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Dear reader,

We are aware of the importance of IRB(Re) in the country's economic context and its commitment to the well-being of society. Therefore, we value and prioritize ethics and integrity in all relationships and emphasize the importance of adopting actions based on our Essence, Purpose and Positioning.

Therefore, this Code of Conduct presents guidelines for employees' actions towards internal and external audiences, in order to guarantee the sustainability of the business, promote an environment of integrity, cordiality, respect, and commitment to our investors and shareholders.

These guidelines must be applied daily by subsidiaries and controlled companies of IRB(Re), and observed by partner companies or third parties, which carry out any activity representing or on behalf of IRB(Re).

We are all responsible for knowing the content of this Code of Conduct and complying with its guidelines, so that, together, we can promote a culture of integrity and fulfill the Company's Purpose.

Board of Directors.

OUR CODE OF CONDUCT

The Code of Conduct applies to IRB(Re) managers, workers (employees, trainees and young apprentices), members of advisory committees to the Board of Directors, suppliers, service providers, stakeholders, its branches and subsidiaries, and aims to guarantee a high standard of integrity in the Company's activities and establish conduct guidelines that must be followed by everyone.

Our Code of Conduct is approved by the Board of Directors of IRB(Re) and is in accordance with its articles of incorporation.

THE IRB(Re) WAY OF BEING

It has as its **Essence**

The transformation of its business and society through knowledge.

It adopts as its **Purpose**

Being the main agent to protect society's future.

And it has as its **Positioning**

To contribute to the development of society by putting our knowledge at its service, taking risks responsibly and anticipating solutions, in close collaboration with customers, business partners and other stakeholders. At all times relying on Innovation, Sustainability, Team Spirit, High Performance, Social Responsibility, Integrity and Flexibility.

This tripod, associated with integrity and the principles of good faith and transparency, is the basis for sustainable, profitable, long-term growth, which generates added value and guides the development of the Company's business and decision-making.

The guiding pillars of our **Business Vision** are:



1. BE A (RE)PRESENTATIVE OF ETHICS

1.1. Good Faith and Transparency

To be a (Re)presentative of Ethics at IRB(Re) we expect that the conduct of your activities follows the principles of good faith and transparency. Therefore, we highlight examples of what you can do in your daily life to express good faith:

- Do the right thing the right way!
- Be empathetic and inclusive, remember that respect and cordiality are reciprocal!
- Respect the uniqueness of others, let's create an environment without discrimination!
- Don't impose your beliefs and dogmas on colleagues, remember: impartiality is key to respectful connections!
- Practice active listening and responsible speaking!
- Collaborate with colleagues, be patient!
- Learn from your colleagues, they can also teach you valuable things!
- Share knowledge whenever you can!
- Give credit and support colleagues' achievements. It's a sign of professional maturity!
- Use properly the benefits granted, observing their regulations.

Furthermore, we highlight examples of conduct that may represent bad faith and will therefore not be tolerated in the workplace:

- Submission of half information, being imprecise and incomplete;
- Change the content of any document, information or data;
- Spreading gossip or information about the lives of colleagues;
- Discrimination, in all its forms;
- Retaliation against people who report possible illegal acts, misconduct, violations of current policies and legislation.

1.2. Personal and Professional Conduct

In addition to adopting the principles of good faith and transparency, to be an (Re)presentative of Ethics we must, additionally, observe attitudes that are fundamental in carrying out our duties:

- Be efficient, mitigating the possibility of errors, waste or delays in the provision of services;
- Avoid creating artificial difficulties with the aim of overvaluing our professional performance or hindering the performance of our colleagues;
- Seek self-development in conducting our training and career;
- Present yourself appropriately and with good posture, especially during meetings, including those held online, especially where the camera is on;
- Always wear headphones at online meetings to avoid leaking confidential information;
- Avoid holding scheduled meetings at workstations, so as not to impact the productivity of other employees and ensure that matters are restricted to interested parties.
- Contact your colleagues to discuss professional matters during the working hours set by the company, especially when working remotely;
- Take care of your conduct in public environments, especially when using a badge or items that identify the brand.
- Act with care and prudence, both in circumstances focused on professional activity and in situations of private life, thus preserving IRB(Re) reputation and your own career;

- Share any operational failure or error with your hierarchical superior and other agents who may be impacted, so that corrective measures are taken as soon as possible, thus mitigating further damage to the company, colleagues and/or our customers.



Dilemma in practice!

I prepare a monthly chart to demonstrate to the Statutory Board the performance of IRB(Re). In a given month, after the presentation, I identified that the data was not reflecting reality, as I made a mistake when tabulating the information. I was very apprehensive and reported the fact to my immediate manager so that corrective measures could be taken and further damage avoided.



Dilemma in practice!

I'm working remotely and to ensure the security of the information I'm wearing a headset, I don't let other people view my screen, and if I want to share any photos of my daily life, I only take photos of my moment, which could be a coffee or showing what my day is like or my location, for example, but always taking care that no IRB(Re) information appears in the photo.

