

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Publicly-Held Company

NIRE 35300010230

CORPORATE POLICY ON INTEGRITY, ETHICS AND CONDUCT (GLOBAL)

1. OBJECTIVE

Establish complementary guidelines to the Itaú Unibanco Code of Ethics and Conduct, related to the Itaú Unibanco Integrity and Ethics Program, as well as establish rules of conduct in relationships with *stakeholders* and in situations related to conflicts of interest. In addition, the document mentions the prevention of illicit acts, rules for the distribution and negotiation of securities and socio-environmental responsibility.

2. TARGET AUDIENCE

It applies, in Brazil and abroad, to all Itaú Unibanco Holding SA managers and employees, also including any interaction that the Conglomerate maintains with clients, partners, suppliers and other stakeholders.

3. INTRODUCTION

Society demands from large companies transparency and commitment to the objectives and commitments made. Small slips can almost instantly ruin a good reputation and a brand built over decades.

Aware of this and of Itaú Unibanco's corporate responsibility towards society, we conduct our business, processes and relationships in the direction of establishing lasting bonds and generating shared value with our *stakeholders*. We are committed to high business conduct standards, valuing sustainable relationships and complying with laws, standards and regulations in every location we operate or establish business relationships.

Through the confidence acquired and the quality of our products and services, we guarantee the continuity of business and client satisfaction, understanding client's perception and meeting the requirements expected by them when providing a service.

These traits of our identity are reflected, above all, in the organizational culture, in the guidelines and practices of the Code of Ethics and Conduct and corporate governance. These values, principles and guidelines are key assumptions of our Integrity and Ethics Program.

4. GUIDELINES

4.1 Integrity and Ethics Program

Itaú Unibanco's Integrity and Ethics Program comprises a set of integrity and ethics processes, policies and procedures, in addition to the Code of Ethics and Conduct. In addition, awareness and training actions are carried out.

Senior management supports the Program through resources and the promotion of an ethical and law-abiding culture.

Our Integrity and Ethics Program, based on good national and international market practices, is monitored by specific risk assessments and indicators.

Details of the pillars and actions of the Integrity and Ethics Program are described in a internal specific procedure.

4.2 Channels for Ethical deviations, Doubts and Unlawful Acts

All employees, administrators, customers, partners, suppliers and any other person may inquire or report, without the need for identification, questions, suspicions or violations of the Itaú Unibanco Code of Ethics and Conduct. They may also report evidence of illicit acts of any nature, related to the activities of the Conglomerate, with confidential treatment and protection of the whistleblower's identity being ensured in all claims.

The communication channels must timely, independently, impartially and confidentially investigate the communications received and keep a record of the identified situations, investigations and decisions adopted.

4.2.1 Reporting Channels

Channel	Topics	Contacts
Ethics Consulting	<p>Questions:</p> <ul style="list-style-type: none"> • Itaú Unibanco Code of Ethics and Conduct • Corporate Integrity, Ethics and Conduct Policy • <u>Corporate Corruption Prevention Policy.</u> • Conflicts of Interest • Ethical dilemmas. 	<p>External</p> <p>E-mail: comitedeintegridadeetica@itau-unibanco.com.br</p>
Ombudsman	<p>Events – suspicions, reports and complaints, etc. about:</p> <ul style="list-style-type: none"> • Interpersonal conflicts and conflicts of interest in the work environment 	<ul style="list-style-type: none"> • External e-mails: ombudsman@ombudsman.itau-unibanco.com.br or • Personal contact
Reporting Channel	<p>Questions, red flags and reports about:</p> <ul style="list-style-type: none"> • Fraud in electronic channels. • Documentary fraud in its various forms. • Corruption and bribery acts. • Theft and robbery of units and extensions, customers, administrators and employees • Burglary in general. • Extortion through kidnapping. • Physical, personal, property and information security incidents. • Misbehavior of administrators and employees 	<p>External:</p> <ul style="list-style-type: none"> - Corporate website: https://www.itau.com.br/atendimento-itau/para-voce/denuncia/ - Phone: 0800-723-0010 - working days - from 8:30 am to 7:00 pm; - E-mail: inspetoria@itau-unibanco.com.br e fornecedores_relatos@itau-unibanco.com.br

<p>Channel for Questions, Suspicions and Reports on the Prevention of Money Laundering and Combating the Financing of Terrorism</p>	<p>Questions, red flags and reports about:</p> <ul style="list-style-type: none"> • Risk of money laundering or terrorist financing; • Financial incompatibility; • Atypical proposals from clients and non-clients; • Transactions that disguise ownership of the money; • Expressive movement in cash without justification or in fractions; • Suspicion of hidden partners (or dummies); • Lack, omission or inaccuracy of information provided; • Mishandled cash movements (e.g. moldy, marked, damaged); • Suspicious foreign exchange transactions. 	<ul style="list-style-type: none"> • Phone: +55 (11) 2757-6753
<p>Audit Committee</p>	<p>Red flags and claims:</p> <ul style="list-style-type: none"> • Legal or regulatory non-compliance. • Fraud and errors in auditing, accounting and internal controls. 	<p>email: AUDIT COMMITTEE box. External email: comite.auditoria@itau-unibanco.com.br.</p> <p>Mailing address: Att. Audit Committee Itaú Unibanco Holding S.A. - Praça Alfredo Egydio de Souza Aranha, 100 - Torre Olavo Setúbal, Piso PM, São Paulo - SP - CEP 04344-902.</p>

NOTE: In the International Units, the whistleblower may communicate to one or more of: (i) local channels made available in the local Codes of Ethics and Conduct or in Annex 1 - REPORTING CHANNELS INTERNATIONAL UNITS, which contains the channels of manifestation used by each international unit; (ii) matrix channels: Inspection, Audit Committee and Ombudsman for cases according to specific governance.

4.2.2 Whistleblower Protection

- Administrators and Employees

They cannot carry out acts of retaliation against anyone who, in good faith, reports or expresses a complaint, suspicion, doubt or concern regarding possible violations of the guidelines of this Policy;

They must adopt good faith in reports or claims, not communicating facts that are known to be false;

They must provide information or assistance in investigations regarding such possible violations and must preserve the confidentiality of information related to investigations of possible violations of the guidelines of this Policy.

- The reporting channels must accept anonymous manifestations and preserve the anonymity of the whistleblowers.
- Good faith reports are protected. Administrators or employees who attempt or practice retaliation against those who report possible violations of the guidelines of this Policy will be eligible for disciplinary sanctions.

4.3. Relationship with Stakeholders

The following items express our way of doing business and relating to our *stakeholders*, including customers, suppliers, service providers, partners, shareholders, investors, public sector, press, social media, third sector and even with employees and administrators.

4.3.1 Relationship with customers

At Itaú Unibanco we are focused on client and user satisfaction at all stages of their relationship with the institution. To that end, we are committed to maintaining high standards of business conduct, monitoring the quality of sales and adhering to laws, standards and regulations, in all jurisdictions in which we operate and establish business relationships. Thus, customers and users make the decision, freely and consciously, for the products and services that are most suited to their interests, needs and objectives. In the case of providing services and relationships with *cross-border* (international) customers by any employee of the Conglomerate, the specific rules applicable to conducting the business must be observed.

4.3.2 Relationship with suppliers, service providers and partners

We strive to have with our suppliers, service providers and partners the same transparency, lawfulness, quality and trustworthiness we have achieved with our clients.

To this end, the Relationship Code with Suppliers* guides interactions between our employees and suppliers.

