

ODONTOPREV S.A. SECURITIES TRADING POLICY

1. Objectives and Coverage

1.1. The objective of the present Securities Trading Policy is to establish the rules that must be observed by the Company's directly or indirectly controlling shareholders, as well as by its Directors, members of the Administration and Fiscal Boards, Auditing Committee, Human Resources Committee and any organs having technical or consultative functions, which may be established through statutory disposition, besides employees and third parties that have access permanently or eventually to relevant information ("Related Persons"), under the terms of Article 15 of the Securities Commission Instruction ("CVM" - Securities and Exchange Commission of Brazil) N° 358/02 ("Instruction CVM N° 358/02") and by OdontoPrev S.A. ("Company or OdontoPrev"), looking to limit the use of privileged information concerning a Relevant Act or Fact relative to the Company ("Privileged Information") in self-benefit and/or benefit to persons linked in negotiation with the emission of Company securities ("Securities") and to state the directives that will rule, in an ordered fashion and within the limits established by Law, for the negotiation of such Securities as given under the terms of the CVM Instruction N° 358/02.

1.2. Such rules will also look to prevent the practice of insider trading (the improper use, in self or third party benefit, of Privileged Information) and tipping (privileged information tips so that third parties may benefit from them), thus preserving transparency in the negotiations involving Securities.

1.3. The rules of this Securities Trading Policy define periods during which persons within the Related Persons group must abstain from negotiation involving Securities, in such a way as to avoid the improper use of Relevant Information not divulged to the public.

1.4. As well as the Related Persons, the norms of this Securities Trading Policy also applies to cases in which negotiations on the part of Related Persons occurs in a direct or indirect manner for their own benefit, by means of the use of for example: (a) a company directly or indirectly controlled by them; (b) third parties with whom there is maintained a management, fiduciary and / or administration contract involving an investment portfolio in financial assets; (c) proxy holders or agents; and / or (d) spouses who have not been judicially separated, companions and any dependent included in the person's annual income tax declaration. In this manner, indirect negotiation is understood as those in which the Related Persons, in spite of not being conducted in their name, have the control and the deciding power over the realization of the negotiation.

2. Adhesion to Securities Trading Policy

2.1. Adhesion to the present Securities Trading Policy is obligatory after signing the Adhesion Instrument prepared under Annex 1, for all Related Persons.

2.2. The Company will maintain at the disposition of the CVM a list of the persons who have adhered to the present Securities Trading Policy

3. Prohibition of negotiation

3.1. Under the terms of the CVM Instrument N° 358/02, negotiation, provision of advice or investment assistance is prohibited by the Company itself or by Related Persons, from the date on which they became aware of the Relevant Act or Fact relating to the Company, in accordance with that defined in the CVM Instrument N° 358/02 ("Relevant Act or Fact") until its release to the market. Any negotiation with Securities by the Related Persons on the dates on which the Company is to negotiate its shares emission, based upon any re-purchasing program approved by the Company's Administrative Board is prohibited. The Company must inform, with antecedence, the Related Persons concerning such dates.

3.2. The Company and the Related Persons must abstain from negotiating their Securities during all of the periods in which the Investor Relations Officer has determined the prohibition of negotiation, following prior authorization from the Board of Directors. The Investor Relations Officer is not obliged to take the decision of determining the blockage period, which will be dealt with in a confidential manner by its addressees.

In order to assure adequate standards regarding the trading of OdontoPrev securities by its management, it has been determined that all trading will only be made through few Accredited Stock Brokers, to be informed by the Company's Investor Relations Officer, also during periods that will be defined by the Investor Relations Department and informed to those specific Stock Brokers.

The Company, besides providing the Securities Trading Policy in its intranet and Investor Relations website, sends a Non-negotiation notice to the Related Persons, of which appoints period of negotiation prohibition.

3.3. In the context of a public offer of Securities distribution and under the terms of Article 48 of the CVM Instruction N° 400/03 ("CVM Instruction N° 400/03"), the Related Persons must abstain from negotiating Securities from the date on which they became aware of such a public offer until the publication of the announcement on the relative closure of the public offer in question.

3.4. The Related Persons cannot negotiate Securities, independent from the determination of the Investor Relations Officer: (a) during a period of 15 (fifteen) consecutive days that antecede the divulging of the Company's Quarterly Reports (ITR) and Annual Reports (DFP), it being the responsibility of the Investor Relations Department to inform, with antecedence, the Related Persons as to the dates forecast for the divulging of this information; (b) between the deliberation date of the competent organ for an increase in social capital, dividend distribution and interest payment over its own capital, and the publication of the respective edictal or announcements and (c) starting from the moment at which they have had access to the information relative to the Company's intention or that of the Company's controlling shareholders: (i) to modify the Company's social capital by way of the subscription of new shares; (ii) to approve the program of acquisition

or alienation of the Company's emission shares by the Company itself; or (iii) to distribute dividends and / or interest over its own capital, bonuses in shares or their derivatives or splitting, and until the publication of the respective edictal and / or announcements or press releases.

3.5. The Related Persons who leave the Company prior to the divulging of the Relevant Act or Fact that originated during their period of employment must not negotiate Securities from the date on which they became aware of the Relevant Act or Fact until whichever occurs first between (i) the date of release by the Company to the market and (ii) 6 (six) months after leaving the company.

