NOMINATION AND ELIGIBILITY POLICY OF CAIXA SEGURIDADE PARTICIPAÇÕES S.A.
1. **Responsible unit**
   DIGOE – Strategic and Corporate Governance Office

2. **To whom this Policy applies**
   Persons responsible for nomination, analysis of eligibility criteria and election of Candidates to the Board of Directors, the Executive Board, the Supervisory Board and the Board Committees of Caixa Seguridade Participações S.A.

3. **Regulation**
   Decree 8.945 of 12/27/2016
   Bylaws of Caixa Seguridade Participações S.A.
   CVM Instruction 308 of 5/14/1999
   CVM Instruction 480 of 12/7/2009
   Complementary Law 64 of 5/18/1990
   Law 6.404 of 12/15/1976
   Law 8.112 of 12/11/1990
   Law 12.813 of 5/16/2013
   Law 13.303 of 6/30/2016
   B3’s Regulation of Governance Program for State-Owned Companies
   CGPAR Resolution 12 of 5/10/2016
   Minutes No. 82 of 4/5/2019 of the Board of Directors’ Meeting

4. **Purpose**
   4.1 To establish principles and guidelines for the process of nomination and eligibility of Directors and Officers, members of the Supervisory Board and the Board Committees of Caixa Seguridade Participações S.A.
   4.2 To establish the requirement for an analysis of the competencies and characteristics of the head of internal audit and the chief risk, internal control and compliance officer, in order to support the appointment by the Board of Directors. The analysis must be conducted following the rule of the parent company CAIXA.

5. **Definitions**
   - *Directors and Officers – members of the Board of Directors and the Executive Board of the Company.*
• ANS – National Regulatory Agency for Private Health Plans.
• BACEN – Brazil’s Central Bank.
• CAIXA – Caixa Econômica Federal.
• Caixa Seguridade or Company – Caixa Seguridade Participações S.A.
• Board Committees – committees created pursuant to the Company’s bylaws to provide assistance to the Board of Directors, such as Audit Committee, Eligibility Committee and Related-Party Transaction Committee.
• Controlled Companies – companies over which the Company has Controlling Power.
• CVM – Brazilian Securities Commission.
• Guidelines – a set of instructions or indications to carry out a plan, an action or a business.
• Employee – an individual who has a contract of employment with CAIXA and works at the units of Caixa Seguridade or its Subsidiaries.
• Corporate Governance – the system by which companies and other organizations are directed, controlled and incentivized, involving relationships between owners, board of directors, executive board, oversight and control bodies and other stakeholders.
• Group of Shareholders - a group of persons: (i) linked by contracts or agreements of any nature, including shareholders’ agreements, oral or written, whether directly or through any companies Controlled by, Controlling or under Common Control with such persons; or (ii) having a controlling relationship with respect to one another; or (iii) who are under Common Control; or (iv) representing the same interest.
• Candidate – a person who is being considered for the position of member of the Executive Board, the Board of Directors, the Supervisory Board and the Board Committees of the Company.
• Innovation – according to the Brazilian Institute of Corporate Governance (IBGC), innovation is defined as the identification of opportunities and the ability to think and deliver processes, products and services in different ways, adding value.
• Governance Bodies – includes the General Meeting, the Board of Directors, the Executive Board, the Supervisory Board and the Board Committees of the Company.
• Interested Parties or Stakeholders – any individual or group that can affect or be affected by the Company’s opinions and actions. For example: senior management, employees, suppliers, consumers, community, government, stockholders, among others.
• Investees – companies in which Caixa Seguridade has made a direct or indirect investment.
• Controlling Power - the actual power to directly or indirectly conduct the corporate business and to direct the action of the governing bodies of the investee, as a matter of fact or law. Ownership of control is to be presumed as to a person or Group of Shareholders holding such number of shares as
may have secured an absolute majority of the votes cast by the shareholders present at the past three shareholders’ meeting of the investee even though not holding such number of shares as would secure an absolute majority of the voting capital.

