



Itaú Unibanco's Commitment to Human Rights

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1. GENERAL PRINCIPLES

This document reinforces the commitment of Itaú Unibanco Holding S.A. to promoting and respecting Human Rights in all its relations – with employees, clients, suppliers, partners and society. This commitment is supported by the UN Guiding Principles on Business and Human Rights, based on the “Protect, Respect and Remedy” pillars, as set out in John Ruggie’s Final Report and approved by the UN Human Rights Council in 2011.

Itaú adopts the UN International Charter of Human Rights as a reference, which comprises the Universal Declaration of Human Rights of 1948, the International Covenant on Civil and Political Rights of 1966, and the International Covenant on Economic and Social and Cultural Rights of 1966. Additionally, we are signatories to the United Nations Global Compact, the Corporate Charter for Human Rights and the Promotion of Decent Work of the Ethos Institute, and adhered to the Standards of Conduct for Companies of the UN Free & Equal initiative.

Our guidelines and practices are aligned with the UN 2030 Agenda and address, in particular, the following goals:



2. GOVERNANCE

The governance of Itaú Unibanco's Human Rights agenda is carried out by the Institutional Relations and Sustainability Office, whose mission is to coordinate and engage the different departments of the organization in sharing the responsibility for the promotion, protection and respect for key rights and guarantees.

Itaú Unibanco's Human Rights Commitment is formally approved by a member of the Executive Committee, has national coverage and also serves as the benchmark of the Foreign Units of the Conglomerate. This commitment guides the institution's performance through guidelines and structured actions, aimed at preventing and mitigating the risks associated with violations of Human Rights — whether direct¹ or indirect² Human Rights risks.

2.1 The Institution's Policies

Itaú Unibanco's guidelines on Human Rights are formally expressed in the [Environmental, Social and Climate Responsibility Policy](#), which introduces the principles, strategies and guidelines on the topics – including Human Rights – to be observed in the performance of business, activities, and processes of the organization, as well as in its relations with all stakeholders.

Respect for and protection of Human Rights are reflected in this document by promoting diversity, equity, and inclusion, preventing and fighting moral and sexual harassment, rejecting discrimination of any type and expressly prohibiting degrading work in violation of the law (child, forced, or compulsory labor). These principles are supported by transparent and responsible ethical conduct, which permeates in all spheres of the institution's performance.

Additionally, the [Code of Ethics and Conduct](#) guides the labor relations, ensuring, among other aspects, the rights to collective bargaining and free party, religious, and union association, in accordance with the Union Relations Policy. The Institution also provides formal and accessible whistleblowing channels, ensuring active listening, confidentiality and proper handling of complaints received.

2.2 Due Diligence Process in Human Rights

Since 2015, Itaú Unibanco has been carrying out, on a regular basis, a Due Diligence process in Human Rights to identify, prevent, mitigate and account for the impacts – direct and indirect – of its activities on the Human Rights of employees, clients, suppliers and society.

This process is supported by specialized independent consulting firms, which assess the Institution's exposure to Human Rights risks and violations, taking into account the Brazilian regulatory and socioeconomic context. The analysis covers both the direct risks, which are associated with the operations and services under the direct responsibility of the Bank, and the indirect risks, which are associated with third parties with whom we have commercial, contractual or institutional relations. See more details on the process in the [ESG Report 2024 \(page 201\)](#).

3. RISK MANAGEMENT

The respect for and protection of Human Rights at Itaú Unibanco is ensured through the implementation, operation and monitoring of the guidelines, carried out by the proper departments and governance forums. These guidelines are added to the current policies and processes, aimed at preventing and/or mitigating the direct and indirect risks.

3.1 Direct Risks

Direct risks refer to a company's direct responsibility for potential offenses such company causes, i.e., related to actions taken by its employees or management members. Learn below about respect, protection, mitigation and remediation practices related to this type of risk.