All are subject to a risk analysis process to ensure proper relationship.

(* although the Relationship Code with Suppliers shall not apply to international units, they should have practical suppliers, service providers and business partners assessments in line with the guidelines applied in the matrix.

4.3.3 Relationship with shareholders and investors

In order to preserve the specific interests of shareholders and investors, we are committed to disclosing relevant information in a correct and timely manner to our shareholders and investors, regardless of the interest they hold.

The behavior expected from the investor relations professional is defined in the Code of Conduct for Investor Relations available on the Investor Relations website:

<https://www.itaubr.com.br/relacoes-com-investidores/Download.aspx?Arquivo=4ikpB/KzBaOhLHcIJ4T4Wg==&IdCanal=jjCFHS5ladmGCLdvw2zldg==>

4.3.4 Relationship with the public sector

The relationships and contacts maintained with public officials in Brazil and abroad, regardless of position or hierarchy, require broad transparency and strict accountability from us, with the aim of guaranteeing legality and cooperation in these interactions.

At Itaú Unibanco, we have rules for relationships and contracting with public officials and companies that are part of the direct and indirect public administration. These standards include Government Relations activities, tender procedures, the signing of administrative contracts and compliance with regulators.

The expected conduct for the relationship with members of the Public Sector is defined in the Government and Institutional Relations Policy.

4.3.5 Relationship with the press, media and third sector

Relationship with the press and the third sector, such as in the processes of donations and sponsorships, are important aspects in our relationship with society. For this reason, they are based on the guidelines of the Code of Ethics and Conduct and specific internal procedures.

4.3.6 Relationship with employees and managers

All interaction between employees and managers must always be guided by respect for Human Rights and the promotion of social diversity, combating any form of discrimination, harassment, prejudice and unworthy working conditions.

These precepts are defined in the Itaú Unibanco Code of Ethics and Conduct, in the Human Rights Commitment and specific internal procedures, such as: Ombudsman procedure, Guide for Combating Moral Harassment and Diversity and Inclusion Policy.

5. PREVENTION OF UNLAWFUL ACTS

It is unacceptable to practice or tolerate business and operations that may contribute to the performance of unlawful or criminal acts. To comply with this prohibition, Itaú Unibanco has specific procedures for preventing, detecting and combating and Corruption. Such procedures are part of a governance structure guided by national and international best practices, aiming at transparency, compliance with standards and regulations and cooperation with police and judicial authorities.

6. DISCLOSURE AND TRADING OF SECURITIES AND PERSONAL INVESTMENTS

Employees and managers personal investments must be oriented towards the long term, maintaining the members solvency and credibility, in order to avoid any reputational risk for Itaú Unibanco.

We have internal policies and specific procedures on conduct in securities negotiation and on segregation of activities between departments in order to guarantee the confidentiality of non-public information on securities and to ensure fairness and smooth functioning of the markets.

The information held by managers and employees as a result of their professional activities at Itaú Unibanco Conglomerate must be kept confidential and cannot be used as a basis for making decisions about their personal investments, avoiding Insider Trading and other unfair practices.

Transactions with Securities of Publicly-Held Companies Related to Itaú Unibanco Holding SA or referenced therein must comply with the standards set forth in Trading Policy for Securities Issued by Itaú Unibanco Holding SA.

The acknowledgment agreement signed by the employee will identify the respective set of rules that must be followed to guide their personal investments. The International Units must observe local rules regarding personal investments and the employees of these units must seek to be aware of the rules with the local Compliance department.

Doubts about personal investments: - Securities of the conglomerate; - Assets of other companies.

7. SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY

Our objective goes beyond financial results, seeking to generate shared value, which is why we conduct our actions. We want to be partners in developing people, society and the countries where we operate. In this context, we recognize our responsibility to play a transforming role, our commitment to sustainable development is at the core of our activity and is reflected in our sustainability strategy, which guides the integration of social, environmental and climate aspects into our businesses, and the way we generate value for society through our Positive Impact Commitments (sustainability strategy with public goals on the institution's website), which permeate the entire organization and guide our decision-making in our businesses, activities and processes.

We promote financial education, the integration of social-environmental issues into business and activities, and we value transparency in our practices, building sustainable relationships.

For more information on this subject, access the Social, Environmental and Climate Responsibility Policy.

8. CONFLICT OF INTEREST

Whenever the personal interests of a manager or employee are not in line with those of the Institution or its stakeholders, a conflict appears. These situations can jeopardize our reputation.

Any type of conflict, in addition to being promptly communicated to management and the competent channels, must be managed in an effective and transparent manner. People involved in possible conflicts of interest should refrain from decisions that involve them, leaving the forum when such decisions are dealt with.

9. DISCIPLINARY SANCTIONS

Managers and employees who violate the terms of this Policy are subject to the disciplinary sanctions provided for in an internal policy.

At International Units, disciplinary sanctions will be applied in accordance with applicable policies and legislation.

10. SPECIFIC GUIDELINES

More restrictive guidelines than those in this Policy may be established in internal rules of the companies or departments of the Conglomerate. In case of conflict between the guidelines of this Policy and the local laws of the representations abroad, the most stringent standard will prevail, as long as it does not violate local law.

For departments where it is necessary to have a Conduct manual with specific guidelines for the business, it must be consulted in the department itself (e.g. department's intranet or internal documents). However, it is important to point out that specific internal documents do not eliminate the application of the guidelines established in the documents above and in the procedures subordinated to this policy.

PROCEDURE FOR CONFLICTS OF INTEREST (GLOBAL)

Whenever a manager or employee's personal interests are not in line with those of the Itaú Unibanco Conglomerate (Conglomerate) or its stakeholders, there is a conflict. These situations can jeopardize the Conglomerate's integrity and reputation. That is why they must be enforced effectively and transparently, **in addition to being promptly communicated to management and competent channels.**

Furthermore, the people involved in possible conflicts of interest should refrain from decisions that involve them, leaving the forum when such decisions are dealt with (in internal meetings like, for example, integrity and ethics committees or other similar meetings; or even external forums like Executive Board and Board of Directors meetings, and Partners' Assemblies/Meetings where the party involved is a member).

Below are some of the most common conflict of interest situations identifiable in the Conglomerate:

1. USE OF CONGLOMERATE AND THIRD-PARTY INFORMATION, REGISTRATIONS, AND KNOW-HOW.
2. HOLDINGS IN COMPANIES
3. EXTERNAL ACTIVITIES
4. PUBLIC OFFICE CANDIDACY AND ELECTION
5. KINSHIPS AND PROXIMITY RELATIONS
6. RELATIONS WITH CUSTOMERS, SUPPLIERS, BUSINESS PARTNERS, AND EMPLOYEES.
7. GIFTS, INVITATIONS, AND HOSPITALITIES
8. GIFTS BETWEEN EMPLOYEES
9. CONTRIBUTIONS (DONATIONS AND SPONSORSHIPS): OFFERINGS AND RECEIVING.
10. PERSONAL INVESTMENTS.
11. QUESTIONS AND EXCEPTIONS

USE OF CONGLOMERATE AND THIRD-PARTY INFORMATION, REGISTRATIONS, AND KNOW-HOW

Information, including databases of any kind (internal and confidential), records of people and companies (employees, clients, suppliers, competitors, etc.), and know-how (knowledge, technologies, methods, models, systems, policies, etc.) that circulate internally are the responsibility of the Conglomerate.

