

AUSTRAL



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CODE OF ETHICS AND CONDUCT

AUSTRAL GROUP

Dear Employee,

Austral Group was created based on principles and values that we consider valuable and that reflect our culture and the way we conduct our relationships.

Based on these principles and values, we have drawn up this Code of Ethics and Conduct, which applies to all Austral employees, regardless of hierarchical level, service providers, shareholders and/or other interested parties. All the guidelines and themes contained herein should be widely known and practiced by everyone, as well as transmitted to our clients and other partners. Carrying out our activities in accordance with the ethical principles and rules presented in this Code of Ethics and Conduct seeks to enhance and guarantee Austral's image and reputation, which is a valuable asset. It is through each person's practice and behavior that we play the role of multipliers of our ethical and professional principles, as well as influencing the way Austral is perceived.

This Code of Ethics and Conduct is not intended to exhaust all practices or principles of conduct, but rather to serve as a source of the Austral Group's guiding values and principles, conveying the guidelines that have shaped our culture. This document does not cover all existing standards, rules or policies applicable to the Company and should not replace the duty of employees to seek additional guidance when necessary.

We recommend that all of you take a time to get to know and assimilate the contents of this Code. Your effective personal identity with our corporate culture is a key success factor for the organization to ensure ethics and integrity as central elements in all our relationships and activities. We are all responsible for applying it in our daily working lives, from our managers to our trainees.

If you have any questions or suggestions about the topics described here, you can contact your manager, any member of the Governance, Risks and Compliance team, any member of the Ethics Committee or the communication channels provided here.

AUSTRAL

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AUSTRAL GROUP VALUES

The Austral Holding Group manages companies in the Brazilian insurance and reinsurance market for entrepreneurs and investors seeking innovation, experience, agility and consistent financial results in a **horizontal, creative, transparent and secure** manner, guaranteeing the unity of skills and knowledge together with autonomy and independence of action, driving the growth of companies and the transformation of the segment in Brazil.

Our non-negotiable principles:

- **Horizontality** - We invest in partnership relationships, with respectful and equal communication. We recognize the equity of knowledge and practices and encourage frank conversations and simple, genuine relationships.
- **Innovation** - We maintain our orientation towards the new, we are always in line with the future. We encourage creativity and intelligence within our companies, in their processes, relationships and product development.
- **Transparency** - We act with ethics, clarity and organization in complying with rules and regulations and in managing the information of all our companies, sharing what is due and preserving the independence and confidentiality of their businesses.

AUSTRAL INSURANCE

It provides solutions for corporate risks, with the aim of increasing the sense of security of the people with whom we interact, simplifying interactions and creating the best solutions side by side. We are more than an insurance company:

- We are **Strategy**: commitment to your business.
- We are **People**: a team of specialists...
- We are **Flexibility**: your way.
- We are **Agility**: on time.

AUSTRAL REINSURANCE

A Brazilian reinsurer that spares no effort to find solutions to all kinds of challenges faced by our clients in Brazil and Latin America, always with:

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

AUSTRAL GROUP ETHICS AND CONDUCT COMMITTEE

In order to ensure compliance with ethical and conduct standards, the Ethics and Conduct Committee was created, a collegiate body subordinate to the Company's Board of Directors, in accordance with the regulations established and approved by the relevant authorities.

The Ethics and Conduct Committee will be responsible for impartially examining and deciding on any and all incidents of violations of this code, through the channel comitedeetica@australholding.com. These channels may also be used for questions, suggestions, advice, complaints or criticisms about this Code.

In the event of complaints made through the Austral Group's Whistleblowing Channel(www.contatoseguro.com.br/austral or 0800-800 8404), which is available on our website to all employees, clients and partners, the committee will monitor the process and decide on the measures to be taken, guaranteeing the complainant anonymity and non-retaliation.

