



seguridade

***DISCLOSURE POLICY OF MATERIAL ACTS OR FACTS OF CAIXA
SEGURIDADE PARTICIPAÇÕES S.A.***

1 RESPONSIBLE AREA

Executive, Controllershship, Finance and Investors Relationship Board

2 COVERAGE

All units of CAIXA Seguridade Participações S.A.

3 REGULATION

Decree No. 8,945, of 12/27/2016;

CVM Instruction 358, of 01/03/2002;

CVM Instruction 361, of 03/05/2002;

Law No. 6,404, of 12/15/1976;

Law No. 13,303, of 06/30/2016;

Regulations of the Highlight Program in State Companies Governance - B3;

Novo Mercado Regulation - B3

4 GOAL

Establish rules and guidelines for the communication, use and disclosure of Material Acts or Facts or other information considered sensitive within the scope of the Company, for the protection of Inside Information.

5 CONCEPTS

- **Controlling Shareholder** - the shareholder who holds Power of Control in the Company; Caixa Econômica Federal - CAIXA.
- **Managers** - they are the members of the Management Bodies.
- **Capital Market Agents** - they are the regulatory bodies, the Stock Exchanges, securities brokers and distributors, investors, portfolio managers, market analysts, associations and self-regulatory capital market committees.
- **Material Act or Fact** - any decision by the Controlling Shareholder, resolution by the General Meeting or by the Management Bodies or any other act or fact of a political-administrative, technical, business or economic-financial nature that

occurred or related to the business of the Company, its Subsidiaries and Affiliates, which may significantly influence (i) the quotation of the Securities, (ii) the decision of investors to buy, sell or keep those Securities or (iii) the decision of investors to exercise any rights inherent to the condition of holder of the Securities.

- **B3** - is B3 S.A. - Brasil. Bolsa. Balcão, entity managing the stock exchange market.
- **Stock Exchange** - it is the Stock Exchanges on which the Securities issued by the Company are admitted for trading, in Brazil or abroad.
- **Caixa Seguridade** – the Caixa Seguridade Participações S.A.
- **Affiliates** - they are the companies in which the Company has significant influence, under the terms of Law No. 6,404/76.
- **Company** - the Caixa Seguridade Participações S.A.
- **Notice to the Market** - it is the means of disclosing the information that the Investor Relations Officer deems pertinent to bring to the attention of the Capital Market Agents, even if the information does not constitute a Material Act or Fact or that its disclosure is not required by the legislation and regulations in force.
- **Consultants** - they are all people who provide services to the Company, its Subsidiaries and Affiliates or the Controlling Shareholder, such as independent auditors, securities analysts, distribution system institutions, advisors, lawyers, accountants, who have access to Inside Information.
- **Subsidiaries** - they are the companies in which the Company has Power of Control.
- **CVM** - it is the Brazilian Securities and Commission.
- **DRI** - it is the Investor Relations Officer.
- **Employees** - they are employees with a work contract and valid employment relationship with Caixa Econômica Federal - CAIXA and who work in Caixa Seguridade or its Subsidiary units.
- **Group of Shareholders** - it is the group of people: (i) bound by contracts or agreements of any nature, including shareholders' agreements, oral or written, either directly or by means of Subsidiaries, Controlling Companies or under Common Control; or (ii) among which there is a Control relationship; or (iii) under Common Control; or (iv) that act representing a common interest.
- **Inside Information** - see Material Information.
- **Material Information** - it is the information related to Material Acts or Facts until they are disclosed to Organs regulatory bodies, the Stock Exchange and other similar entities and, simultaneously, to shareholders and investors in general.
- **Statutory Members** - they are the members of the Statutory Bodies.

- **Management Bodies** - they are the Company's Executive Board and Board of Directors.
- **Statutory Organs** - they are the Board of Executives, the Board of Directors, the Fiscal Council, the Audit Committee and other bodies with technical or advisory functions of the Company, created by statutory provision.
- **Company's Regulatory Body** - it is the Brazilian Securities and Exchange Commission - CVM.
- **Related People** - these are the people who maintain the links indicated below with Statutory Members of the Company, its Affiliates and Subsidiaries or the Controlling Shareholder: (i) the spouse, from whom he is not legally separated; (ii) the partner; (iii) any dependent included in the annual income tax return; and (iv) the Subsidiaries directly or indirectly, either by the Management and the like, or by the Related Persons.
- **Stakeholders** - they are the individual or the Company or its Subsidiaries may affect group that may affect the Company or its Subsidiaries, through their opinions or actions, or that. Example: members of the Executive Board and the Board of Directors, internal public, suppliers, consumers, community, government, shareholders, among others.
- **Subject People** - they are those defined in item 7.1 of this Policy.
- **Power of Control** - it is the power effectively used to direct social activities and guide the functioning of the organs of the invested company, directly or indirectly, in fact or in law. There is a relative presumption of ownership of the control in relation to the person or Group of Shareholders who own shares that ensure the absolute majority of the votes of the shareholders present at the last three general meetings of the investee company, even if they do not own the shares that ensure it the absolute majority of the voting capital.
- **Relevant Proceedings** - are those judicial, administrative or arbitration proceedings that, in the opinion of the Company, could influence the investment decision of investors or potential investors, since they have the potential to (i) significantly impact the equity of the Company or its Subsidiaries, as well as their respective financial and business development capabilities, and/or (ii) have a negative impact on the Company's image, and/or (iii) involve legal risks related to the discussion of the validity of clauses in the Company's Statute.
- **Subsidiary** - it is a subsidiary corporation whose capital is wholly owned, directly or indirectly, by Caixa Seguridade, characterizing the Subsidiary as state-owned.
- **Securities** - these are any shares, debentures, subscription bonuses, receipts and subscription rights, promissory notes, call or put options, indices and derivatives of any kind, or any other securities or collective investment contracts issued by Company, or referenced to them, which, by legal determination, are considered security.