Therefore, managers and employees must use this information, records, and know-how in accordance with the law and internal standards regarding information security and privacy, avoiding its misuse and leakage.

Managers and employees may not use the Conglomerate's Information, records, and know-how for private purposes or pass it on to third parties without prior authorization, even after leaving the Conglomerate.

When voluntarily or involuntarily receiving sensitive or confidential information regarding competitors from third parties (e.g., customers, business partners, suppliers, etc.), this information must not be passed on or used internally or externally to the organization.

1.1 Authorization for external use

The use of information or know-how in external activities and publications, such as those listed below, must be previously authorized.

1. Lectures, debates, seminars, courses, congresses, interviews, external projects, etc.
2. Academic papers, monographs, dissertations, articles, theses, books, handouts, etc.
3. Newspapers, magazines, social media, websites, blogs, chats, etc.
4. Offering the bank's information and know-how to third parties.
5. *Benchmarking** with companies in the market.

The use of information classified as internal or confidential must be authorized via email by (i) the director of the department that owns the Information and (ii) the superintendent (or higher hierarchical level) of the employee/administrator, or by the general director or vice president for information classified as restricted.

That authorization must be obtained even if the activity or publication is carried out on behalf or in the Conglomerate's interest.

The same rules must apply when third parties request the use of the Conglomerate's Information.

Additionally, for items 1 and 3 above, the Press Relations and Participation in Awards and Recognition in Internal Policy guidelines for Brazil and local guidelines for international units must be followed.

*Employees must request authorization from a superintendent or someone higher in the hierarchy before conducting *benchmarking* meetings.

Articles publication, participation in interviews on any media vehicle (print, electronic, internet or television), even if they use only public information, where the employee identifies himself as being from Itaú Unibanco (in a signature, in mentions in the text, etc.) must be submitted to the Corporate Communication Superintendence

2. HOLDINGS IN COMPANIES

2.1. Board Members

Board members must inform the Nomination and Corporate Governance Committee of any interest they hold in other organizations for analysis and possible reporting of potential conflicts of interest.

2.2. Employees and Administrators (except Board members)

a) May not form a company or have holdings* in companies or undertakings in the same business lines as the institution or whose activities conflict in any way with the activities developed at Itaú Unibanco (e.g., activities involving financial products and services).

(*) exceptions are made to invest in an organized securities market.

b) May be partners in companies or undertakings in different lines of business than that of the institution, provided that:

- There is no conflict of interest between the activities carried out at the institution and those carried out in these companies and undertakings;
- The work hours established in the employment contract are not interfered with.
- Partnerships are not formed jointly by employees in the same department;
- There is no internal advertising of this activity among employees or even with customers, suppliers, or business partners;
- No equipment, machines, systems, office supplies, etc. from the institution is used for the benefit of the external activity or enterprise;
- The rules of item 1 [**USE OF CONGLOMERATE AND THIRD-PARTY INFORMATION, REGISTRATIONS AND KNOW-HOW**] above are followed.
- The direct manager is informed.

b.1) Furthermore, in addition to the guidelines above, they may participate in companies or invest in *startups*, *FinTech's*, *P2P lending* platforms, and the like, provided that:

- There is no conflict with the employee's activities;
- Those are minority stakes, and the employee has no management authority in the business;
- Investments are not made jointly by employees in the same department;

b.2) For enterprises or external companies whose purpose is to provide services related to lectures, *live streams*, consultancies, courses focused on financial management/planning, to individuals or companies, on websites, blogs, social media, etc., in addition to guidelines of item b) above, the following practices should also be followed:

- The shared content must cover only **general market information**, which does not refer to internal, confidential, or restricted practices/information (e.g., knowledge, data, techniques, technologies, methods, strategies, systems, software, among others) of the Conglomerate, or its customers, partners, suppliers, and competitors;
- The Conglomerate's or competitors' products or services may not be offered;
- The employee/administrator will not be able to identify himself or herself and speak on behalf of the Conglomerate;
- Whether it is included on their page, profile, presentation, or any other expositive material, a disclaimer warning that the contents or presentation bears no relation with the official stance of the Conglomerate.
- Private services (paid or unpaid) cannot be provided to other employees, customers, suppliers, or business partners, in a way that generates a conflict of interest (see item 6 k) below).

Before starting a company, regardless of its type, should there be questions about the existence or not of a conflict of interest, employees must inform management and consult the Ethics Consultancy.

2.3. Registering holdings in companies

In Brazil, holdings in companies or ventures in which there is a question about a potential conflict of interest with their activities in the bank or the same branches of activity in the institution must be registered in internal system.

If the manager does not have external management in companies or enterprises, he/she must register the option "I don't have". Outdated records must be immediately corrected or deleted from the register.

3. EXTERNAL ACTIVITIES

3.1. Board Members

Board members must inform the Nomination and Corporate Governance Committee of any external activities they perform in other organizations for analysis and possible reporting of potential conflicts of interest.

3.2. Employees and Administrators (except Board members)

a) Cannot perform external activities to assist in or directly contribute to the management of companies or enterprises that conflict with the activities performed within the institution.

b) Should consult the Ethics Consultancy to:

b1) Perform activities in companies or ventures that conflict with business lines as the institution, even if they do not conflict with their activities (e.g., activities involving financial products and services).

b2) Perform activities in companies owned by the institution's clients, suppliers, business partners, and competitors in a way that creates a conflict of interest.

b3) Participate in company boards, professional activities in the media, advertising companies, business associations, and professional associations. Activities involving the media, advertising companies, and interviews should also be reported to the Corporate Communication Area to obtain a specialized opinion.

c) May perform external activities in companies and ventures with different fields of activity to those of the institution, and which do not conflict with their activities, such as, for example, educational institutions, third sector companies, businesses, and services, provided that:

- There is no conflict of interest between the activities carried out at the institution and those carried out in these companies and ventures.

- The work hours established in the employment contract are not interfered with.

- There is no internal advertising of this activity among employees or customers, suppliers, or business partners.

No resources, equipment, machines, systems, office supplies, etc. from the institution are used to benefit the external activity or enterprise.

- The rules of item 1 [**USE OF CONGLOMERATE AND THIRD-PARTY INFORMATION, REGISTRATIONS AND KNOW-HOW**] above are followed.

- The direct manager is informed.

c1) For external activities related to lectures, *live streams*, consultancies, courses focused on financial management/planning, to individuals or companies, on websites, blogs, social networks, etc., in addition to the guidelines above, the following practices should also be followed:

- The shared content must cover only **general market information**, which does not refer to internal, confidential, or restricted practices/information (e.g., knowledge, data, techniques, technologies, methods, strategies, systems, software, among others) of the Conglomerate, or its customers, partners, suppliers, and competitors;
- The Conglomerate's or competitors' products and services may not be offered;
- Employee/administrator will not be able to identify himself or herself and speak on behalf of the Conglomerate;
- Whether it is included on their page, profile, presentation, or any other expositive material, a disclaimer warning that the contents or presentation bears no relation with the official stance of the Conglomerate.
- Private services (paid or unpaid) cannot be provided to other employees, customers, suppliers, or business partners, in a way that generates a conflict of interest (see item 6 k) below).

d) May perform activities in non-profit institutions of public or community interest: religious and third sector institutions, political parties, associations, clubs, condominiums, neighborhood associations, etc., provided that:

- There is no conflict of interest between the activities carried out at the institution and those carried out in these institutions.
- The work hours established in the employment contract are not interfered with.
- The rules on item 1 [**USE OF CONGLOMERATE AND THIRD-PARTY INFORMATION, REGISTRATIONS AND KNOW-HOW**] above are followed.

e) Must consult the Ethics Consultancy and inform a director or someone at a higher hierarchical level before performing professional activities in (or connected to) public office, open positions, commissioned or appointed, or as a service provider (self-employed or through a legal entity) to the public agency.

f) Must also request prior authorization from a director or someone at a higher hierarchical level before giving lectures or presentations on behalf of the Conglomerate, even if they do so at events by representative entities such as, for example, Febraban and Anbima.

g) When performing activities on behalf of the Conglomerate or in a business association in the financial sector, managers (or employees) must: (a) waive the remuneration offered in exchange for the activity, using the pattern template for this purpose; **or** (b) receive the compensation and inform Compliance and the HR Department (compensation) so that this sum is deducted from their "total cash" in the Conglomerate.