3.1.1 Diversity and Inclusion

Itaú Unibanco is permanently committed to appreciating diversity by promoting inclusion and equal opportunities in a safe and respectful environment. Promoting diversity means respecting and understanding the different realities and needs of our stakeholders – including clients, employees, stockholders, investors, suppliers, business partners and society in general – recognizing the plurality of origins, affective and sexual orientations, races, genders, ages, cultures, beliefs, nationalities, social or civic status, and disabilities.

We continuously work to avoid all forms of discrimination, whether in the hiring, promotion, compensation and dismissal processes or in our communications and interactions with the different stakeholders. To this end, we adopt policies and practices that reinforce our ethical and social commitment in an agenda of transformation focused on equity and inclusion.

3.1.2 Treatment Equity among Employees and Third Parties

Respect and treatment equity are provided for in Itaú Unibanco [Code of Ethics and Conduct](#), and the key points are as follows:

- **Labor relations:** “We appreciate our employees by respecting Human Rights and promoting diversity. For this reason, we have adopted policies and practices to prevent and combat all types of discrimination, harassment, prejudice and indecent working conditions (such as child or forced labor).”
- **Professional attitude:** “It is necessary to promote relations based on cooperation and respect for dignity and equal treatment, thus contributing to an environment that is conducive to development and healthy interactions, aiming at maintaining a participative and friendly environment.”

As part of this commitment, Itaú Unibanco adopts specific measures when hiring third parties so as to ensure the adherence to the same ethical and legal standards applied to the organization. Among these measures, we highlight the inclusion of specific clauses in contracts to ensure compliance with labor legislation, as well as adherence to sustainability recommendations, such as:

- preventing and combating moral and sexual harassment and any form of discrimination;
- promoting a safe and respectful environment;
- appreciating, training and employing people with disabilities;
- promoting diversity, ensuring inclusion and equal opportunities for all;
- ensuring proper working conditions;
- expressly rejecting child, forced or compulsory labor.

3.1.3 Accessibility

Accessibility is a constant concern in Itaú Unibanco's work. The concept goes beyond disability-related aspects and aims at ensuring that all people, regardless of their



physical, sensorial, cognitive or social conditions, have easy, safe and autonomous access to financial information, products and services.

For our clients to be able to make conscious decisions and manage their funds with autonomy, it is necessary that all of them, with or without disabilities, can have easy access to and understand information, products and services, resulting in inclusion and positive user experience. We have a team dedicated to promoting accessibility testing, which includes people with disabilities, which continuously works to validate and improve our products, services and digital journeys.

This work ensures that our applications, websites and other channels are developed based on accessibility criteria, allowing any user – regardless of their conditions – to be able to perform any type of transaction, contract services or manage their finances in an independent, agile and secure way.

We adopt the international WCAG - Web Content Accessibility Guidelines standard, which is currently in the 2.1 version, as a reference and implement its guidelines in our digital channels. We carry out tests on a systematic basis so as to ensure the correct application of these guidelines, focused on user experience and full inclusion. Although we have already made significant headway – such as the offer of accessory tools, including services via Chat or videoconference — we remain committed to continuously improving the accessibility in every touchpoint with us.

In addition to the concern with digital clients, Itaú Unibanco adopts structured measures to also ensure accessibility in the branches, for both clients and employees. To this end, our initiatives are in compliance with current legislation, in particular, Federal Law No. 13,146/2015 – Brazilian Law for the Inclusion of People with Disabilities (Statute of People with Disabilities). The main actions implemented include:

- Architectural and furniture accessibility with physical adjustments that ensure access and circulation of people with disabilities in our branches;
- Branches with ATMs designed to be independently and safely used, regardless of the level of mobility or perception limitations;
- Accessible equipment;
- Credit card bills printed in Braille and/or large print for blind or visually-impaired clients, which are also available in our digital channels;
- Clients, both individuals and companies, with current accounts, cards, consortia, payroll loans, vehicle and real estate loans are provided with accessible service through voice, video and digital channels, such as: Chat, Itaú Virtual Assistant (AVI) and Contact Us.