The Austral Group's whistleblowing channel is managed by a service provider in an environment separate from our infrastructure and follows segregated access rules to maintain anonymity and avoid conflicts of interest in the handling of complaints. Investigations conducted by the Ethics and Conduct Committee must follow the provisions of the Committee's own internal regulations.

The Ethics and Conduct Committee will also be responsible for periodically reviewing this Code of Ethics and Conduct, seeking its constant improvement and proposing such changes to the Board of Directors for approval.

ETHICAL STANDARDS AND CONDUCT

CONFLICT OF INTEREST

- The Company's resources, goods and services shall be used exclusively to serve the interests of the Austral Group.
- Conflicts of interest usually occur when an employee uses his or her position or relationship in the company to gain an undue advantage, directly or indirectly, or is guided by personal interests that conflict with the interests or what is best for the Austral Group.
- The Employee must inform a member of the Governance, Risks and Compliance area or the Ethics and Conduct Committee when any particular activity may interfere or conflict with the Company's interests, clarifying its nature and extent. The Committee will ultimately make the final decision on the possible conflict.
- If the possible conflict is reported to any person who is not a member of the Ethics and Conduct Committee, the latter must report the situation to the Committee in good time.
- External professional activities are only allowed when they do not harm the Employee's activity in the Company, do not involve the use of information, resources, time or knowledge owned by the Austral Group and are not perceived as a conflict of interest. In the case of employees who hold positions of trust, given the nature of their activities, they undertake to dedicate themselves exclusively to the Company, and are prohibited from taking on other professional activities of any kind, except in cases brought to a decision and expressly authorized by the Ethics and Conduct Committee.
- Employees who wish to serve as members of the board of directors of other companies or institutions must inform the Ethics and Conduct Committee of their interest. If one of the Committee members is interested, the matter should be referred directly to the Board of Directors.

- First-degree relatives (father, mother, children, siblings and spouses) of our employees may not be hired. In exceptional situations, this rule may be relaxed, taking into account hiring needs. The assessment of this flexibility will be made by the Ethics and Conduct Committee and, in the case of an employee with influence, i.e. holding a position of trust, it will be taken to the Board of Directors, with the appropriate support provided by the Ethics and Conduct Committee.

- The negotiation of contracts on behalf of the Austral Group with individuals or persons with whom one of the Collaborators is related or has an intimate relationship must be taken to the Ethics and Conduct Committee for evaluation, ensuring that there is no conflict or harm in the relationship to be established. It is worth noting that all contracts must follow the principle of fair competition, market conditions and internal contracting rules.

- Employees are not allowed to sell products, services, values and/or facilities not related to the Austral Group's business on its premises.

- As of August 18, 2014, Austral Group directors and employees may not: (i) acquire new shares of any insurance companies and/or reinsurers that operate or not in the same lines of business as the companies of the Austral Group ("Competitors"), whether the Competitors are closed or publicly-held companies; and/or (ii) acquire shares of funds whose operating guidelines are directed towards investments in shares that fall under item "(i)" above.

- Employees must not, in the performance of their duties, offer or accept any gifts, gratuities, presents, trips or favors of any kind, and these restrictions do not apply to institutional gifts of insignificant value, understood as those of less than R\$ 600.00 (six hundred reais), within a period of one year to the same beneficiary, provided that they are not offered or accepted by public officials or members of law firms. Even in cases where the value is less than the above, it should be assessed whether the gift, gratuity, etc. exerts or attempts to exert a significant influence on the decision of the recipient. If you have any questions, you should contact a member of the Governance, Risks and Compliance department or the Ethics and Conduct Committee.

- Social invitations that are considered customary, reasonable and appropriate in the business circumstances in question (such as a lunch, dinner or artistic event) can be offered and accepted as long as they do not mean or could mean significant influence on the decision of whoever is the beneficiary.
- Employees must refuse offers or gifts that could clearly jeopardize their impartiality in the regular exercise of their professional activities, regardless of the amount or the occasion.
- If it is not convenient to refuse the gift, always in defense of the Company's best interests, the Employee must send it to the Ethics and Conduct Committee, for raffles or donation to charities.