3.3. Employees and Administrators (except Board members) civil servants or former civil servants

Administrators and employees must inform the manager if they hold or held a public service position from which they were exonerated less than five years ago, which may represent a conflict of interest with the bank's activities. Should there be questions about the existence or not of a conflict of interest, consult the Ethics Consultancy.

3.4. Registering external activities (including public office)

In Brazil, external activities in private, public (even if the employee/administrator has been exonerated within the past five years), or third sector bodies in which there is a question about a potential conflict of interest with their activities in the bank or the same branches of activity as the institution, must be registered (only by employees of the Central Administration in the positions of managers/specialists II and above) in internal system.

If the manager does not have external activity, he/she must register the option "I don't have". Outdated records must be immediately corrected or deleted from the register.

4. PUBLIC OFFICE CANDIDACY AND ELECTION

4.1 In Brazil

a) Administrators and employees who are running for or elected to public office must apply for unpaid leave immediately after the Electoral Court confirms their candidacy during:

- the period extending between their electoral campaign and the day of the 1st round of the election and the runoff election if there is one.
- the period extending between the campaign and the beginning of their term in office if they are elected.
- exercising public office.

b) Administrators and employees who run for public office must observe the internal institutional standards, as well as those specific to the company, and cannot receive any kind of contribution or support to their candidacy from it, nor carry out an electoral campaign on the bank's premises.

4.2. In International Units

Local rules regarding candidacy for public office must be followed. Refer to the local Compliance Officer for any questions.

5. KINSHIPS AND PROXIMITY RELATIONS

5.1. - Kinships and proximity within the conglomerate.

Administrators and employees can indicate*, maintain or become relatives or have close relationships within the Conglomerate, as long as there is no conflict of interest.

(*the indication can be made internally or externally to the organization.

In indications for hiring or transferring with the potential to generate a conflict of interest, the Ethics Consultancy's opinion must be requested, and the people in charge of hiring must be informed.

Any kinship or proximity relationships in the Conglomerate must be reported to the direct manager.

Kinship and proximity relationships are not allowed when there is a hierarchical relationship between those involved. Other kinship situations, should be evaluated by a manager and the Ethics Consultancy.

Administrators and employees must inform the Ethics Consultancy and the respective HR Consultant about possible conflicts of interest of which they are aware.

Kinship or proximity relationships within the same board should be reported by management to the department's director, regardless of whether there is a conflict of interest or not.

Employees cannot authorize the hiring of relatives and people in their proximity, nor can they appoint a relative or person in proximity to them for the Y-axis evaluation (or similar forms of evaluation) and performance evaluation surveys.

In the branch network (individual or legal entity), kinship or proximity relationships are not allowed in the same agency or similar physical locations (e.g., platforms, centers, digital branches, investment advisory, and USO). Kinship or proximity relationships are also not allowed between employees who participate in communities that work in collaborative work models, whose activities result in a potential conflict of interest.

The situations below involve kinship and proximity relationships, even if there is no hierarchical relation between those involved, they should be evaluated by management and by the Ethics Consultancy to identify possible conflicts of interest:

- Supplementary activities or those related to each other (e.g., done and checked, approvals of processes and payments, sales and processing, processes and controls, interaction in communities, relations between the activities of the 1st, 2nd, or 3rd line of defenses, etc.).
- Performance evaluations, merits, and promotions, as well as access to information related to these matters.
- Situations that can affect the health of the work environment.

Note: The KYE (Know Your Employee) Corporate Policy describes the process of identifying, analyzing, and solving situations of conflict of interest in the selection and hiring process.

5.1.1 Kinship and proximity relationships with public agents

Administrators and employees must inform the manager if they have a kinship or proximity relationship with public agents or former public agents - who have been exonerated less than five years ago - which may represent a conflict of interest with the activities in the bank.

5.2 Registering kinship or proximity relationships (including public officials)

In Brazil, it is mandatory that all employees and administrators register kinship and proximity relationships in the conglomerate in IU Conecta.

6. RELATIONSHIP WITH CUSTOMERS, SUPPLIERS, BUSINESS PARTNERS, COMPETITORS, AND EMPLOYEES

Managers and Employees must:

- a) Keep the confidentiality of the Conglomerate's customers', suppliers', business partners' and employees' information, registrations, operations, hired services, etc.
- b) Refrain from conducting private business - in their name, their relatives, or on behalf of organizations or enterprises in which they are executives or partners - with individuals, professionals, companies, and

managers of companies that are clients, suppliers, or business partners of the Conglomerate, or even use their position for that purpose, to generate a conflict of interest or another kind (e.g., situations that may negatively impact on our relationship with customers and other stakeholders). Suppose they have prior or subsequent knowledge of any such situation.

Managers and Employees may not:

- a) Hire suppliers, service providers, or business partners who have a relationship with administrators or employees (e.g., kinship or proximity, interest in the company, etc.) to generate a conflict of interest.
- b) Enter into agreements, contracts, or commitments with customers, suppliers, or business partners that imply reciprocity and an exchange of favors or personal advantages for themselves or third parties or that may seem like they do.
- c) Sign or manage negotiations, be responsible for relationship management or have active and constant contact with client companies, suppliers, or business partners which:
 - c.1) They are a partner or representative of the company.
 - c.2) Their spouse (partner), relatives, or people in a close relationship are administrators (e.g., in the role of director or business manager).

Important note: if the employee is in this situation (or a similar one) where they have access to business information, leading to a potential or actual conflict of interest with a third party (e.g., customer, supplier, business partner, etc.), they or the manager must immediately contact the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE to request an assessment of the situation.

- d) Carry out transactions with related parties without taking the corporate policy rules on Transactions with Related Parties into account.
- e) Unduly facilitate business on behalf of the Conglomerate's customers, suppliers, or business partners.
- f) Request employment for relatives and people in close relationships with them from companies owned by clients, suppliers, or business partners with whom they have direct contact in the exercise of their job in the Conglomerate.
- g) Request gifts or contributions from customers, suppliers, and business partners.
- h) Manage bank accounts (current, savings, investment, etc.) and other products and services of the Conglomerate, belonging to themselves (individual or legal entity), their relatives, or persons in close relationships with them.
- (i) Manage employees' current or investment accounts under their direct management, requiring the transfer of portfolios to other managers or physical or digital branches.
- j) Provide services to the institution as third parties.
- k) Provide private services (paid or unpaid) to other employees or administrators, for themselves or on behalf of their company, in a way that generates a conflict of interest.

