

## 1 Responsible Area

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- 1.1 Governance, Risk and Compliance Executive Board.

## 2 Scope

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- 2.1 This Policy applies to BB Seguridade Participações S.A. (“BB Seguridade” or “Company”) and its subsidiaries BB Seguros Participações S.A. (“BB Seguros”), BB Cor Participações S.A. (“BB Cor”) and BB Corretora de Seguros e Administradora de Bens S.A. (“BB Corretora”).

## 3 Regulation

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- 3.1 Law 9.613, March 03, 1998.  
3.2 Law 12.846, August 01, 2013.

## 4 Review Frequency

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- 4.1 This Policy shall be reviewed annually or, extraordinarily, at any time, and submitted to the Board of Directors for approval.

## 5 Introduction

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- 5.1 This Policy is composed by the set of directives that guide the actuation with regard to preventing and combating money laundering, terrorist financing and corruption.

### Definitions

- 5.2 For the purposes of this Policy, the following definitions apply:

5.2.1 **Employees:** individuals belonging to the active workforce of BB Seguridade.

5.2.2 **Corruption:** social relationship (with personal, non-market and illegal nature) established between two agents or two groups of agents (corrupt and corrupting) whose goal is money transfer within the society or public fund with strictly private purposes. This relationship is engaged by the exchange of favors between groups of agents and the compensation for the corrupt act is often promoted by bribes, rewards or any other kind of pay-off<sup>1</sup>.

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<sup>1</sup> Source: <http://www.cgu.gov.br/Publicacoes>

- 5.2.3 **Terrorist financing:** according to the Federal Prosecution Service, is the pool of funds or capital to carry out terrorist activities. These funds may have legal origin - such as donations, revenues from various licit economic activities - or illegal - such as criminal activities (organized crime, fraud, smuggling, extortion, kidnapping, etc.).
- 5.2.4 **Fraud:** any illegal, dishonest, cunning action that seeks to mislead or deceive anyone.
- 5.2.5 **Money laundering:** expression that refers to the economic and financial practices that are intended to dissimulate or hide the illicit origin of certain financial or patrimonial assets in a manner that they would appear to have a lawful origin, or having, at least, a difficulty of proving or demonstrating its illicit origin. It's the same as giving illegal money an appearance of legal<sup>2</sup>.
- 5.2.6 **Third Parties:** individuals who do not belong to the active workforce of BB Seguridade, and companies who, for interests of the service and contractual provision or legal obligation, establish relationship with BB Seguridade.

## 6 Directives

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- 6.1 We reject acts of corruption, money laundering, terrorist financing or other crimes.
- 6.2 We prevent money laundering, terrorist financing and corruption practices in conducting business in accordance with national and international laws.
- 6.3 We operate in accordance with the international commitments of the Federal Government regarding the prevention and combat to money laundering, terrorist financing and corruption, in compliance with current legislation.
- 6.4 We adopt procedures, in the relationship with public entities, to inhibit the practice of corruption acts.
- 6.5 We orient our subsidiaries to adopt parameters established by law to registration of transactions and identification of those considered indicative of money laundering or terrorist financing and development of automated systems for monitoring transactions carried out.
- 6.6 We use specific parameters for monitoring financial transactions and transactions between related parties that may constitute indication of corruption.
- 6.7 We orient our subsidiaries to adopt procedures, in products and services development, to inhibit its use for illegal practices associated with money laundering, terrorist financing and corruption.

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<sup>2</sup> Source: <http://www.cgu.gov.br/Publicacoes>

- 6.8 We assess, related to the commercial transactions performed, the instruments used, the way they were performed, the frequency, the parties and amounts involved and any indications of irregularity or illegality in order to detect indications of money laundering , terrorist financing or corruption.
- 6.9 We adopt due diligence procedures prior to making investments in order to mitigate risk of money laundering, terrorist financing and corruption.
- 6.10 We adopt measures of restrictive nature on conducting business with suppliers and partners when any evidence of its involvement in acts related to money laundering, terrorist financing or corruption is revealed, in compliance with current legislation.
- 6.11 We consider, in maintaining business relationship with partners and suppliers, the existence, within these third parties, of mechanisms for preventing and combating money laundering, terrorist financing and corruption.
- 6.12 We maintain specific hotline for receiving reports, including the anonymous ones.
- 6.13 We investigate evidences and reports of acts of corruption committed by employees or third parties, in the Company's benefit or interest and against the public administration, in compliance with current legislation.
- 6.14 We investigate evidences and reports of acts of corruption committed by employees or third parties, against Company's property, in compliance with current legislation.
- 6.15 We conduct, in a confidentially way, processes of registration, analysis and reporting about evidences of money laundering and terrorist financing to the competent authorities, as well as the processes with regard to ascertainment of acts suspected of corruption.
- 6.16 We preserve as anonymous the whistleblowers's identity.
- 6.17 We reject any acts of reprisal or retaliation against good faith whistleblowers that have chosen to identify themselves.
- 6.18 We adopt measures to protect whistleblowers employees in regarding the facts arising from the reports.
- 6.19 We communicate the competent authorities of negotiations or investments that, in compliance with current legislation, characterize evidence of money laundering, terrorist financing and / or corruption.
- 6.20 We cooperate with public authorities in ascertainment related to acts that are detrimental to the government, arising from our activities, in compliance with current legislation.
- 6.21 We adopt criteria for hiring and management of employees, focusing on preventing and combating money laundering, terrorist financing and corruption.

6.22 We maintain specific program for training employees on preventing and combating money laundering, terrorist financing and corruption.

## **7 Governance of Affiliated Companies on Preventing and Combating Money Laundering, Terrorist Financing and Corruption**

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- 7.1 We recognize that the Company's exposure to the risks related to illegal practices also originates from affiliated companies' operation.
- 7.2 We look after the Company's interests directing BB Seguridade's officers in the governance bodies of the Affiliated Companies, mainly in Boards of Directors, advisory committees to the Boards of Directors, Audit Committees and Supervisory Boards on preventive and detective aspects about preventing and combating money laundering, terrorist financing and corruption.
- 7.3 We promote technical exchanges between Affiliated Companies, BB Seguridade and Banco do Brasil.
- 7.4 We assess indicators and monitor the reports to the governance bodies related to practices for preventing and combating money laundering, terrorist financing and corruption.

## **8 Responsibilities**

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### **8.1 The Risk Executive Board**

8.1.1 The Risk Executive Board, through the Division of Internal Controls and Compliance, is responsible to disseminate, review, improve and update this Policy.

### **8.2 Employees and Third Parties**

8.2.1 The observance and diligence for this Policy compliance is responsibility of all employees and third parties.

## **9 Last Review**

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9.1 August 19, 2016.

## **10 Final Statements**

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10.1 Omissions in this Policy shall be submitted for approval to the Board of Directors.