PUBLIC SERVANT RELATIONS

- **Public agents** are: (i) politicians and advisors; (ii) members of public companies; (iii) members of mixed-capital companies; (iv) members of regulatory bodies; (v) members of municipalities and other government entities; and (vi) diplomats.
- Employees of the Austral Group must ensure that another employee of the Company is present when meetings or hearings are held with public officials.
- **OBS:** For the purposes of this guideline, meetings or hearings of working groups and/or sectoral thematic meetings involving SUSEP employees are not understood. Any training or other situations not provided for here must be analyzed by the Governance, Risks and Compliance area.
- Employees of the Austral Group are prohibited from authorizing or offering gifts, gratuities or non-business-related entertainment, even if of a symbolic nature, to public officials to whom Austral is seeking to sell or is selling goods or services, or with whom it has a relationship aimed at regulating or supervising or drafting public policies of general interest, without prior consultation with the Ethics and Conduct Committee.

- No form of payment or any other benefit may be offered to an authority or civil servant of the direct or indirect public administration in exchange for advantages.
- Austral's Group People & Management department, in the event of hiring a former federal, state and/or municipal civil servant who has occupied the hierarchical levels provided for in article 2 of Law 12.813/13 (provides for conflict of interest in the exercise of office of the Federal Executive Branch and subsequent impediments to the exercise of office), will observe the 6 (six) month quarantine period provided for in item II of article 6 of Law 12.813/13, when applicable.

ILLEGAL OR NON-COMPLIANT ACTIONS

- The Austral Group has a duty to comply with all applicable laws and regulations aimed at preventing criminals from using the financial system to finance terrorist and criminal activities, in order to ensure that its program to prevent money laundering or fraud practices satisfies legal requirements and that all employees and business partners fully comply with the laws and regulations aimed at combating money laundering and terrorist financing, fraud, drug trafficking and other criminal activities.
- The Austral Group is against any form of corruption, direct or indirect, and prohibits the payment of bribes, kickbacks or benefits to any person, public body (including political parties and candidates for political office) or private party by an employee, third party or service provider.
- Therefore, under no circumstances may an Employee knowingly facilitate or participate in any suspected or obvious money laundering, fraud or terrorist financing activity. Employees who act in this way will be subject to the appropriate measures and should be referred to the competent authorities and regulatory bodies for possible civil and criminal penalties. Employees who have any doubts about their duties, responsibilities or obligations under the Company's anti-money laundering program should contact the Governance, Risks and Compliance area or the Ethics and Conduct Committee.

- All allegations of fraud, theft, robbery or other criminal activity will be promptly investigated with the involvement of members designated by the Ethics and Conduct Committee. The latter is responsible for examining the matter and determining the necessary corrective measures and legal procedures, as well as recommending the appropriate internal measures to be applied to the Employees involved.
- The Austral Group's employees undertake not to commit any acts harmful to the public administration, paying attention to and complying with all the laws and regulations that deal with the subject, especially the rules set out in Anti-Corruption Law No. 12,846/13.
- Any Employee who knows or has reason to believe that an applicable law, rule or regulation is being violated must immediately notify the Ethics and Conduct Committee or any member thereof, either directly or via the Austral Group's Whistleblowing Channel.
- Failure to act in the face of a known violation of the law or any provision of this Code of Conduct is not correct and constitutes a violation of this Code.
- Internal Audit, with the support of the Ethics and Conduct Committee, is the only body authorized to carry out internal investigations or investigations into business partners. The Governance, Risks and Compliance area will monitor the progress of ongoing investigations in order to monitor and manage the company's compliance risk and, where necessary, implement changes and improvements to the integrity program to mitigate this risk.
- All Employees have a duty to cooperate fully with any internal investigation conducted within the Austral Group.
- If an Employee suspects that a fraudulent act or fact, theft or robbery, or any other criminal act has taken place, he or she must report it immediately via the Company's Whistleblowing

Channel(www.contatoseguro.com.br/austral or 0800-800 8404) or by contacting the Ethics and Conduct Committee(comitedeetica@austraholding.com).

