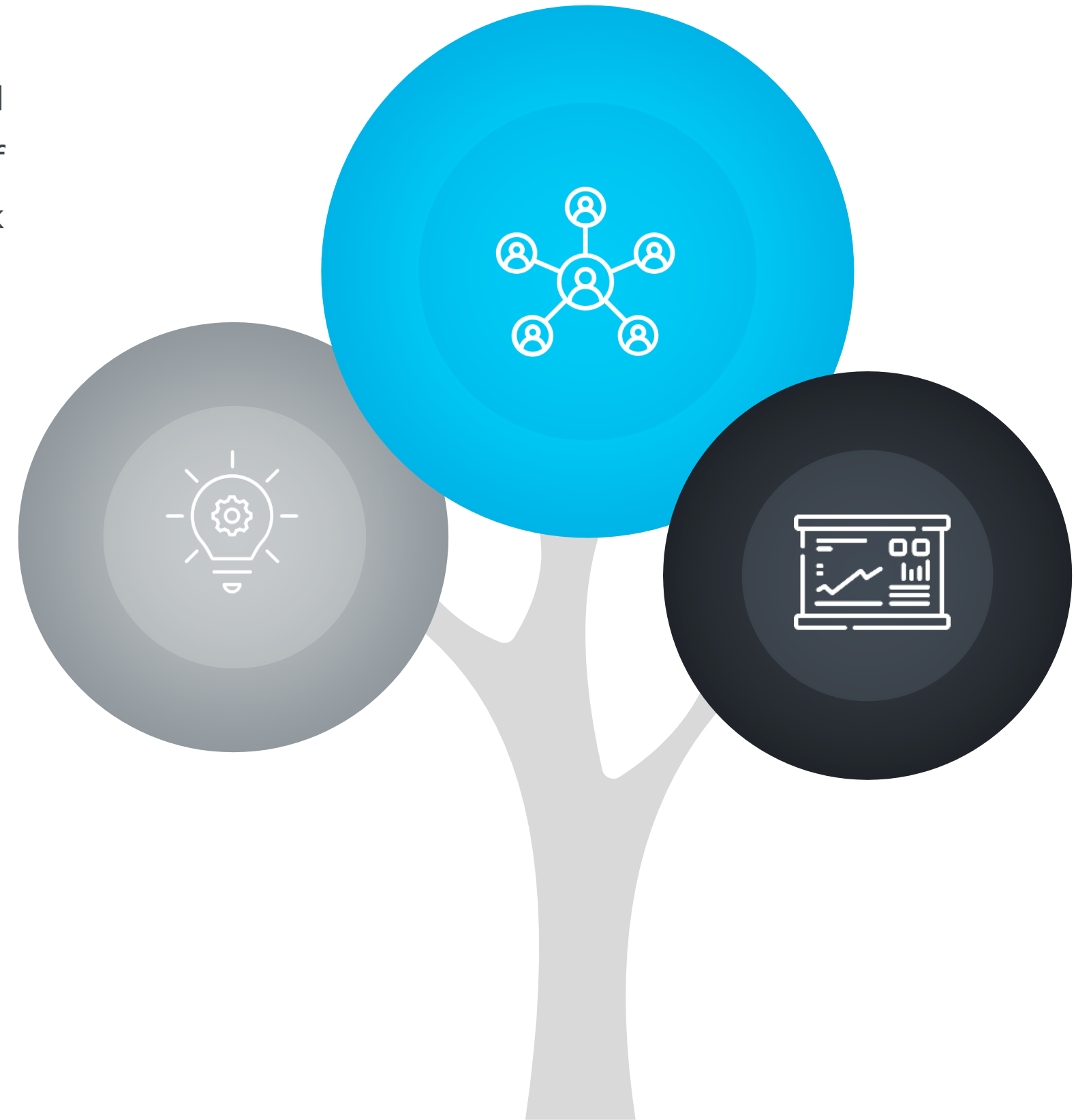
Innovation

We maintain our orientation towards the new, we are always in line with the future. We stimulate creativity and intelligence within our companies, in their processes, relationships and product development



Transparency

We act with ethics, clarity and organization in complying with rules and standards and in the management of information of all our companies, sharing what is due and preserving independence and confidentiality among their businesses.