- Reappointment – appointment for a further term of office in the same position.
- Federal Employees – those holding an office or job with the federal government either through competitive examination or under temporary free appointment (articles 2 and 9 of Law 8.112/1990).
- Subsidiary – a corporation whose shares are all owned directly or indirectly by Caixa Seguridade, characterizing the subsidiary as a state-owned company.
- SUSEP – Brazilian insurance regulator.

6 Principles

6.1 Transparency

Disclosure of information in an effective, accurate and clear manner that ensures the legitimacy of information and free access to it, to support Stakeholders in the decision-making process.

6.2 Ethical behavior

Ethical behavior of all those involved in the process of verifying whether the nominated candidates meet the eligibility criteria.

6.3 Fairness

Just and equal treatment for all Candidates in the eligibility verification process.

6.4 Compliance

All routines and procedures are compliant with the relevant internal and external rules.

6.5 Commitment

The Candidates possess competencies and characteristics and work experience that demonstrate their identification with and commitment to the Company through their behavior and positive attitudes to contribute to the growth of the organization(s) for which they work or worked, proactive behavior, active participation in projects, recommendation of improvement solutions and improved performance and, principally, alignment with the set goals and objectives.

6.6 Results Focused

The Candidates possess competencies and characteristics and work experience that demonstrate their ability to prioritize and set strategies for achieving high
performance results, value added optimization, profit generation, dividend distribution, maintenance of the financial and economic sustainability and longevity of the Company.

6.7 **Diversity**

Complementary experiences allow the Company to benefit from a diversity of opinions and a higher quality and more effective decision-making process.

7 **Guidelines**

7.1 Nominations for the Board of Directors, the Executive Board, the Supervisory Board and the Board Committees of the Company are based on the requirements of this Policy, the Company’s bylaws, legislation in force, and good practices of the domestic and international market.

7.2 The Candidates for the Board of Directors, the Executive Board, the Supervisory Board and the Board Committees of the Company must have time available to devote to the position, analysis of issues and fulfillment of their duties of diligence, in accordance with the Company’s codes of ethics, conduct and compliance, management of risks involved, sustainability of results, creation of shareholder value and strengthening of the reputation of Caixa Seguridade.

7.2.1 The Company expects the Candidates for the Board of Directors and the Executive Board to participate in the consolidation of an enduring culture of innovation throughout the Company.

7.3 Diversity and complementary experiences, preferably, age, ethnic and gender diversity are also key considerations.

7.4 Active and retired employees of CAIXA and Federal Employees are preferred to fill positions on the Board of Directors and the Board Committees, except independent members, where applicable.

7.5 **General eligibility requirements**

7.5.1 To be nominated and elected, Candidates must:

a) be Brazilian citizen;

b) have integrity and high ethical standards;

c) have extensive knowledge relevant to the position for which they are nominated;

d) have a university degree in a field relevant to the position for which they are nominated, which must include undergraduate or graduate programs recognized or accredited by the Ministry of Education;
e) have demonstrated work experience that enables them to discharge their duties effectively as established by law and the Company’s bylaws.

7.6 Specific eligibility requirements

7.6.1 In addition to the general eligibility requirements mentioned above, Candidates for the Board of Directors should preferably live in Brazil and are required to have at least one of the work experiences listed below, and only the experiences mentioned in the same item will count toward the time required:

a) ten years in the public or private sector, in the same industry as the Company or industry related to that in which they are nominated for a high-ranking position;

b) four years as an Officer, Member of the Board of Directors, member of the audit committee or in high-ranking positions with companies of a similar size or sector as that of the Company, given that high-ranking position is understood to be at the two highest hierarchical levels of the company;

c) four years in a temporary free appointment position or position of trust equivalent to level 4 or higher in mid- or high-level management positions (DAS) in domestic public administration agencies or entities;

d) four years as a professor or researcher at a university or college in a field relevant to the business of the state-owned company;

e) four years as self-employed worker engaged in an activity related to the business of the Company; or

f) ten years as an active employee of CAIXA or the Company (through competitive examinations) and, in one of the companies, have occupied a senior management position, demonstrating their ability to assume the responsibilities of the mandate.