Additionally, we implemented a video center for service in the Brazilian Sign Language (LIBRAS) that serves current account holders and credit card holders via digital channels and the network of physical branches.

3.1.4 Freedom of Association

Itaú Unibanco assures its employees the absolute right to free union association, as well as freedom to participate in union activities, in compliance with the Brazilian legislation in effect and the collective bargaining agreements of each professional category represented in the financial industry. We recognize and respect the legal prerogatives of the representatives elected to executive positions in the unions, ensuring the conditions required to the performance of their duties.

In Brazil, employees elected to executive positions perform union representation duties. Part of these professionals works full time for the Union, and they have full benefits and basic salary ensured in the same conditions as if they were performing their professional duties in the Bank.

Additionally, Itaú Unibanco recognizes the importance of social dialogue and supports the union activities, allowing unions to carry out unionization campaigns and, when requested, to hold meetings with participation of representatives of the Union Relations department, supervisors and employees of the Bank, in order to seek negotiated solutions in a respectful manner and in line with ethical principles.

In the Foreign Units, free union association is in compliance with applicable local legislation and in line with ethical principles of the [Code of Ethics and Conduct](#). Find out more in the [ESG Report 2024 \(page 171\)](#).

3.1.5 Health and Safety

Itaú Unibanco works in all stages of health and safety governance, from prevention to rehabilitation, observing different indicators such as absenteeism rate and the epidemiologic profile of the population. We recognize that physical and mental health is a fundamental right and essential for a dignified existence. Accordingly, we invest in practices that ensure a safe, healthy and friendly work environment, by carrying out inspections to assess the workplaces, regularly developing strategic indicators and maintaining open communication channels with employees to manage the actions.

The information collected is analyzed and discussed by a team of experts to define priorities and provide for the involvement of the Bank's senior management. Additionally, meetings specifically focused on the Occupational Health and Safety agenda are regularly held with representatives of the employees.

Among the actions scheduled for the control of the main requirements in Health and Safety the highlights are:

- Risk Management Program (PGR) – it identifies the risks in the workplace, proposing adjustments for exposure control

- Program to support the return to work – it provides support to the employee and their dependents with a multi-professional team (psychologists, social workers, nutritionists, physical educators, among others).
- Occupational medical exams - essential in all spheres of the health and safety prevention strategy
- Training and supporting materials on mental health and ergonomics
- Internal Week of Prevention of Work-Related Accidents (SIPAT)
- Investigations of Work-Related Accidents
- Ergonomic analyses and customized regularization of work stations

In addition to these initiatives, Itaú Unibanco encourages and supports the adoption of habits that generate the physical, emotional and social well-being of employees, such as the importance of self-care. Therefore, we provide a number of benefits, rules and procedures aimed at equipping our employees in the search for balance, such as: medical and dental care available to all employees, offer of fitness center plans with broad national coverage, outpatient clinics at the main administrative centers and vaccines against flu.

Additionally, we offer parental support programs, with prenatal courses, workload reduction in certain periods, spaces for milk extraction and storage, and specialized guidance after birth. Check out more details in the [ESG Report 2024 \(page 189\)](#).

3.1.6 Moral and Sexual Harassment

Itaú Unibanco does not tolerate moral or sexual harassment or any behavior that may cause damage to the personal integrity of any individual in the workplace. For cases of moral or sexual harassment investigated and considered legitimate, disciplinary measures, guided by Itaú Unibanco's Policy of Guidance and Application of Disciplinary Standards, are implemented.

The values of our culture are reinforced on an ongoing basis with affirmative actions, promoting and expanding the awareness of diversity and encouraging employees to express themselves and not accept situations involving threats, persecution, exclusion, shaming and harassment.