1.3. Carrying Weapons, Illicit Drugs and Gambling in the Performance of Activities

To be a (Re)presentative of Ethics, it is important to adopt a good attitude at events held by the Company, on commemorative occasions, as well as at external events of business partners. Therefore, it is mandatory to use alcoholic beverages in moderation. If you are a (Re)representative under 18 years of age, the consumption of alcoholic beverages is prohibited, in accordance with current Brazilian legislation.

Remember that you will be (Re)presenting and acting as an extension of the image of IRB(Re), which vehemently repudiates the consumption or possession of illicit drugs, as it is an illegal practice in the company's headquarters country.

We do not allow the carrying of weapons of any kind on company premises, except in cases authorized by law.

Gambling on the Company's premises, with or without wagering, is expressly prohibited.

1.4. Financial Loans, Commercial Transactions and Collections

In order to maintain harmonious relationships in the work environment and comply with contractual obligations, the request and granting of financial loans within the Company, as well as the sale or exchange of goods of private interest, are prohibited.

We like to socialize and, to ensure that participation in collections to fund celebrations or donations is carried out on an optional and voluntary basis, we avoid disclosing the amounts donated by the participants. Furthermore, it is prohibited to retaliate or create embarrassing situations involving colleagues who do not want to participate in fundraising or donations. The decision is voluntary and these colleagues must be respected.

In order to avoid any correlation to the practice of bribery, we do not approach customers and/or suppliers for any kind of financial collection in any way.

Any charitable actions on IRB(Re)'s premises or that use the company's name must be non-profit and must be previously analyzed by the Marketing and Communication management.



Dilemma in practice!

My co-workers and I decided to give a gift to a colleague who will complete 10 years of service at the Company. As he is very dear to everyone, we started a voluntary collection to buy the gift. In order not to embarrass people who did not contribute or contributed with lower amounts, I made sure that the amounts donated and the list of donors were not disclosed.

2. INTEGRITY

2.1. Conflict of Interests

A conflict of interest occurs when personal interests or activities influence or seem to influence decision-making on behalf of IRB(Re), that is, when personal interests conflict with the interests of the Company, whether due to financial, social or political criteria.

A conflict of interest occurs when there is no independency in relation to the matter under discussion or, due to someone's position, kinship or private interest, which may somehow generate influence or decision-making motivated by interests other than those of the company.

When conflict situations arise or when we identify a potential conflict, we must be diligent and share the situation with our superiors so that, together, we can assess the need to abstain from the decision-making process.

We shall not use in any way titles, roles, position and influence of IRB(Re) with the intention of obtaining any favor for ourselves or for any other person, including our relatives: spouse, siblings, children, grandchildren, cousins, partner, parents, grandparents, uncles, nephews, in-laws (parents-in-law, daughter-in-law/son-in-law, siblings-in-law, stepmother/stepfather, stepchildren).

IRB(Re) does not allow obtaining undue personal advantages or any interference that could generate conflicting situations.

We share some examples of conflict of interest situations, to help identify cases like this in everyday life:

- Use or share confidential or privileged information to generate personal gain or gain for others, for example, to profit from the purchase and sale of IRB(Re) shares;
- Hiring a supplier, assignor, retrocessionaire or other business partner, whether friend or family member, under less favorable conditions for the company when compared to those practiced in the market by third parties with equivalent capacity;
- Entering into a contract companies that are owned by public agents or their family members with the intention of influencing the decisions of the public agent;
- Use IRB(Re) resources to meet particular interests.

2.2. Participation in external activities

We must be careful and not engage in private activities whose nature may be considered conflicting, such as shareholding in an insurance company, reinsurance company or insurance

or reinsurance brokerage company, except if there is an opinion of the Board of Directors to do so, pursuant to the provisions of the Articles of Incorporation of IRB(Re).

If we intend to carry out any external professional activity, considering here also the intention to run for or take on public office, we should reflect on some topics, as suggested below:

- Can this activity somehow compete with the business purposes of IRB(Re)?
- Can this activity interfere with the performance of my duties at IRB(Re), reducing my efficiency?
- Do I have all the physical, logical, human or financial resources necessary to not misuse the company's resources for private interests?
- Am I sure that this activity is in compliance with legislation and aligned with the ethical principles of IRB(Re)?
- Can I ensure that this activity will not affect my reputation or that of IRB(Re)?

After reflecting on these topics, to be a (Re)presentative of Ethics it is important to share them with your manager so that together, we can rule out the existence of any conflict, and then, we report it to the People Attraction and Development Management, so that it can record this parallel activity, ensuring full visibility of all external activities carried out by the Company's employees.

All of us must report to the People Attraction and Development Management the equity interests we hold, directly or indirectly, in operating companies, family holdings (except investments in companies through stock exchanges). In the case of a holding company that has interests in other companies, they must also be reported.

The Compliance Management can be consulted with to assess potential conflicts between the activities carried out.

