

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Companhia Aberta

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 lawabiding 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 • Corporate Corruption Prevention Policy. • Conflicts of Interest • Ethical dilemmas. 	<p>External E-mail: comitedeintegridadeetica@itauunibanco.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 	<p>External e-mails: ombudsman@ombudsman.itauunibanco.com.br or</p> <ul style="list-style-type: none"> • Personal contact
Canal de Denúncias	<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: - Corporate website: https://www.itau.com.br/atendimento-itauparavoce/denuncia/ - Phone: 0800-723-0010 - working days - from 8:30 am to 7:00 pm; - E-mail: inspetoria@itauunibanco.com.br e fornecedores_relatos@itauunibanco.com.br</p>
<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
Audit Committee	<p>Red flags and claims:</p> <ul style="list-style-type: none"> • Legal or regulatory noncompliance. • Fraud and errors in auditing, accounting and internal controls. 	<p>email: AUDIT COMMITTEE box. External email: comite.auditoria@itauunibanco.com.br.</p> <p>Mailing address: Att. Audit Committee Itaú Unibanco Holding S.A. - Praça Alfredo Egydio de Souza Aranha, 100 - Torre Olavo</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.itaubank.com.br/relacoes-com-investidores/Download.aspx?Arquivo=4ikpB/KzBaOhLHclJ4T4Wg==&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 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.

Approved by the Board of Directors on 11.24.2022

PROCEDURE FOR CONFLICTS OF INTEREST (GLOBAL)

1. INTRODUCTION

Whenever the personal interests of a manager or employee 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 the 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 INFORMATION AND KNOW-HOW OF THE CONGLOMERATE AND THIRD PARTIES
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. PRESENTS, INVITATIONS AND HOSPITALITIES
8. PRESENTS BETWEEN EMPLOYEES
9. CONTRIBUTIONS (DONATIONS AND SPONSORSHIPS): OFFERINGS AND RECEIVING.
10. PERSONAL INVESTMENTS.
11. QUESTIONS, EXCEPTIONS AND CONSEQUENCE MANAGEMENT

2. TARGET AUDIENCE

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

3. USE OF INFORMATION AND KNOW-HOW OF THE CONGLOMERATE AND THIRD PARTIES

Information, including internal databases of any nature, registrations of people and companies (employees, customers, suppliers, business partners, competitors, etc.) and know-how (knowledge, techniques, technologies, methods, strategies, systems, software, policies etc.) that circulate internally are the responsibility of the Conglomerate.

Therefore, administrators 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.

In case of receiving sensitive or confidential information from competitors, customers, business partners, suppliers, among others, these must not be passed on or used internally or externally to the organization without authorization from these stakeholders.

3.1 Authorization for external use

Administrators and Employees:

- They may use the Conglomerate's information and know-how in benchmarking, lectures, academic work, among others, with authorization from the superintendent or director of the department that owns the information and the superintendent or director of the employee/manager.
- They cannot use the Conglomerate's information and know-how for private purposes, nor pass it on to third parties without prior authorization, even after leaving the Conglomerate.

The rules of the PR-1319 Criteria for Classification and Information Management must also be observed and followed.

For situations in which the employee/administrator represents or identifies themselves as being from Itaú Unibanco, even if they only use public information (e.g. lectures, seminars, debates, congresses, interviews, publications in magazines, newspapers or social networks), they must follow the guidelines of the Press Relationship and Participation in Awards and Recognitions Policy (PS-6) for Brazil and the local guidelines for international units must be followed.

Additionally, in these situations, the employee/administrator must request approval from the Corporate Communications Superintendence through the email address IMPRENSA ITAU UNIBANCO.

4. HOLDINGS IN COMPANIES

4.1. Board Members

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

4.2. Employees and Administrators (except Board members)

a) May not form a company or have participation* in companies or ventures in the same lines of business 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 for the purpose of investing in an organized securities market.

b) May be partners in companies or ventures 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 ventures ;
- 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 venture;
- The rules of **Use of Information and Know-How of the Conglomerate and Third Parties**, item 3 are respected;
- The direct manager is informed.

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

- There is no conflict with the employee's own 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, *livestreams*, 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:

- Shared content should only cover **general market information**, which does not refer to internal, confidential or restricted practices/information (e.g. knowledge, techniques, technologies, methods, strategies, systems, software, among others) of the Conglomerate, or its customers, business partners, suppliers and competitors;
- The Conglomerate's or its competitors' products or services cannot be offered;
- Employees / Administrators cannot identify themselves as such or speak on behalf of the Conglomerate;
- A *disclaimer* is included in its page, profile, presentation or any other exposition material stating that the information contained or presented has nothing to do with the official position of the Conglomerate;
- Private services (paid or unpaid) may not be provided to other employees, customers, suppliers or business partners, in a way that creates a conflict of interest (see item 8 k) below).