7.6.2 Candidates for the Executive Board must live in Brazil and:

a) have at least one of the work experiences mentioned below, and only the experiences mentioned in the same item will count toward the time required:

- ten years in the public or private sector, in the same industry as the Company or industry related to that in which they are nominated for a high-ranking position;

- four years as an Officer, Member of the Board of Directors, member of the audit committee or in high-ranking positions with companies of a similar size or sector as that of the Company, given that high-ranking position is understood to be at the two highest hierarchical levels of the company;
- four years in a temporary free appointment position or position of trust equivalent to level 4 or higher in mid- or high-level management positions (DAS) in domestic public administration agencies or entities;
- four years as a professor or researcher at a university or college in a field relevant to the sector in which the state-owned company operates;
- four years as self-employed worker engaged in an activity related to the business of the Company; or
- ten years as an active employee of CAIXA or the Company (through competitive examinations) and, in one of the companies, have occupied a senior management position, demonstrating their ability to assume the responsibilities of the mandate; and

b) have occupied in the last ten (10) years:
- for at least two (2) years, positions specifically provided for in the bylaws or senior management positions in Conglomerate CAIXA or in companies licensed to operate by SUSEP, ANS, BACEN or CVM, given that senior management position is understood to be at the two highest hierarchical levels of said company; or
- for at least four years, important positions in public administration agencies or entities, given that important position is understood as a free appointment position or position of trust equivalent to DAS-4 or higher.

7.6.3 In addition to the general eligibility requirements, Candidates for the Supervisory Board must live in Brazil and must have occupied for at least three years the positions enumerated below, considering that only the experiences mentioned in the same item will count toward the minimum time required, provided that they relate to different periods:

a) a management or advisory position in direct or indirect public administration; or

b) a member of the supervisory board or director or officer of a company;

7.6.4 Candidates nominated by the federal government for the Supervisory Board must be permanent federal employees in the public administration.

7.6.5 In addition to the general eligibility requirements, Candidates for the Audit Committee should preferably live in Brazil and are required to have work experience and university degree in a field relevant to the position, preferably in accounting, audit or the sector in which the Company has its business. The following requirements also apply:

a) at least one member of the Audit Committee must have accounting or financial expertise, i.e. must have the following attributes:
   - an understanding of generally accepted accounting principles and financial statements;
the ability to assess the application of such principles in connection with the accounting for estimates, accruals and reserves;

- experience preparing, auditing, analyzing or evaluating financial statements that present a breadth and level of complexity comparable to the Company’s financial statements;

- professional qualification compatible with the duties of the Audit Committee; and

- an understanding of internal controls and procedures for financial reporting.

b) at least one member of the Audit Committee must have specifically experience and an appropriate level of expertise relevant to the sector in which Caixa Seguridade operates (insurance, premium bonds, private pension, health and dental plans, brokerage, among others); and

c) one member of the Audit Committee must also be an independent member of the Board of Directors of the Company.

7.6.6 Whenever it is necessary to set new requirements in addition to those already imposed by applicable legislation for members of the Board of Directors and the Supervisory Board, such requirements shall be submitted to stockholders for approval at the General Meeting for subsequent inclusion in this Policy.