In addition, we must inform about any administrative or judicial proceedings and/or investigations that we are involved in and that, due to the possible outcome, may result in damage to the image of IRB(Re).

2.3. Relatives, partners and spouses at IRB(Re)

We may appoint and/or hire relatives (by blood or affinity), of partners or spouses. However, in order to avoid any conflict of interest, we must report the kinship to the People Board, which will analyze the case together with the Compliance Management and, then, with the Statutory Board, prior to hiring.

Family or romantic relationships can occur within the company, as long as there is no hierarchical relationship and that the people involved work in different managements. However, we must report the fact to the immediate manager, the People Board, which will notify the Compliance Management, as soon as it begins. We must ensure the integrity of our reputation and eliminate any possibility of favoritism due to this relationship.



Dilemma in practice!

I am an employee at IRB(Re) and would like to appoint my brother-in-law to a vacant management position. Although the vacancy is in another board and does not generate a hierarchical relationship, I reported the fact to the People board, which will analyze the case together with the Compliance Management.

2.4. Souvenirs, Gifts and Hospitality

To be a (Re)presentative of Ethics, we must have clear concepts of Souvenirs, Gifts and Hospitality, so we can reflect on how to proceed in case of doubt regarding the refusal or acceptance of any of them.

- **Souvenirs:** items of modest value or with no commercial value distributed as a souvenir of the brand and/or as a compliment (e.g., notebooks, pens, calendars, among others).
- **Gifts:** any items with commercial value, received or offered, free of charge, from/to another individual (e.g., wines, baskets, box of chocolates or bonbons, panettone, cell phone accessories, among others).
- **Amenities:** concessions of discounts, costing or amenities received from or offered to another individual (ex.: congresses, fairs, training, qualification courses, workshops, concert tickets, theater, exhibitions, air tickets, transportation, accommodation, among others).

Any and all acts of granting or receiving souvenirs, gifts and hospitality must be carried out in an open and transparent manner, avoiding being directed directly to individuals and at all times being in compliance with the rules of conduct for business partners.

The limit values to be complied with when offering or receiving souvenirs, gifts and hospitality are as follows:

- Government entities/government agents: The value of R\$ 100.00 (one hundred reais) per year must not be exceeded.
- Private Companies The value of R\$ 500.00 (five hundred reais) per year must not be exceeded.

The criteria for offering/receiving souvenirs, gifts and hospitality are as follows:

- They must not be offered/received during the contractual negotiation period;
- They must not be offered/received less than every 12 months;
- Offer/receipt must not characterize as leisure or strictly personal, without relation to the employee's duties and area of activity.

Any grants offered for educational and employee development purposes do not fall within the financial limitation rule, due to their purpose, provided that the criteria indicated in the previous paragraph are complied with and reported for prior analysis by the Compliance Management, and subsequent recording in its controls.

The Compliance Management is responsible for managing the process of offering and receiving souvenirs, gifts and hospitality.

The offer or receipt of souvenirs, gifts and hospitality resulting from sponsorship actions must follow the provisions of the **Sponsorship Rules**.

All cases of offer or receipt of souvenirs, gifts and hospitality must be reported to the Compliance Management, via email: conformidade@irbre.com

The Compliance Management must be consulted with in case of doubts related to the offer or receipt of souvenirs, gifts and hospitality, via email: conformidade@irbre.com

Compliance management **must always be** notified so that the nature and frequency of souvenirs, gifts and hospitality received and/or offered can be verified, even if within the established values.

2.5. Fraud, Corruption and Money Laundering

The Company strongly prohibits any illegal or inappropriate practices against government or private entities. And, in a preventive manner, it establishes the **Anti-Fraud and Anti-Corruption Policy**, the **Anti-Money Laundering and Countering the Financing of Terrorism and Proliferation of Weapons of Mass Destruction Policy** and the **Integrity Program**, duly aligned with the provisions of applicable laws and regulations, as guiding instruments of our actions.

The organization has a Reporting Channel that allows employees or external people to report suspected fraud, corruption and/or money laundering, preserving their anonymity, if they prefer.

Being a (Re)presentative of Ethics means striving for the integrity of our actions in the performance of our activities, always being attentive to signs of illegal acts and complying with the best prevention practices described in internal regulations.



Dilemma in practice!

I am a reviewer of a certain activity and I am starting to notice some operating deviations, which could suggest fraud. As an IRB(Re) (Re)presentative of Ethics, I decided to report these suspicious activities in the reporting channel, so that they can be reported and investigated, even if there is a possibility that they are just common operating errors. I know that being silent in these moments could mean that I am participating in the fraud scheme, which is why I report everything I see that involves fraud, corruption or money laundering.

2.6. Diligence

IRB(Re) seeks to establish lasting partnerships and commercial relationships, based on mutual trust and respect, fostering a culture of Integrity.

It is through diligence that we ensure that our actions are guided by the principles of transparency, ethics, in search of sustainable growth for our organization and in compliance with applicable laws and regulations.

