

The SulAmérica logo features a white wavy line above the company name "SulAmérica" in a white, sans-serif font. The background of the entire image is a photograph of three smiling people in an office setting.

SulAmérica

2019 ANNUAL REPORT
Environmental, Social and
Governance Indicators (ESG)



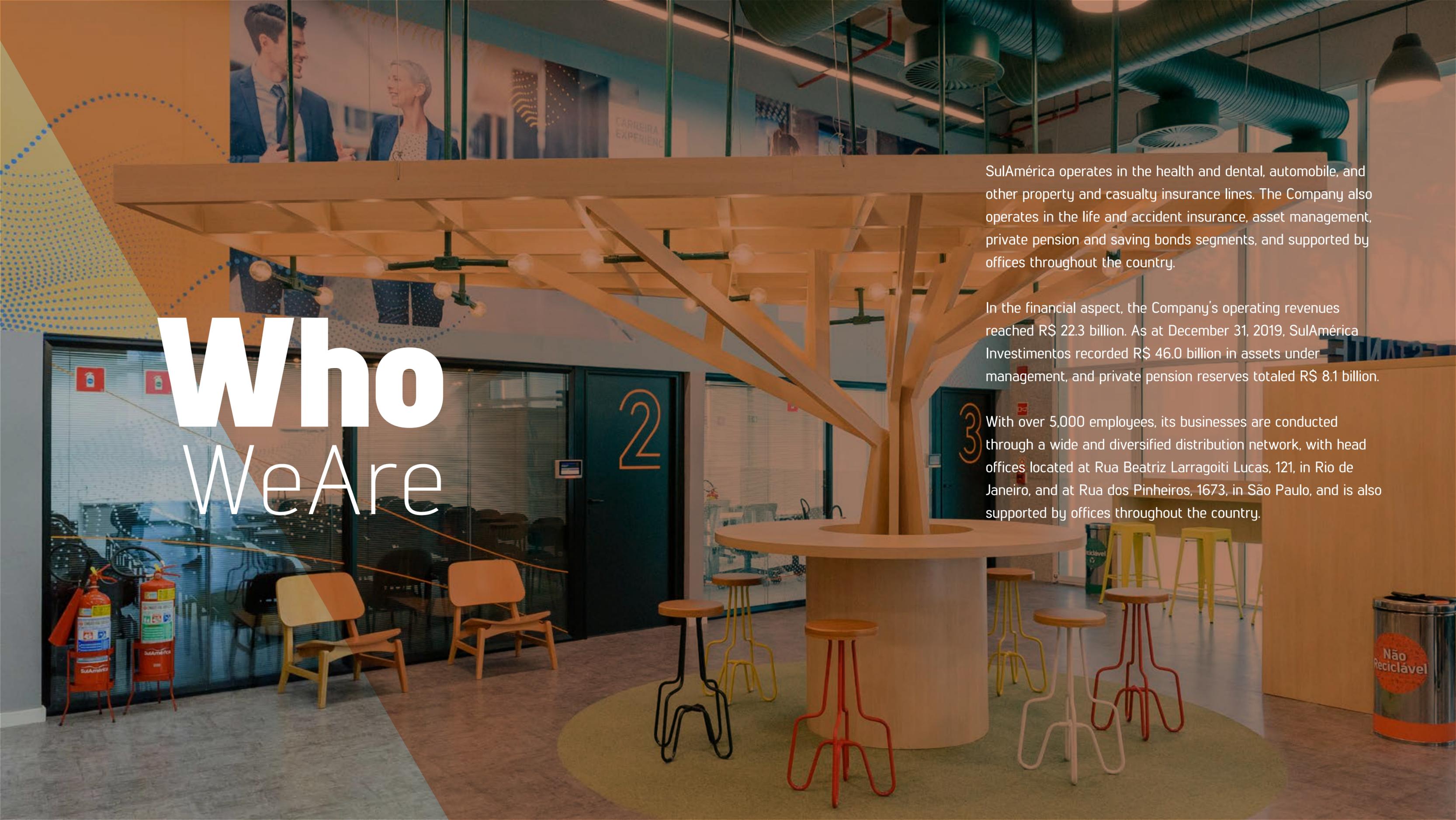
Annual Report 2019

This document is part of the Company's Annual Report and presents, adopting an integrated approach, our main Environmental, Social and Governance (ESG) indicators, complementing the economic and financial ones.

This document is based on the guidelines and principles of the Global Reporting Initiative (GRI), of the United Nation's Global Compact and the Principles for Sustainable Insurance (PSI), and the reporting standards of the Sustainability Accounting Standards Board (SASB). It also considered the alignment of initiatives and their contributions to the Sustainable Development Goals (SDG).

In 2016, following the conceptual framework for Integrated Reporting, proposed by the International Integrated Reporting Council (IIRC), we revised our data collection process, consolidating indicators, indexes and reports, which started to be reported according to five capitals: Financial, Human, Intellectual, Social, and Relationship. A new methodology of indicators was developed, called SULA indicators, aligned with SulAmérica's material themes.

This change is the result of the pursuit of integration and transparency in the process of communication with our customers, shareholders, employees, brokers, and the society.



Who WeAre

SulAmérica operates in the health and dental, automobile, and other property and casualty insurance lines. The Company also operates in the life and accident insurance, asset management, private pension and saving bonds segments, and supported by offices throughout the country.

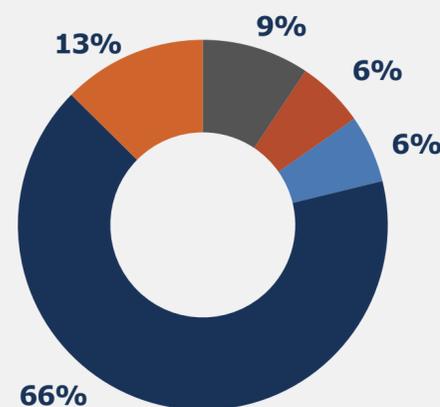
In the financial aspect, the Company's operating revenues reached R\$ 22.3 billion. As at December 31, 2019, SulAmérica Investimentos recorded R\$ 46.0 billion in assets under management, and private pension reserves totaled R\$ 8.1 billion.

With over 5,000 employees, its businesses are conducted through a wide and diversified distribution network, with head offices located at Rua Beatriz Larragoiti Lucas, 121, in Rio de Janeiro, and at Rua dos Pinheiros, 1673, in São Paulo, and is also supported by offices throughout the country.

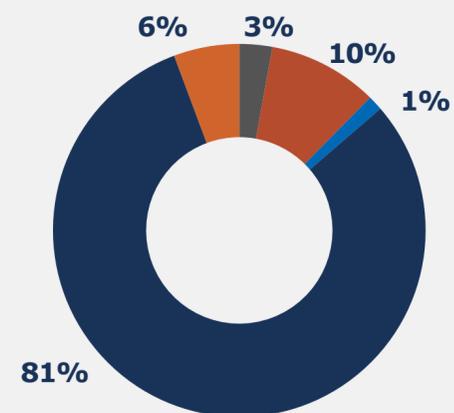
SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 1	Significant changes during the period covered by the report	To learn about the main historical facts of the Company, access its Investor Relations website .	102-10	-	-	-	-
SULA 2	Location of the organization's headquarters, countries where it operates, and where it has significant operations	The Company has operations that provide service throughout Brazil. Its main administrative offices are located in the municipalities of Rio de Janeiro (state of Rio de Janeiro) and São Paulo (state of São Paulo). For further details on its offices, access the Company's corporate website .	102-3 102-4	-	-	-	-
SULA 3	The organization's name, scale, and legal form, and the percentages of the portfolios per region	SulAmérica Seguros, Previdência, Investimentos e Capitalização (trade name)/ Sul América S.A. (legal name) is a joint-stock company, publicly-held corporation. It is a large company, with revenues of R\$ 22.3 billion in 2019 and over 5,000 employees. SulAmérica is considered a midcap, according to the market capitalization classification.	102-1 102-5 102-7 G4-FS6	-	-	-	-

SULA 3: Portfolio percentage of business line per specific region, scale (e.g. micro/small and medium/large), and industry. (GRI FS6)

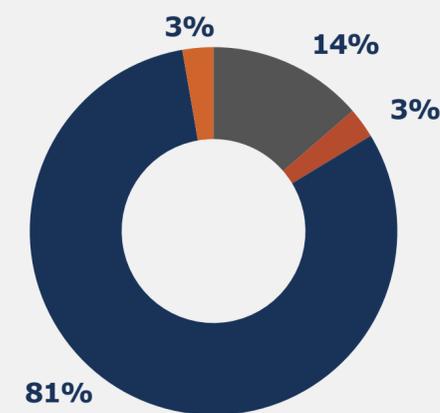
Premiums by region:
Life and Private Pension



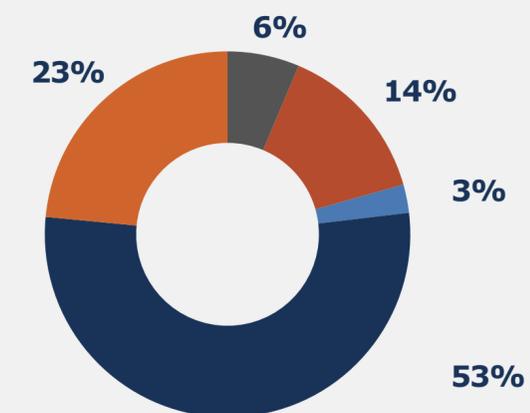
Premiums by region:
Health and Dental



Revenue by region:
Asset Management



Premiums by region:
Auto and Massified



- Center West
- Northeast
- North
- Southeast
- South

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 5	Message from the CEO and key events	The CEO message and the key events of the Company are on the Investor Relations' website .	102-14 102-15	-	Message from the CEO	-	I
SULA 6	The organization's values, principles, standards, and norms of behavior, such as the codes of conduct and ethics	<p><u>Mission, vision and values</u></p> <p><u>Code of Ethical Conduct</u> This Code was approved by SulAmérica S.A.'s Board of Directors and applies to all companies of the SulAmérica Conglomerate.</p> <p>Management members (the members of the Board of Directors and its advisory committees and of the Executive Board), employees and interns (collectively referred to as employees) shall have zeal in any and all internal or external relationship, so that it is based on respect and transparency, in full compliance with SulAmérica's values, this Code of Ethical Conduct (Code), and the applicable laws and regulations.</p> <p><u>Code of Ethical Conduct for Suppliers and Service Providers</u></p>	102-16	-	7 and 10	16	I

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 9	List of membership of associations	<p>SulAmérica is an active member of trade entities and bodies that regulate the areas in which it operates, contributing to the most relevant discussions that help positioning the industry with regard to standards and development of good practices. SulAmérica has seats in all Federations of the insurance market and participates in many debate forums about the regulations of its activities.</p> <p>One hundred and three executives and employees of the Company hold management positions in commissions and work groups in Federations and in the National Confederation of Insurance, Private Pension and Life Insurance, Private Health Insurance and Savings Bonds Companies (CNSeg in Portuguese), in addition to unions and other bodies that represent the industry.</p> <p>These participations, combined with the performance of the professionals who are dedicated to regulatory issues and government relations – National Regulatory Agency for Private Health Insurance and Plans (ANS in Portuguese), Central Bank of Brazil (Bacen in Portuguese), Brazilian Securities and Exchange Commission (CVM in Portuguese), and Superintendence of Private Insurance (Susep in Portuguese) – enable SulAmérica to anticipate changes, and organize itself beforehand to meet new requirements, as well as to contribute to the enhancement of the industry’s regulations. As part of its strategy of always taking domestic and international good practices to the insurance market, SulAmérica has a representative in CNseg’s Sustainability and Innovation Commission.</p> <p>Internationally, the Company is represented in international discussions through participation in the Board of the Principles for Sustainable Insurance (PSI) of the United Nations Environment – Financial Initiative (UNEP-FI), and in the CDP’s technical board of Latin America.</p> <p>The Company also participates in the work groups of Human Rights and Integrity of Ethos Institute and in the work groups focused on the Sustainable Development Goals of the Global Compact’s Brazilian Network.</p> <p>In 2019, the Global Investors for Sustainable Development Alliance (GISD Alliance) was created, an United Nations initiative made up of 30 business leaders from all over the world who work together to remove impediments to investments aimed at financing the Sustainable Development Goals (SDG). SulAmérica is represented in this group by its Board Chairman, Mr. Patrick Larragoiti.</p> <p>SulAmérica has also participated in the Investors for Climate’s initiative, launched in 2019 by SITAWI, sponsored by the Institute for Climate and Society (iCS), and supported by PRI and CDP, and in the Brazilian Finance Green Initiative, coordinated by CEBDS and the Climate Bonds Initiative.</p>	102-13	-	-	17	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 10	Externally-developed charters, principles, or other initiatives	<p>SulAmérica is a member of national and international organizations that contribute towards the guidelines, indicators, principles and goals of the sustainable management of its businesses. The voluntary commitments guide the Company on management practices that defends human rights, labor rights, environmental preservation, combating of corruption, besides ethical and transparent relationships with the society.</p> <p>Some of the commitments and initiatives are the <u>Principles for Sustainable Insurance (PSI)</u>, <u>Principles for Responsible Investment (PRI)</u>, and <u>Global Compact</u>.</p> <p>Acknowledgments: In 2019 the company was included for the second consecutive year in the Dow Jones Sustainability Emerging Markets Index and for third consecutive year in the FTSE4Good.</p> <p>Signatory of additional voluntary pledges and statements:</p> <ul style="list-style-type: none"> • Paris Pledge for Action Signed in the COP-21, the UN's Conference on Climate Change, the pact reinforces the Global Agreement on Climate, established in Paris. Its focus is to mobilize many sectors of the society all over the world to reduce global warming by controlling GHG emissions. • The Climate Risk Statement of the Geneva Association. The Geneva Association is an organization focused on research and performs forward-looking work on insurance industry around the world. SulAmérica signed its statement in 2014 and undertook to apply a series of principles to actions aimed to combat climate change and its effects on society and businesses. • Investor Statement on Green Bonds Idealized by the Climate Bonds Initiative (CBI) in partnership with the PRI and SITAWI's Finance for Good, the document stimulates the creation of bonds focused on projects that produce positive environmental impact on Brazil. SulAmérica Investimentos signed the statement, which also has a global version. • Investor Statement on Amazon Deforestation and Fires SulAmérica Investimentos signed in 2019 the Investor Statement on Amazon deforestation and fires organized by the PRI and CERES that requires greater commitment and effort from companies to combat deforestation. 	102-12	-	-	17	-

Materiality

Materiality Matrix brings for discussion with the top management and main external stakeholders (brokers, customers, regulatory bodies, investors, shareholders, and service providers) of SulAmérica the matters of highest relevance to the Company according to its business strategy.