Employees or administrators who are in personal relationships with people from our competitors (e.g., as relatives, close relations, partners or sharing a common external activity) in a way that creates a conflict of interest, they or their manager must immediately involve the Ethics Consultancy.

Private business relationships between employees, employees, and managers, or between managers who have a hierarchical relationship with each other, must be avoided to avoid conflicts of interest or undesirable situations that may affect the work environment's health.

6.1. Registering Relationships with Suppliers

In Brazil, relationship with suppliers in which there is a question about a potential conflict of interest concerning the third party's role in their department or a different department in the bank must be registered in internal system.

Note: The KYE (Know Your Employee) Internal Corporate Policy describes the process of identifying, analyzing, and solving situations of conflict of interest in the hiring process.

7. GIFTS, INVITATIONS, AND HOSPITALITIES

7.1. Gifts - offering

a) **Prohibition:** managers and employees are prohibited to offer gifts of any nature to influence decisions, facilitate businesses that initially wouldn't be realized or obtain any improper advantage (financial or not) for yourself, third parties or the Conglomerate, directly or indirectly, to private agents or public agents, from Brazil or any other country.

b) **Gifts in cash:** managers and employees may not offer gifts in cash, favors, or the equivalent of any amount (e.g., present or prepaid cards, *vouchers* convertible into cash, etc.) to third parties from Brazil or any other country, regardless of the recipient of the Offer.

c) **Physical gifts:** offering physical gifts (e.g., presents, books, diaries, and other items of small value, acquired under the terms of the Privacy Policy or local policy applicable to the international unit) to private agents or public agents from Brazil or any other country, are allowed only when the following items are cumulatively observed:

c.1) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the gift is found.

c.2) It is linked to institutional or business relations initiatives.

c.3) Each individual gift is limited to a R\$ 400.00 value for private agents; R\$ 100.00 for public agents in Brazil; and US\$ 100.00 in international units (for public or private agents) or if it has no market value.

c.4) The department's manager offering the present with a minimum superintendent level has approved of it.

d) **Exceptions:** if the object of the gift is not acquired via the Purchasing Department or if it individually exceeds the price limits established above, the Offer must be submitted to the evaluation of the Ethics Consultancy and the approval of a director or someone at a higher hierarchical level in the department offering the gift.

e) The rules above does not apply, for example, to situations when gifts or even money are offered for massive customer and user loyalty campaigns (e.g., *iti*, *cash backs*, payment of slips, offers from the investment office, etc.). Questions about offering cash values that differ from the campaign average, recurrence, and the number of gifts allowed to the same beneficiary, must be addressed to the Ethics Consultancy..

f) **Purchase Equity and Assets Board:** management and employees of this division cannot offer presents.

7.2. Gifts: Receiving

a) **Prohibition:** managers and employees are prohibited to receive presents of any nature from private agents or public agents to influence decisions, facilitate businesses or grant any improper advantage (financial or not) for who is offering the gift, directly or indirectly.

b) **Gifts in cash:** managers and employees may not accept gifts in cash (any amount), favors, or the equivalent of any amount (e.g., gift or prepaid cards, *vouchers* convertible into cash) to third parties regardless of who makes the Offer.

c) **Physical Gifts:** receiving institutional material or relationship presents (e.g., presents, books, calendars, and other items of small value) is allowed, provided that the value of the gift does not exceed R\$ 400.00 per person in Brazil and US\$ 100.00 per person (for public or private agents) in international units.

c.1) Institutional gifts in large quantities for several employees should not be accepted, even if their value does not exceed the value stipulated in item c). Possible situations that occur must be submitted to the Ethics Consultancy for evaluation.

c.2) Material presents whose individual value exceeds the values of item "c)" must be refused.

c.3) In situations where refusing a present will cause significant discomfort, seen as an offense, or if it is not possible to return it, the administrator or collaborator must thank and inform the gift giver about the

institution's determination to donate the gift to a social service institute supported by the institution. In these situations, the administrator or employee must send an email to Compliance for consultation and guidance on refusing, returning, or even donating the gift through a specific term.

c.4) The Procedure for refusing and returning the present must be accompanied by a letter for which the model is attached to this Policy. According to the model attached to this Policy, the donation must be made by signing a Term of Delivery of Donations.

d) **Purchase Equity and Assets Board:** management and employees of this division cannot receive gifts.

e) **External awards:** gifts received in connection with Itaú Unibanco's participation in external awards not promoted by the Conglomerate must be forwarded for evaluation by the Ethics Consultancy.

7.3. Lunches and dinners

Participating in lunches and dinners with private agents and/or public agents is allowed to maintain institutional, commercial, and customer prospecting relationships. In these situations, it is preferable that the companies or parties involved bear their participants' expenses. In exceptional cases where the bank employee or administration or the counterparty offers to pay:

a) The amount offered and received must be compatible with the position and role of the person offering/receiving the invitation in the Conglomerate.

b) The cost must be reasonable.

c) The employee must communicate the fact to their immediate superior with a minimum hierarchical level of superintendent when involving public agents.

d) There must be caution with expenses and location choice (noting whether it is suitable for the public involved). It is acceptable to consume alcoholic beverages during meals, in extreme moderation, and if there is justification for the consumption.

These payments must not be made unreasonably. They must follow the internal payment and, when applicable, also the rules for relationships with public authorities described in the Internal Governmental and Institutional Relationship Policy and the respective Procedure. In international units, local standards and applicable guidelines must be followed.

7.4 Tickets/invitations: offering and receiving

7.4.1. Offer

a) **Tickets /Invitations linked to events sponsored by the Conglomerate:** people from the private sector, from Brazil or any other country, are allowed to offer tickets/invitations linked to events sponsored by the Conglomerate (e.g., invitations to congresses, lectures, forums, cultural or sporting events, etc.), provided that, cumulatively:

a.1) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the present is found.

a.2) The guest's reputational assessment is carried out according to criteria and rules defined in Brazil's Sponsorship Policy or the local rules applicable to the international unit.

a.3) Delivering tickets/invitations to events sponsored by the Conglomerate to public agents is not allowed, even if clients of the Conglomerate, or to employees or administrators of self-regulatory entities or other entities that act as self-regulatory.

a.4) Delivering tickets/invitations for events sponsored by the Conglomerate to public agents for institutional events of the Conglomerate for which tickets are not sold, such as the opening of new units, is allowed.

b) **Tickets/Invitations linked to events sponsored by the Conglomerate:** tickets linked to events sponsored by the Conglomerate (e.g., invitations to congresses, lectures, forums, cultural or sporting events, etc.) can be offered to people from the public or private sector, from Brazil or any other country, provided that, cumulatively:

b.1) The invitation is addressed to the highest authority of the public body or entity.

b.2) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the present is found.

c) Other invitations or tickets to events not sponsored or promoted by the Conglomerate, to promote technical and market development (e.g., invitations to fairs, seminars, congresses, forums, meetings, etc.) can be offered to private agents in Brazil and abroad, provided that:

c.1) The ticket/invitation offered is not intended to influence decisions.

c.2) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the gift is found.

c.3) Gifts are not offered with unreasonable frequency, to the same person or in disproportionate amounts.

c.4) A collaborator with a minimum position of director or someone at a higher hierarchical level has approved it.

d) **Hospitality:** offering tickets/invitations includes offering hospitality (e.g., travel expenses, transportation, accommodation, meals, among others), provided that those are offered under conditions similar to those practiced by the Conglomerate for its administrators and employees and provided a director or someone at a higher hierarchical level approves it. Guidance on offering hospitality to speakers can be obtained from the Events Procedure in the Conglomerate. In international units, local standards and applicable guidelines must be followed.

e) The person making the Offer must be comfortable in publicly justifying the guest's participation in the event.

f) The Offer must not be provided with unreasonable frequency to the same guest in a way that may raise any suspicion of undue advantage.

g) The Offer can be made if the person making it is not aware of relevant ongoing negotiations, of any interest to the Conglomerate and the guest, that depends on them or their influence to be sorted.

h) **Non-institutional events:** offering tickets/invitations to sports or cultural events, with no link to the actions listed in items a), b) and c) above, must be evaluated by the Ethics Consultancy and deliberated by the Integrity and Ethics Committee of the Executive Department or external unit. This assessment must be preceded by a reputational analysis of the recipient by the Corporate Security Directorate.