3. RELATIONSHIPS WITH STAKEHOLDERS

3.1. Shareholders and Investors

We value our shareholders and investors, which is why our strategy focusing on the good performance of our business is extremely important, always respecting transparency, trust and equity.

In this regard, we have a set of initiatives to provide this audience and stock market professionals with timely, reliable and complete information. We support the market for a correct evaluation of

the results and we keep the information about all the activities and performance of the Company up to date, through press releases, reports, meetings and information available on the institutional website dedicated to this public.

Information will be provided to investors and shareholders equally and simultaneously, regardless of the value of their investment or the number of shares they represent.

Notices and information to shareholders and stock market entities must be made exclusively by authorized employees and in accordance with internal rules and applicable legislation.

3.2. Public Sector

IRB(RE) determines that the relationship with public sector representatives is based on constitutional **principles**, the principle of good faith and transparency.

Our interactions with regulatory and supervisory bodies are always carried out with the participation of one or more representatives from the Compliance Management, in order to reinforce our commitment to transparency in our interactions.

3.3. Regulatory and Supervisory Bodies

Regulatory and supervisory bodies supervise our market, work to apply the rules and guidelines, ensure the safety, solvency and improvement of the reinsurance sector. They also provide for the need to implement compliance rules, in accordance with rules and legislation related to Anti-Corruption, Conflict of Interests, Fraud, Bribery, Money Laundering and Terrorism Financing, as well as SUSEP and CVM Resolutions and Circular Letters.

As a reinsurer and publicly traded company, IRB(Re) is regulated and supervised by the Private Insurance Superintendence - SUSEP and the Securities and Exchange Commission - CVM.

These bodies also provide for the need to establish practices based on standards and legislation related to Anti-Corruption, Fraud and Money Laundering and Terrorist Financing.

In our relationship with regulatory and supervisory bodies, we must:

- Providing information and documents, being absolutely transparent about our acts and actions;
- Keeping all required information in an organized and secure manner;
- Not destroy or render documents and confidential or relevant information that are important for the fulfillment of legal and administrative obligations useless;
- Meet deadlines and provide only reliable information;
- Cooperate fully and timely in any cases.

If there is any inappropriate request by any government agent from regulatory or supervisory bodies, with the aim of facilitating analyses, inspections, releases, immediately contact the Compliance Management, for alignment and guidance on the response.

3.4. Internal and External Customers

Our relationship with internal and external customers is based on respect, transparency and our way of being.

Therefore, we develop our activities aiming to continuously improve the product delivered to customers, whether internal or external, always responding with professionalism and agility.

All our clients are treated equally and fairly, without favoritism, at all times in a transparent manner, valuing the sustainability of the businesses developed by IRB(Re).

3.5. Suppliers

As IRB(Re) is committed to an ethical and honest stance, we expect the same from our suppliers, who must respect our code provisions and demonstrate the same commitment in relation to the practices adopted here. In this regard, we adopt impartial and transparent selection, hiring and evaluation criteria that allow for plurality and competition, at all times respecting impartiality and proportionality among suppliers. Additionally, suppliers are expected to state that they/their:

- have not received any adverse judgment by a government authority;
- do not maintain any type of relationship with the company's employees that may constitute a conflict of interest;
- do not carry out any operations that may be classified as illegal practices, such as fraud, money laundering or support for terrorism;
- do not use child and/or slave labor;
- activity adheres to regulations and/or environmental, social and governance (ESG) best practices.

Each contract manager is responsible for ensuring that the subject-matter of a contract is being fulfilled by the contracted supplier and has the duty to report, through the Reporting Channel, if they identify:

- Indications of illegal acts or non-compliance with the guidelines set out in this Code of Conduct or in Internal Policies.

In addition to the definitions in this Code of Conduct, we have a document called the **Brochure: Everything under (Re) Compliance** available on the IRB(Re) institutional website, a guide that must be read by all suppliers.



Dilemma in practice!

I have been working with the same consulting provider for over three years. During the contract renewal period, the supplier contacted me and, due to the length of work and good relationship, the vendor scheduled a meeting to discuss the new values for the contract. In order to maintain independence in the business relationship, I immediately forwarded the invitation to the Procurement and Contracting area of IRB(Re) and politely informed the supplier that the discussion of values should be carried out directly with this area.

3.6. Competitors

We believe in fair competition and maintain a professional relationship of respect and cordiality with our competitors, in order to also obtain benchmarking on common matters between IRB(Re) and its competitors. Therefore, we prohibit any action that could be interpreted as anti-competitive, monopolistic or contrary to legal and ethical business practices.

Competitors are allowed to visit the premises of IRB(Re), with the employee being required to align with his/her immediate manager in advance. There is room for all companies, whether they are competitors or not, that are in search of fair and equal economic development.

3.7. Third sector

The third sector consists of non-profit and non-governmental organizations, which aim to provide public services.