After consulting these stakeholders, the following five themes were prioritized in its operations: Assistance and Services Quality, Products and Services Innovation, Human Capital Development, Responsibility in the Value Chain, and Financial Education and the Conscious Use of Insurance. (GRI Standards 103-1)

- **Assistance and Services Quality:** SulAmérica is always open to talk with customers and network of business partners. Constant dialogs help to identify demands and improve everybody's experience with products and services. For this purpose, SulAmérica created many customer service channels, customer satisfaction surveys, and tools for customers, brokers and service providers.
- **Products and Services Innovation:** The solutions are conceived not only to meet the needs of customers and partners, but also those of the society as a whole. The most innovative products and services respond to economic, environmental and social challenges, and this is SulAmérica's way to transform the world.
- **Human Capital Development:** employees, customers, brokers, service providers and the society as a whole are fundamental to make SulAmérica the largest independent insurer group in Brazil. Each one matters, therefore, the Company values, respects and encourages the development of the people involved in its businesses.
- **Responsibility in Value Chain:** The diversity and number of partnerships is what causes SulAmérica to have great capacity to offer products to different needs of people. From broker to service provider, including suppliers, sales teams, marketing areas and customers in the middle, the company establishes a relationship of trust, ethic and responsibility. It is this relationship that makes it possible that the products and services are used according to the established social and environmental requirements, contributing actively and positively to Society.
- **Financial Education and Conscious Use of Insurance:** Encouraging financial responsibility is our priority, because our products and services contribute to the financial security and stability of our customers. We invest in initiatives, products and services to help customers and brokers to take care of their capital in the present and future. It also includes raising awareness of the appropriate use of insurance, which has a fundamental social and economic role in our society.

For further information, access the [Investor Relations' website](#) (include link:), in the Stakeholders and Materiality section.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 12	List of the material topics identified in the process for defining report content	<p>The report considers, according to the materiality, the five themes listed as strategic in the Corporate Sustainability Policy, prepared in a process that had the participation of internal and external stakeholders.</p> <p>For further information, access the Investor Relations' website</p>	102-47	-	-		-
SULA 13	List of stakeholder groups engaged by the organization, basis for identifying and selecting stakeholders with whom to engage, and approaches to stakeholder engagement.	<p>SulAmérica has specific actions and practices to engage brokers, customers and service providers (Health and Auto/ Massified).</p> <p>In addition, it directly and indirectly (CNSeg) engages the stakeholders of regulatory agencies and the Judicial Branch to increase awareness of the challenges and dilemmas of the industry.</p> <p>For further information, access the Investor Relations' website</p>	102-40 102-42 102-43	-	-		-
SULA 14	Key topics and concerns that have been raised through stakeholder engagement	<p>The key topics raised were the following: Assistance and Services Quality, Human Capital Development, Products and Services Innovation, Responsibility in Value Chain, and Financial Education and the Conscious Use of Insurance.</p> <p>For further information, click here.</p>	102-44	-	-		-

Governance

Corporate governance is the system through which companies and other organizations are managed, monitored and promoted, involving the relationships between shareholders, board of directors, executive board of officers, inspection and control bodies, and other stakeholders.

The Company is committed to the recommendations of the IBGC's Code of Best Practices of Corporate Governance, which comprise the principles of transparency, fairness, accountability, and corporate responsibility.

For further information, access the [Investor Relations' website](#), in the Governance section.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 17	Report whether and how the organization applies the precautionary principle or approach	<p>The Company has a product analysis process that assesses, on several aspects, the risks and opportunities associated with each project. The Product Assessment and Review Procedure (PARP) was implemented by the area of actuarial controllership as a component of responsible behavior, aiming at tangible gains over time, producing additional encouragement for internal improvements such as transparency, agility and consensual decisions. The process consists of several multidisciplinary analyses, seeking to mitigate the risks and evaluate the opportunities for new initiatives or partnerships, contributing to the Company's good corporate governance practices.</p> <p>See Note 5 to the Financial Statements.</p>	102-11	-	-	16	I
SULA 18	Structure and composition of the governance body and its committees	The structure and composition of the governance body and advisory committees of the Board. Click here .	102-18 102-22	-	-	-	I
SULA 19	Report whether the chair of the highest governance body is also an executive officer in the organization (and, in the case of the latter, describe his or her function within the organization's management and the reasons for this arrangement)	Patrick Antonio Claude de Larragoiti Lucas is the chairman of the Board of Directors of SulAmérica, and also sits on the Governance and Disclosure, Investment, and Human Capital committees.	102-23	-	-	-	-
SULA 21	Delegation of authority for economic, environmental, and social topics, and executive-level position or positions responsible for such topics	<p>Since 2009 SulAmérica has a Sustainability Committee formed by the main executives of the Company, an external specialist, and a member of the Board of Directors – that, in 2011, became an advisory committee of the Board of Directors. Since then, the Committee has focused on the formulation of a sustainability strategy aligned with the Company's strategic plan, so that the organization's risks and opportunities are considered beyond the traditional business boundaries, including in the leadership discussions a sustainability vision developed around the social and environmental challenges in the agendas and priorities of its stakeholders.</p> <p>The Sustainability Committee is assisted by the Sustainability Superintendence, which compiles the demands and information collected by the Company's several communication and service channels, and in many interactions with strategic stakeholders, and also presents the social and environmental risks and opportunities, for definition of the Company's initiatives and projects, and presentation of the most relevant ones to the Board.</p>	102-19 102-20	-	-	-	I

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 22	<p>Report the processes for consultation between stakeholders and the highest governance body on economic, environmental, and social topics</p> <p>If consultation is delegated, describe to whom it is delegated and how the resulting feedback is provided to the highest governance body</p>	<p>The Sustainability Committee is assisted by the Sustainability Superintendence, which organizes and carries out actions on the theme.</p> <p>All of the attained results are reported to the Committee, responsible for guiding the board of directors and executive management.</p>	102-21	-	-	-	I
SULA 24	Nomination and selection process for the highest bodies and committees	<p>The Board of Directors' advisory committees comprise the members of the Board of Directors and Executive Board, all of whom with proven experience in the addressed themes on the group's responsibility, as well as independent external consultants capable of making significant contribution to the development of the group works. The members of the Board of Directors are annually elected by the company's shareholders whereas those of the Executive Board are elected by the Board of Directors.</p> <p>The process of election of members to committees is conducted by the Board of Directors. The selection of members to the Board of Directors and its Advisory Committees meet three criteria, as the case may be: (i) legal minimum requirements, if any; (ii) recommendations on the best corporate governance practices provided by renowned institutes such as the IBGC, COSO and IIA, among others; (iii) minimum requirements established in the internal rules of each body. Particularly regarding the Sustainability and Human Capital Committees, external members with renowned experience in social and environmental responsibility and human capital were selected, besides management members representing the areas that concentrate the higher impacts on the company.</p> <p>For information on nomination and selection process for the highest bodies and committees, access the Investor Relations' website.</p>	102-24	-	-	-	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 25	<p>Processes for the highest governance body to ensure conflicts of interest are avoided and managed.</p> <p>Report whether the conflicts of interest are disclosed to stakeholders</p>	<p>SulAmérica has a Policy on Transactions with Related Parties and Other Situations Involving Conflicts of Interest that sets the procedures to be followed by employees, management members, and the parents of the Company and its subsidiaries, in transactions to be performed with related parties as well as other situations in which there is potential conflict of interests, in compliance with the best practices of Corporate Governance and prioritizing the interests of the Company. This policy establishes that the operations entered into by the Company with related parties shall observe market conditions, in order to assure that it is performed on arm's length.</p> <p>Also, the policy establishes that in the event of any interests conflicting with the Company's interests, with regard to certain matter(s) to be decided in a board or shareholder meeting, the shareholder or management member shall timely disclose the conflict of interest or private interest, declaring herself/himself impeded to participate in the discussions and decisions about the matter. In case she/he fails to do so, another party attending the meeting may report the existing conflict, which will be decided by majority of votes of those present in such meeting. The aforementioned policy forbids the following transactions with related parties of the Company: (i) those conducted on conditions other than the market ones, jeopardizing the interests of the Company; and (ii) granting of loans to its parent, management members, and other related parties established in item 2 of the Policy on Transactions with Related Parties and Other Situations Involving Conflicts of Interest. It is also forbidden, under the terms of the Company's Code of Ethics, the participation of management members and employees in businesses of private or personal nature that interfere or conflict with the interests of the Company or that lead to the use of insider information obtained in view of the performance of the position or job that she/he holds in the Company.</p> <p>The Company's Policies are available on the Investor Relations' website, in the section <u>Policies and Charters</u></p>	102-25	-	10	16	I
SULA 26	<p>Report the highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value, vision or mission statements, strategies, policies, and goals related to economic, environmental, and social topics</p>	<p>The Board of Directors periodically reviews the Company's strategic planning, which will drive the establishment of the values, mission and vision, besides the policies and goals related to environmental and social impacts of the Company.</p>	102-26	-	-	-	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 27	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental, and social topics	<p>The Company has a Sustainability Committee, formed by the main executives of the Company, an external specialist, and a member of the Board of Directors, which advises the Board of Directors. The Committee holds meetings four times per year, and in every session there is a moment for sharing trends and material issues. In addition, one of the Committee's independent members with renowned expertise on the theme is responsible for providing information and updates in all sessions.</p> <p>These information and trends are periodically taken to the Board of Directors and an annual presentation is made to increase the level of the Board's knowledge of and engagement to the theme.</p>	102-27	-	-	-	-
SULA 28	<p>Report the processes for evaluating the highest governance body's performance with respect to governance of economic, environmental, and social topics.</p> <p>Report whether such evaluation is independent or not, and its frequency. Report whether such evaluation is a self-assessment.</p> <p>Report the actions taken in response to evaluation of the highest governance body's performance with respect to governance of economic, environmental, and social topics, including, as a minimum, changes in membership and organizational practices</p>	<p>The Company's Executive Board has a performance evaluation mechanism based on financial and operational performance indicators, as well as satisfaction rates of the main stakeholders and sustainability goals. The Company's Executive Board's members are annually evaluated by the Board of Directors or the Human Capital Committee based on the targets set in the management contracts, aligned with the Company's strategies. In addition, the members of the Board of Directors and its advisory committees annually participate in a self-assessment process of individual and joint performance, identifying and proposing actions that contribute to improve their performance. Regarding the Board of Directors, the aspects related to the performance and interaction with advisory committees are also considered.</p> <p>The process of evaluation of the Board of Directors is available on the Investor Relations' website.</p>	102-28	-	-	-	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 30	Report the highest governance body's role in identifying and managing economic, environmental, and social topics and their impacts, risks, and opportunities. Mention the highest governance body's role in the implementation of due diligence processes.	The Company has a Sustainability Committee, formed by the main executives of the Company, which advises the Board of Directors. Its main duty is to work on the alignment with the strategic plan, so that the organization's risks and opportunities are considered beyond the traditional business boundaries, including in the leadership discussions a sustainability vision developed around the social and environmental challenges in the agendas and priorities of its stakeholders. Accordingly, the Board of Directors monitors the theme and is regularly updated on the progress of mitigation and control actions.	102-29 102-30 102-31	-	-	-	-
	Report whether stakeholder consultation and relationship processes are used to support the highest governance body's identification and management of economic, environmental, and social topics and their impacts, risks, and opportunities	The information discussed and presented to the Board of Directors and Sustainability Committee is directly or indirectly a result from stakeholders consultation and dialogue processes. Direct information refers to survey and specific demand data, that is, information that directly depends on the participation of stakeholders. Indirect consultations consider the information collected from third parties and organized as public documents, reports or interviews, in which the information is from a known source, however, it was not directly generated by the Company.					
	The management's role in reviewing the effectiveness of the risk management processes for economic, environmental and social topics Frequency of the senior management's review of economic, environmental, and social topics and their impacts, risks, and opportunities	The Board of Directors addresses the theme annually, during the meeting dedicated to the sustainability theme. The Sustainability Committee, on the other hand, addresses the theme at least four times a year, according to its rules. The Executive Committee address it more intensively, once the Human Capital, Administrative and Sustainability Vice-presidency permanently serves on the board that meets weekly to take resolutions on the Company's issues.					
SULA 31	Report the highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material topics are covered	CEO	102-32	-	-	-	-
SULA 32	Report the process for communicating critical concerns to the highest governance body	SulAmérica has a solid Corporate Governance structure that assures the flow of information between the Company's Executive Board and Board of Directors. Additionally, the Board of Directors has a channel called Fale com o Conselho (Talk to the Board) for any pertinent issue addressed to it.	102-33 102-34	-	-	-	-
	Report the total number and nature of critical concerns that were communicated to the highest governance body, and the mechanism(s) used to address and resolve them	Compliance reports the misconducts to the Executive Committee through the Report on Internal Controls and to the Ethics Committee. Such conducts are reported in the SULA 38 indicator.					

