

SULAMÉRICA S.A. CORPORATE POLICY ON STAKEHOLDERS ENGAGEMENT

1. INTRODUCTION

1.1. Purpose

To create a culture that foster perennial relationships between SulAmérica and its stakeholders, based on partnership and trust, and aimed at improving the communication and dialogue in order to enhance its products, services and processes, incorporating environmental, social and governance (ESG) issues.

1.2. Scope

This document is applicable to the SulAmérica holding and its subsidiaries, and guides its relationships with the following stakeholders:

- Consumers/Customers;
- Internal Audience;
- Brokers;
- Benefit Advisory and Administration Companies;
- Other distribution channels;
- Service providers;
- Suppliers;
- Regulatory Bodies and other governmental entities;
- Trade associations and entities;
- Shareholders and Investors;
- Organized civil society;
- Community;
- Press.

1.3. Update and Disclosure

The Sustainability Superintendence is responsible for updating this document.
The disclosure of new versions shall take place when this document goes through updates.

1.4. Concepts/ Definitions:

- Engagement: Process established by SulAmérica for building up relationship with its stakeholders, aimed at finding collective solutions that take into account different perspectives and produce mutually beneficial results, in order to mitigate risks, while strengthening, developing and improving the interactions between the parties.
- Stakeholder: Individual or group who has interest in any decision or activity of an organization. (Source: ISO 26.000)
- Value Chain: Network of relationships of interdependence and addition of value to the provision of services formed by SulAmérica and its suppliers, service providers, brokers, sales and marketing teams, and customers.

2. GENERAL RULES

2.1. Documents required for understanding these rules:

Corporate Sustainability Policy.
Code of Ethics.

2.2. Rules

This document sticks to the following principles:

- Ethics and Transparency:** Establish ethical relationships with stakeholders by means of communication that is transparent, agile and using a language that is appropriate to each audience.
- Trust:** Establish trustworthy relationships between SulAmérica and its stakeholders, based on dialogue, besides communication about its advances and challenges, taking into account the demands from the involved parties and incorporating them, when possible, into its decisions.
- Equity:** Guarantee equity in the relationships between SulAmérica and its stakeholders in all units of the companies.

3. PROCEDURES

The guidelines of the Engagement Policy presuppose engaging in and keeping a standard conduct in the company to establish strong, transparent and perennial (sustainable) relationships between SulAmérica and its stakeholders.

3.1. General guidelines

3.1.1. Encourage the **development of human capital**, by means of capacity building, dialogue and mobilization, creating proximity and trust with Sul América;

3.1.2. Provide **quality in service** in all stages of the relationship with SulAmérica's stakeholders, respecting the particularities of each situation and the involved audience;

3.1.3. Encourage collaboration with stakeholders in the process of innovation in products and services, and responsibility in the value chain, incorporating environmental, social and governance (ESG) issues;

3.1.4. Carry out engagement actions with the society to promote financial education and the conscious use of insurance as a way to enhance the understanding of the conditions of its products and services, and the role of insurance in the society, as well as strengthening the financial health of its stakeholders;

3.1.5. Render accounts to stakeholders specifically in relationship to the established engagement, by means of continual structured feedback and dialogues.

3.2. Performance Indicators

3.2.1. The stakeholders engagement performance indicators are developed based on SulAmérica's stakeholders map, according to each segment or area responsible for the relationship.

3.3. Responsibility and Governance

3.3.1. The Executive Committee is responsible for Governance and Monitoring of stakeholders engagement performance indicator;

3.3.2. The Sustainability Committee is responsible for providing guidance on the strategy on environmental, social and governance (ESG) issues, integrated into the company's process, and for reporting to the Board of Directors;

3.3.3. The Corporate Sustainability area is responsible for developing and integrating the ESG issues, according to the guidance of the Sustainability Committee;

3.3.4. All executives and employees of SulAmérica are responsible for the application of this Policy rules.