We can participate in movements for social and cultural promotion, as long as the relevant legislation is observed and as long as the ethical principles of the organizations are aligned with the values of IRB(Re).

4. REPORTING CHANNEL

In order to strengthen compliance with this code, we emphasize that employees, suppliers, third parties and IRB(Re) business partners must use the Reporting Channel as a means of communication to report illegal acts, violations of ethical principles, atypical behavior patterns, violations of policies and current legislation, as well as violations of the Company's Code of Conduct.

The report is received through an independent company, with interlocutors who speak Portuguese, Spanish and English, and the procedure allows the record to be identified or anonymous.

This channel is an important tool that enables employees, directors and people outside the organization to report suspected illegal acts, violations of the principles set forth herein, atypical behavior patterns, violations of current policies and legislation, preserving anonymity, if that is more comfortable.

It is very easy to use the Reporting Channel.

- Just access the link: <https://contatoseguro.com.br/pt/irbre>; or
- Access the intranet, exclusively for employees; or also
- Call, free of charge, the following telephone numbers:
 - Brazil: 0800 900 9992
 - Argentina: 0800 345 8149
 - London: 0800 069 8737
 - USA: 1 800 763 1384

Every report entered in the channel generates a filing number that guarantees the whistleblower the confidentiality of the information, the possibility of adding more evidence or even interacting with the committee to which the report has been forwarded.

The report, whenever possible, should be accompanied by evidence or reliable indications of the occurrence being reported. When making a report, make sure you submit as much information as possible, preferably mentioning what happened, who did it, how, when, where and which people became aware of the fact.

In this regard, IRB(Re) encourages the use of the Reporting Channel and reinforces each employee's commitment to integrity and loyalty, therefore, reporting any evidence of misconduct, impropriety and/or unlawful acts that may jeopardize the Company's objectives.



Dilemma in practice!

I witnessed a situation that could be classified as suspected fraud. Acting diligently and being aware that I must uphold the ethical principles of IRB(Re), I decided to cooperate and register what happened in the Reporting Channel. Despite being a difficult situation, I felt comfortable to report the situation, as I know that IRB(Re) has zero tolerance for any kind of retaliation against people who make reports, it has a channel that gives us the possibility of register anonymous reports, in addition to having a flow for handling reports, and penalties defined and disclosed in the company's internal channels.

4.1. Investigation of Reports and Anti-retaliation Mechanisms

It is the company's premise to guarantee the whistleblower's protection and prevent him from being harmed or punished for having made a report or having collaborated with an investigation. Therefore, IRB(Re) adopts anti-retaliation mechanisms, such as:

- Distribution and classification of reports by an independent company;
- Establishment of investigation committees with different compositions, considering the subject matter of the report and the parties involved;
- Possibility of making anonymous reports; and
- Handling of the entire complaint investigation process observing the principles of confidentiality, impartiality and independence.

Furthermore, we have a **Disciplinary Consequences and Actions Policy**, which presents the structure for investigating complaints, the responsibilities of each investigation committee and the measurement method, depending on their severity.

The application of disciplinary actions will be proportional to the facts found and will be adopted regardless of the author's position or role in the Company.

5. SOCIAL RESPONSIBILITY AND COMMITMENT TO THE ENVIRONMENT

5.1. Respect for Diversity

We respect others and treat everyone as we would like to be treated, both inside and outside the company. Therefore, we strongly repudiate any action of moral and sexual harassment, abuse of power, aggressive or inappropriate behavior and discriminatory practices with regard to color, ethnicity, sexual orientation, religion, age, social status, accessibility, physiognomy, health conditions, among others.

We have a diversified work environment that encourages interpersonal and intersectorial relationships, allowing us to achieve common interests.

5.2. Equal Opportunities

We provide all our employees with the possibility of participating in internal processes and having professional growth within the company, always adopting professionalism, qualification and merit as criteria.

We reject the adoption of practices that discriminate or favor certain employees and/or external candidates.

Being a (Re)presentative of Ethics means having team spirit and recognizing all colleagues in a fair and equal way. Following this line, we are always, and increasingly, committed to respecting our employees, sponsoring educational and professional development and encouraging the maintenance of a physically and emotionally healthy work environment.

5.3. Expression of Religious, Political-Partisan, Trade Union and Other Positions

Being an (Re)presentative of Ethics at IRB(Re) means having knowledge of your rights as a citizen and being careful not to use human, physical and technological resources or even the image of IRB(Re) to meet personal interests or to express any political, trade union, religious or sports association positions.

We maintain neutrality in the exercise of our professional activities and preserve independence from our private influences/preferences. Thus, we guarantee the impartial performance of our duties. Avoid expressing your private preferences to the work environment. Being a (Re)presentative of Ethics means understanding that not all colleagues share the same political or religious choices.

Therefore, we do not allow, under any circumstances, political party, trade union and other manifestations in the work environment or through social media and e-mails owned by the Company. Remember: it is not recommended that our opinions be linked to IRB(Re) image, so be careful on personal social networks when expressing yourself politically or religiously with the IRB(Re) brand.