The Code of Ethics

The Code of Ethics

The code of ethics is a set of principles and rules that translate our culture and the way we conduct our relationships. It establishes standards of conduct to be adopted by all Austral employees, regardless of hierarchical level, service providers, committee members, shareholders and other stakeholders, promoting values such as integrity, transparency, respect and responsibility.



The Whistleblowing Channel

Grupo Austral has a Whistleblowing Channel, which is available 24 hours a day, 7 days a week and can be accessed by the following means:

Website: www.contatoseguro.com.br/austral

Phone: 0800-800 8404

Grupo Austral's Whistleblowing channel is managed by a service provider in an environment separate from our infrastructure and follows access segregation rules to ensure anonymity and avoid conflict of interest in the handling of complaints.

The Ethics Committee will monitor the process, deliberating on the measures to be taken.



The Ethics and Conduct Committee

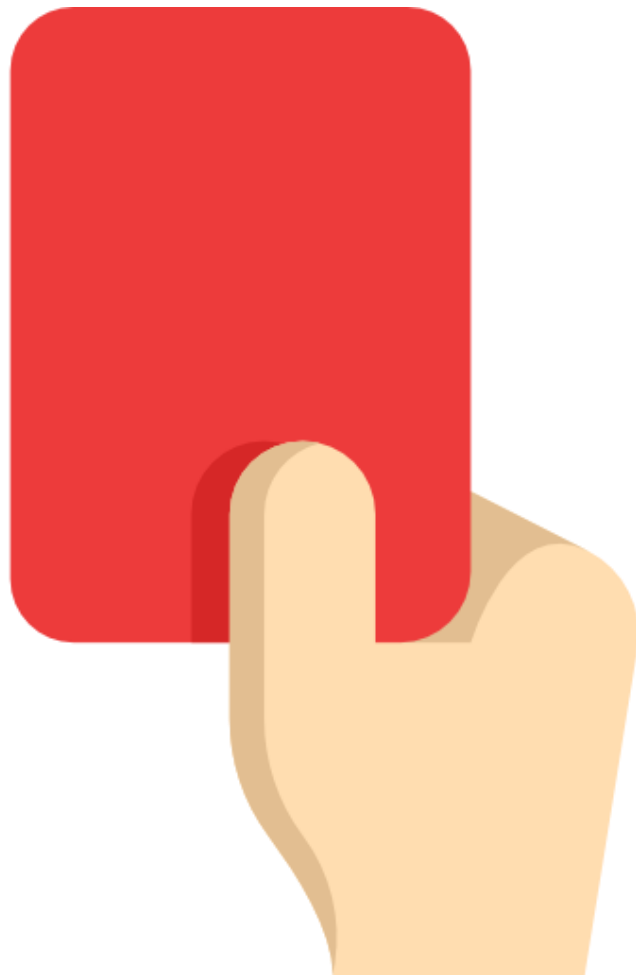
The Ethics Committee is a collegiate body subordinate to the Company's Board of Directors.

The Committee is responsible for examining and deliberating, with impartiality, any and all occurrences received regarding violations of the Code of Ethics and Conduct, either via the whistleblowing channel or directly.

The Committee can be accessed for questions, suggestions, advice, complaints or criticisms of the Code of Conduct, by e-mail comitedeetica@australholding.com.

Unethical or unlawful conduct

It is the responsibility of all employees of Grupo Austral to report any unethical or illegal conduct that is known or suspected, whether by another employee or third parties who have any connection with the Company



- Every employee has the duty to act in accordance with and not fail to comply with the guidelines established in the Austral Group's Code of Ethics and Conduct.
- Every employee has the right and duty not to omit and report in the face of suspicion or verification of any irregularity involving Grupo Austral.
- Grupo Austral prohibits retaliation against an employee who reports an activity that he believes to be a violation of any law, rule, regulation or provision of the Code of Ethics and Conduct. Any and all complaints will be treated confidentially and the whistleblower, if they identify any type of retaliation.
- It is the responsibility of all employees to be aware of the content of the Code of Ethics and Conduct. Any violation may lead to sanctions, and in the case of service providers may result in immediate suspension of the contract.