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 33	<p>Report the remuneration policies for the highest governance body and senior executives for the following types of remuneration:</p> <ul style="list-style-type: none"> – Fixed pay and variable pay – Performance-based pay – Equity-based pay (share or stock options) – Bonus – Deferred or vested shares – Sign-on bonuses or recruitment incentive payments – Termination payments – Clawbacks – Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees <p>Report how performance criteria in the remuneration policies relate to the highest governance body's and senior executives' objectives for economic, environmental, and social topic</p>	<p>The Compensation Policy establishes the criteria for compensation of the highest governance body and senior executives of the Company.</p> <p>The assessment of executives is performed by Management Contract, which includes a 360-degree appraisal, and performance comparison based on to the quantitative targets set in the beginning of the year.</p>	102-35	-	-	-	-
SULA 34	<p>Report the process for determining remuneration. Report whether remuneration consultants are involved in determining remuneration and whether they are independent of management.</p>	<p>The Company's Shareholders are responsible for deciding on the global annual remuneration of Management members at the Shareholders' Meeting. In this occasion, the Shareholder's votes are discussed and evaluated, as well as any expressed opinion. Additionally, the Company has a Human Capital Committee, which duty includes the proposition of a remuneration, compatible with the best practices observed in the market in which the Company operates, to the Management members of the Company. Additionally, the Company has a Compensation Policy.</p> <p>For the remuneration of employees, SulAmérica participates in union negotiations to define the Collective Bargaining Agreement of Insurance Workers (CCT in Portuguese) using as benchmark the market salary surveys, and the results of climate and engagement surveys with employees.</p>	102-36	-	-	-	-
SULA 36	<p>Report any other relationships that the remuneration consultants have with the organization</p> <p>Report how stakeholders' views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and proposals, if applicable</p>		102-37				

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 38	Political contributions	From 2015, in view of the enactment of Law 13,165, the legislation started to prohibit donation from companies to political parties and candidates; the theme was the subject of Direct Action of Unconstitutionality, ruled by the Supreme Court, which reaffirmed the prohibition. Thus, in accordance with the law, SulAmérica did not make contributions to political parties.	415-1	-	-	-	-
SULA 39	Confirmed incidents of corruption and actions taken	<p>SulAmérica launched its Anti-Corruption Policy on December 9, 2014, aligned with the Clean Company Law 12,846/13.</p> <p>SulAmérica's Anti-Corruption Policy is public and is on our Investor Relations' website. The employees, which definition include employees, administrators and trainees, make electronic adherence to the document and the adherence of new employees is periodically monitored.</p> <p>In order to work well on anti-corruption concepts, the Company has mandatory interactive e-learning training for all employees. There are also face-to-face training for the areas most susceptible to the risk of corruption, in view of the interaction with the public administration.</p> <p>The Company also uses GRC Agents - employees in each vice presidency, carefully selected and specially trained to be the closest focal points in the areas for the integrity, compliance, and ethics themes.</p> <p>There are also many communication actions, such as materials on the employee's portal, on the televisions in floor halls and elevators, desktop wallpaper, among other media, which address the issue of integrity. Senior management's sponsorship of Governance, Risk and Compliance issues occurs periodically.</p> <p>In relation to business partners and suppliers, all contracts have a clause to adhere to SulAmérica's Anti-Corruption Policy and to the Code of Ethical Conduct, thus ensuring accountability in the value chain.</p> <p>In 2019, no case was reported involving corruption or money laundering, in the past or in progress, filed against SulAmérica or any of its employees.</p> <p>In 2019, SulAmérica recorded 371 reporting in groups I and II established in SUSEP Circular 445/12 for evaluation by the competent bodies. In addition, the Company reports to the Council for Financial Activity Control, a government body that deals with money laundering, any indication of such practice. These refer to reportable proposals, transactions or operations, according to the effective regulation. In 2019, 11 negative incidents were reported.</p> <p>*Reporting made related to the non-occurrence of reportable proposals, transactions or operations, according to the effective regulation.</p>	205-1 205-3 DMA Anti-corruption	-	10	16	I

Risk Management

SulAmérica's risk management process is aimed at supporting the attainment of strategic goals of the organization, identifying potential events that may affect the expected results for the following periods. In this process, corporate, business, credit and market risks are considered, as well as socio-environmental risks, seeking to ensure adequate capital to support operations in unexpected scenarios, according to the current risk appetite. The process is carried out in integrated and continual phases, as Follows:

(a) Risk identification:

process of identification and prioritization of the risks that may affect the established short or long-term business results;

(b) Risk quantification:

the prioritized risks are quantified through specific modeling involving their likelihood of occurring and possible impacts;

(c) Risk response:

according to the results of the quantification process and aligned with the current risk appetite, risk-response action plans are devised;

(d) Monitoring and reporting:

the information on each risk and its respective response action plans are monitored and managed based on indicators and reports by the enterprise risk area, which report to the Business Units, Risk Committee, Audit Committee and Board of Directors, according to an established frequency or whenever considered necessary. Additionally, for each subsidiary we determine the sufficiency of equity in relation to the capital according to the required regulatory capital and own internal models, based on the best risk management practices.

For further information on the Company's risk management, see Note 5 (Risk Management) of the latest version of SulAmérica's Financial Statements, or access the latest version of the Company's Reference Form, in items 4 (Risk Factors) and 5 (Risk Management).

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 55	Coverage and frequency of audits to assess implementation of environmental and social policies, and risk assessment procedures	<p>The implementation of social and environmental guidelines is a continuous process that considers not only the purchases of products and services, but also the selection and accreditation of service providers and business partners.</p> <p>It is part of the service and product engagement cycle the requirement of full compliance with the Sustainability and Social and Environmental Responsibility Clause, which shares all commitments assumed by SulAmérica with its value chain.</p> <p>In the Automobile portfolio, in which there are greater social and environmental risks, inspection and inquiry are integral parts of the service provider accreditation process. Inquiries and inspections are often performed, but there is also a timeline of service provider reassessment which is performed every two years.</p> <p>In the asset management business, the identification of social and environmental risks consists of analyzing the companies to be invested, including the environmental, social and governance (ESG) aspects. Some assessed items are how inputs are used as their sources, like water, energy and raw materials, impact on climate changes, relationship with workers, communities, customers and suppliers, independence of the board of directors, ethics, transparency and accountability, among others. For each assessed item, a score is given, and after all items are classified, an overall score is given to the company for the ESG criteria.</p>	G4-FS9	-	-	-	I
SULA 58	Procedures for evaluation and classification of environmental and social risks in business lines	<p>Complementing the follow up within the scope of the Audit and Risk Management Committee and Sustainability Committee, the Company has a Product and Partnership Assessment Process (PARP), which considers, on several aspects, the risks and opportunities associated with each project or product.</p> <p>Among other items, it evaluates the adherence of products and services to the voluntary commitments, the Sustainability and Environmental Policies, as well as its contribution to the Principles for Sustainable Insurance (PSI).</p>	G4-FS2	-	1 to 10	-	I and II
SULA 60	Total number and percentage of operations assessed for risks related to corruption, and the significant identified risks	All units of the Company are submitted to the assessment of risks related to corruption, money laundering, and other risks mapped as significant and high impact. For further information, see SULA 39.	205-1	-	10	16	I

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 61	Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations	<p>In relation to SUSEP, in 2019, there was no significant fine – over R\$ 1 million – for non-compliance with laws and regulations.</p> <p>As to the ANS, no fine over R\$ 1 million was imposed in 2019. About non-monetary sanctions, two warning notices were issued by the ANS.</p> <p>The fines considered significant to SulAmérica have amounts equal to or over R\$ 1 million.</p>	419-1	-	-	-	-
SULA 64	Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, broken down by type of results.	No incident of non-compliance with regulations and codes concerning marketing communication, advertising, promotion, and sponsorship was identified.	417-3	-	-	16	-



Financial Capital

The financial capital in SulAmérica consists of the financial funds obtained by means of its activities and insurance operations (health, homeowners, dental, life, private pension, and travel), savings bonds, and asset management.

In 2019, operating revenues reached R\$ 22.3 billion and net income registered R\$ 1.2 billion, an increase of 30.7% in comparison to the previous year.

For further information, access the [Investor Relations' website](#).

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 68	List of all entities included in the organization's consolidated financial statements or equivalent documents	Sul América S.A., Sul América Companhia Nacional de Seguros, Saepar Serviços e Participações S.A., Sul América Seguros de Pessoas e Previdência S.A., Sul América Companhia de Seguro Saúde, Sul América Investimentos Distribuidora de Títulos e Valores Mobiliários S.A., Cival Reinsurance Company Ltd., Sul América Santa Cruz Participações S.A., Sul América Serviços de Saúde S.A., Sul América Odontológico S.A., Sul América Capitalização S.A.- SULACAP, Sul América Investimentos Gestora de Recursos S.A. and Exclusive Investment Funds, Docway Aplicativo para Serviços em Saúde S.A, Sul América Serviços e Participações S.A, Sul América Holding S.A, Sul América Participações e Investimentos, PRODENT - Assistência Odontológica Ltda. See also the Financial Statements	102-45 201-1 DMA Economic performance	HC-MC-000.A HC-MC-240a.1 FN-IN-270a.2 HC-MC-000.A FN-IN-410a.1 FN-IN-000.A	-	8	-
	Direct economic value generated and distributed						

SULA 68 – Social Investment

	Direct and indirect beneficiaries	Beneficiary organizations	Investment without incentive	Investment with incentive
2009	10,921	16	888,868.59	154,703.70
2010	12,448	33	905,536.08	1,411,628.84
2011	13,830	41	478,309.00	1,186,995.85
2012	4,319	35	177,117.71	1,031,272.43
2013	5,206	58	178,256.04	1,139,943.08
2014	4,855	18	196,000.00	3,882,730.00
2015	408,313	6	143,348.37	6,218,116.00
2016	18,400	5	124,367.78	6,981,568.00
2017	341,474	8	172,704.02	6,294,450.76
2018	330,265	24	292,314.38	6,446,758.66
2019	44,859	39	395,687.04	7,847,735.20
Total	1,150.031	283	3,952,509.01	42,595,902.52

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 69	Markets served	SulAmérica's customers are divided into individuals and businesses. In Auto, Savings Bonds, Life Insurance and Private Pension lines, most of customers are individuals, whereas in the Health, Dental, and Asset Management lines, most of them are businesses. SulAmérica operates throughout Brazil.	102-6	-	-	-	-
SULA 71	Percentage of assets subject to environmental or social screening, positive or negative	<p>SulAmerica Investimentos uses social and environmental metrics in the assessment of investees.</p> <p>The applied criteria are the following:</p> <ul style="list-style-type: none"> • Environmental: Water, energy and materials; Biodiversity and soil use; Climate change; Residue management. • Social: Relationship with workers; Relationship with communities; Relationship with customers; Relationship with suppliers. <p>SulAmerica has a stock fund that applies social and environmental criteria for selecting assets, Sul America Total Impacto FIA, with R\$ 15,104,455.74, representing 0.04% of AUM. Besides the ESG selection criteria, it donates 100% of the management fee to an organization that have social impact on Amazon, Vagalume.</p>	G4-FS11	FN-IN-410a.2 FN-AC-410a.2 FN-AC-410a.1	1 to 10	-	I, II and III

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Intellectual Capital

SulAmérica's intellectual capital comprises organizational intangible assets based on technical knowledge, as well as systems capable of guaranteeing an adequate risk underwriting process, efficient in claims management and responsible in investments, contributing to business sustainability.