Note:

1) Particularities regarding the approval flow for offering invitations at events sponsored or promoted by Itaú Unibanco in international units can be found in an attachment to this Procedure.

2) Other informations regarding events and contracting speakers can be obtained in the Events Procedure in the Itaú Unibanco Conglomerate.

7.4.2. Receiving

a) **Technical Events:** the Conglomerate's managers and employees can receive tickets/invitations to technical events (e.g., lectures, congresses, forums, visits to companies, business meetings, etc.) from private or public agents to publicize the brand, products, services and undertakings, technology, techniques, provided that:

a.1) It is compatible with the position and role of the recipient of the gift and with Itaú Unibanco's objectives and needs.

a.2) It must not be received with unreasonable frequency in disproportionate quantities in a way that may raise any suspicion of undue advantage.

a.3) The ticket/invitation offered is not intended to influence decisions and does not raise suspicion of undue advantages.

a.4) There is approval from the immediate manager.

b) Institutional, marketing, cultural and sporting events: administrators and employees may, as a result of their condition as administrators or employees at the Conglomerate, receive tickets/invitations linked to institutional, marketing, events from private agents or public agents cultural and sporting events, celebrations, or celebrations, aiming to strengthen the relationship, provided that:

b.1) The ticket/invitation received is not intended to influence decisions.

b.2) It must not be received with unreasonable frequency in disproportionate quantities in a way that may raise any suspicion of undue advantage.

b.3) The ticket/invitation is compatible with the position and role of the recipient.

b.4) An email is sent to the Ethics Consultancy for their assessment.

b.5) A collaborator with a minimum position of director or someone at a higher hierarchical level has approved it. Invitations to general directors, vice-presidents, and the president must be approved by the Executive Committee.

c) Non-institutional cultural and sports events (not related to item b): tickets/invitations to sports or cultural events should not be accepted if they are not linked to institutional, marketing, or technical events by customers, suppliers, or partners commercials (including companions or not). Exceptional cases must be evaluated by the Ethics Consultancy with subsequent submission for deliberation by the Integrity and Ethics Committee of the Executive Department or external unit.

d) Hospitality: in any situation of receiving tickets/invitations, expenses with travel, transportation, accommodation, meals, etc., must be covered by the Conglomerate.

d.1) If it is not possible to refuse the Offer (e.g., the Offer is made in the form of a "package") or if the refusal causes discomfort, acceptance will be conditioned to prior evaluation and registration by the Ethics Consultancy and approval by the executive director of the department or someone at a higher hierarchical level.

d.2) Acceptance of invitations to general directors, vice-presidents, and the president is conditioned to the Executive Committee's approval,

e) Receiving tickets/invitations linked to events sponsored by the Conglomerate and offered by third parties (e.g., suppliers, business partners, and customers) is not allowed, except when the third party is also a sponsor of the event.

7.5 Other prohibitions

No alternative form of offering gifts and amenities will be allowed as a way of violating the above rules and restrictions, such as, for example, offering presents to relatives of recipients who could not receive it, recurring offers, or disproportionate quantities of them.

No alternative form of receiving gifts and amenities will be allowed as a way of violating the above rules and restrictions, such as, for example, receiving gifts from relatives of administrators or employees who could not receive them, forwarding them to places other than the office or residence (when working from home), recurring receipts or disproportionate quantities of them. Any unusual events must be communicated to the employee's immediate manager and the Ethics Consultancy.

8. GIFTS BETWEEN EMPLOYEES

Prudence and moderation are advised both when offering and accepting gifts exchanged in the work environment or internal and external gatherings (birthdays, weddings, lunches or dinners, farewell parties, visits or gifts to managers or member(s) of the team, etc.) to avoid exaggeration, suspicion, misunderstanding, and rumors. The price of gifts exchanged or invitations must not exceed the sum stipulated in item 7.2 c)

Furthermore, optional and voluntary participation in allotments or collections to fund internal celebrations, gifts for colleagues, secret Santa, or donations must be guaranteed and respected, without allowing the disbursed amounts to be disclosed, to maintain a healthy and cordial atmosphere.

9. CONTRIBUTIONS (DONATIONS AND SPONSORSHIPS): OFFERING AND RECEIVING.

a) Contributions made by the Conglomerate, in financial or non-financial resources, must comply with the provisions of the Sponsorship Policy and the Donation Policy or in each unit's sectoral policies and be subject to the authority and approvals stipulated in these policies.

- b) Contributions must not be offered or accepted - or allow for this interpretation - to exchange favors, facilitate business or operations, or any other improper benefit or advantage (financial or not) for the institution or third parties.
- c) Contributions must not be offered or accepted according to the laws and regulations of the countries in which the institution is present and with the institution's companies' internal rules.
- d) To avoid suspicion of favor in audits, inspections, and negotiations, contributions of any kind to regulatory or supervisory bodies, as well as to employers' and employees' unions, are forbidden.
- e) Contributions to the Conglomerate must be made through its foundations and social and cultural institutes.

9.1. Contributions to candidates for public office and political parties

Contributions to election campaigns, candidates for public office, and political parties by Conglomerate companies in Brazil and abroad are prohibited.

9.2. Contributions to the third sector

- a) The Conglomerate's contributions to third sector organizations must follow corporate guidelines. (see Donation Policy and Sponsorship Policy in Brazil, or the local standards applicable to the international unit).
- b) Third sector organizations, their managers, and other partners or those benefiting from the institution's contributions must have a good reputation.

9.3. Contributions to managers and employees

Contributions to employees (book publishing, art exhibitions, film and play productions, sports events participation, etc.) must be approved by the Integrity and Ethics Committee Members of the Conglomerate companies.

10. PERSONAL INVESTMENTS

In investments made for their benefit in the financial market, situations that may constitute a conflict of interest concerning the Conglomerate and/or its clients must be avoided. The Personal Investment Policies applicable in Brazil or local standards applicable to the international unit must be followed. When in doubt, contact the Control Room in the Wholesale Compliance Superintendence. In international units, local standards and applicable guidelines must be followed. Refer to the local Compliance Officer for any questions.

11. QUESTIONS AND EXCEPTIONS

Questions and exceptional assessments related to the Procedure topics, or possible related matters not covered, should be referred to the Ethics Consultancy at the Regulatory and Compliance Relationship Superintendence or the respective local Compliance Officer for International Units. If necessary, the Ethics Consultancy or the local Compliance Officer may refer the case for deliberation in an integrity and ethics collegiate body.

Situations of conflict or possible conflict of interests identified through the compliance register in the internal system, in addition to the analysis of the Ethics Consultancy, the situation can also be assessed by the Compliance Area or even referred to the Integrity and Ethics Committee for deliberation.