PARTY POLITICAL INVOLVEMENT

- The Austral Group is not responsible for any donations that its Employees choose to make in favor of electoral campaigns, and under no circumstances will the political-party choices made by Employees represent the opinion of the Company. The practice of political campaigns or partisan demonstrations on the company's premises is prohibited.

- Voting and joining political parties is a choice for each employee and cannot be induced in any way by superiors or work colleagues. Furthermore, an employee's professional situation may not be influenced, harmed or favored because of their political party choice. It is worth noting that if an employee wants to run for office or is publicly involved in a candidacy, he or she must ask to be dismissed beforehand.

INTELLECTUAL PROPERTY

- Violation of the rights of any person protected by copyright or confidentiality, trade secret, patent or other intellectual property right or similar laws and regulations is not permitted.

- All inventions, data or improvements arising from the activities associated with the employment contract that occur during the term of the contract and after its termination, for an indefinite period, are the property of the Austral Group.

- Inventions or improvements, even if not arising from the activities associated with the Employee's employment contract, which have been developed using resources, data, means, materials, facilities or equipment of the Austral Group, are the exclusive property of the Austral Group.

- No one is authorized to use the name or brands of the Austral Group in publications, brochures, advertisements and other vehicles without prior approval from the Company. Approval will be based on the analysis of a request for authorization to use the trademark made to the Board of Directors responsible for the marketing area or the Chief Executive Officers, with the adoption of the appropriate measures.

WORKING ENVIRONMENT

- Relationships at work must be guided by trust, honesty, integrity, impartiality and mutual respect.
- We treat our employees with respect, regardless of their hierarchical position.
- The search for conciliation between the interests of the Austral Group and the Collaborator must take place, as a priority, through dialog.
- Sexual and/or moral harassment of any kind will not be tolerated, which includes any verbal or physical conduct that humiliates, coerces or threatens employees or contractors, managers or trainees.
- It is forbidden to use Austral's Group internet, intranet and/or e-mail system to send or receive discriminatory or harassing messages, chain letters, obscene or distasteful material, commercial solicitations that in any other way violate this Code of Conduct. All messages sent or received by these means are the property of Austral Group, which has the right to verify and use them.
- The Austral Group values maintaining a healthy working environment that fosters individual performance and employee satisfaction. Transparency in relations is fundamental.
- The Austral Group does not accept the use of forced, compulsory or child labor or any other form of exploitation that attacks human dignity inside or outside the company. For this reason, it

incorporates the Universal Declaration of Human Rights of the United Nations (UN) and the Statute of the Child and Adolescent into its principles and actions.

- The Austral Group does not accept any form of discrimination related to race, age, sex, color, national origin, religion, physical or mental disability and/or any other classification protected by law, including in recruitment and selection processes, training, remuneration, promotion, dismissal, transfer or any other factors related to professional performance.
- Any employee who in any way believes that he or she has suffered any type of prejudice or discrimination by any other employee or business partner of the Austral Group, or who becomes aware of any case involving Austral Group employees in cases of prejudice or discrimination, must immediately report this fact to the Ethics and Conduct Committee, either directly or via the Austral Group's Whistleblowing Channel.

CUSTOMER FOCUS

- The commitment to customer satisfaction must be reflected in respect for their rights and in the search for solutions that meet their needs, in line with the strategic objectives of the Austral Group.
- All our customers will be listened to carefully, their questions answered and their requests and suggestions dealt with appropriately. Employees must attend to clients promptly, courteously and efficiently, offering accurate and transparent information, always conveying security and credibility.
- Preferential treatment of any client based on personal criteria that are not in line with Austral's Group objectives is not permitted.
- All customers must be treated with respect, on an equal basis, without discrimination of any kind, be it related to race, age, gender, color, nationality, religion, sexual orientation, physical disability, etc.