Before forming a company, in case of doubt as to whether or not there is a conflict of interest, you must inform management and request an opinion from the Ethics Consultancy using the e-mail address (ConsultoriadeEtica@itau- unibanco.com.br).

4.3. Registering holdings in companies

In Brazil, participation in companies or enterprises in which there is doubt about a potential conflict of interest with their own activities at the bank or with 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 IU Conecta through the route: for me > terms, statements and documents > Compliance > access registration.

If the employee/administrator does not have an external participation in companies or ventures, they must register the option "I do not own". It is the responsibility of the employee/administrator to keep this registration up to date. In case of doubt, consult Annex PR-57-8 of this procedure.

5. EXTERNAL ACTIVITIES

5.1. Board Members

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

5.2. Employees and Administrators (except Board members)

a) Cannot perform external activities in order 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 the lines of business as the institution, even if they do not conflict with their own activities (e.g. activities involving financial products and services).
b2) Perform activities in companies owned by the institution's customers, 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 that involve the media, advertising companies and interviews in general should also be reported to the Corporate Communication department 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 own 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 with customers, suppliers or business partners.

- No resources, equipment, machines, systems, office supplies, etc. from the institution is used for the benefit of the external activity or venture.

- The rules for the **Use of Information and Know-How of the Conglomerate and Third Parties**, item 3 are respected.

- The direct manager is informed.

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

- Shared content should only cover **general market information**, which does not refer to internal, confidential or restricted practices/information (e.g. knowledge, techniques, technologies, methods, strategies, systems, software, among others) of the Conglomerate, or its customers, business partners, suppliers and competitors;
- The Conglomerate's or its competitors' products and services cannot be offered;
- Employees/administrators cannot identify themselves as such or speak on behalf of the Conglomerate;
- A *disclaimer* must be included in the page, profile, presentation or any other exhibition material stating that the information contained or presented has nothing to do with the official position of the Conglomerate;
- Private services (whether remunerated or not) cannot be provided to other employees or administrators, customers, suppliers or commercial partners, in a way that generates a conflict of interest (see item 8 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 for the **Use of Information and Know-How of the Conglomerate and Third Parties** , item 3 are respected.

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 carrying out activities on behalf of the Conglomerate or in a business association in the financial sector, administrators (or employees) must: (a) waive receiving the remuneration offered for carrying out the activity, according to the standard model for this purpose (see Annex PR -57-4); **or** (b) receive the remuneration and inform the HR Dept. (Remuneration) through the e-mail key remuneracaoatividaderepresentativa@correio.itaun.com.br so that such amount is deducted from their "total cash" in the Conglomerate.

5.3. Employees and Administrators (except Board members) public officials or former public officials

Administrators and employees must inform the manager if they hold or held a public service position from which they have been exonerated less than five years ago, which may represent a situation of conflict of interest with the activities in the bank. If you have any doubts about the existence or not of a conflict of interest, request an opinion from the Ethics Consultancy via the email address Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br).

5.4. Registering external activities (including public office)

In Brazil, external activities active in private, public bodies (even if the employee/administrator has been dismissed in the last five years) or in the third sector, in which there is doubt about a potential conflict of interest with their own activities in the bank or with the same areas 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 IU Conecta through the route: for me > terms, declarations and documents > Compliance > access registration.

If the employee/manager does not have external activity, they must register the option "I do not have". It is the responsibility of the employee/administrator to keep this registration up to date. In case of doubt, consult Annex PR-57-8 of this procedure.

6. PUBLIC OFFICE CANDIDACY AND ELECTION

6.1 In Brazil

a) Administrators and employees who are candidates or elected for public office must request unpaid leave immediately after confirmation of the candidacy by the Electoral Court during:

- the period extending between their electoral campaign and the day of the 1st round of the election and the 2nd, 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.

In Brazil, for more information, access the Government and Institutional Relations Procedure ([PR-45](#)).

6.2. At International Units

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

7. KIN AND PROXIMITY RELATIONS

7.1. Kinships and proximity within the Conglomerate

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

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

In appointments 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 and all kinship or proximity relationships in the Conglomerate must be reported to the direct manager.

Kinship and proximity relationships described in Annex PR-57-6 are not allowed, when there is a hierarchical relationship between those involved. Other kinship situations (by blood or affinity) that involve a hierarchical relationship, and that are not provided for in Annex-2, must be evaluated by the manager and by 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 branch or in 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 models of collaborative work, whose activities result in a potential conflict of interest.