SulAmérica products were designed so that people and companies keep their health and wealth protected, supporting the Sustainable Development Goals (SDGs), in particular of SDGs 3 – Good Health and Well-being and 11 – Sustainable Cities and Communities.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 77	Primary brands, products and/or services	<p>SulAmérica operates in the health and dental, automobile, and other property and casualty insurance lines. The Company also operates in the life and accident insurance, asset management, private pension products, and savings bonds segments.</p> <p>To learn more about our products and services, access SulAmérica's website and click on the Para você or Para empresa menus, or access the sustainability page, only in portuguese.</p>	102-2	-	-	-	-
SULA 78	<p>Initiatives to improve access to financial services for people with disability.</p> <p>Access to financial services in low-populated or economically-disadvantaged areas.</p> <p>Initiatives to improve access to financial services for low-income population</p>	<p>Aimed at providing access to people with hearing or speech impairment, a toll-free customer service number (SAC in Portuguese) was created for serving them, without intermediaries and with priority. SAC provides basic and corporate information on the Auto, Health, Life, and Private Pension lines.</p> <p>In Health and Dental, the Company has a portfolio that sells products with national coverage, comprising many plan levels that meet the needs of companies for benefits to all hierarchical levels.</p> <p>From 2019, it has started to develop and sell regional health plans, which have optimized networks, in partnership with strategic partners, aiming to meet the needs of a group that is not traditionally served by traditional products. This new line provides opportunity for access to the private health system for a wider range of customers at a budget price.</p> <p>In Dental, the products are sold through a broker, and on the websites Odonto Fácil and SulAmérica Odonto Individual, with budget starting price.</p> <p>In the Auto and Massified line, the Auto Compacto, provides full coverage (collision, fire and robbery/theft), with a more limited guarantee profile, which is up to 20% cheaper than the traditional Auto insurance. In the massified line, we have the homeowners insurance with low cost packages.</p>	G4-FS13 G4-FS14	-	1	3, 8, and 11	I

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 79	Initiatives to enhance financial literacy by type of beneficiary	<p>SulAmérica, in line with its sustainability policy and strategic themes, has many Financial Education initiatives.</p> <p>Private Pension Communications through e-mail marketing, social media, direct mail encouraging customers to think about the best alternative to invest their savings. In the Educaprevi product, there is the Online School Help, which consists of a portal with activities to help children and youths in school years. The tool offers resources like question clearing, online classes of all subjects from the 5th year of Primary School to university entrance examination, virtual tests and subject revision.</p> <p>Financial Education Program The Financial Education Program is aimed at raising awareness among employees and their relatives of a change in behavior, to improve the financial health of their whole families. We create spaces for individual reflection in groups of employees, and also stimulate action in the family environment, about financial behavior. The Program takes about six months and is supported by talks delivered to the group, select employees families, and individual advisory with certified consultants. The applications to the Program are made voluntarily.</p> <p>Economic Reports Besides an in-depth Know Your Client (KYC) process, aiming at advising about the most appropriate investment to the client's moment, life, and risk profile, the Company posts on its website articles about financial education. To access them, click here.</p>	G4-FS16	-	1	8	1

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 80	Monetary value of products and services designed to deliver a specific social and environmental benefit for each business line broken down by purpose	<p>Seeking to take a more active role in promoting sustainable development, SulAmérica has been integrating social and environmental benefits into its products and services.</p> <p>Motorista Amigo (Driver Friend) SulAmérica Auto Insurance customers can count on Motorista Amigo, who safely drives the insured and her/his car home if the driver is in no condition to drive. Driver Friend contributes to the reduction of traffic accidents, as well as to a culture of responsible driving.</p> <p>Responsible Disposal SulAmérica's Homeowners and Business customers can rely on the convenience of the home appliance, electrical and electronic equipment and furniture collection, separation and recycling services. In partnership with Ecoassist Serviços Sustentáveis, the Company launched in August 2013 the Responsible Disposal service, which, besides providing customers with comfort and savings, ensures that the objects and wastes are appropriately disposed. Before being disposed, the objects collected in the insured home are sorted and evaluated. In 2019, 184 insured used the service.</p> <p>Auto.Vc App The app, freely available at Google Play and App Store for the company's customers and non-customers, encourages safe driving, giving score to each drive, thus assessing unsafe attitudes, as sudden breaks and excess speed. It distributes gifts and discount on Auto insurance that could reach R\$ 440 based on score. During the user's journey, it also gives tips on a safer driving, which contributes to a safer traffic.</p> <p>SulAmérica Business – Education Establishments SulAmérica's Business Insurance for Education Establishments is targeted at schools and other institutions of the education industry and has coverage for liability for bullying. The coverage guarantees the reimbursement for expenses for which the establishment is held liable in court, arising from bullying occurred in its premises caused by students, teachers and employees. This product meets the specific needs of education institutions, helping to disseminate the education system, in order to protect who learns and who teaches, guaranteeing tranquility for several education establishments.</p> <p>SulAmérica Business Co-working This insurance has all coverage of a business product and also relies on an exclusive differential for this segment: guarantee for the assets of coworkers (customers with any contract relationship). Through products that meet the specific needs of Co-working, SulAmérica helps to make viable these new models based on working spaces with collaborative economy and sustainability concept, using the optimization of physical space to reduce costs and gather professionals from different areas.</p> <p>SulAmérica Container The launch of the insurance for containers reflects the company's response to the market transformations and demands that guarantees to the owners of these spaces the benefit of the protection that an insurance provides. Through a product that meets the needs of new construction modalities, SulAmérica helps to make these models with sustainability concept viable, optimizing the physical space and use of natural resources.</p>	203-2 G4-FS7 G4-FS8	HC-MC-260a.1 HC-MC-260a.2 HC-MC-260a.3 FN-IN-410b.2	1, 3, 4, 5, 6, 7 and 8	3, 8 and 11	

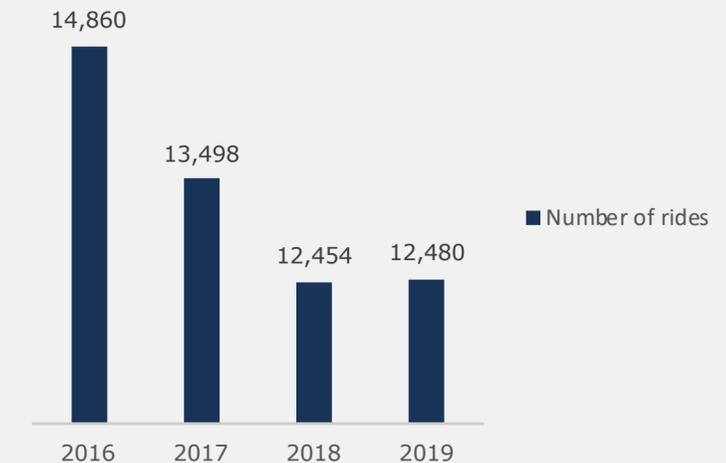
SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 80	Monetary value of products and services designed to deliver a specific social and environmental benefit for each business line broken down by purpose	<p>SulAmérica Auto Women SulAmérica Auto Women offers exclusive benefits to this segment such as the availability of a driver to take the insured home after midnight, when she is alone or accompanied by women only, escort to the police station in case of theft or robbery, and possibility of purchasing coverage with zero deductible in the first accident, among others.</p> <p>Active Health The 17 Sustainable Development Goals are an universal call for action against poverty, planet protection, and guarantee that all people have peace and prosperity. The SDG reflects the society's challenges and balance the three dimensions of sustainable development: economic, social and environmental. Our Health business is the one that is most directly related to the SDG 3: Health and Well-being with the alignment of our initiatives to 10 of 13 goals of this SDG.</p> <p>To access each of the national goals of the Sustainable Development Goal 3, a work conducted by the IPEA, click here.</p> <p>The materialization of the Company's commitment to sustainable development is the alignment of businesses with the social and environmental challenges by transforming our organization in an engine to promote benefits to the society. In this sense, our health business unit plays a key role in the Company's alignment with SDG 3.</p> <p>SulAmérica offers to all health insureds the Active Health Program, a set of initiatives focused on the integrated health management, promoting higher quality of life and wellness. This program is targeted at insured that are healthy as well as those that have complex cases. With actions on promotion of health, wellness, prevention of diseases and their complications, it helps companies to take care of their most valuable assets: people.</p> <p>The initiatives are implemented according to the insured needs and the company's maturity in health and wellness management, either by behaviors that impact health and wellness or more complex cases, like patients who have cancer, risky pregnancy, spinal and articulation pathologies, among others. Everything is aligned with the expertise of Saúde Ativa – a reference in the development and implementation of sustainable strategies in health.</p> <p>In total, 185,563 have already been impacted by the program's initiatives, and the Active Health portal has already impacted 1,060,778 people with the contents posted on the website. In the portal, we make available to the population in general about 400 articles with contents that include themes like obesity, women health, financial health, mental health, chronic diseases, among others.</p> <p>For further information: click here (only in portuguese).</p>	203-2 G4-FS7 G4-FS8	HC-MC-260a.1 HC-MC-260a.2 HC-MC-260a.3 FN-IN-410b.2	1, 3, 4, 5, 6, 7 and 8	3, 8 and 11	I

SULA 80 – Monetary value of products and services designed to deliver social and environment benefit

SULA 80 – Active Health



SULA 80 – Driver Friend



SULA 80: Alignment of the health initiatives with SDG 3

Active Health Program's Initiatives	Description	Main results	Alignment SDG 3												
			TARGET 3.1	TARGET 3.2	TARGET 3.3	TARGET 3.4	TARGET 3.5	TARGET 3.6	TARGET 3.7	TARGET 3.8	TARGET 3.9	TARGET 3.A	TARGET 3.B	TARGET 3.C	
Atenção no Alto Risco (high-risk management)	Focused on the insured stability and recovery process after hospital discharge, especially when there are aggravating situations. In this program, we contribute by clearing up doubts that may arise after hospital discharge through phone call monitoring and home visits.	15,385 patients monitored after hospital discharge and advised on the risk of returning to inpatient care			X	X	X				X				
		3,800 active monitoring													
		525 discharges from the program													
Coluna ativa / Coluna in (Company active back care / back care in-company)	Back problems have increasingly affected people's lives, causing discomfort and impairing quality of life. These problems are also the main cause of absentee rate in companies. The active back care initiative helps to reduce and control complications related to back problems. Through a qualified multi-professional team, we could improve the clinical picture with services focused on the personal needs of each insured. Meanwhile the back care in-company program provides advice on posture care, stretching and strengthening in the corporate environment to treat and prevent spine injuries.	1,008 patients treated													
		47% reduction in surgeries													
		656 clinical discharges								X					

SULA 80: Alignment of the health initiatives with SDG 3

Active Health Program's Initiatives	Description	Main results	Alignment SDG 3														
			TARGET 3.1	TARGET 3.2	TARGET 3.3	TARGET 3.4	TARGET 3.5	TARGET 3.6	TARGET 3.7	TARGET 3.8	TARGET 3.9	TARGET 3.A	TARGET 3.B	TARGET 3.C	TARGET 3.C		
Rede de Atenção Primária de Saúde (network of basic health care)	This model takes the individual to the center of care, dealing with most of the health issues of the population.	9,000 ambulatory services									X	X					
		3,000 beneficiaries monitored															

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 84	Substantiated complaints concerning breaches of customer privacy and data loss	<p>SulAmérica has a cyber security strategic that is annually reviewed, performed by a team focused on this subject and structured to manage cyber security risks. The following actions are regularly performed: risk assessment, business continuity plan, and regular tests for incident response, external audit of the information security system, and incident response procedure to manage flaws in confidential information security.</p> <p>The Security Policy is disclosed to all employees in the Company's platform, as well as the internal incident response procedure.</p> <p>In the past three years, there was no data security breach in the Company and there have been no complaints from customers or regulators regarding breaches of data privacy.</p>	418-1	HC-MC-230a.3 HC-MC-230a.2 HC-MC-230a.1	-	-	-

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Human Capital

Human capital comprises employees, with their experiences, motivations and competencies, aimed at excellence in service provision, focus on customer, adaptability, collaboration, and team management with high performance, thus contributing towards the development of innovative projects, operations, products and services that satisfy the customer and ensure business sustainability.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SGD	PSI
SULA 85	Total number of employees by employment type, employment contract, gender, and region	Table below	102-8	FN-AC-330a.1	1 and 6	8	I

SULA 85 – Total number of employees by employment type, employment contract, gender, and region (GRI 102-8)

Employment type		Gender and Region									
		Center West		Northeast		North		Southeast		South	
		Female	Male	Female	Male	Female	Male	Female	Male	Female	Male
Executive Management	30	0	0	0	1	0	0	7	21	0	1
Management	722	1	10	13	11	2	2	327	334	11	11
Specialist	2,963	23	22	47	46	15	6	1,503	1,201	54	46
Administrative	937	14	3	31	11	7	2	612	224	27	6
Operational	817	0	2	0	1	4	2	655	152	0	1
Total	5,469	40	38	88	74	27	12	2,931	1,869	91	64

¹ Interns and apprentices are not included. ² It considered the employee base in December 2019. ³ SulAmérica categorizes the positions according to the PWC methodology.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	ODS	PSI
SULA 86	Report the percentage of total employees covered by collective bargaining agreements	All employees of SulAmérica are covered by the Collective Agreement of the Insurance Industry's Workers (CCT), following the agreements of their respective states or federation. Access the CCT of São Paulo and the CCT of Rio de Janeiro , locations where there are higher concentration of SulAmérica's employees.	102-41	-	-	8	-
SULA 87	Total number and rate of new employee hires and employee turnover, by age group, gender and region	Table below	401-1	-	6	5 and 8	-

SULA 87 – Total number and rate of new employee hires and employee turnover, by age group, gender and region (GRI 401-1)

Age group			
	New hires	Termination	Turnover
Up to 25 years	249	95	3.16%
From 26 to 35 years	442	383	7.58%
From 36 to 45 years	296	263	5.14%
From 46 to 55 years	42	98	1.29%
From 56 to 65 years	4	26	0.28%
Over 65 years old	0	6	0.06%
Total	1,033	871	17.5%
Region			
	New hires	Termination	Turnover
Center West	8	13	0.19%
Northeast	16	17	0.30%
North	4	3	0.06%
Southeast	978	810	16.44%
South	27	28	0.51%
Total	1,033	871	17.5%
Gender			
	New hires	Termination	Turnover
Female	648	385	9.50%
Male	518	353	8.01%
Total	1,166	738	17.5%

¹ Interns, apprentices and executive management are not included.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	ODS	PSI
SULA 88	Return to work and retention rates of employees that took parental leave, by gender	<p>From October 2017 to September 2018, 129 mothers took maternity leave, 115 returned and 97 continued to work after the subsequent 12 months, accounting for a return to work rate of 89.14% and retention rate of 75.19%. One hundred twenty one employees took maternity leave in 2019.</p> <p>In relation to paternity leave, 105 took it from October 2017 to September 2018, and all them returned to work after the end of the leave and 95 employees continued to work after the subsequent 12 months. A return rate of 100% and retention rate of 90.48%. Seventy two employees took paternity leave in 2019.</p>	401-4	-	1, 2 and 6	5 and 8	I

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 89	Composition of the governance bodies, and breakdown per employee category according to gender, age group, and other indicators of diversity	The composition of the governance bodies can be found on the Investor Relations' website .	405-1	-	1 and 6	-	I