3.6. In the case where any agreement or contract has been agreed, with the purpose of the transference of the respective shareholding control, or if an option or mandate to the same end has been granted, as well as if there exists the intention of promoting an incorporation, total or partial fission, fusion, transformation or company reorganization, and whilst the operation has not become public by way of the publication of the relevant facts, the Related Persons must not negotiate Securities and the Company's Administrative Board must not deliberate the acquisition or alienation of shares of its own emission.

3.7. Prohibitions in the negotiation of Securities will cease to be in operation as soon as the Company divulges the Relevant Act or Fact applicable to the market. Nevertheless, such prohibitions will be maintained, even after the release of the Relevant Act or Fact, in the case in which eventual negotiations with Securities can interfere, in damage to the Company or its shareholders, with the act or fact associated to the Relevant Act or Fact.

3.8. Even after its release to the market, the Relevant Act or Fact must continue to be dealt with as not having been divulged until a minimum period of time has elapsed so that the market participants have received and processed the Relevant Act or Fact, as well as in the hypothesis in which the negotiation can, in the judgment of the Company, interfere in the conditions of the negotiations with the Company's Securities, in such a way as to result in damage to the Company itself or its shareholders, it being the case that, in any hypothesis, such additional restriction is to be informed by the Investor Relations Officer.

4. Authorization for the negotiation of securities

4.1. Notwithstanding the prohibitions detailed in Item 3 of this document, the Related Persons could exceptionally negotiate Securities, assuming that such negotiations attend to at least one of the following situations: (i) the acquisition of shares that are lodged in the treasury, by way of private negotiation, originating from the exercise of a purchase option in accordance with the approved option plan approved by the Company shareholders and the eventual re-purchase by the Company, also by means of private negotiations; or (ii) the application of variable remuneration, received the title of participation in the result, in the acquisition of Securities.

4.2. The prohibitions mentioned in this Securities Trading Policy do not apply to negotiations realized by investment funds of which the Related Persons are shareholders, assuming that they are not exclusive investment funds or investment funds whose decisions of the business administrator or portfolio manager are determined or influenced by the Related Persons.

4.3. According to Article 11 of CVM Instruction 358/02, Paragraph 4, line I with wording from CVM Instruction 590 of September 11, 2017, the Related Persons must inform its negotiation to the Company in a time period of 5 (five) days.

5. Penalties

5.1. Under the terms of the present legislation, the use of relevant information as yet not divulged to the market is considered to be criminal behavior and subject to the penalty of prison, from one to five years, and a fine of up to three times the amount of the gain illicitly obtained as a result of the crime.

5.2. Failing to communicate to OdontoPrev, to the CVM and to the B3, immediately after inauguration into the position, the quantity, the characteristics and the manner of acquisition of Securities, as well as the eventual alteration of positions, subjects the defaulter to a comminatory daily fine determined by the regulatory organ.

6. Responsibility of Third Parties

6.1. The dispositions of this Securities Trading Policy do not suppress the responsibility of third parties not directly linked to the Company who have had access to the Relevant Act or Fact.

7. Obligation of Silence

7.1. It is the obligation of the Related Persons and the Company employees to keep silent concerning information relative to the Relevant Act or Fact to which they have had privileged access as a result of their work or position that they occupy until its release to the market.

8. Final Dispositions

8.1. The present Securities Trading Policy will come into effect after its approval by the Board of Directors, and will be valid for an undetermined period, until there has been deliberation in an opposite direction. Any eventual alterations to the Securities Trading Policy must be approved by the Board of Directors, as well as being remitted to the CVM and the B3.

8.2. The Company does not adopt individual plans of investments and stock loan, so the referred policy does not contemplate parameters and rules for these matters.

8.3. The Securities Trading Policy cannot be altered in the contention of the release of the Relevant Act or Fact.

8.4. Any violation of the rules in this Securities Trading Policy will be subject to the procedures and penalties forecast in law, as well as being held responsible for any losses or damages caused to the Company and / or third parties.

8.5. The non-authorized release of Privileged Information, not divulged publicly, concerning the Company is damaging to the Company, and is strictly prohibited.

8.6. The Related Persons, and those who may acquire this qualification, must sign the Adherence Term in accordance with Annex I.

8.7. The Company could establish prohibition periods concerning negotiation with Securities additional to those forecast in the Securities Trading Policy, notification being made immediately to the Related Persons.

8.8. Negotiation of Securities by the Related Persons during the periods of negotiation restriction in accordance with that forecast in the Securities Trading Policy could occur exceptionally through authorization by the Company's Investor Relations Officer, by way of a request presented in writing containing the justification for the necessity of negotiation, without prejudice to the dispositions contained in the Instruction CVM 358/02.

8.9. Any violation of this Securities Trading Policy verified by the Related Persons must be immediately communicated to the Company, through the person of the Company's Investor Relations Officer.

8.10. The Company's Investor Relations Officer is responsible for the application of the terms of this Securities Trading Policy; any doubts in relation to its dispositions, must be clarified in conjunction with the Company's Investor Relations Officer.

8.11. The "model of the Adherence Term to the Securities Trading Policy" makes up part of this Instrument.

8.12. Where applicable, the rules in the current legislation apply to this present Instrument.

ANNEX I

MODEL OF THE ADHERENCE TERM TO THE SECURITIES TRADING POLICY

I, [name and qualification], [function], do, by means of this present Term, adhere to the Securities Trading Policy of OdontoPrev S.A, approved at a Board of Directors Meeting that took place on [day] of [month] of [year].

Barueri, [day] of [month] of [year].

[Name] RG: [•] CPF/MF: [•]