We ratify that we do not fund political parties or candidates for public office, in Brazil and in the countries where we operate, and we repudiate all political party opinions expressed in an illicit, aggressive manner, in a violent and/or threatening tone.



Dilemma in practice!

It's the election period. The week before voting day, we had a corporate event at IRB(Re). As I disagree with the political opinion of some colleagues, I jokingly asked us not to talk about the topic so as not to "come to blows". After I said that, the atmosphere was heavy and I realized that the joke was totally inappropriate. I must not, under any circumstances, express my views aggressively or in a violent and/or threatening tone. Given the fact, I apologized to everyone and informed them that this would never happen again.

**Dilemma in practice!**

I was participating in a religious service when I decided to take a photo to post on social media, but I was wearing the IRB(Re) badge and shirt, so I decided not to post the photo, as it could imply that IRB(Re) has some type of connection with a certain religious service.

5.4. Sponsorships and Donations

We know that sponsorships and donations promote the democratization of access to culture, social transformation and sustainable development of society. However, we need such initiatives to respect the regulatory provisions, in addition to being in accordance with the premises established in the **Marketing and Communication Policy** and in the Company's **Sponsorship Standard**.

If we have any indication of sponsorship and donation, we need to direct the proposal for analysis by the Marketing and Communication management, which will observe whether the case falls within the terms of the Company's Policies such as:

- Donations to trade unions, sports associations, charities and charitable organizations, philanthropic, social, cultural, environmental, health projects, and focused on the welfare of society, can only be made after the due diligence process carried out by the Compliance management;
- All donations must be managed transparently and disclosed by the company's internal and external official channels. Donation in cash is prohibited;
- IRB(Re) prohibits sponsorship or donation to institutions related to government agents, their advisors and family members, to political parties and related institutions, as well as to individuals;
- Donations, including depreciated assets, and/or sponsorships must comply with the company's internal regulations, as well as the authorizations provided for in the **Policy of Authority** in force.

**Dilemma in practice!**

I live near a community and, after heavy rain in the area, many people were left homeless and/or without some household belongings. In view of the fact, I started a campaign of donations in my condominium. As I know that IRB(Re) is a company engaged in social causes, at first I thought of asking for its support. But, upon verifying that the company is not authorized to make donations to individuals, I decided to resort only to my friends and family.

5.5. The Environment

Being (Re)presentative of Ethics means being socially and environmentally (Re)sponsible in our daily actions.

Therefore, we invite everyone to efficiently use the planet's resources, inside and outside our headquarters and offices, encouraging the conscientious consumption of water, energy, paper and plastic objects, focused on reducing impacts on the environment.

Furthermore, IRB(Re) spares no effort to adopt the best Environmental, Social and Governance (ESG) practices, with a focus on promoting sustainability across the Company.

6. ASSET PROTECTION AND INFORMATION SECURITY

6.1. Assets

Being a (Re)presentative of Ethics means being (Re)sponsible for the proper use, within the planned professional activities, of all IRB(Re)'s assets, equipment and work facilities, such as furniture, physical computer equipment, software, virtual storage solutions, office supplies, among others.

In case of any failure or possibility of failure of any equipment, we must report directly to the responsible manager, so that the repair or preventive maintenance can be carried out, thus preserving the useful life of the asset and avoiding any assessment of negligent use that may result in the need for compensation by the employee to the company.

The assets and resources offered by IRB(Re) to its employees should be used responsibly and only for professional purposes. Employees should not expect privacy in relation to devices and systems made available by IRB(Re) for the execution of professional activities such as Internet, telephones, emails, software, hardware and any others. IRB(Re) will monitor such devices and systems whenever necessary, within the limits of the law, without any prior communication or consent.

6.2. Books and Records

We are committed to the integrity of our records, books and financial reports. Therefore, employees who assist in the processes of preparation and disclosure of financial reports are responsible for:

- Ensuring that all accounting books and records are accurate, complete and adequately reflect the actual transactions or events recorded;
- Complying with all controls and procedures that ensure public reports and documents are made available or formally delivered to regulatory bodies, ensuring that the Company's obligations comply with established laws and rules.

It is the duty of all employees to ensure the accuracy of the information recorded so that IRB(Re) shareholders can monitor, in a transparent manner, the company's performance.

6.3. Ownership of Information

We know that all content produced in the execution of our duties is owned by IRB(Re). Thus, when we are interested in participating, as a presenter, in external lectures, seminars, lives, training or in any event in which it is necessary to share any information or know-how (knowledge, technologies, methods, systems, etc.) that have been developed either by the employee or by another area of the company, we must:

- Share with the director of the area for assessment and authorization;
- Share the authorization with the Marketing and Communication management, which will guide the content to be shared externally, and

- Report the fact to the Compliance Management, which will record and monitor participations in external events of each employee.