Claims or disagreements related to the topics of this Procedure, or the opinions issued by the Ethics Consultancy, must be deliberated by a specific Sector Integrity and Ethics Committee for the executive department in Brazil or the specific International Unit.

Approved by the Compliance board on 02/12/2021

INTEGRITY AND ETHICS PROGRAM PROCEDURE (GLOBAL)

1. INTEGRITY AND ETHICS PROGRAM OBJECTIVE

Establish guidelines related to the Integrity and Ethics Program in line with the Code of Ethics.

2. TARGET AUDIENCE

This procedure applies, in Brazil and abroad, to all Itaú Unibanco Conglomerate administrators and employees, as well as to any interaction that the Conglomerate maintains with clients, partners, suppliers and other stakeholders. It is understood as an administrator, any member of the Board of Directors and of the Executive Board.

3. INTEGRITY AND ETHICS PROGRAM

It is the set of guidelines and processes aimed at ensuring compliance with Decree 8420/2015 as well as the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, among others in the countries where we have a presence.

The Integrity and Ethics Program is composed of processes and procedures as detailed below:

3.1 Commitment Senior Management

The collegiate bodies of integrity and ethics in Brazil are responsible for defining the guidelines and practices of the program, for monitoring their compliance and other actions necessary for the management of the program. They meet according to a defined frequency and whenever there is a need. Documented in internal procedure. Are the same actions that are carried out in the International Units in the collegiate bodies that deal with the local topics of integrity and ethics, when applicable

3.2 Policies and Procedures

These encompass the creation of and updates to the conglomerate's integrity and ethics guidelines, in order to conform them to the Code of Ethics, applicable legislation and good national and international market practices.

Policies and procedures related to the program are listed in the Integrity, Ethics and Good Conduct Corporate Policy.

3.3 Education and Communication

The education and communication plan aims to disseminate knowledge on the topics covered in the integrity and ethics policies, as well as their guidelines, so that administrators and employees are trained and informed to act in accordance with the values and principles of the institution, described in the Code of Ethics of Itaú Unibanco, in its business, relationships and other activities. In addition, it guides the identification and communication of adverse situations that may pose risks to the Conglomerate's business, relationships and operations, as well as affect its image and reputation.

3.3.1 Training

The education actions are carried out at a distance (e-learning/lives/meetings) and/or in person, being coordinated by the departments of Corporate Compliance and AML, Corporate Security, Ombudsman, Procurement, among others with the support of the HR Department (IOX Learn and Develop).

Training helps administrators and employees to:

- Deepen knowledge of integrity and ethics guidelines, as well as their application to business and process and people management, with a view to minimizing related risks;
- Be able to identify, prevent and resolve/communicate any ethical dilemmas, conflicts of interest, interpersonal conflicts, misconduct and even illegal acts that arise during the development of their daily activities;
- Know how to act in the identification and communication of adverse situations that may pose risks to the Itaú Unibanco Conglomerate's business, relationships and operations, as well as affect its image and reputation;
- Know the channels for reporting and resolving questions.

Education actions are replicated to the International Units, respecting local contexts and norms.

3.3.1.1 Governance of training:

I. Training topics

The trainings cover subjects such as Business Ethics, Conflicts of Interest, Prevention of Corruption, Prevention of Money Laundering (AML) / Combating the Financing of Terrorism (CFT), Information Security, LGPD, Compliance, Relationship with Suppliers, Customers, Government, RFPs, among others. If other issues or risks are identified that affect the integrity of the organization, these will be incorporated into training actions.

II. Target audience

Eligibility for mandatory training in the integrity and ethics program covers employees and administrators in Brazil and at the International Units. Specific training is also provided for sensitive departments and suppliers.

III. Methodology

The Integrity and Ethics Program trainings are structured in learning paths containing content at a distance (available on the training platform, as well as on the local platforms of the International Units) and face-to-face /virtual, which address concepts, practical case studies and the application of knowledge testing; videos and articles, lectures/presentations, among others.

Content review takes place at most every 2 years from the date of its release. The e-learning courses have a retention assessment with a minimum percentage of correct answers of 70% of the knowledge questions on the topics, and failure to reach this percentage implies reassessment of the training until the minimum percentage of knowledge is reached.

The e-courses last approximately 3 hours (taking into account the training itself and the support materials) and the face-to-face sessions range from 30 to 60 minutes.

On a monthly basis, the Integrity and Ethics team monitors the training targets, which currently is the adhesion of 90% of all employees and administrators.

IV. Training controls

Control of the execution and use of training is carried out by indicators generated by the HR Department IOX – Business School, in conjunction with the People Telemetry department and are periodically monitored by the departments managing the themes.

Pending issues are sent for employee awareness, as well as the percentages of pending trainings are submitted to management (immediate manager, superintendent and director) through alerts sent by the People Telemetry department, via email, and the Managerial Results are presented to the Bank's executive departments and reported to the Integrity and Ethics Committees.

In the International Units, control over the execution and use of training is carried out through indicators generated by School of business, in conjunction with the Cross-border Compliance Management and local Compliance Officer. Reinforcement and awareness actions for employees are carried out locally.

3.3.2 Communication

Communication practices comprise awareness campaigns, communications on specific topics related to the Integrity and Ethics Program, with an emphasis on awareness, dissemination of standards and guidelines and risk mitigation.

Annually, the Corporate Compliance and AML Board, together with the Endomarketing department, prepares a communication schedule on matters related to the Code of Ethics, the Corporate Policy for the Prevention of Corruption and the Corporate Policy Integrity, Ethics and Conduct, among others matters relevant to the Institution's Integrity and Ethics Program. This plan is approved by the Integrity and Ethics Board.

This action takes place through monthly communications to all employees and administrators, through e-mails, publications and posts on intranet, among others. In addition, other communications are made opportunely due to identified risks, complaints, doubts, fraud, among others.

We have indicators of our channels of doubts and complaints for reporting and monitoring purposes, so we also select the main subjects for the preparation of communications.

In the International Units the Institutional Communication plan is applied by the Corporate Compliance and AML Board in partnership with the Compliance Officer of the International Units and with the Endomarketing department.

3.4. Monitoring the Integrity and Ethics Program

The continuous monitoring of the effectiveness of the program and of possible adaptation needs is coordinated by the Corporate Compliance Board and AML with periodic reporting to the Audit Committee and the committee members that deal with matters related to Integrity and Ethics, defined in the Policy

Corporate Integrity, Ethics and Conduct.

This monitoring includes tests of key controls in the processes that can be performed by Operational Risk or Internal Audit (2nd and 3rd lines of defense), Compliance assessments, monitoring of indicators, information from channels of doubts and complaints and handling of new regulations that impact the program.

The Corporate Compliance and PLD Board submits to the Audit Committee and the Integrity and Ethics Boards, as applicable: (i) before the start of the calendar year, an annual monitoring plan for the following year; and (ii) during the second quarter of the year, an annual report, included in the compliance report, with the effective execution of the plan, the relevant situations identified in the previous year and the needs for adaptation in the Integrity and Ethics Program.

Internal Audit carries out periodic independent evaluation of the Integrity and Ethics Program and related processes. The analysis of the program and possible opportunities for improvement may also be carried out by an external consulting / audit, legal, certification or accreditation company.

The 1st line of defense (business and operational departments) plays an important role in the definition and application of internal controls related to the Integrity and Ethics Program, which aim to ensure the correct progress of processes and other activities, as well as the mitigation of risks inherent to them.