7.7 General prohibitions

7.7.2 In addition to the persons who are ineligible, illiterate or disqualified by law and other applicable rules, the following persons shall not be elected or continue to serve on the bodies created under the Company’s bylaws:

a) those who have been disqualified by CVM and/or for management positions in entities licensed to operate by SUSEP, CVM, BACEN or in other entities subject to the license, control and oversight of direct and indirect public administration agencies and entities, including private pension entities, insurance companies, premium bond companies and publicly traded companies;

b) those who are defending themselves or as a controlling shareholder or manager of the legal entity from protests of bills, debt collection lawsuits, issue of non-sufficient funds check, non-payment of obligations and other similar events or circumstances;

c) those who have been declared bankrupt or insolvent;

d) those who held control or participated in the management of a company in court-ordered reorganization, bankruptcy or insolvency proceedings five years prior to the date of election or appointment, except if acting as trustee, receiver or manager appointed by a court;
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e) a partner, ascendant, descendant or collateral relative or relative by affinity within the third degree, of a member of the Board of Directors, the Executive Board and the Supervisory Board of the Company;

f) those who are in debt to the Company, its Subsidiaries or its parent company and/or political and administrative entity to which it is related, or who have caused losses to them that have not yet been recovered;

g) those who hold a controlling or majority interest in a company in debt with the entities mentioned in the preceding item or who have caused them losses that have not yet been recovered, as well as those who have occupied management positions in a company in said situation in the fiscal year immediately prior to the date of election or appointment;

h) those who have been convicted in a final decision for any bankruptcy crime; tax evasion; crimes against public administration (malfeasance in office, active or passive bribery, extortion, embezzlement) and public assets; against popular economy; against public faith; against property; against the National Financial System; against the capital markets; against the environment and public health; election crimes for which the law determines sentence of imprisonment; abuse of authority punished with removal from office or disqualification from holding a public office or position of public employment; laundering or concealment of property, assets and money; trafficking narcotics and other drugs; racism, torture, terrorism and hideous crime; reduction to a condition analogous to slavery; crimes against life and sexual dignity; and crimes committed by criminal organization, gang or band; and any criminal offense that prohibits, even if temporarily, access to public office; and

i) any person who has a conjugal relationship, common-law partnership or is related within the second degree to:
   - an Officer or Member of the Board of the Directors of the Company;
   - an Officer or Member of the Board of the Directors of Companies directly or indirectly controlled by the Company; or
   - an Officer or Director of CAIXA (Executive Officer, Vice Chairman, Chairman or Member of the Board of Directors) or the federal government (Secretaries of State, Ministries of State, President and Vice President of the Republic).

7.7.3 It is prohibited to nominate a person having interests conflicting with the interests of the Company or holding a position in companies that can be considered competitors of the Company, especially on advisory boards, board of directors or supervisory boards.

7.7.3.1 The General Meeting can exempt the Candidates for the Board of Directors, the Supervisory Board and the Audit Committee from the above prohibition.
7.7.4 The members of the direct or indirect public administration are prohibited from paid participation in more than two bodies of a state-owned company, including the Board of Directors, the Supervisory Board and the Audit Committee.

7.8 Specific prohibitions

7.8.2 The following persons and the person’s relatives within the third degree by consanguinity or affinity are ineligible to be a member of the Board of Directors, the Executive Board, the Supervisory Board and the Audit Committee of the Company:

a) a representative of the regulatory body of the state-owned company;

b) a Federal Ministry, State Secretary and Municipal Secretary;

c) a holder, including retired civil servant or government employee, of a free appointment position (special or mid- and high-level management positions) in the direct or indirect federal public administration (foundations and independent agencies) on a temporary work assignment;

d) a leader of a political party and a member of the legislative branch of any state, even if on leave;

e) a person who has participated, in the last thirty-six months, in the decision making of a political party;

f) a person who has worked, in the last thirty-six months, on organizing, structuring and implementing an electoral campaign;

g) a person holding an officer or staff position in a union;

h) an individual who has entered into an agreement or partnership as supplier or buyer, offeree or offeror, of goods or services of any nature, with the federal government, the Company or a state-owned company of its state-owned conglomerate, three years prior to the date of his or her appointment; and

i) a person who has or may have any conflict of interest with the political and administrative controlling entity of the state-owned company or with the company.