6 PRINCIPLES

6.1 TRANSPARENCY

The Company's information is disclosed in an effective, accurate, appropriate and clear manner in order to provide the Stakeholders with an understanding and to support their decision-making.

6.2 EQUITY

Caixa Seguridade adopts fair and equal treatment for all parties involved in the process.

6.3 CONFIDENTIALITY

The information is private to authorized persons and access to any others that do not have authorization is prohibited.

6.4 CONFORMITY

All routines and procedures take place in strict compliance with the internal and external standards to which they relate.

7 GUIDELINES

7.1 PEOPLE SUBJECT TO THIS POLICY

The rules and guidelines established in this Policy shall be compulsorily observed by Caixa Seguridade, its Administrators, Supervisory Board and any bodies with technical or advisory functions created by statutory provision or by any Employees and third parties hired by Caixa Seguridade who have permanent or to Insider Information, as well as, by adhering to this Policy, by signing a specific term and/or providing for these rules in specific regulations, its Controlling Shareholder, members of its Statutory Bodies, Employees and third parties who have permanent or eventual access Insider Information.

Persons who fall under the conditions described above must sign a Term of Adhesion to this Policy, pursuant to article 16, paragraph 1 of CVM Instruction 358/02.

7.2 OBLIGATION TO INDEMNIFY

The persons responsible for non-compliance with any provision contained in this Policy undertake to reimburse the Company and/or other third parties, in full and without limitation, for all the losses that the Company and/or other third

parties may incur and which may result from such non-compliance, respecting due legal process, contradictory and broad defense.

7.3 REVIEW

The terms of this Policy will be reassessed at least annually, and a technical report must be submitted to the Board of Directors justifying the maintenance of the version if the need for revision is not identified.

In case of doubt or divergence, the terms of CVM regulations, or any other law or regulation dealing with the same subject, shall prevail over those of this Policy.

7.4 THIRD PARTY RESPONSIBILITY

The provisions of this Normative Manual do not eliminate liability, arising from legal and regulatory requirements, attributed to third parties not directly connected to the Company and who are aware of a Material Act or Fact.

7.5 DUTY OF CONFIDENTIALITY

Subject persons who have access to the Relevant Act or Fact information must keep this information confidential until it is disclosed to the market and ensure that subordinates, related persons or other people they trust also do so, responding jointly to them in the event of non-compliance.

The Company enters into confidentiality agreements with its interlocutors, especially with the Consultants, whenever these, due to the services provided, the consultations addressed to it, or for any other reason, have access to information that is not public knowledge.

For guidance purposes, whenever there is a doubt about the relevance of Privileged Information, contact the Company's DRI in order to resolve the doubt.

7.6 RESPONSIBILITY TO DISCLOSE

DRI is primarily responsible for the communication and disclosure of a Material Act or Fact that occurred or related to the business of the Company, Affiliates and Subsidiaries, as well as ensuring its wide and immediate dissemination, simultaneously in all markets where such securities are admitted to negotiation.

Subject Persons who have personal knowledge of a Material Act or Fact must communicate it in writing to DRI.

The Controlling Shareholder or the Statutory Members who find DRI's omission in the fulfillment of its duty of communication and disclosure - and if the decision to maintain confidentiality is not configured - will only be exempt from liability if they immediately communicate the Relevant Act or Fact to CVM.

Subject Persons who, inadvertently or without authorization, in any way communicate, personally or through third parties, Privileged Information to any

unrelated person, prior to its disclosure to the market, must inform such act immediately to DRI so that it can respond appropriately.

In the event of an atypical fluctuation in the quotation, price or quantity traded of the Company's Securities, DRI should inquire the Subject Persons, including Controlling Shareholders and Administrators, in order to ascertain whether they are aware of information that should be disclosed to the market, and must maintain record than ascertained.

7.7 EXCEPTION TO IMMEDIATE RELEASE

A Material Act or Fact may, exceptionally, cease to be disclosed if the Controlling Shareholder or the Management understands that its disclosure will jeopardize the Company's legitimate interest.