Among the main actions, we continue to encourage the reading of the Guidelines on Harassment and Discrimination in Work Relationships, which is an additional material to the [Code of Ethics and Conduct](#) and clarifies important concepts and reaffirms our commitment to fight and not tolerate harassment and discrimination. Throughout the year, we also carried out several communication, disclosure and incentive initiatives to our employees, in different channels and formats, on Training on Harassment and Discrimination in Work Relationships.

The training program reinforces the concepts of the Manual and describes practical examples so that the employees can learn and recognize situations like this and also fight them. Find out more in the [ESG Report 2024 \(page 262\)](#).

3.1.7 Remuneration

To ensure employees fair working conditions and compensation, we promote meritocracy and transparency. To avoid any form of discrimination, we maintain compensation policies and processes that respect diversity. The governance of this practice is carried out by the Personnel Department, which, through meetings of joint bodies, monitors the compliance with the guidelines, curbing discrimination and prejudice in compensation practices.

Annually, the key findings of the pay equity review are submitted to the governance levels and executive leadership for follow-up. The promotion of pay equity has been a

strategic priority, which is reflected in the continuing studies conducted by the Bank based on criteria set forth by Brazilian legislation.

Our compensation principles and practices are formalized in the Compensation Policy, which is aimed at attracting, rewarding, retaining and encouraging management members and employees to carry out the business in an ethical, responsible and sustainable manner. Compensation and benefit strategies are adopted through parameters such as: market salary surveys, taking part in industry surveys and attending specialized forums. Learn more in the [ESG Report 2024 \(page 177\)](#).

3.1.8 Corruption Prevention

We understand as corruption the act of suggesting, offering, promising, granting, soliciting, requiring, accepting or receiving, directly or indirectly, whether or not through a requirement, to/from people or companies from the public or private sectors or third sector organizations, from any country, undue advantages of any nature in exchange for the performance or omission to perform acts that are inherent in their duties, operations or activities aimed at benefits for themselves or third parties.

[The Corporate Corruption Prevention Policy](#) was implemented, which strengthens our commitment to work proactively in the prevention and fight against corruption in all its forms for the purpose of coordinating actions and complying with current legislation and internal policies. Itaú Unibanco has the Integrity and Ethics Program, provided for in the [Corporate Integrity, Ethics and Conduct Policy](#), applicable to all employees and management members, in Brazil and abroad.

The Integrity and Ethics Program, managed by the Corporate Compliance Office, covers a set of guidelines and processes to mitigate the Bank's risks of exposure to illicit acts and to ensure compliance with the [Code of Ethics and Conduct](#) and our

principles and values. Governance on the prevention and combat of illicit acts is carried out by the Board of Directors, Audit Committee, Operational Risk Committees, Risk and Capital Management Committee and Anti-Money Laundering Committees. This program is applied to the Itaú Unibanco Conglomerate and its companies in Brazil and abroad.

With an eye to the continuous training of employees on this topic, in addition to the Integrity and Ethics Program, we apply specific training for the departments/activities that pose a higher risk on an annual basis, in accordance with the risk-based approach criteria, such as for employees of rating agencies and employees who operate with foreign exchange.

3.1.9 Privacy and Information Security

The privacy and information security governance is part of the risk management practices and makes up our strategy. Our purpose is to foster a safe, reliable environment, by ensuring privacy and protection for personal data of our clients, employees, business partners, suppliers, society and other subjects.

By adopting a structured and preventive approach, we reaffirm our commitment to Human Rights in data handling and management, in compliance with current legislation and the highest ethical and corporate responsibility standards. In our activities, we observe the legal requirements¹ and resolutions for the financial sector². Our privacy and data protection strategy prioritizes training, which aims to raise awareness among employees, and the secure development of solutions for our clients.

¹ General Personal Data Protection Law (LGPD) and related laws and regulations.

² Resolution No. 4,893/2021, of the National Monetary Council (CMN). Resolution No. 85/2021, of the Central Bank of Brazil (Bacen). Resolution No. 35/2021, of the Brazilian Securities and Exchange Commission (CVM). Circular No. 638/2021, from the Superintendency of Private Insurance (Susep).