SULA 89 – Composition of the governance bodies, and breakdown of employees per employee category according to gender, age group, minorities and other indicators of diversity (GRI 405-1)

Degree	Executive Management	Management	Specialist	Administrative	Operational
	Middle school diploma	0	5	24	13
Less than middle school diploma	0	0	0	0	1
High school diploma	1	137	1,219	509	617
Higher education diploma	21	437	1,490	378	193
Postgraduate degree/Master/MBA	8	141	225	37	3
Ph. D.	0	2	5	0	0

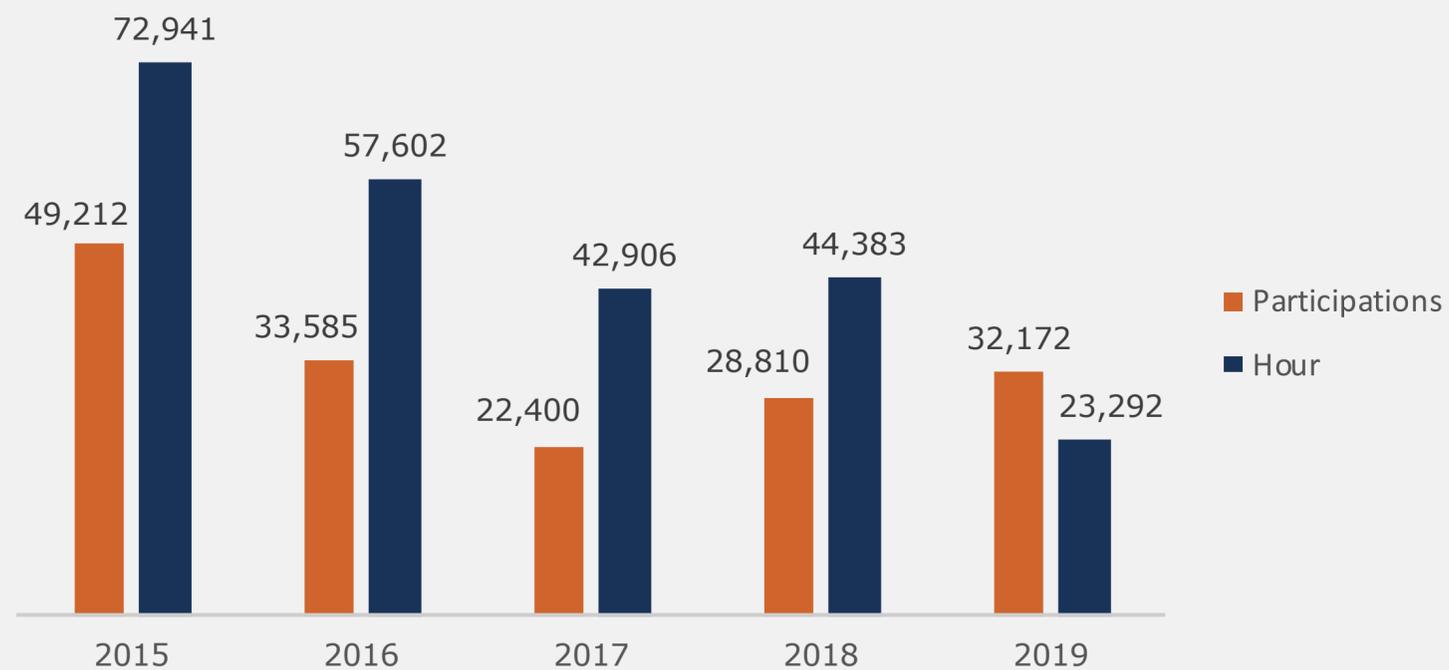
SULA 89 – Composition of the governance bodies, and breakdown of employees per employee category according to gender, age group, minorities and other indicators of diversity (GRI 405–1)

Race					
	Executive Management	Management	Specialist	Administrative	Operational
Yellow	0	6	20	11	5
White	29	531	1,651	387	286
Indigenous	0	1	1	0	0
African	0	6	118	51	65
Biracial	1	178	1,173	488	461
Age group					
	Executive Management	Management	Specialist	Administrative	Operational
Up to 25 years	0	0	271	153	127
From 26 to 35 years	0	142	1,234	379	308
From 36 to 45 years	9	342	950	268	302
From 45 to 55 years	12	194	410	103	68
From 56 to 65 years	7	39	88	28	8
Over 65 years old	2	5	10	6	4

¹ It was considered the employee base in December 2019

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 90	Average hours of training per year per employee, broken down by gender and employee category	<p>SulAmérica carries out several programs to improve the competences and abilities and build the capacity of its employees. In 2019, the Company invested more than R\$7 million in internally-developed training, talks, grants to attend external training courses and events, among other professional and career development programs. Employees took more than 28 thousand training courses offered by the SulAmérica's Corporate University – Universas.</p> <p>Some of the programs are the following:</p> <p>CarreiraCon Career convention on the Reinvent Yourself theme was attended by more than 3,000 people during the six days of event, in the Rio de Janeiro and São Paulo head offices. Dozens of activities reinforced protagonism and self-knowledge with a look at diversity and inclusion themes.</p> <p>Sua Estrada (Your Road) Program Aimed at developing key employees for the organization in several professional area levels. It held two editions with differentiated focuses:</p> <p>First Management: Mapping and training of senior-level professionals to take first management jobs. More than 1,200 employees were mapped, 54 prioritized to attend specific trainings focused on business, management and people, totaling more than 180 training hours with 90% of favorable response. Sixty five percent of the prioritized ones were moved during the two years of the program. Specialized: Mapping and development of employees who have expertise and technical knowledge that are critical to the business – actuaries, statisticians, and physicians. More than 120 employees were mapped, generating around 100 indications of customized individual training, according to the business needs and the employees career aspirations. In addition, the whole group was invited to attend behavioral training such as resilience, influence and communication. Thirty percent of the group was moved during the first year of the program.</p> <p>In 2019, the Data Scientist Program was launched and will train 20 data scientists in the company.</p> <p>SulaTalks Event that gathered SulAmérica's leaders to debate current themes (arts, communication, neurosciences, etc.). In 2019, 170 leaders participated.</p> <p>Commercial track Development of an exclusive training track to the commercial area, reaching roughly 180 sales and unit managers. With over 80 presence-based training hours, and participation of all business heads, including operations and innovation, we addressed themes like Accountability, Creation of Influence Network, Strategic Leadership and Result-oriented Negotiation, inviting the teams to rethink their activities seeking higher autonomy, and business and insurance market knowledge in light of innovation and behavior trends.</p> <p>Digital Week In July 2019, the Digital Week event was held to disseminate the digital culture addressing the SulAmérica's digital transformation moment and the main market trends. It held 30 talks and 2,400 people participated.</p>	404-1 DMA Education and Training	-	-	4	I

SULA 90 – Participation in and Hours of Training



SULA 90 – Average hours of training per year per employee, broken down by gender and employee category (GRI 404-1)

Position	Training hours		Participation	
	Female	Male	Female	Male
Executive Management	2	7	3	11
Management	861	670	1,238	947
Specialist	5,679	4,401	8,124	6,110
Administrative	3,551	1,171	5,858	1,690
Operational	3,725	788	4,529	895
Intern	1,076	1,361	1,192	1,575
Total	14,894	8,398	20,944	11,228

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 91	<p>Total number of hours devoted to employee training in human rights policies concerning aspects of human rights that are relevant to the operations of the organization's procedures, including the percentage of employees that received training</p> <p>Communication and training in anti-corruption policies and procedures Procedure(s) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines</p>	<p>Training in Human Rights In 2011 SulAmérica developed a Human Rights e-learning course that addresses the themes that are related to the labor environment and is aimed at disseminating the concept of human rights and ethical values. In 2019, the training was provided to more than 205 participants and took 205 hours.</p> <p>Training in Legal Compliance Pursuant to the regulation on money laundering introduced in 2011, SulAmérica developed a corporate program of money laundering combat and prevention so that all employees understand the theme. Before that, SulAmérica had already implemented the mandatory fraud combat course. In 2019, 1,675 employees completed the fraud combat and money laundering prevention courses.</p> <p>Besides the ethics and legal compliance training, which totaled 1,711 attendance and hours, SulAmérica has strengthened the culture focused on risk management and created several GRC actions. GRS stands for Governance, Risk and Compliance, a management model focused on ethical work, aligned with risk appetite and compliance with laws and internal rules. Twenty one GRC multiplying agents were trained, 318 people attended the Popcorn session, with theme-related talks and short films, and, finally, 814 people participated in the GRC Week.</p> <p>Training in Sustainability SulAmérica has invested in the dissemination of Environmental, Social and Governance (ESG) concepts in its business lines, mainly to the teams of the investment, product, control and Investor Relations (IR) areas. In 2019, 427 employees took the Sustainability and Sustainability Strategic Themes course in the UNIVERSAS platform.</p>	412-2 205-2 G4-FS4	-	1, 2, 3, 4, 5, 6 and 10	4	I
SULA 97	<p>Ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individuals) in the same country</p> <p>Ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individuals)</p>	<p>The ratio of the annual compensation for SulAmérica's highest-paid individual to the median annual compensation for all employees is 8.51.</p> <p>The ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individuals) in the same country is 6.80.</p> <p>And the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) is 5.61.</p>	102-37 102-38 102-39	-	-	8	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 98	Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation	Table below	405-3	-	1 and 6	5 and 8	I
SULA 98 – Ratio of the basic salary and remuneration of women to men by employee category and significant locations of operations (GRI 405-2)							
		Salary		Ratio			
		Female	Male				
Management		R\$ 13,845.85	R\$ 15,245.81	-9,18%			
Specialist		R\$ 5,236.38	R\$ 5,847.27	-10,45%			
Administrative		R\$ 3,073.32	R\$ 2,796.80	9,89%			
Operational		R\$ 1,659.38	R\$ 1,663.68	-0,26%			
Total		R\$ 23,814.93	R\$ 25,553.56	-6,80%			

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SGD	PSI
SULA 99	Percentage of total employees by gender and by employee category who received a regular performance and career development review	SulAmérica annually reviews the performance of its employees, taking into account the performance in relation to targets, and the development of their skills and competencies. In 2019, 87.9% of employees were reviewed by the Performance and Development Management (GPD in Portuguese) system. The Commercial teams (7.2%) are reviewed by the Sales Bonus Program (ReX), which offers bonus tied to the achievement of sales targets. The employees performance in relation to the target is quarterly assessed, and the bonus is paid every six months, according to the fulfillment of the program's conditions.	404-3	-	-	-	-

SULA 99 – Percentage of total employees who received regular performance and career development reviews, by gender and employee category – Commercial Area Employees (GRI 404-3)

	Performance review		
	Female	Male	Total
Management	42	63	105
Specialist	229	138	367
Administrative	79	12	91
Operational	0	0	0
Total	350	213	563

SULA 99 – Percentage of total employees who received regular performance and career development reviews, by gender and employee category – Other employees (GRI 404-3)

	Performance review		
	Female	Male	Total
Management	323	333	656
Specialist	1,427	1,167	2,594
Administrative	580	205	785
Operational	589	117	706
Total	2,919	1,822	4,741

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 101	Worker participation in formal occupational health and safety health and safety committees, comprising workers from different job levels	<p>SulAmérica has a team in the Human Capital, Administrative and Sustainability Vice-Presidency dedicated to the Health Management of employees, which besides the regular occupational test duties has health and well-being initiatives.</p> <p>In 2019, a first aid outpatient department was implemented in the Pinheiros unit, with family physician, gynecologist, nutritionist, occupational physician, first aid nursing, and massotherapy.</p> <p>Over 800 people were vaccinated against Measles and over 5,100 employees and dependants against flu.</p> <p>On the financial health theme, 100 collaborator families were trained, helping to reduce the indebtedness level of most of them.</p> <p>Over 50 check-ups of our executives were performed, guaranteeing the physical and mental health of the Company's leaders.</p> <p>Finally, health programs in the mental health, autism, oncology, healthy gestation, physical activity, telepsychology, orthopedics, and healthy food areas were carried out in our offices in São Paulo and Rio de Janeiro, and health and dental plans and travel insurance were provided, even during vacation, to employees and their relatives.</p>	403-1	-	-	3	-
SULA 102	Types of injury, injury rate, occupational disease rate, lost day rate, absentee rate, and work-related fatalities, per region and gender	Tabela below	403-2	-	-	-	-

SULA 102 – Injury, lost workday, and absentee rates (GRI 403–2)

Region			
	Injury rate (TL)	Lost workday rate (TDP)	Absentee rate (TA)
Center West	0.00	0.34	0,32
Northeast	3.44	0.06	0,49
North	0.00	0.11	0,84
Southeast	0.46	0.13	0,99
South	0.00	0.00	0,38

Gender			
	Injury rate (TL)	Lost workday rate (TDP)	Absentee rate (TA)
Female	0.52	0.16	1,21
Male	0.53	0.07	0,54

¹ The absentee rate considers the hours of sick leave/ scheduled hours x 100.