The situations below, should they involve kinship and proximity relationships, even if there is no hierarchical relation between those involved, should be evaluated by management and by the Ethics Consultancy in order 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 defense, 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.

7.1.1 Kinship and proximity relationships with public officials

Administrators and employees must inform the manager if they are related or have a close relationship with public officials or former public officials – who have been dismissed less than five years ago – who may represent situations of conflict of interest with the bank's activities. If you have any doubts about the existence or not of a conflict of interest, request an opinion from the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br).

7.2 Registering kinship or proximity relationships (including public officials)

In Brazil, it is mandatory to register kin and proximity relationships in the conglomerate by all employees and administrators in IU Conecta through the route: for me > terms, statements and documents > Compliance > access registration .

Kin or proximity relationships with a public official (even if the latter has been exonerated in the last five years) must also be registered (only for employees of the Central Administration in the positions of managers/specialists II and above).

If the employee/manager does not have a kin or proximity relationship_(including with public officials), they must register the option "I have no knowledge". It is the responsibility of the employee/administrator to keep this registration up to date. In case of doubt, consult Annex PR-57-8 of this procedure.

8. RELATIONS WITH CUSTOMERS, SUPPLIERS, BUSINESS PARTNERS, COMPETITORS AND EMPLOYEES

Administrators and Employees must:

- a) Keep confidential the information, registrations, operations, contracted services, etc. of customers, suppliers, business partners and employees of the Conglomerate.
- b) Refrain from carrying out private business – in one's own name, that of relatives, or in the name of organizations or enterprises in which they are executives or partners – with individuals, professionals, companies and managers of companies that are customers, suppliers or commercial partners of the Conglomerate, or even use the position for such a purpose, in a way that creates a conflict of interest or otherwise (e.g. situations that may affect good relationships with customers and other stakeholders). If there is prior or subsequent knowledge of any situation of this type, the immediate manager must be notified and must request an opinion from the Ethics Consultancy through the e-mail address (ConsultoriadeEtica@itau-unibanco.com.br). Any doubts should also be forwarded to the Ethics Consultancy.

Administrators and Employees may not:

- a) Hire suppliers, service providers or business partners that have a relationship with managers or employees (e.g., kinship or close relationship, participation in society, etc.) in a way that generates a conflict of interest.
- b) Sign agreements, contracts or commitments with customers, suppliers or business partners that imply reciprocity and exchange of favors or personal advantages for themselves or third parties or that may give this perception.

- c) Sign or manage negotiations, being responsible for managing relationships or having active and constant contact with customer companies, suppliers or business partners of which:
 - c.1) They are a partner or representative of the company.
 - c.2) Their spouse (partner), relatives or people in close relationship are administrators (e.g. in the role of director or business manager).

Important note: if the employee is in this situation (or similar) where there is access to business information and is in a situation of potential or actual conflict of interest with a third party (e.g. customer, supplier, business partner, etc.), they or the manager should immediately contact the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br) to request an assessment opinion on the situation.

- d) Carrying out operations with related parties without taking into account the rules of the Corporate Policy for Transactions with Related Parties (item 4.1).
- e) Improperly facilitate business on behalf of the Conglomerate's customers, suppliers or business partners.
- f) Request employment for relatives and people with close relationships in companies of customers, suppliers or commercial partners with whom there is direct contact in the exercise of the employee's position in the Conglomerate.
- g) Request gifts or contributions from customers, suppliers and business partners.
- h) Manage bank accounts (checking, savings, investment, etc.), and other products and services of the Conglomerate, belonging to themselves (individual or legal entity), relatives or persons of close relationship.
- i) Manage the checking or investment account of employees under their direct management, requiring the transfer of portfolios to other managers or physical or digital branches.
- j) Provide services to the institution themselves as third parties.
- k) Provide themselves (or through their companies) private services (paid or not) to other employees or managers, customers, suppliers or business partners in a way that generates a conflict of interest.

Employees or administrators who have personal or private relationships with people in the competition (e.g. kinship, close relationships, companies or common external activities) in a way that creates a conflict of interest, they or the manager must immediately contact the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br) to request an opinion to assess the situation.

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

8.1. Registering Relationships with Suppliers

In Brazil, relations with suppliers, in which there is doubt about a potential conflict of interest in relation to the performance of the third party in their department or in another department of the bank, must be registered (only by employees of the Central Administration in the positions of managers/specialists II and above) in the IU Conecta via the route: for me > terms, declarations and documents > Compliance > access registration.