7.8.3 Any person who falls within any of the ineligibility conditions set forth in item I of the introductory paragraph of article 1 of Complementary Law 64 of May 18, 1990 is ineligible for appointment as a member of the Board of Directors, the Executive Board, the Supervisory Board and the Audit Committee of the Company.

7.8.4 The following persons may not be appointed for the Supervisory Board:

a) any person who is or has been, in the last twenty-four months, an Officer or Director of the Company or its Subsidiary; and
b) an employee of the Company or its Subsidiary or the same group, or a spouse or relative within the third degree of an Officer or Director of the Company.

7.8.5 A person may not be appointed for the Audit Committee if she or he is, or has been, within twelve months prior to her or his appointment:

a) an Officer, Employee or member of the Supervisory Board of the Company or its parent company, direct or indirect Subsidiary, associate or joint venture. The prohibition extends to the spouse or any relative within the second degree by consanguinity or affinity or adoption of these persons;

b) an accountant, officer, manager, supervisor or any other member serving as manager of the team involved in the audit work of the Company. The prohibition extends to the spouse or any relative within the second degree by consanguinity or affinity or adoption of these persons;

c) a holder of a public office, even if on leave, or of a free appointment position in a public administration agency or entity that has a controlling interest in the public or semi-public company. The prohibition extends to the employee of an independent agency or foundation having jurisdiction over the business of Caixa Seguridade.

7.8.6 The majority of the members of the Audit Committee must meet the independence requirements of CVM, and must not:

a) serve or have served within the five years prior to their appointment:
   ▪ as an officer or employee of Caixa Seguridade, its direct or indirect controlling entities, direct or indirect subsidiaries, associates or joint ventures; or
   ▪ as a person responsible for the team involved in the audit work of Caixa Seguridade;

b) the spouse, relative by lineal or collateral consanguinity within the third degree and by affinity within the second degree of the persons mentioned in item a.

7.8.7 The roles of CEO and Chairman of the Board of Directors of the Company may not be held by the same person to avoid concentration of power and not to compromise the Board’s duty to oversee the CEO and other senior management.

7.8.8 The Officers, members of the Supervisory Board and of the Board Committees of Caixa Seguridade may serve on at most three (3) Boards or Committees at the Company and its Investees.

7.9 Reappointments must follow the provisions of this Policy.

7.10 Directors and Officers and members of the Supervisory Board who do not participate in the annual training provided by the Company in the last two (2) years are not eligible for reappointment.
8 Periodic Review

8.1 This Policy will be revised whenever necessary in order to ensure that it remains relevant and appropriate to the nature, complexity and risks compatible with the Company’s business objectives and Corporate Governance.

9 Responsibilities

9.1 General Meeting

- Decide on the candidate proposed for election for the Board of Directors and the Supervisory Board, after the Eligibility Committee having expressed its opinion pursuant to the Bylaws.

9.2 Audit Committee

- Analyze the skills and characteristics of the head of Internal Audit and the risk, internal control and compliance officer appointed by the Board of Directors. The analysis must be made following the rule of the parent company CAIXA.

9.3 Board of Directors

- Decide on the candidates proposed for election as head of Internal Audit and risk, internal control and compliance officer of the Company, pursuant to the rules of the parent company CAIXA.
- Decide on the candidate nominated for the Executive Board and the Board Committees, after the Eligibility Committee having expressed its opinion pursuant to the Bylaws.

9.4 Eligibility Committee

- Give its opinion about whether the Candidates meet the requirements established by law, bylaws, rules and regulations for the positions to which they are nominated, and that there no grounds for their ineligibility or disqualification under law, bylaws, applicable rules and regulations, in order to assist the competent governance bodies in the election of the members of the Executive Board, the Board of Directors, the Supervisory Board and the Board Committees of the Company.

9.5 Strategic and Corporate Governance Office

- Monitor good practices of Corporate Governance in the market in order to evaluate whether this Policy needs to be updated.
- Coordinate the nomination process.