If the employee receives a request from a business partner for the use/disclosure of the logo, name or projects of IRB(Re), by using either hard or electronic means, he/she must forward it to the Marketing and Communication management to evaluate the application/disclosure, subject to the contractual provision agreed upon between the parties.

Under no circumstances does the Company share information about its active or non-active customers.



Dilemma in practice!

I participated in an innovation program by IRB(Re), in partnership with two important players. In that project, we developed a new product for the insurance/reinsurer market that has become a reference. As I would like to share the information and know-how we obtained in the execution of the work in market events and with potential clients, I formally requested from my director and the players involved in the program the approval for this disclosure, respecting the ownership of information and the terms of confidentiality between the parties.

6.4. Privileged or Confidential Information

As a publicly traded company, with shares listed on the Stock Exchange, we value ethics and transparency in relationships, we do not disclose privileged or confidential information to third parties, including relatives and spouses, even if this information is obtained due to position or responsibility.

It is prohibited to trade bonds, shares or other securities issued or referenced by IRB(Re) Brasil RE, until the information to which we have privileged or confidential access becomes public.

Therefore, executive officers, advisors and employees are prohibited, under any circumstances, from trading shares and any other securities issued by IRB(Re):

- In the period of 15 (fifteen) days prior to the disclosure of the Company's quarterly (ITR) and annual (DFP) information;
- Upon becoming aware of a Relevant Fact that is not yet disclosed to the public; and
- In other situations that may be defined by the Investor Relations department, as established in the Securities Policy, the **Share Trading Policy**, the **Material Fact Disclosure Policy**, and as provided in Law No. 6,404, of December 15, 1976, in CVM Resolution No. 44, of August 23, 2021, as well as in the Novo Mercado Regulations.

The Investor Relations Management may issue an internal communication informing the beginning and the end of the prohibition periods for trading IRB(Re)'s securities. In this way, we must, prior to the negotiations, check whether we fit into this period.

When dealing with confidential information, in the Company's environment, in a home-office or external environments, we must restrict access to such information only to authorized people, taking extra care with access to documents, materials and work tools.

Strategic and/or confidential matters should not be disseminated and discussed on: widely accessible workspace, social networks, elevators, reception, restaurants, restrooms or in any public setting.

In the teleworking mode, we must follow the recommendations of the Information Technology and People Boards and other information released by the Communication and Marketing Management through internal communication channels, in order to mitigate the risks of information leakage.

As to confidentiality, we must classify information according to the **Information Classification and Treatment Standard** guidelines, available on the Intranet.

To ensure proper use and protection of confidential information, IRB(Re) monitors the use of its electronic systems, including corporate email and Internet access.



Dilemma in practice!

I am a new hire at IRB(Re) and, for the first time in my career, I am excited to work for a publicly traded company. After a general analysis of the market, I decided to buy some shares of the company because I believed in their growth potential. However, I identified that I could not start this process at that time, as we were just days away from disclosing our financial statements and, as an employee, I need to respect the rules related to privileged information and the prohibition period, in order to avoid any economic advantage in trading with the market.

6.5. Electronic and Information Security Systems

In order to be an Ethics (Re)presentative, it is essential to be aware of data privacy rules and correctly treat the information collected, used or transmitted by us.

Passwords and user logins for access to IRB(Re) documents and information are for personal use, non-transferable and their sharing is prohibited. We do not use the domain of IRB(Re), that is, your professional email, on social media, unless it is for professional activity within IRB(Re).

Being aware that access to electronic and information security systems provided by IRB(Re) is strictly intended for the exercise of professional activities, we use these tools in a manner consistent with our professional conduct, ensuring compliance, mainly, with the provisions of the **Information Security Policy**.

The Company's official digital platforms for conducting videoconferencing and exchanging messages on corporate matters are the tools that are available in the standard configuration of our workstation and meet established Information Security criteria.

We may use alternative communication tools, only when it is not possible to use corporate tools and respecting the rules defined in the **Acceptable Use of IT Assets Standard**.

If you have any question, consult the IT Operations and Infrastructure Management.

**Dilemma in practice!**

I left IRB(Re) to join a new professional project. Within a week of my departure, I found that I had forgotten an important private document saved in the company's directory. My first impulse was to contact HR asking for the redemption and forwarding of this document. However, I remembered that the virtual storage solutions provided by IRB(Re) are strictly intended for professional activities. Thus, when saving a particular document in the company directory, I took the risk of not accessing it anymore.

6.6. Data Protection and Privacy

Privacy is a Fundamental Right of every natural person who interacts with IRB(Re), therefore, for the ethical use of personal data, we must be committed to preserving the intimacy, privacy and image of human beings. Therefore, we act in accordance with the General Data Protection Law (GDPL), observing the appropriate treatments regarding **personal data and sensitive personal data**:

We emphasize the need for all contracted third parties and employees who process personal data to follow the company's internal guidelines defined in the **Data Use and Treatment Standard**, as well as regulatory provisions and the General Data Protection Law – GDPL.