The Controlling Shareholder or the Directors are obliged, directly or through the DRI, to immediately disclose a Material Act or Fact, in the event that the information is out of control or in the event of an atypical fluctuation in the quotation, price or quantity negotiated Securities.

The events related to the Material Act or Fact must have their materiality analyzed in the context of the ordinary activities and the size of the Company, as well as the information previously disclosed and not in the abstract, in order to avoid trivializing the disclosure of Material Acts or Facts to the detriment of the quality of the analysis, by the market, of the Company's perspectives.

The Managers or any shareholder may request the CVM to decide on the provision of information that has ceased to be disclosed, which will not relieve them of their responsibility for the disclosure of the Material Act or Fact.

7.8 PROCEDURES

The disclosure of a Material Act or Fact and the Notice to the Market in a symmetrical manner ensures all investors the availability, in a timely manner, in an efficient and reasonable manner, of the information that may influence their investment decisions, ensuring that the information in question be disseminated in a comprehensive and uniform manner.

The communication of the Material Act or Fact and the Notice to the Market is made to the CVM, through an electronic system available on the World Wide Web and, if applicable, to the Stock Exchange and the organized over-the-counter market entity in which the Securities issued by the Company are admitted to trading.

The disclosure of the Material Act or Fact and the Notice to the Market is made simultaneously on the Company's page, www.caixaseguridade.com.br, and the disclosure of the Material Act or Fact is made in Portuguese and English, and may be made available in other languages means of communication determined by current legislation.

Additionally, the Company maintains an online information disclosure system, in order to distribute the information through electronic mail (email) to people registered in a database created for this purpose.

Disclosure is made to the market, by means of a written document, in a clear, precise, complete and impartial manner, in language accessible to the investing public, containing all the technical information that is necessary for its understanding.

Whenever possible, the disclosure of a Material Act or Fact or Notice to the Market will occur before the beginning or after the closing of business on the Stock Exchange, and, in case of incompatibility of schedules with other markets, the opening hours of the Brazilian market.

The DRI must also observe the following, with the principle of immediate provision of information prevailing in cases of leakage:

- a) Communicate and disclose the Material Act or Fact that occurred or related to the Company's business immediately after its occurrence, preferably outside of trading hours;
- b) In case the information is disclosed before the opening of the trading session, it must be observed at least 30 minutes in advance, to allow the dissemination of the information provided;
- c) If it is necessary to disclose the Relevant Act or Fact during trading hours, DRI will request the Stock Exchange to suspend trading in the Securities or referenced to it, for the time necessary for the proper dissemination of the Relevant Fact, in compliance with the procedures provided for in the regulations edited by the Stock Exchange on the subject;
- d) Provide the competent bodies, when duly requested, with clarifications on the disclosure of a Material Act or Fact or on a Notice to the Market.

7.9 INFORMATION CONTROL

The principles and guidelines for protection and discipline in the use of the Company's information assets or in its custody are detailed in Caixa Seguridade Participações S.A. Information Security Policy. (XS006).

The classification of information, according to the degree of secrecy, is mandatory in Caixa Seguridade for all data and information produced by it or in its custody, regardless of the support or the form used for its storage or transmission and its implementation and treatment takes place through the specific rules Classification and Treatment of Information - Caixa Seguridade Participações S.A. (XS601).

The Company monitors news published in the press and information about itself on social media and assesses the need to respond to the market in the event of rumors or speculation, even though it has not found any leakage of relevant information.

Once the Relevant Information is leaked, DRI will have the obligation to:

- a) Communicate the Relevant Information immediately to the CVM and the Stock Exchange;
- b) Disclose to the market simultaneously;
- c) Investigate the facts about the occurrence of leakage, in order to know its cause;
- d) Interact with the Subject Persons, including Controlling Shareholders and Administrators, about the occurrence of a leak, to verify any facts or interactions with third parties that may have led to the leak, and must keep a record of this procedure;
- e) Report the occurrence to the Board; and
- f) Interact with representatives of the Ministry of Economy and the Company's Regulatory Body, and must keep a record of these interactions.

Failure to comply with this Policy, especially the duty of secrecy, will subject the infringer to sanctions, in accordance with the Company's internal rules, without prejudice to the applicable administrative, civil and criminal sanctions.

7.10 OBJECTIVE CRITERIA TO BE OBSERVED IN THE DISCLOSURE

For the disclosure of information related to Relevant Processes, in addition to the legal and regulatory requirements, the following criteria must be observed:

RELEVANT PROCESSES / PROBABILITY OF LOSS OF THE COMPANY	LIKELY	POSSIBLE	REMOTE
Below 1 RV	-	-	-
Between 1 and 3 RV	Material fact	Notice to the Market	-
Above 3 VR	Material fact	Notice to the Market	Notice to the Market

For the purposes of this item, "RV" means Reference Value, that is, 1% of the value of the Company's equity, based on the last financial year ended.

The logo for CAIXA, featuring the word "CAIXA" in a bold, sans-serif font. The letters "CAI" are blue, and the letters "XA" are orange.

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