If the employee/manager does not have knowledge, they must register the option "I have no knowledge". It is the responsibility of the employee/administrator to keep this registration up to date. In case of doubt, consult Annex PR-57-8 of this procedure.

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

9. GIFTS, INVITATIONS AND HOSPITALITIES

9.1. Gifts - Offering

a) **Prohibition:** administrators and employees are prohibited from offering gifts of any nature with the purpose of influencing decisions, facilitating businesses that originally did not would be realized or obtain any improper advantage (financial or not) for you, for third parties or for the Conglomerate, directly or indirectly, to private agents or public officials , 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. gift 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:** it will be allowed to offer, to private agents or public officials , from Brazil or any other country, physical courtesies (e.g.: gifts, books, diaries and other items of small value, acquired under the terms of the Privacy Policy). Purchase Policy (Brazil) (PS-19), or local policy applicable to the international unit), provided that, cumulatively:

c.1) It is possible to verify that this is a habitual practice, aimed at a wide public or a certain 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 officials in Brazil; and US\$ 100.00 in international units (for public or private agents) or if it has no market value.

c.4) The manager of the department 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 do not apply, for example, to situations where gifts or even money is offered for massive customer and user loyalty campaigns (e.g. iti, cashbacks, payment of slips, offers from the investment office, etc.). Questions about offering cash values that differ from the campaign average, recurrence and number of gifts allowed to the same beneficiary, the Ethics Consultancy should be consulted.

f) **Purchase Equity and Assets Board:** administrators and employees of this division can not offer presents.

9.2. Gifts - Receiving

a) **Prohibition:** administrators and employees are prohibited from receiving presents of any nature from private agents or public officials with the purpose of influencing decisions, facilitating businesses or grant any improper advantage (financial or not) for who if 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) from third parties regardless of who makes the offer.

c) **Physical Gifts:** receiving institutional material or relationship gifts (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 individual 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. The procedure for refusing and returning the courtesy must be accompanied by a letter, the model of which is attached to this Policy (see Annex PR-57-1).

c.3) In situations where the refusal of a courtesy causes great discomfort, may be seen as an affront or it is not really possible to return it, the administrator or employee must thank and inform the offeror about the institution's determination in the sense of donating such gift to an Institution supported by Itaú Unibanco. In these situations, the administrator or employee must send an email to the Ethics Consultancy key (ConsultoriadeEtica@itau-unibanco.com.br) for consultation purposes and guidance on donating under a specific term (see Annex PR-57 -two).

c.4) The donation process will be conducted by the Sponsorships and Donations Unit according to the guidelines described in the Internal Procedures Manual: Donations (PR-43).

d) **Purchase Equity and Assets Board:** administrators and employees of this division can not 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.

9.3. Lunches and dinners

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

a) The offer and the receipt must be compatible with the position and function of the offeror/recipient of 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 officials .

d) Care must be taken with expenses and with the choice of location, observing whether it is suitable for the public involved and provided that conditions are similar to those practiced by the Conglomerate for its own administrators and employees. It is acceptable to consume alcoholic beverages with meals, as long as they are consumed in extreme moderation.

These payments must not be made with unreasonable frequency and must follow the internal rules for payment described in the Procedure for Travel, Food and Accommodation (PR-534) and, when applicable, also the rules of relationship with public authorities described in the Policy of Government and Institutional Relations (PS-7) and its Procedure ([PR-45](#)). In international units, local standards and applicable guidelines must be followed.

9.4 Tickets/invitations: offering and receiving

9.4.1 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 common practice, aimed at a wide public or a certain category of people, in which the beneficiary of the gift is found.

a.2) A reputational assessment of the guest is carried out following the criteria and rules defined in the Sponsorship Procedure ([PR-162](#)) in Brazil or in the local rules applicable to the international unit.

a.3) The gifting of tickets/invitations to events sponsored by the Conglomerate to public officials, even if they are customers of the Conglomerate, or to employees or administrators of self-regulation entities, will not be allowed.

b) **Tickets/Invitations linked to institutional events promoted by the Conglomerate:** the offer, to people from the public or private sector, from Brazil or any other country, of tickets/invitations linked to events promoted by the Conglomerate (for example: seminars, invitations to congresses, visits, technical meetings, forums, opening of new units etc.), is allowed provided that:

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 habitual practice, aimed at a wide public or a certain 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, with the aim of promoting 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 common practice, aimed at a wide public or a certain 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 own 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 in the Conglomerate Events Procedure (PR-215, item 7.2). 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:** the offer of tickets/invitations to sporting or cultural events, without being linked to actions listed in items a), b) and c) above, must be evaluated by the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br) and resolution 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 AML Board.