Specific guidelines for monitoring and handling situations that may lead to conflicts of interest are described in Conflicts of Interest Procedure.

In addition, the Integrity Program has monitoring indicators, which are:

Term: Employees and administrators are aware of and declare to have knowledge and access to the Conglomerate's Integrity Policies, through the Term of Adhesion to the Integrity Policies, this is monitored and reported via indicator in the various Integrity and Ethics Committees and there is a monthly collection of pending issues to the directors.

Registration: Possible internal conflicts of interest are evaluated based on the Compliance record that must be updated by employees and administrators as defined in the Conflicts of Interest Procedure. Exceptions to the rule are submitted for analysis by the Corporate Compliance Board and, if a possible conflict is identified, the employee's managers are informed for knowledge and action.

Training: The training is monitored and reported periodically to the Integrity and Ethics Committees and, in order to improve the performance rate, monthly collections of pending issues are also made to the directors.

Through the results of monitoring, the needs to adapt and improve the Integrity and Ethics Program are identified.

RESPONSIBILITIES

4.1. Board of Directors

Approving the conglomerate's integrity and ethics guidelines and their respective amendments.

4.2. Audit Committee

Monitor the processes related to the Integrity and Ethics Program through reports from the Internal Audit, Operational Risk, Corporate Compliance and AML, Corporate Security and Ombudsman Superintendence, as well as through other mechanisms available to it.

4.3. Internal Audit

Conduct independent periodic evaluation of the Integrity and Ethics Program.
Carry out periodic and independent assessment of the processes related to the Integrity and Ethics Program, as required by regulatory bodies and risk assessment.

4.4. Integrity and Ethics Committee Members

The main responsibilities of the Higher Committee ESG and other Integrity and Ethics Committees in Brazil are described in the annex of the procedure PR-333 - STRUCTURE OF ITAÚ UNIBANCO HOLDING SA (BRAZIL). For International Units they are defined in local procedures.

4.5. Corporate Compliance and AML Board

4.5.1 The Superintendence of Compliance, Regulators, Integrity, Social, Environmental and Climate (SCRISC) is responsible for managing the Integrity and Ethics Program and its main functions are:

- a) Coordinate the Integrity and Ethics Committees in Brazil and their regulations and monitor compliance with the deliberations.
- b) Develop and provide integrity and ethics training and awareness campaigns and make them available to managers and employees in Brazil and abroad.
- c) Clarify doubts and guide managers and employees about this Procedure and its application, as well as the Conflict of Interest Procedure, situations related to ethical dilemmas, misconduct and other practices that conflict with the associated institutional policies through the Ethics Consultancy or through local channels at the International Units. If necessary, employees or administrators of International Units can turn to the local Compliance Officer or the Ethics Consultancy in Brazil for assistance.
- d) Monitor and report compliance with the guidelines related to the Integrity and Ethics Program for the Integrity and Ethics Committee Members.
- e) Forward the periodic reports provided for in this procedure for consideration by senior management and to the integrity and ethics forums.
- f) Report potentially significant situations, related to the topics covered in this document to the Audit Committee and Collegiate Integrity and Ethics, as necessary and in a timely manner.
- g) Answer questionnaires, market research, internal and external reports related to integrity and ethics.

4.5.2 Wholesale Compliance Superintendence

- a) Through the Cross-border Compliance Management, coordinate the implementation, monitoring and evolution of the Integrity and Ethics Program in International Units, in partnership with SCRISC.
- b) Respond to questionnaires, market surveys, internal and external reports related to integrity and ethics issues with regard to International Units, according to demand from SCRISC.
- c) To assist in clarifying doubts about this Procedure, as well as the Conflict of Interest Procedure (PR-57 - CONFLICT OF INTEREST PROCEDURE) and its application.

4.6 Operational Risk Board

- a) Reports on issues of integrity and ethics in the CCRO of each UI when necessary, observing the procedures established in internal procedure and those established by the respective UI and Local CRO. Topics that may have a transnational impact (e.g. corruption) or others that the Local CRO deems necessary for the Holding's knowledge and/or action must be discussed with the Regional CRO, who will bring the topic for discussion with the Holding in the appropriate forums.

4.7 Corporate Security Board (DSC)

- a) Maintain a specific channel for receiving and investigating complaints with indications of illegality of any nature and possible violations of the guidelines of this Policy and the Code of Ethics, with regard to misconduct.
- b) Report potentially significant situations related to the topics discussed in this document to the Audit Committee and Integrity and Ethics Committee Members, as necessary and in a timely manner.

4.8 Ombudsman Superintendence

- a) Welcoming, guiding and handling suspicions, red flags and complaints about ethical deviations and practices contrary to institutional policies, such as moral or sexual harassment, discrimination, disrespect and interpersonal and conflicts of interest on the part of administrators and employees in: Brazil * at the work environment.
- b) Report, at least every six months, channel information to the Integrity and Ethics Committees and to the Audit Committee.

- c) Report potentially significant situations related to the topics discussed in this document to the Audit Committee and Integrity and Ethics Committee Members, as necessary and in a timely manner.

* Note. important: for the International Units, the Ombudsman becomes an exception only for cases related to:

- Complaints related to international CEOs;
- Complaints about expatriates who returned to Brazil and had a case that occurred abroad, or a foreigner who is in the Head Office;
- Requests made by the Heads responsible for operations (DEs / VPs);
- Complaints of non-standard situations reported by the CEOs of the International Units and agreed with DE / VP;
- In cases where there may be a conflict of interest in the local whistleblowing channels.

4.9 HR Department – IOX – Business School

- a) Enable the application of integrity and ethics training for the conglomerate, in Brazil and abroad.
- b) Manage application control and training progress.

4.10 Endomarketing

Enable the transmission of corporate communication on the topics of integrity and ethics in the conglomerate, in Brazil and abroad (with the help of country focal points for translating, producing and disseminating content - according to the available channels).

4.11 Employees and Administrators

- a) Know and follow the guidelines of the Code of Ethics, of this Procedure and other related documents
- b) Disseminate its principles and guidelines and encourage expected attitudes and behaviors.
- c) Carry out the available integrity and ethics training and adhere to the **Term – Integrity Policies**, certifying your knowledge and agreement with its content.
- d) Promptly report any suspicions of illicit or misconduct, conflict of interest or interpersonal conflicts to the competent channels.

5. DISCIPLINARY SANCTIONS

Administrators and employees who violate the terms of this Procedure are subject to the disciplinary sanctions provided in internal policy in the specific rules of each International Unit.

6. QUESTIONS AND EXCEPTIONS

Doubts and exception assessments related to the topics of this Procedure or possible issues not covered related to integrity and ethics, must be forwarded to the Ethics Consultancy or to the local Compliance Officer at the International Units. If necessary, the Ethics Consultancy or the local Compliance Officer may refer the case for deliberation in an integrity and ethics collegiate body.

Note:

Claims or disagreements regarding the topics of this procedure, or the opinions issued by the Ethics Consultancy must be resolved by the respective member(s) of the Executive Committee of the department(s) impacted in Brazil (or CCRO department) or Committee of the respective International Unit.

7. SECTOR GUIDELINES

Guidelines more restrictive than those in this Procedure can be established in the company or areas of the conglomerate's internal standards.

In case of conflict between the guidelines of this Procedure and the local laws of the representations abroad, the most stringent standard will prevail, as long as it does not violate local law.

Approved by the Compliance board on 05/31/2022