

## **Addendum to the Code of Ethics & Business Conduct**

### **Liberty Mutual – Brasil**

This addendum ("Addendum") is intended to complement Liberty Mutual Group's Code of Ethics & Business Conduct ("Code of Conduct") within the scope of **Liberty Mutual Surety Brasil Seguros S.A.'s, Liberty Mutual Consulting Brasil Ltda.'s** and **Liberty Mutual Insurance Company's activities**, as well as their respective subsidiaries in Brazil ("Companies"), and was prepared based on applicable Brazilian legislation, especially Law No. 12,846/2013 (Anti-Corruption Law) and its regulation via Decree No. 11,129/2022, , SUSEP Resolution No. 382/2020 and CNSP Resolution No. 416/2021.

#### **1. Applicability**

**1.1.** This Addendum should be read in conjunction with the Code of Conduct, serving as additional guidance to Employees as defined below. This Addendum should also be read in a manner that complements the other policies adopted by Liberty Mutual Group.

**1.2.** The Code of Conduct and this Addendum are applicable to the Employees of the Companies, including officers, employees and apprentices.

**1.2.1.** For third-party suppliers, the specific Supplier Code of Conduct applies.

**1.3.** Employees must receive copies of the Code of Conduct and this Addendum at the time of their hiring and whenever the documents are updated.

#### **2. Additional guidelines**

**2.1.** In addition to the values, objectives, guidelines and determinations of the Code of Conduct, Employees must conduct their activities in the principles of ethics, responsibility, transparency, diligence, loyalty, probity, honesty, good faith, as well as other principles applicable to the relationships established, especially with the Companies' customers, in compliance with the applicable regulations and legislation.

#### **3. Report violations of the Code of Conduct**

**3.1.** Within the scope of operations in Brazil, the following reporting channels may be accessed at any time and free of charge, to make complaints about violations of laws and/or policies applicable to the Companies, including Federal Law No. 12,846/2013, the Code of Conduct or other policies adopted by the Companies:

- **For Employees:** [libertycompliancehelpline.com](http://libertycompliancehelpline.com) ; and
- **For third parties:** [Compliancehelpline\\_LMSBrasil@libertymutual.com](mailto:Compliancehelpline_LMSBrasil@libertymutual.com).

**3.2.** As described in the Code of Conduct, Liberty Mutual Group does not tolerate retaliation against Employees who make complaints through the available channels. For more information, consult the Code of Conduct available on its website.

#### **4. Concerns related to discrimination, harassment, or retaliation**

**4.1.** As described in the Code of Conduct, Liberty Mutual Group provides channels aimed at receiving and following up on complaints, which may address, among other concerns, discrimination, harassment or retaliation, allowing the anonymity of the complainant.

#### **5. Charitable donations or charitable contributions by Companies in Brazil**

**5.1.** Liberty Mutual Group adopts specific procedures for making charitable donations or charitable contributions on its behalf. For clarification purposes, within the scope of the operations of the Companies in Brazil, donations to political parties or for electoral purposes on behalf of the Companies or using their resources are not permitted.

#### **6. Relationship with contracted third-party service providers**

**6.1.** As stated in the Code of Conduct, Liberty Mutual Group expects all its Employees to be committed to avoiding conflicts of interest, especially during the relationship with third-party contracted service providers. In this sense, all selection processes of suppliers and service providers to be hired by Companies in Brazil must be conducted in accordance with established Company policy and procedures in a manner free of favoritism.

#### **7. Periodic training and qualification**

**7.1.** All Employees must regularly carry out, and in accordance with the periodicity established internally by the responsible department of each Company, training on the standards of ethics and integrity established by Liberty, which may include periodic training and updating actions for all its Employees on the integrity policies adopted by the Companies, including the Code of Conduct and compliance issues.

#### **8. Antitrust and Competition**

It is strictly prohibited to require a customer to purchase one type of insurance policy in order to be able to purchase a different type of policy, except where previously approved by your local Compliance or Legal resources and in strict compliance with applicable law.

#### **9. Guidelines and clarifications**

**9.1.** The local compliance officers of each Company, together with *Global Compliance & Ethics* (GC&E), are responsible for guiding and providing clarifications on the Code of Conduct regarding operations in Brazil, monitoring its compliance, evaluating its effectiveness, and identifying and correcting any deficiencies and opportunities for improvement.

## **10. Review and update**

**10.1.** Whenever necessary, and at least every two (2) years, the Code of Conduct, including this Addendum, and the other integrity policies and procedures approved by the Companies shall be reviewed to adapt and update them based on the review and/or update of their risk matrix, as necessary.

**10.2.** This Addendum is part of the Code of Conduct adopted globally by Liberty Mutual Group for all purposes, prevailing, within the scope of Brazil, in case of conflict with less restrictive provisions of the Code of Conduct.

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