Note:

- 1) Particularities regarding the flow of approval of invitation offers in events sponsored or promoted by Itaú Unibanco in international units can be found in Annex PR-57-7.
- 2) Further information regarding events, offering invitations and hiring speakers can be obtained in the Events at the Itaú Unibanco Conglomerate Procedure (PR-215) and specifically for IBBA, in the Governmental and Institutional Relations Procedure (PR-45).

9.4.2 Receiving

a) **Technical Events:** the Conglomerate's administrators and employees may receive tickets/invitations to technical events (e.g. lectures, congresses, forums, visits to companies, business meetings, etc.) from private or public officials to publicize the brand, products, services and ventures, 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 from private or public officials, tickets/invitations linked to institutional or marketing events, cultural and sporting events, celebrations or festivals, 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 should be sent for evaluation of the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br).
- b.5) An employee with a minimum position of director or someone at a higher hierarchical level has approved it.
- b.6) If directors who are members of the Executive Committee or president are invited, an evaluation must be requested from the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br) and approval will be from the president (in this case of invited directors) and the Executive Committee with notice to the Internal Audit Executive Board (if the president is invited).

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 business partners (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 subject to prior evaluation and registration by the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br) and approval from the director of the department or higher hierarchical level.

d.2) Acceptance of hospitality by directors who are members of the Executive Committee or president is subject to evaluation by the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br) and approval will be from the president (in the case of invited directors) and the Executive Committee with notice to the Internal Audit Executive Board (if the president is invited).

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

9.5 9.5 Other prohibitions

No alternative form of offering gifts 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.

Any alternative form of receiving courtesies will not be accepted as a way of infringing the rules and restrictions above, such as, for example, reception of courtesies by relatives of administrators or employees who could not receive them, destination to places other than the office or the residence of the administrator or employee, the recurring reception or in disproportionate amounts. Any events must be communicated to the employee's immediate manager and to the Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br).

10. GIFTS BETWEEN EMPLOYEES

It is recommended to use prudence and moderation both when offering and accepting gifts exchanged in the workplace or at internal and external gatherings (birthdays, weddings, lunches or dinners, farewells, visits or gifts to managers or member(s) of the team, etc.), in order to avoid exaggerations, suspicions, misunderstandings and rumors. The value of gifts exchanged or invitations must not exceed the value stipulated in item 9.2 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, in order to maintain a healthy and cordial atmosphere.

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

a) Contributions made by the Conglomerate, whether financial or not, must comply with the provisions outlined in the Sponsorship Procedure ([PR-162](#)) and in the Internal Processes Manual: Donations (Brazil) ([PR-43](#)) or in the sectorial policies of each unit and be subject to the authority levels and approvals stipulated in these policies.

b) Contributions must not be offered or accepted - or allow for this interpretation - with the aim of exchanging favors, facilitating 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 in accordance with the laws and regulations of the countries in which the institution is present and with the internal rules of the institution's companies.
- d) In order 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.

11.1. 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.

11.2. 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.

11.3. 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 companies of the Conglomerate. Requests should be sent to the email key Compliance Integridade Demandas <complianceintegridade_demandas@itau-unibanco.com.br>.

12. PERSONAL INVESTMENTS

In investments made for their own benefit in the financial market, situations that may constitute a conflict of interest in relation to the Conglomerate and/or its customers must be avoided and 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 through the e-mail key: CONTROL ROOM MONITORING. In international units, local standards and applicable guidelines must be followed. Refer to the local Compliance Officer for any questions.

13. QUESTIONS, EXCEPTIONS AND CONSEQUENCE MANAGEMENT

Doubts and exception evaluations related to the topics of this Procedure or to possible related matters, but not contemplated here, should be sent to the Ethics Consultancy in the Superintendence of Compliance, Regulators and Integrity through the e-mail key Ethics Consultancy (ConsultoriadeEtica@itau-unibanco.com.br) (Brazil) or to the respective local Compliance Officer in 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.

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

Claims or disagreements related to the topics of this procedure, or to 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.

Failure to comply with the guidelines of this Procedure is subject to the management of consequences described in the Policy for Guidance and Application of Disciplinary Measures (PS-114).

In the case of doubts, assessments of exceptions and/or non-compliance involving members of the Executive Committee, the governance established in procedure PR – 1436 - Governance for investigating claims or non-compliance with policies involving members of the Executive Committee of Itaú Unibanco must be followed.

Approved by the Compliance board on 11/08/2023

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 emails, 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