- It is recommended that employees who deal with commercial activities pay attention to whether the product fits the customer's profile, including being transparent about non-fitting, when applicable. At the time of marketing, Austral's employees and service providers must act in good faith and provide quality information in a clear and transparent manner regarding the characteristics, limits, risks and particularities of using the products marketed by the Company.

PRESS AND MEDIA RELATIONS, INCLUDING SOCIAL MEDIA

- Austral's Group relationship with the press is based on trust and mutual respect. By disseminating information to the media, the Austral Group seeks to give visibility to actions related to its activities, with the aim of strengthening its institutional and corporate image.

- Only the Chief Executive Officers and the Investor Relations Officer, or persons expressly appointed by them, are responsible for speaking on behalf of the Austral Group. Other employees, if necessary, should request authorization from those responsible and only speak up after proper guidance.

- Employees invited to give speeches, lectures, or publish articles that contain topics related to the Austral Group or cite Austral's name as a reference must previously submit their text to the Investor Relations sector or the Company's Marketing area, which must be aligned.

- Employees are also forbidden to publish anything on behalf of the Austral Group on social networks, other than by the Company's Marketing department, without prior and express authorization from the Ethics and Conduct Committee. Employees are also prohibited from: (i) postings about clients or Austral Group businesses; (ii) responding to client demands or creating pages and profiles on social networks on behalf of the Austral Group; (iii) defamation, slander, libel, harassment and discrimination against the Austral Group, co-workers and other Employees; (iv) access to websites not permitted by the Austral Group during working hours; and (v) the use, without due authorization, of logos, *slogans*, "mascots" and everything that may make up the visual identity of the Austral Group.

RELATIONSHIPS WITH SUPPLIERS AND BUSINESS PARTNERS

- Hiring suppliers and business partners must always be based on technical, professional and ethical criteria and on the needs of the Austral Group.-processes, such as price quotations from at least 3 (three) competing suppliers, which guarantee the choice of the best cost-benefit ratio.
- All employees must respect the contractual and commercial conditions and safeguard the confidentiality of the information established between the Austral Group and its suppliers and business partners, and the latter are also obliged to ensure the conditions of mutual trust in terms of confidentiality and contractual guarantees, under penalty of breaking off commercial relations.
- Business partners and suppliers contracted by the Austral Group must comply with all current legislation, including labor, tax and environmental laws, and may not in any way exploit child or slave labor.
- All suppliers and business partners must conduct themselves in accordance with the principles expressed in this Code of Conduct. At any time, a supplier or business partner who fails to meet these requirements may be disqualified.

RELATIONSHIP WITH COMPETITORS

- The competitiveness of the products marketed by the Austral Group must be exercised on the basis of the principle of free competition.
- No comments should be made that could affect the image of competitors or contribute to spreading rumors about them, and the competitor should be treated with the respect with which Austral expects to be treated.
- It is expressly forbidden to provide strategic, confidential or, in any way, harmful information to the Austral Group's business to any third party, including, but not limited to, competitors, even after the termination of the Employee's relationship with the Austral Group.

- With regard to relationships with competitors, all employees must ensure that they do not enter into any agreements, explicit or otherwise, which could directly or indirectly mean or influence the setting of prices, discounts, sales conditions, the allocation of markets or customers, as well as other measures which undermine the principle of free competition.

WORK SAFETY

- The laws and regulations relating to the safety of installations and work must be strictly observed. The decisions taken by the Austral Group must take into account the risks to safety and the environment.

- No emergency or urgent situation justifies non-compliance with safety rules and laws, putting people or the Austral Group's assets at risk.

- Failure to comply with occupational safety rules is considered serious misconduct and the offending employee will be subject to the penalties provided for by law.