² The injury rate is zero for severity and frequency (only commuting accidents)

³ The lost workday rate is calculated by lost workdays due to accidents, from the first day away from work until the day prior to return/ (worked hours)

SULA 102 – Number of accidents, days away from work, RSI cases, and deaths (GRI 403–2)

	2017	2018	2019	Change
Number of accidents	18	29	18	-38%
RSI cases	0	0	0	-
Work-related deaths	0	0	0	-

¹ The number of accidents reported in 2018 refers to commuting accidents.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SGD	PSI
SULA 105	Benefits granted to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	<p>The benefits offered by SulAmérica are available in the Faça parte do Time section (Join the Team) on the Company's corporate website. The Health Plan, Dental Insurance,PrevSas, Funeral aid, daycare/ babysitter, and meal allowance benefits are not offered to temporary employees.</p> <p>For employees, SulAmérica also offers the Viver Bem (live well) program, which consists of telephone psychological assistance, a breastfeeding room, a primary care clinic, flexible hours and teleworking.</p> <p>SulAmerica also has the Saúde Ativa (Active Health) Program (only in portuguese), which is a set of initiatives focused on prevention and promotion of health, according to the need of each person.</p>	201-3 401-2	-	-	3 and 8	-
SULA 106	Minimum notice period prior to the implementation of operational changes, and whether they are specified in collective agreements	This kind of guarantee is already established in the Law, not being required a Collective Agreement to assert this right.	402-1	-	3	-	-
SULA 107	Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms	In 2019, SulAmérica recorded 120 new labor grievances, of which 36 referred to former employees and remaining ones to third parties. Of these 120 cases, 26 have already been resolved in 2019. Also in 2019, 137 grievances that had been recorded in the period prior to December 31, 2018 were resolved. Total resolved grievances: 163.	103-2	-	-	8	I and II

Natural Capital

The concern with natural capital is a principle included in many of the voluntary commitments SulAmérica took on. They were an inspiration to formulate our Environmental Policy and Environmental Management Program. To control the business impact on nature, we have two main initiatives:

Environmental targets:

We committed to meet the following targets for reduction in natural resources consumption:

- Energy: 60% reduction between 2014 and 2023. In 2019, SulAmérica reached the mark of 49% reduction in consumption, and in 2020 it expects to reach a reduction of 56%.
- Water: 75% reduction between 2014 and 2023. In 2019, SulAmérica reached the mark of 73% reduction in consumption, and in 2020 it expects to reach a reduction of 75%.
- Recyclable waste: 35% increase between 2014 and 2023. In 2019, SulAmérica exceeded the target for reduction, reaching 48%.
- Non-recyclable waste: 12% reduction between 2014 and 2023
- GHG Emission: 35% reduction between 2014 and 2023

SulAmérica organizes conscious consumption campaigns involving employees, suppliers and service providers.

Inventory of GHG emissions:

We have measured and disclosed the GHG emissions in our operations since 2010. The analysis helps to devise strategies for reducing and neutralizing this impact on environment. For further information, access our [inventory history](#) (only in portuguese).

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 115	Materials used, broken down by weight or volume	<p>The Company is a big consumer of paper and has adopted a series of consumption reduction actions, particularly the digitalization of processes (further information in the SULA 119 indicator).</p> <p>In 2019, over 176.3 tons of paper were printed in manual kits and leaflets, which represented a 15% decrease on the prior year.</p>	301-1	-	8	-	-
SULA 116	Energy consumption within the organization Reduction in energy consumption Reductions in energy consumption related to products and services	<p>Seeking to improve its operational efficiency, SulAmérica has an ecoefficiency program (further information in the SULA 119 indicator) and organizes campaigns for raising its employee awareness of the rational consumption of resources like electric energy, water and fuels.</p> <p>Among some of the actions, it is worth noting the change in the turn-on and turn-off hours of lights, lifts and air conditioning system in the administrative units, directly contributing to save electric energy.</p>	302-1 302-4 302-5	-	7, 8 and 9	7	I

SULA 116: Energy consumption within the organization (GRI 302-1, 302-4)

Renewable Energy (MWH)						
Electric Energy	2016	2017	2018	2019 ¹	Change (2018-2019)	
Head office - RJ	7,249	6,719	6,142	4,523	-26.4%	
Head office - Pinheiros/SP	2,354	2,405	2,280	2,194	-3.8%	
Branches	2,658	2,347	2,141	2,385	11.4%	
Subtotal	12,261	11,471	10,563	9,101	-13.8%	
Ethanol	2016	2017	2018	2019	Change (2018-2019)	
Own fleet	677	596	874	822	-5.9%	

SULA 116: Energy consumption within the organization (GRI 302-1, 302-4)

Diesel	2016	2017	2018	2019	Change (2018-2019)
Head office RJ	13	20	11	-	-
Head office - Pinheiros/SP	90	54	14	14	-3.0%
Own fleet	-	2	-	-	-
Subtotal	104	75	25	14	-44.7%
Gasoline	2016	2017	2018	2019	Change (2018-2019)
Own fleet	3,092	3,615	2,951	2,207	-25.2%
Total	16,134	15,757	14,413	12,144	-15.7%

¹ In the second half of 2019 the head office in Rio de Janeiro changed its layout, and half of the building was emptied and returned to the tenant, which caused a decrease in the electric energy consumption.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	ODS	PSI
SULA 117	Energy consumption outside of the organization		302-2		8	7	-

SULA 117: Energy consumption outside of the organization (GRI 302-2)

Emission Sources (GJ)	2016	2017	2018	2019	Change (2018-2019)
AUTO Locksmith	464	422	422	339	-19.6%
AUTO Mechanic	5,951	5,630	5,556	5,154	-7.2%
AUTO Tow Trucks	111,322	103,675	96,573	99,557	3.1%
AUTO Taxi	10,080	4,163	4,069	4,644	14.1%
Reimbursement for ride in km	8,974	9,699	10,358	7,611	-26.5%
Health Ambulance	1,001	585	146	46	-68.5%
Claims - Massified ³	125	-	-	-	-
Document transportation	-	-	13,543	11,617	-14.2%
Taxi for employees ²	1,694	1,869	1,416	2,564	81.0%

(1) SulAmérica will not report Solid Waste disposal emissions because it is impossible to convert such emission into Gigajoule. Such amounts can be found in the GHG Emission Inventory on the GHG Protocol Brasil's website.

(2) In February and March 2016, the Ticket provider system was changed, and it was not possible to collect such information.

(3) From September 2016 SulAmérica terminated its activities with this supplier in the Massified portfolio.

(4) In 2018, we started to report the document transportation source, arranged by trucks in the several units of SulAmérica throughout Brazil, provided by transportation company.

(5) As to 24-hour Services (locksmith, mechanic, tow trucks, and taxi) and Health Ambulance, the amount refers to the services used multiplied by average km over the past three years.

SULA Indicators		Response			GRI Standards	SASB	Global Compact	SDG	PSI
SULA 118	Total water withdrawn by source Total percentage and volume of water recycled and reused	Table below			303-1 303-3 303-5	-	7, 8 and 9	6	I
SULA 118: Total water withdrawn by source (GRI 303-1, 303-3)									
Water consumption (m ³)	2016	2017	2018	2019	Change (2018-2019)				
Head office RJ - Network	18,591	15,233	14,436	11,236	-22.2%				
Head office RJ - Reuse (303-3)	8,959	4,563	3,708	2,970	-19.9%				
Subtotal head Office RJ	27,550	19,796	18,144	14,205	-21.7%				
Head office in Pinheiros/SP - Network	7,995	12,649	6,441	6,262	-2.8%				
Head office in Pinheiros/SP - Reuse (303-3) ¹	9,205	8,838	7,822	11,497	47.0%				
Subtotal head office in Pinheiros/SP	17,200	21,487	14,263	17,759	24.5%				
Branches - Network	11,930	12,878	8,397	8,168	-2.7%				
Total	56,680	54,161	40,805	40,132	-1.6%				

⁽¹⁾ In 2016, the consumption reported in the Pinheiros head office included only the period from June to December, because of an error in Sabesp hydrometer.

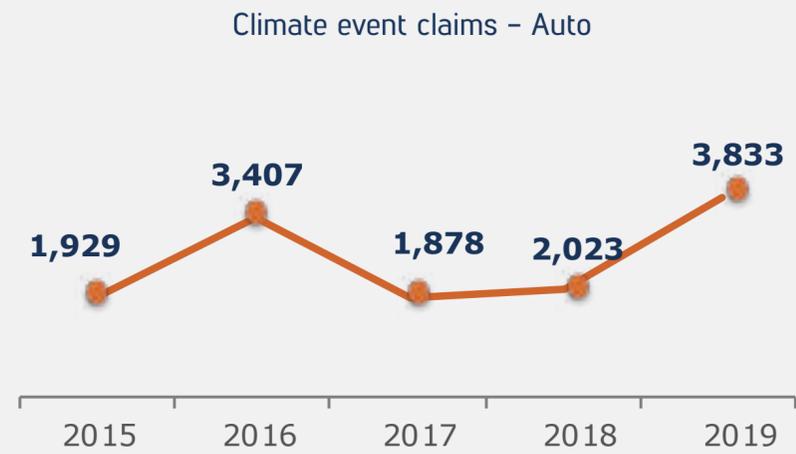
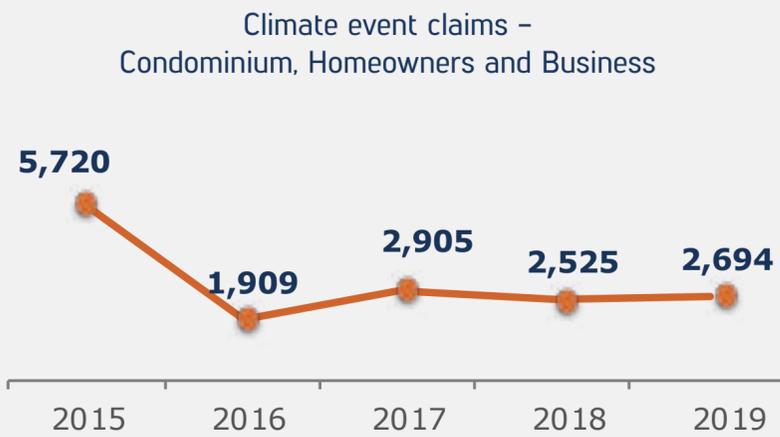
⁽²⁾ In 2017, the reduction in potable water volume in the Headquarters resulted from the consumption reduction actions, like reducing the flow in washbasins, bathrooms, and toilet bowls. In relation to the ETAC, there was reduction in reclaimed water because of problems in the storage and piping system.

⁽³⁾ Also in 2018, water consumption in Branches decreased, because two units were closed down and there was organic reduction.”

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 119	<p>Environmental Impact</p> <p>Mitigation Initiatives Number of grievance related to environmental impacts filed, processes and resolved by formal mechanism</p>	<p>Aiming at mitigating its environmental impacts, SulAmérica has several programs and initiatives in-house and in its value chain for paper reduction.</p> <ul style="list-style-type: none"> - Digital reimbursement: functionality available in SulAmérica's app and on the OnLine Health portal, which provides the option to apply for reimbursement by sending images of requests and bills or invoices. - Digital individual income tax (IRPF) statement: statement for completion of the annual income tax return, available for the latest years, in the app and OnLine Health. - Digital use statement: Statement available in both app and Online Health, which shows all procedures made by the insured over a certain period, as well as the charged co-participation amounts. - Request and tracking of chemotherapy and immunobiological drugs using the app: Functionality available in SulAmérica's app through which insureds undergoing treatment can request and track the sending of oral chemotherapy and immunobiological drugs, receiving them at home. - Médico na Tela (physician on screen) Functionality available in SulAmérica's app that offers the online assistance, which provides direct contact between patient and physician, through video conference. General practice and pediatrics are available. - Médico em Casa (doctor house calls) Benefit offered to currently sold products, through which each insured may request up to two home visits per year. The benefit is available for children who is 12 years old or younger, and adults over 65 years. - Pension: The broker makes available online purchase to customer, by digital signature, and after the proposal is accepted, all documentation (payment forms, product rules, certificates) is digitally sent to the insured. In 2019, 12,399 new proposals used this model. - Client Portal: In the logged area, all information on the purchased insurance is provided (such as policy/ insured card). Client option for resending the digital kit email containing all information on the respective insurance, if no email is found in the mail box. - 100% digital kit for Auto and Homeowners: This is the standard option to send Auto insurance information, whereas for Condominium and Business, this is one of the provided options. With the 100% digital kit, customers receive insurance information only by email and SMS, not being necessary to send printed material. 	103-2	-	-	-	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 119	Environmental Impact Mitigation Initiatives Number of grievance related to environmental impacts filed, processes and resolved by formal mechanism	<ul style="list-style-type: none"> - Auto App: It provides all information on purchased insurance (coverage, deductible, insured card). Customers also have an emergency button, which activate tow or mechanic service through the application, speeding up service, thus decreasing the time exposed to risk. Customers may also get discount from partners that offer car beauty services (such as dry cleaning, which saves water) and minor repairs (customers use the application to send photos of the area to be repaired and receive estimates from shops, being also able to choose the shop where the vehicle is to be repaired and make payment through the app). In addition, customers are able to follow claim and payment status, get all information on broker, have access to discount on products and services, among others. - Claim notice and follow up through the web: Using this tool, customers are able to open the claim quicker, send document and photos, and follow up the claim in real time. Through the tool customers receive authorization for repair and estimates, handled 100% electronically. <p>In relation to its impacts, in 2019 SulAmérica did not receive any grievance related to environmental impacts.</p>	103-2	-	-	-	-
SULA 121	Financial implications and other risks and opportunities to the organization's activities due to climate change	<p>The impact of climate events on SulAmérica's Homeowners, Business and Condominium Portfolios totaled R\$ 8.7 million in damages arising from gales, floods and hails, which represent 15.63% of all claims paid.</p> <p>In the Automobile portfolio, gales, floods and hails resulted in nearly R\$ 64.5 million paid in damages, which corresponds to 2.68% of all claims paid.</p> <p>In the other portfolios, it was not possible to identify the financial impact of climate change.</p>	201-2	FN-IN-450a.2	7 and 8	13	I

SULA 121: Financial implications and other risks and opportunities to the organization's activities due to climate change (GRI 201-2)



SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 122	<ul style="list-style-type: none"> • Direct (Scope 1) GHG emissions • Indirect (Scope 2) GHG emissions from energy acquisition • Other indirect (Scope 3) GHG emissions • Reduction of GHG emissions 	Table below	305-1	-	7, 8 and 9	13	I
SULA 123			305-2				

SULA 122: GHG emissions by scope (GRI 305-1, 305-2, 305-3)

	2016	2017	2018	2019	Reduction
Scope 1 – Direct emissions (CO2e)	1,107.03	1,192.50	968.55	528.00	-45.5%
Scope 2 – Indirect emissions related to energy purchase (tCO2e)	1,101.57	1,065.78	781.51	682.97	-12.6%
Scope 3 – Indirect emissions in the value chain (tCO2e)	10,117.12	9,619.98	9,267.83	9,958.32	7.5%

SULA 122: GHG emissions detailed by scope in 2019

Scope 1 – Direct emissions						
	CO2 (t)	CH4 (t)	N2O (t)	HFC (t)	CO2e (t)	Biogenic CO2 emissions (t)
Stationary combustion	3.35	-	-	-	3.35	0.36
Moble combustion	397.92	0.21	0.05	-	417.85	303.56
Fugitive emissions	0.99	-	-	0.06	106.81	-
Total Scope 1	402.26	0.21	0.05	0.06	528.00	303.92
Scope 2 – Indirect emissions related to energy purchase (location-based)						
	CO2 (t)	CH4 (t)	N2O (t)	HFC (t)	CO2e (t)	Biogenic CO2 emissions (t)
Eletricity	682.97	-	-	-	682.97	-
Total Scope 2	682.97	-	-	-	682.97	-
Scope 3 – Indirect emissions in the value chain						
	CO2 (t)	CH4 (t)	N2O (t)	HFC (t)	CO2e (t)	Biogenic CO2 emissions (t)
Category 1: Purchased goods and services	7,786.77	1.28	0.57	-	7,988.31	909.11
Category 5: Waste generated in operations	-	3.67	-	-	91.83	-
Category 6: Business travel	1,840.69	0.12	0.12	-	1,878.18	126.05
Total Scope 3	9,627.46	5.07	0.69	-	9,958.32	1035.15

SULA Indicators		Response			GRI Standards	SASB	Global Compact	SDG	PSI
SULA 127	Total weight of waste, by type and disposal method	Table below			306-2	-	8	-	-
SULA 127: Total weight of waste, by type and disposal method (GRI 306-2)									
Sanitary landfill (t)	2016	2017	2018	2019	Change (2018-2019)				
SulAmérica (head offices in RJ and Pinheiros/SP)	294	123	118	83	-29.7%				
Subtotal - Sanitary landfill (t)	294	123	118	83	-29.7%				
Recycling (t)	2016	2017	2018	2019	Change (2018-2019)				
SulAmérica (head offices in RJ and Pinheiros/SP)	66	34	37	75	103.9%				
Nespresso capsules	-	-	-	2	-				
Crushed vehicles	602	1,475	1,096	893	-18.5%				
Automobile parts	75	57	45	33	-25.1%				
Telephone and IT cables	-	1	-	-	-				
Glasses	807	729	430	704	63.6%				
Subtotal - Recycling (t)	1,551	2,296	1,607	1,707	6.2%				
Proper disposal/ Decontamination (units)	2016	2017	2018	2019	Change (2018-2019)				
Lamps (head offices in RJ and Pinheiros/SP)	-	1,672	3,500	-	-				
Reuse/ Donation (units)	2016	2017	2018	2019	Change (2018-2019)				
Furniture	26	70	84	87	3.6%				
Equipment	1,308	67.00	-	-	-				

(1) In 2016, the waste collection service supplier that served the Headquarters started to adopt the bucket volume for reporting purposes, using the 230kg/m3 methodology. (2) In 2017, SulAmérica followed the guideline about in-house equipment retrofit and maintenance, thus avoiding sending them for recycling. (3) In 2017, SulAmérica performed a pilot project, in which the vehicles that were not awarded damages, in yards for over a year, were sent for pressing. The project was undertaken according to the legislation, with the duly notification of owners. (4) The 2016 reported figure included the waste of the entire condominium. From 2017, the reported figure refers only to the Headquarters of SulAmérica. (5) The collection of lamps by the supplier is performed only from 1,500 units, which are stored until SulAmérica gathers the minimum quantity. (6) In 2017, changes and retrofits were performed in units where the furniture was in poor condition, increasing the number of disposed furniture. (7) The reduction in the waste sent to landfill and increase in recycling in the Pinheiros head office is a consequence of actions on training and awareness of recycling collection. (8) The recycling of automobile parts reported in this indicator is from the state of São Paulo.

Social and Relationship Capital

DIVERSIDADE
NA VEIA

SulAmérica developed a model of ethical and transparent relationship with its customers, brokers, business partners, regulatory bodies, shareholders, government, and the society. This model has led to a continuous improvement in satisfaction survey rates and customer loyalty, contributing to strengthen the trademark and increase revenue. As a way to give back to the Society, the Company increases its capacity of creating collective value and contributing to the collective safety and wellness.

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 137	Percentage of operations with implemented local community engagement, impact assessments, and/ or development	<p>The Company operates proactively supporting countrywide social, cultural and sports projects. Therefore, 100% of the Brazilian territory is eligible to receive the Company's investments in project development.</p> <p>Donation through incentive laws: Following the social investment policy, the Company proactively supports social, cultural and sports projects aimed at promoting health, wellness, and financial inclusion with high social impact and carried out in the cities where SulAmérica has operations/businesses.</p> <p>In this context, the Communication and Mobilization area was responsible for leading the selection of organizations/projects through the National Elderly Fund and Child and Adolescent Right Fund, besides the National Oncology Care Support Program (Pronon) and the National Support Program of People with Disability Care (PRONAS/PCD).</p> <p>The selection process is performed in two ways: 1. We surveyed the projects eligible to receive funds through PRONON and PRONAS. Among them, we prioritized those that dealt with research and/or prevention, and had potential for continuing as voluntary work with our employees. After this, we validated the choice with the areas of Compliance, Commercial, Health Business Unit, and COMEX.</p> <p>2. For organizations eligible to raise funds through the Elderly and Child and Adolescent ones, we made a Call for Application, posted on the PROSAS Platform - which besides hosting and releasing it, also supported us with their expertise in organization selection. In total, our call for application accounted for 5,141 hits and received 172 applications in the month of its release. After the analysis, which considered several aspects (such as, for example, alignment with the SDG and SulAmérica's businesses, impact and potential for continuity of works), we selected the organizations that would receive the donations - selection subsequently validated by the areas of Compliance, Commercial, Health Business Unit, and COMEX).</p> <p>Considering the above, in line with the Social Investment Policy, in 2019 SulAmérica supported 14 social projects.</p> <p>PRONON Associação Mário Penna Belo Horizonte (state of Minas Gerais) Project: Implementation of a Biobank and Development of a Biomarker Panel for Precision Oncology of Ovarian and Breast Cancer.</p>	413-1	-	1	11	III

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 137	Percentage of operations with implemented local community engagement, impact assessments, and/ or development	<p>PRONAS/PCD Instituto D'Or Rio de Janeiro (state of Rio de Janeiro) Project: Neural cells and cerebral organoids derived from iPS and as platform for studies on the effects of cannabinoids on the Dravet Syndrome (Research)</p> <p>Dona Meca social work Rio de Janeiro (state of Rio de Janeiro) Project: Promote the habilitation, rehabilitation and social inclusion of children and adolescents with disability, in multidisciplinary context, through physical activities, aimed at social inclusion, psychomotor development (including cognitive), and improvement in the quality of life.</p> <p>APAE in Belford Roxo Belford Roxo (state of Rio de Janeiro) Project: Offer new service modalities (cardiology, neurology, pediatrics, therapeutic workshops on capoeira, dance, and art therapy) to children and adolescents with disability, to provide diagnosis, rehabilitation, stimulation and maintenance of functional capacities of the beneficiaries.</p> <p>APAE Belém Belém (state of Pará) Project: Despertar Auditivo: implementation of audiology tests in the institution.</p> <p>ELDERLY FUND Santa Casa in Curitiba Curitiba (state of Paraná) Project: Structure a endoscopy and colonoscopy center for a collective effort to serve a priority waiting line comprising around 6,800 people. Expected result: • Perform 840 tests per month, zeroing the waiting line within eight months. • Perform over 30,000 tests within five years during the useful life of equipment.</p> <p>Group of Arthritis Patients in Porto Alegre Porto Alegre (state of Rio Grande do Sul) Project: Promote a multidisciplinary humanized service, physical activities, therapeutic workshops and talks that contribute to the promotion of health and quality of life of 230 elderly who have rheumatic diseases. Expected result: • Reduction in disease symptoms and improvement of health • Stimulate physical and group activities • Improvement in the physical condition and emotional well-being</p>	413-1	-	1	11	III

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 137	Percentage of operations with implemented local community engagement, impact assessments, and/ or development	<p>Instituto Ânima Divinópolis (state of Minas Gerais) Project: Open University to the Elderly: Build the capacity of elderly in the courses of Elderly Rights, Finance, Computing, Health, Digital Inclusion, English, Entrepreneurship, and workshops on Urban Vegetable Garden, Movie, and Literacy, offering free access to quality education and training. Expected result: • Build the capacity of 1000 elderly, with at least 80% certified.</p> <p>CHILD AND ADOLESCENT FUND Instituto do Câncer Infantil (Childhood Cancer Institute) Porto Alegre (state of Rio Grande do Sul) Project: guarantee the maintenance and qualification of the provided service to improve the quality of life of the patients and relatives supported by the ICI, enabling fundamental support to the continuity of the treatment, thus increasing the rate of cure. Expected result: • Increase the multidisciplinary support to the served children and adolescents • 494 direct beneficiaries</p> <p>Associação Mineira de Reabilitação (rehabilitation association) Belo Horizonte (state of Minas Gerais) Project: Promotion of the care and health of children and adolescents with physical disability, from 0 to 17 years old. It will open 1,340 vacancies for technical guidance to caregivers (relatives/ education professionals) involved in the care of people with disability and 746 services/month to children, adolescents and their relatives. Expected result: • Improvement in the quality of life of children and adolescents with disability.</p> <p>Instituto Sorrir para Vida São Paulo (state of São Paulo) Project: Offer specialized dental clinic care to children and adolescents with disability, systemic diseases, infectious and contagious diseases, behavioral and temporal alterations. Expected result: • 100 monthly dental services • Organization of six talks during the year to patients, relatives, caregivers, institutions and/or hospitals • 12 actions on toothbrushing for patients and relatives.</p>	413-1	-	1	11	III

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 137	Percentage of operations with implemented local community engagement, impact assessments, and/ or development	<p>SORRI- Bauru Bauru (state of São Paulo) Project: Promote the hearing health of children from 5 to 7 years old of state schools. Expected result:</p> <ul style="list-style-type: none"> • Detect approximately 20% children with some conductive hearing loss, 15% with impediments for test, and 1% hearing impairment • Intervene early in 100% of cases of children with conductive hearing loss, impediments for test, and hearing impairment, thus reducing the negative impact on functionality • 1,000 direct beneficiaries <p>Frente de Assistência à Criança Carente Fortaleza (state of Ceará) Project: Through judo and muay thai practice, promote education, sports and leisure activities to children and adolescents, mitigating the exposure to situations of violence and violation of law. Expected result:</p> <ul style="list-style-type: none"> • Dissemination of physical activity for self-development • Strengthen a culture of peace, with the involvement of relatives in proposed activities, narrowing the gap between generations • 100 direct beneficiaries <p>Grupo Marista Curitiba (state of Paraná) Project: Conviver Marista (Service for Living Together and Strengthening Ties) offers innovative full-time education that empower children and adolescents to build knowledge through participation, in vulnerable areas. Expected result:</p> <ul style="list-style-type: none"> • Serve 750 children and adolescents between 6 and 17 years old • Work in neighborhoods that have extreme social vulnerability in the city of Curitiba. 	413-1	-	1	11	III