As a result, all our products and services are designed from the time they are conceived with our clients' privacy and security in mind, including both topics and their respective guidelines in the daily life of the business areas and technology departments.

Since 2018, our Privacy Program has brought together a multidisciplinary group, with the support of the technology, legal, compliance, risk and security departments, which work together with the business staff to ensure more protection and transparency when addressing data privacy and protection, developing and implementing the best practices of the industry related to the topic.

The data subjects' privacy and data protection processes and controls are also subject to regular risk assessments, in the form of internal and external audits, also carried out by an independent certifier, to ensure the reliability of practices and processes that make use of personal data, ensuring and evidencing our commitment to Human Rights in data management.

The cyber security strategy was developed to preserve data security, minimize denial of service risks, protect integrity, and prevent information leakage. To this end, we use an expanded perimeter protection strategy, a concept that believes that the information must be protected wherever it is – for example, within the Bank's infrastructure, in a cloud service at a service provider or in a foreign unit, taking into account the entire lifecycle of the information.

We adopt strict control processes aimed at detecting, preventing, ongoing monitoring and immediately responding to attacks and attempts to hack our infrastructure, thus ensuring security risk management and the construction of a sound foundation for an increasingly digital future.

We have a set of policies and documents³ covering all of our operations and periodically updated, which establish the guidelines, standards, general rules and responsibilities of the data privacy and protection and information security process, in compliance with legal and regulatory aspects, to ensure the protection of important information.

It is worth noting that information is made available to personal data subjects about the collection and processing of their data in our activities⁴ In addition, taking into consideration the data lifecycle, we maintain a clean-up practice of the personal information of data subjects, using procedures designed to maintain only the necessary information in our environments in order to comply with the purpose of usage.

We have a robust, user-friendly awareness program, consisting of training that strengthens the importance of privacy, data protection, and cyber security throughout the Company. By means of our integrity and ethics program, all employees are trained on information security, privacy and LGPD in the scope of compliance with the Itaú Unibanco's [Code of Ethics and Conduct](#) and principles and values.

To mitigate key risks and foster information security, privacy and cyber security, we have several control practices and procedures, conducted in an integrated manner with the business areas and technology departments, to ensure the maintenance of the architecture of solutions and products with the highest level of security, tracking existing trends and ensuring data control and protection.

³ Corporate Information Security and Cyber Security Policy, and Privacy Policy.

⁴ This information can be found on our privacy page, in the section "How do We Obtain Personal Data?", available at: <https://www.itaú.com.br/privacidade>

3.2 Indirect Risks

These refer to possible Human Rights violations committed by agents with whom the Bank has a business, contractual, or partnership relationship. Learn below about respect and protection practices related to this type of risk.

3.2.1 Child Labor, Compulsory Labor and Human Trafficking

We recognize that all forms of compulsory labor are serious violations of Human Rights. Thus, we adopted a List of Excluded Activities consisting of activities that contradict the Bank's principles and values, namely: the use of compulsory labor, the use of child labor, and the exploitation of prostitution, which may be related to human trafficking.

We also verify the Register of Employers that have subjected workers to compulsory labor conditions (as established by the Interministerial Administrative Rule MTPS/MMIRDH No. 4 of May 11, 2016) and/or that have a negative mention of the counterparty in the media captured through monitoring and subsequent assessment by specialized teams, which can result in the blocking of operations in any of the segments served by Itaú Unibanco, both for clients and suppliers.

3.2.2 Embargoes

The international community is increasingly more attentive to acts or behaviors of countries, governments, groups, companies, or individuals that violate the universal precepts of peaceful coexistence, either in connection with civil or military conflicts, terrorist activities and their financing, or those related to illicit or reprehensible practices, such as drug trafficking, compulsory labor, fraud, and money laundering, among others. In retaliation, some jurisdictions or international organizations have established embargoes, which consist of the total or partial ban on doing business with certain countries, groups, individuals and companies.