ENVIRONMENT

- The Austral Group respects Brazilian environmental legislation and supports initiatives and activities aimed at the sustainable development of the country.

- The Austral Group believes in the importance of sustainable actions for the conservation of natural resources and the preservation of the planet.

- Employees must conduct their activities and projects with respect for the environment, in a responsible manner, following health rules and regulations so as not to damage the natural environmental balance.

- The Austral Group seeks and encourages its employees to seek sustainable solutions for their activities.
- The Austral Group has a policy of restricting business that should not be carried out by us, given its potentially harmful nature to the environment, to society and consequently to our reputation.

CONFIDENTIALITY OF INFORMATION

- No Employee shall use, for their own benefit, for the benefit of their family or for the benefit of third parties, any information relating to the Austral Group obtained by themselves or by third parties, even if it has passed, without permission, into the public domain even after the termination of their relationship with the Austral Group.
- No Employee may disclose Austral Group secrets or restricted or confidential information to other Employees or third parties, except when they need access to such information as a result of carrying out their professional activities.
- It is the responsibility of all Austral Group employees to protect and keep confidential relevant or privileged information that has not yet been disclosed to the market, and not to use it for their own benefit or for the benefit of others, in compliance with the Austral Group's internal policies and applicable legislation and regulations.
- The necessary precautions must be taken during public discussions or informal conversations so that information restricted to the Company is not inadvertently disclosed.
- All information and data circulating, produced or maintained in our environment is the exclusive property of the Company and must be used solely in the interests of the Austral Group.
- All personal or sensitive personal data circulated within the Company's environment, in view of the applicable legislation, has a legal purpose and is stored and processed taking into account the

principles of information security. Under no circumstances should this data be used by Employees for personal purposes or disclosed to third parties without due cause.

- Documents, electronic files, *software* and other media containing restricted or confidential information of the Austral Group must be used and disposed of with care, so as to avoid their inadvertent disclosure.
- It is not permitted to cause or admit breaches of the security of the Company's technology network, always seeking to avoid identifying the user or the security of any computer, computer network, application or other technology and/or revealing their password to others allowing them to use it. The use of *software* not authorized by the IT department on the data network or computer is also prohibited.

USE OF AUSTRAL GROUP RESOURCES

- It is not permitted to use or negotiate with Austral's Group financial resources for one's own benefit or for the benefit of third parties. The Employees responsible must ensure that commercial and financial operations are in order.
- The Austral Group's assets may not be used to obtain personal advantages or used by third parties for any purpose.
- The removal of Austral's property from its premises or the use of its services must always be done with the prior authorization of the responsible manager. *Laptops*, cell phones and/or other equipment must be used for work in an appropriate and safe manner, within the respective established guidelines;
- The rendering of accounts for authorized expenses (e.g. advances and/or travel expenses, fixed funds, etc.) incurred in the service of the Austral Group must be precise and substantiated within the established rules and deadlines, in accordance with current policies.

PROHIBITION OF RETALIATION

- The Company prohibits retaliation against an Employee who reports an activity that he or she believes, in good faith, to be a violation of any law, rule, regulation or provision of this Code of Conduct.
- Retaliation or reprisal against Employees is a violation of this Code of Conduct. Any Employee who believes that he or she is the object of any form of retaliation must report this fact to the Ethics and Conduct Committee, either directly or via the Austral Group's Whistleblowing Channel.

TRAINING AND COMPLIANCE

The Austral Group believes that, in order for the duties of this Code of Conduct to be fulfilled, it is essential that all Employees are aware of this Code and understand the rules on which it is based.

In this sense, it is the duty of the Company's Management and the Austral Group's Ethics and Conduct Committee to set an example and promote the dissemination of the principles, values and provisions of this Code of Conduct, as well as the applicable laws and regulations and all other rules whose knowledge is relevant to the ethical, solid and consistent performance of the Austral Group's image and mission.

It must be ensured that periodic training sessions are held to disseminate and keep employees up to date on the content of this Code, as well as the importance of observing it and complying with its provisions.