7. SOCIAL MEDIA, PRESS AND DIGITAL PLATFORMS

Being a (Re)presentative of Ethics means being proud to work at IRB(Re) and taking due care with your positioning on social networks in order to prevent a personal post from gaining a professional connotation, or impacting the Company's reputation and image.

As we know that social networks are used to exchange opinions, we are required to act with politeness, moderation and appropriate language, especially in relation to sensitive subjects such as: politics, religion and sexual nature, among others.

To make the topic more practical, we share examples of positions we expect from IRB(Re) employees:

- Do not criticize or spread rumors or participate in intrigues involving the Company, competitors, business partners or co-workers;
- Report untrue or questionable content published in public media to Marketing and Communication management or check our official channels before sharing;
- Do not speak on behalf of the company or expose and use the brand without prior authorization and guidance from the Marketing and Communication management;
- When it comes to a technical and professional subject, take care to transmit only true, correct and constructive information. Whenever possible, mention the sources of the content;
- Disclose matters about IRB(Re) only when they have been previously disclosed on official channels and/or are public.

Employees must support the actions developed and the content posted on the official IRB(Re) profiles, following, liking and sharing the publications, helping to strengthen our brand, as an ambassador and guardian of the brand, in addition to a (Re)presentative of Ethics!

With responsibility, we help build the company's reputation, that's why we like to share content that reinforces our image and values, such as an award photo, virtual or in-person events indicating the hashtags #IRB(Re), #SoulRB or #orgulhodeserIRB, sharing our posture, our professionalism and our pride in being part of the Company.

**Dilemma in practice!**

I read an article in a well-known media that dealt with the strategic planning of IRB(Re) for the coming years and found that such information was not disclosed by our official internal and external channels (intranet, IRB em Foco, release, institutional website, social media, among others). Therefore, I concluded that it could be fake news or confidential information and, therefore, I did not share the news and reported the fact to the Marketing and Communication Management.

**Dilemma in practice!**

I received a message about IRB(Re) from an investor on social media. As I am not authorized to respond on behalf of the company, I forwarded the message to the Investor Relations department to assess the best way to deal with the matter.

Only persons designated by the Management and guided by the Marketing and Communication management may act as spokespersons for the Company.

Therefore, if you are contacted directly by journalists or print or digital media, by phone, email or in person to talk about IRB(Re), ask the professional to forward the request through the press office or to the Marketing and Communication Management, whose contacts are available on the institutional website. After this guidance, immediately inform the Marketing and Communications Management of what happened.

8. FINAL PROVISIONS

Being a (Re)presentative of Ethics means knowing, understanding and complying with the provisions set forth in this Code, as well as guiding actions in accordance with internal normative instruments, laws and regulations applicable to IRB(Re).

Acting as a (Re)presentative of Ethics, we (Re)affirm our commitment to the integrity, essence, purpose and positioning adopted by IRB(Re).

Failure to comply with the provisions of this Code, as well as internal regulations or current legislation, may result in the imposition of penalties provided for in the **Disciplinary Consequences and Actions Policy**.

If you have any doubts about the guidelines contained in the Code of Conduct, please contact the Compliance Management (conformidade@irbre.com).

The review of this document is the responsibility of the Compliance Management and it will be carried out every two years, or on demand, whenever there are regulatory or operational changes.

Now that you have reached the end of our Code, sign the Deed of Commitment, acknowledging to have received, read and been made aware of the provisions of this Code and reinforcing your role as a (Re)presentative of Ethics.

Update history

Version	Effectiveness/Approval	Main changes	Management area
001	06/12/2007	Initial version.	Compliance Management
002	11/26/2013	Update with the participation of employees aiming to upgrade the normative text.	Compliance Management
003	05/29/2015	CONAD – 214 th RO: Inclusion of the Corporate Ethics Channel	Compliance Management
004	03/28/2016	CONAD – 224 th RO: Inclusion of an item on preventing money laundering, fighting corruption and illegal acts of any nature, prohibition of financing political parties or candidates for public office, inclusion of the item Suppliers and new wording for Final Provisions.	Compliance Management
005	05/26/2017	CONAD – 238 th RO: Update in line with the amounts approved by the Board of Directors at the 233 rd RO.	Compliance Management
006	11/23/2018	CONAD – 256 th RO: Revision of the Code of Ethics and Conduct of IRB(Re)	Compliance Management
007	01/28/2019	CONAD – 258 th RO: Change in the frequency of updates	Compliance Management
008	11/26/2021	CA – 290 th RO, dated 09/24/2021: Revision of the Code of Ethics and Conduct of IRB(Re) Published on 11/26/2021, after conducting training on the subject.	Compliance Management
009	03/30/2023	CA – 308 th RO: Adaptation to the Novo Mercado Regulation - B3 and other internal processes.	Compliance Management
010	09/02/2023	CA – 313 th RO: Brand update, indication of new drivers; update of chapters, update of the rules and values for offering and receiving souvenirs, gifts and hospitality.	Compliance Management