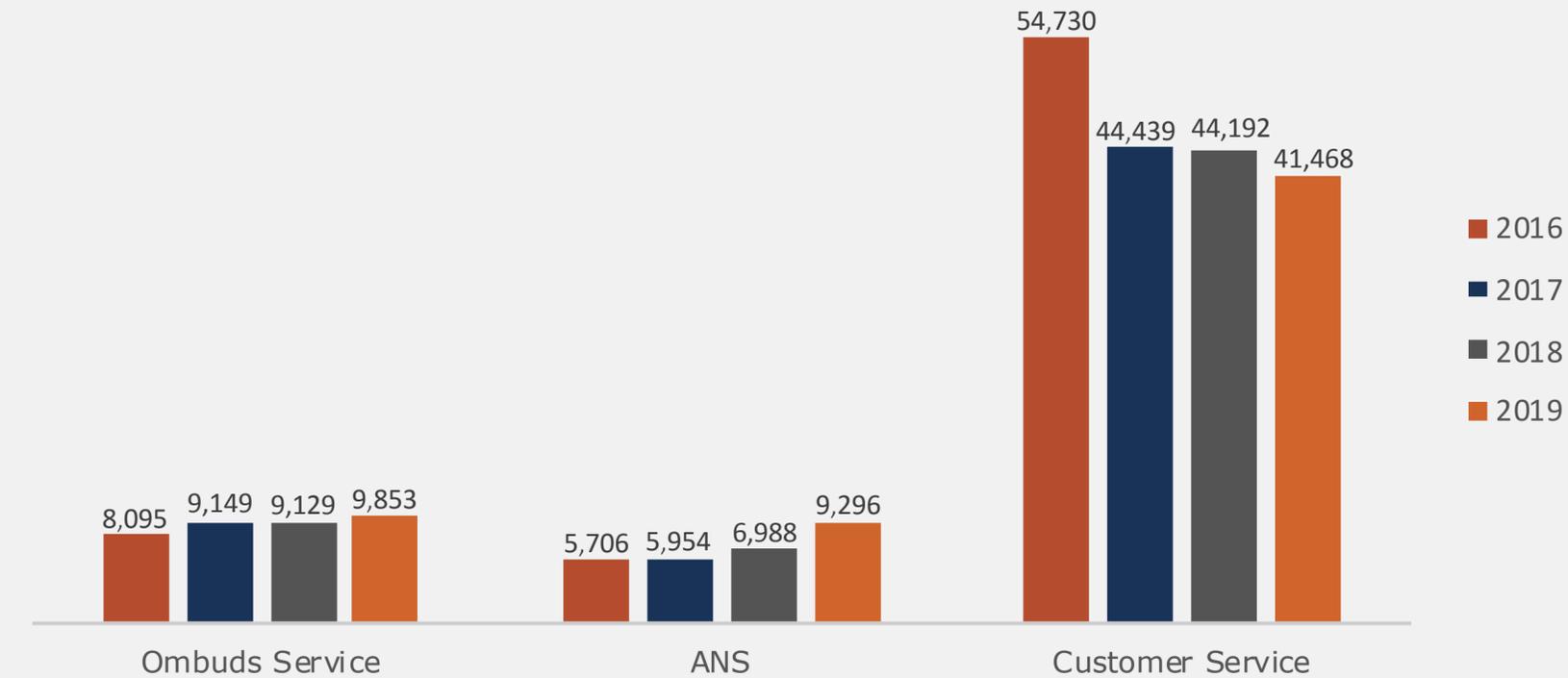
SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 137	Percentage of operations with implemented local community engagement, impact assessments, and/ or development	<p>Citizenship Day: In 2019, SulAmérica held two editions of the Citizenship Day – one in Rio de Janeiro and another in São Paulo. It is a social responsibility initiative, an event that offers free health, cultural and leisure services, producing a positive impact on the population of the surrounding areas of the main head offices of the Company.</p> <p>A total of 51 services were provided to the population (of which 36 in Rio de Janeiro and 15 in São Paulo), such as, for example, complete ophthalmologic exams, hair cuts measurement of glycemia and arterial pressure, exemption of fees for obtaining documents, assistance in employment search, legal guidance, and oral care tips.</p> <p>These actions involved 101 volunteers and totaled 6,298 services – of which the assembly and distribution of 407 glasses for free in the Rio de Janeiro edition of the event is worth noting. It should be stressed that 13 organizations received non-incentive funds from SulAmérica due to partnerships to make the Citizenship Day viable.</p> <ul style="list-style-type: none"> • ABRATI – Associação de Apoio a Terceira Idade • ADJ – Associação de Diabete Juvenil • Aliança Resgate Org. Não-Governamental • Associação Acorde das Oficinas para Desenvolvimento • Associação de Apoio Renovatio • Associação Mães pela Diversidade • ASSPTJ- Associação dos Assistentes Sociais e Psicólogos do Tribunal da Justiça do estado de SP • Brenda Lee • CIES Global • Ideia Fértil • IMBRA – Instituto Muda Brasil • ONG Núcleo Espiral • Verbem Oculos S.A. <p>Other actions: Throughout 2019, we also promoted other actions on social responsibility These were the following:</p> <ol style="list-style-type: none"> 1. Campaign for school material collection 2. Campaign for blood donation (two in São Paulo and one in Rio de Janeiro) 3. Winter campaign (for collection of blankets and sweaters) 4. Solidary Christmas (for collection of toys) <p>Moreover, we promoted two actions on collection of materials for donation. A total of 972 volunteers were involved, benefiting 2,765 people and 12 organizations with 5,092 items collected.</p>	413-1	-	1	11	III

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 138	Number of grievance related to impacts on society filed, processes and resolved by formal grievance mechanism	In 2019, 84 grievances were filed in the reporting channels, of which 34 of Labor Relations, 16 of Inappropriate Conduct with Third Parties, 9 of Conflicts of Interest, 6 of harassment, 6 of Confidential Information, 4 of Inappropriate Use of SulAmérica's Image, 4 of Protection of Asset and Information, and 5 of Other.	103-2	-	-	11	II
SULA 143	Describe the organization's supply chain	Click here to access the video.	102-9	-	-	12	-
SULA 145	Significant actual and potential negative social impacts on labor, human rights, society, and environment practices in the supply chain, and the measures taken on such respect	<p>For SulAmérica, significant negative impacts are considered to be labor analogous to slavery, child labor, involvement in corruption, negligence of social and environmental issues, and infringement of labor rights.</p> <p>The main impact in relation to labor and human rights practices on the supply chain of SulAmérica is the breach of the Consolidated Labor Laws, whether by not signing the work card or evading taxes and payroll charges.</p> <p>To mitigate such risks, 100% of SulAmérica's contracts, in which it is possible to use a standard draft, contain a labor clause, to ensure that service providers and suppliers comply with the Brazilian labor legislation, as well as show supporting documents, such as, for example, the payment forms of labor charges. In addition, all contracts consider the Sustainability and Social and Environmental Responsibility Clause, which condition the maintenance of engaged services to the compliance with laws and voluntary commitments assumed by the company on the theme.</p>	308-2 414-2	-	-	8	II and III
SULA 146	Percentage of new suppliers that were screened using labor, environmental, human rights, and society-related criteria	<p>According to standard procedure, every supplier goes through a careful screening for the involvement in corruption, environmental negligence.</p> <p>According to its rules, every supplier shall be evaluated and analyzed according to the labor practices to be approved and cleared for negotiation, however, no supplier was commissioned based only on environmental criteria.</p> <p>Access the SULA 150 indicator for further information on this theme.</p>	308-1 414-1	-	-	8 and 12	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 147	Percentage spent with suppliers local to significant location of operations	<p>SulAmérica serves its insureds by means of its accredited service providers, and screens them using criteria like structure coverage, technical skills, 24-hour service center, service cost and quality according to the needs of each business segment.</p> <p>To commission local suppliers, on the other hand, the Supply area considers cost, location, product quality, and delivery capacity, except in the cases of products with specific technical qualities.</p>	204-1	-	-	8 and 12	-
SULA 150	Total number and percentage of significant investment agreements, and that include human rights clauses, or that were submitted to human rights-related screening	<p>To guarantee that its suppliers share SulAmérica's commitment to sustainability, all of the new contracts have a Sustainability and Business Responsibility Clause.</p> <p>In the Supplies area, standard contracts have labor and human right responsibility clauses – the exceptions are the contracts that follow the model proposed by the supplier.</p> <p>All contracts have clause of adherence to the Code of Ethical Conduct, thus ensuring the responsibility in the value chain.</p>	412-3	-	1, 2, 4, 5 and 6	8 and 12	I
SULA 151	<p>Identified operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk, and the measures taken to support this right</p> <p>Identified operations and suppliers considered to have risk for incidents of child labor and the measures taken to contribute to the effective abolition of child labor</p> <p>Operations and suppliers considered to have significant risk for incidents of forced or compulsory labor, and the measures taken to contribute to the elimination of all forms of forced or compulsory labor</p>	<p>In 2019, no incident was reported in which the collective bargaining and the freedom of association were impeded in any unit of the company or in any of its main service providers.</p> <p>In 2013, SulAmérica included in its contracts a Sustainability and Social and Environmental Responsibility Clause, which contains the theme abolition of child labor.</p> <p>Access the SULA 150 indicator for further information on this theme.</p>	407-1 408-1 409-1	-	1, 2, 3, 4 and 5	8 and 12	I

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 155	Report the organization's internal and external mechanisms for seeking advice about ethical and lawful behavior	SulAmérica has many internal and external mechanisms for ethical, legal, fraud and corruption issues, besides the law firms that provide legal advisory services, when necessary.	102-17	FN-AC-510a.2	-	16	-
SULA 156	Report the organization's internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and organizational integrity, like reporting concerns by hierarchical means, mechanisms for reporting irregularities or reporting channels	<p>Mechanisms:</p> <ul style="list-style-type: none"> - Fala Comigo (talk to me) - reporting channel available on the corporate website, managed by an outsourced company, Contato Seguro, which ensures independence and alignment with the market practices, allowing any hierarchical level of the company to file any possible breach of the guidelines of the Code of Ethical Conduct; and - Internal and external policies, which will be addressed by the Ethics Committee (joint forum). 					
SULA 160	Results of customer satisfaction surveys	<p>SulAmérica conducts several quality and satisfaction surveys on its strategic target groups (insureds, customers, service providers, brokers and investment analyst) as a way to improve processes and the quality of its products and services.</p> <p>The Company uses the Net Promoter Score (NPS) methodology, which measures customer satisfaction and loyalty level. Among the NPS benefits, we highlight its user friendly and simplicity qualities, besides the identification of actions to optimize loyalty, improving even more the customer experience with our products and services.</p> <p>The main results of the surveys conducted in 2019 were the following:</p> <ul style="list-style-type: none"> - The satisfaction level of brokers in relation to SulAmérica increased 1.2 p.p. in relation to 2018 with 81.5% of satisfaction. - The National Regulatory Agency for Private Health Insurance and Plans (ANS) monthly assesses the private healthcare plans and in December 2019 SulAmérica ranked 16th in grievances, 3 ranks down in relation to December of last year. 	102-43 102-44	-	-	8	1

SULA 160 – Reclamações recebidas



Besides the above channels, grievances are received by PROCON (2,190 grievances), SUSEP (1,347 grievances), Press (85 grievances), and Other Channels (1,374 grievances)

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 162	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	SulAmérica did not have in 2019 the inclusion of environmental and/or social requirements in agreements with customers. However, it has a clause of Sustainability and Social and Environmental Responsibility. To learn about the clause, click here	G4-FS3	-	1 to 10	12	I and II
SULA 167	Interactions with clients/ investees/business partners regarding environmental and social risks and opportunities	Seeking a more active role in promoting sustainable development, SulAmérica has been integrating social and environmental benefits into its businesses, products and services. For innovations in products and services, see SULA 80; for initiatives in the value chain, see SULA 127; and for initiatives in financial education and responsible use of insurance, see SULA 79.	G4-FS5	-	1 to 10	-	II and III



Other Indicators

SULA Indicators		Response	GRI Standards	SASB	Global Compact	SDG	PSI
SULA 170	Policies with specific environmental and social components applied to business lines	<u>Environmental Policy</u> <u>Donations and Investments of Social Interest Policy</u> <u>Corporate Sustainability Policy</u> <u>Social and Environmental Risk Policy</u> <u>Responsible Investment and Social Responsibility Policy</u>	G4-FS1	FN-IN-450a.3 FN-AC-410a.2	1 to 10	12	I and II
SULA 171	Process for defining the report content and the topic boundaries	As described on the <u>Investor Relations' website</u>	102-46	-	-	16	-
SULA 172	Report of any specific limitation regarding scope or report boundary	The social and environmental information, in certain cases, covers only some units, due to the lack of indicators or impossibility of monitoring. In such cases, explanatory notes were included in tables, charts, and texts.	103-1	-	-	-	-
SULA 173	For each topic report its boundary outside the organization	To learn about the material themes identified by the Company, access the <u>Investor Relations' website</u>	103-1	-	-	-	-
SULA 174	Report the effect of any restatements of information given in previous reports, and the reasons for such restatements	In 2019, in the data in relation to which the measurement methodology changed, an explanatory note on the nature of such change was included.	102-48	-	-	-	-
SULA 175	Significant changes in the scope, boundary or measurement methods applied in the report	All significant changes in the measurement methods in relation to 2019 are notified in the respective text, spreadsheet, or chart to which the change refers.	102-49	-	-	-	-
SULA 176	Reporting period for the information provided.	1.1.2019 to 12.31.2019	102-50	-	-	-	-
SULA 177	Date of most recent previous report	3.31.2019	102-51	-	-	-	-
SULA 178	Reporting cycle	Annual	102-52	-	-	-	-
SULA 179	The contact point for questions regarding the report or its contents	<u>Corporate Website</u> <u>Investor Relations'</u> Social and environmental information: sustentabilidade@sulamerica.com.br / +55 (11) 3779-5027 For other information: ri@sulamerica.com.br	102-53	-	-	-	-

SULA Indicators		Response	GRI Standards	SASB	Global Compact	ODS	PSI
SULA 180	Content index that specifies where the information can be found in the report	SulAmérica prepares its Annual Report according to the Core option, reporting the impacts of its economic, environmental, social, and governance impacts. This document – Environmental, Social and Governance indicators – contains information on indicators, or provide links to the websites of the Company that contain the responses.	102-54 102-55	-	-	-	IV
SULA 181	The policy and current practice with regard to seeking external assurance for the report	<p>SulAmérica's management is responsible for the preparation and presentation of the information contained in the Annual Report related to the period from January 1, 2019 to December 31, 2019. Since 2008, this report has been prepared in accordance with the criteria, assumptions, and methodologies of the Global Reporting Initiative (GRI). In 2017, the Company has started to use the GRI STANDARDS version (Core reporting option). Since 2011, SulAmérica has had external assurance for its annual reports.</p> <p>To get the external assurance for its Annual Report, SulAmérica seeks companies operating in the market that have the skills it requires to perform assurance for its report and inventory. The engagement is carried out by the Purchase and Sustainability areas, in which Purchase checks the financial and compliance criteria, while Sustainability checks technical issues. Click here to see the assurance letter.</p>	102-56	-	-	-	-



SulAmérica