Working environment

Grupo Austral values the maintenance of a safe and healthy work environment, which favors individual performance and employee satisfaction, in which respect and transparency in relationships are fundamental



- Grupo Austral encourages and acts so that the relationship at work is based on the principles of trust, honesty, integrity, impartiality and mutual respect, regardless of the hierarchical level or function performed.
- The conciliation between the interests of Grupo Austral and the employee must occur, as a priority, through dialogue, with the search for amicable solutions, which meet the interests of both parties.
- Grupo Austral does not admit any type of prejudice or form of discrimination against any person, whether in the conduct of its activities, with its employees and outsourced workers or in the relationship with any counterparty.
- Grupo Austral does not tolerate any type of violence or harassment, whether of a sexual and/or moral nature, which includes any verbal or physical conduct, such as humiliation, coercion or threat to employees of any hierarchical level, outsourced workers or managers.

Conflict of Interest

Conflict of interest occurs when the employee uses his position to obtain an undue advantage, or is guided by personal interests, which conflict with the interests of the Company. Measures such as the segregation of duties prevent conflicting decisions from being made, in addition to promoting transparency and independence in operations.



- External professional activities are allowed only if they do not harm the employee's activity in the Company - their time of dedication, the use of resources, information and knowledge - and, especially, if they do not conflict with the Company's business, that is, in the same sector of activity or close to them. Also, for the company's leaders, no external professional activity is admitted without the endorsement and evaluation of the Ethics Committee.
- The hiring of 1st degree relatives (father, mother, child, spouse) of our employees is not allowed without the approval and evaluation of the Ethics Committee.
- The establishment of contracts on behalf of Austral with individuals or legal entities with which one of the employees is related or intimate must also be communicated by the employee and taken for evaluation by the Ethics Committee.
- Austral employees may not acquire shares in any insurance and/or reinsurance companies, whether privately held or publicly-held. It is also forbidden to acquire shares of funds that invest in insurance companies and/or insurance companies.

Relationship with Third Parties

The contracting of suppliers and business partners must always be based on technical, professional, ethical criteria and the needs of Grupo Austral. It is essential to have clarity in the scope of the service, aiming at an adequate delivery, which adds value to our business.



- Knowing the partners with whom we have relationships in advance is essential to mitigate any risks. Thus, before hiring any service, due diligence must be requested by the Governance, Risks and Compliance area.
- The receipt or offering of gifts, gifts and courtesies must comply with the provisions of Grupo Austral's Code of Ethics and Conduct and may not represent an improper or inappropriate relationship, conflict of interest or generate potential damage to the Company's image.
- It is forbidden to offer gifts or courtesies of any value to politicians and advisors, members of public and mixed-economy companies, members of regulatory bodies and other government entities, lawyers and representatives of law firms.
- In addition, any representative of Grupo Austral when participating in meetings, events, training, etc. held in public and mixed companies, must be accompanied by another representative of the Company.

Resource utilization

Grupo Austral's resources must not be misused, which can result in significant financial losses, reputational damage and even legal proceedings against the Group.



- It is not allowed to use or negotiate with Grupo Austral's financial resources for one's own benefit or that of third parties. Employees are responsible for ensuring that business and financial operations are in good standing.
- The removal of Austral's assets from its premises or use of its services must always be done with prior authorization from the manager in charge. Notebooks, cell phones and/or other equipment must be used for work, properly and safely, within the respective guidelines established in policies on the subject.
- The rendering of accounts for authorized expenses (e.g., travel expenses), occasioned at the service of Grupo Austral, must be accurate and proven within the established rules and deadlines, in accordance with the policies in force.
- No one is authorized to use the name or brands of Grupo Austral in publications, brochures, advertisements and other vehicles without prior approval from the Company. The approval will be based on the analysis of the request for authorization to use the trademark made to the Board of Directors responsible for the marketing area or Chief Executive Officers, with the adoption of the appropriate measures.

Confidentiality of Information

It is the responsibility of all employees of the Austral Group to protect and maintain confidentiality about relevant or privileged information not yet disclosed to the market, as well as not to use it for their own benefit or that of third parties



- Every employee must take the necessary precautions during public discussions or informal conversations, avoiding the accidental disclosure of information restricted to Grupo Austral.
- All information and data that circulate and are produced or maintained in our environment are the exclusive property of the Company and should be used only for the interests of Grupo Austral.
- It is essential to comply with the principles of Information Security in order to ensure that Grupo Austral's information and data are protected against access and misuse, whether by employees or third parties.



THANK YOU

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www.australholding.com.br