All Employees must reaffirm their compliance with this Code by signing the Commitment Form attached to this Code, which must be forwarded to the Governance, Risks and Compliance area upon joining the Group.

Finally, the updated version of this document will be made available for timely access by all company employees via a shared folder.

NON-COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

- It is the responsibility of all employees to be aware of the contents of this Code of Ethics and Conduct. In this way, any violation of any of the provisions may result in sanctions, which may even result in the dismissal of the Employee and the filing of legal actions.

- In the case of service providers and suppliers, failure to comply with this Code of Conduct may result in immediate suspension of the respective contract and, as the case may be, legal proceedings.

- All employees, clients and business partners of the Austral Group have the right and duty to immediately report, as appropriate, any violation of the provisions of this Code of Conduct. Austral Group has a Whistleblowing Channel for this purpose.

- For Employees, failure to report such a violation may result in the same penalties and sanctions as the offender, as mentioned in this Code of Conduct. To this end, Austral Group has made available the Whistleblowing Channel, which guarantees total anonymity.

- Any and all information regarding non-compliance with the provisions of this Code of Ethics and Conduct will be treated confidentially and no retaliation of any kind will be permitted.

- Any exception or exemption to the applicability of any provision herein may only be made with the express approval of the Ethics and Conduct Committee.

FINAL PROVISIONS

- The Austral Group is available to answer and resolve any questions, suggestions, complaints or criticisms about this Code, which can be sent to the e-mail address provided by the company (comitedeetica@australholding.com) or to any member of the Committee. If confidentiality is desired, such doubts, suggestions, complaints and criticisms may also be forwarded through the Austral Group's Whistleblowing Channel, with due anonymity guaranteed.
- This Code of Conduct represents basic principles that guide ethical relations within Austral and must be respected by all employees.
- The Company will not allow people to suffer any kind of retaliation, reproach or discrimination when they ensure compliance with this Code.
- Any cases not covered by this Code of Conduct shall be resolved by the Board of Directors, in accordance with the law, applicable regulations and the Bylaws. The Board of Directors shall resolve any existing doubts directly or through any of the Advisory Committees.

This Code of Conduct was approved by the Company's Board of Directors on , and will be reviewed every two years or whenever the Company deems it necessary, in order to keep it in line with the Company's other policies.

TERM OF KNOWLEDGE AND COMMITMENT

I, _____, holder of the Austral work registration number _____, declare that I have had access to the following documents in the "Austral Internal Processes" directory:

- (i) Austral Group's Code of Ethics and Conduct, with the aim of transmitting Austral's values and guidelines;
- (ii) Policies of common interest to all employees, which govern the Company's guidelines regarding the topics listed in Annex I of this term; and
- (iii) Specific Training on Combating Fraud and Money Laundering, in compliance with the obligations set out in the rules of the Private Insurance Superintendence - SUSEP.

I undertake to comply with them in full, to inform other employees of any non-compliance and, if in doubt, to consult my superiors or the Board of Directors, as well as to keep up to date with any changes to them.

I read and understood,

_____ of _____ of _____.

Employee Signature

TERM OF KNOWLEDGE AND COMMITMENT - ANNEX I

- (i) Sustainability Policy
- (ii) Information Security Policy
- (iii) Human Resources Policy
- (iv) Data Privacy Management Policy
- (iv) Business Continuity Management Policy
- (v) Internal Audit Policy
- (vi) Organization Policy
- (vii) Board Policy
- (viii) Internal Controls Policy Investment Policy
- (x) Risk Management Policy
- (xi) General Expenses Disbursement Policy
- (xii) Money Laundering Prevention Policy
- (xiii) Fraud Prevention Policy
- (xiv) Anti-corruption policy
- (xv) *Compliance* Policy
- (xvi) Refunds and Travel Policy
- (xvii) Regulatory Documentation Policy
- (xviii) Infrastructure Policy