We have adopted the embargo guidelines established by the Office of Foreign Assets Control (OFAC), the United Nations (UN), the European Union Council, and His Majesty's Treasury (HMT). We also follow the Cuba Restricted List, the Cuba Accommodation List, which are published exclusively by the U.S. Department of State, and the Bureau of Industry and Security (BIS) restrictive list, published by the U.S. Department of Commerce.

3.2.3 Credit Granting

Environmental, Social and Climate Risk management in credit risk management is based on methodologies and tools guided by the best international and national practices, which are applied to identify, measure, assess, monitor and disclose risks.

Environmental, social and climate criteria, as well as the applicable consequences, are assessed through four analyses: List of Excluded Activities, applicable to all clients and suppliers; Sector Categorization, applicable to all legal entity clients; Client Categorization, applicable to large corporate clients; and Sensitive Sectors, applicable to large corporate clients and Agribusiness. Find out more about the analysis and mitigation and remediation actions in the [ESG Report 2024 \(page 32\)](#).

3.2.4 Investments

Itaú Asset Management has its own methodology for integrating environmental and social variables into traditional company valuation models. This valuation identifies eight multi-sector dimensions, some of them focused on the relationship with stakeholders – Workers, Communities, Clients and Suppliers – and some of them focused on environmental dimensions – Water, Energy and Materials, Biodiversity and Land Use, Waste Management and Climate Change. It prioritizes the critical dimensions for each industry when evaluating the companies. Part of the methodology consists of the engagement with the investees for the purpose of

establishing a constructive dialogue, deepening the understanding of Environmental, Social and Governance (ESG) issues, disseminating best practices and mitigating possible risks.

Also, with regard to financed projects, any risks identified can be mitigated through specific contractual obligations, including the implementation of action plans, the execution of which is monitored throughout the duration of the financing contract. Find out more in the [ESG Report 2024 \(page 32\)](#).

3.2.5 Mergers and Acquisitions

Prior to formalizing any proprietary M&A transaction – including joint ventures - specifically when it involves the acquisition of a preexisting legal entity, we conduct a thorough due diligence process to ensure that the target Company is in compliance with the applicable legislation and to identify risks associated with the operations. The assessment includes legal, labor, accounting, tax, litigation, anti-corruption and anti-money laundering (AML) aspects and possible indications of compulsory labor.

Additionally, agreements signed within the scope of M&A transactions include specific representations and warranties clauses, requiring that the counterparties comply with all laws and regulations applicable.

3.2.6 Supplier Management

Our [Supplier Relationship Code](#) complements the [Code of Ethics and Conduct](#), establishes the principles and values that govern the interactions between our employees and our suppliers through the declaration of values that define the expected conduct in commercial relations, and its purpose is to achieve the same transparency, legality, quality and reliability that we have with our clients in the interactions with our suppliers and service providers. As of its release, in November

2016, the electronic acceptance of this code is required from all suppliers in Brazil thus reinforcing our commitment to an ethical and responsible supply chain.

As a complement to the [Supplier Relationship Code](#), in 2020, we launched the Environmental and Social Responsibility and Positive Impact Guide for Suppliers, aimed at sharing the environmental and social guidelines, encouraging our suppliers to adopt commitments to appreciate Human Rights and diversity in their agendas and promote sustainable practices in our supply chain.

In addition, we use a standard contract that includes specific provisions on the monitoring of critical topics, such as: respect for Human Rights, compliance with labor obligations, occupational health and safety standards, environmental and social compliance, environmental legislation, corruption prevention, liability for damage and information security. These requirements are also applicable to the supply chain of our business partners.

We periodically carry out external audits at suppliers classified as critical in order to map and assess respect for Human Rights, in addition to the environmental and social issues. If irregularities are identified, action plans may be developed to help the supplier solve the problem or, in more critical situations, penalties that may lead to the suspension or termination of the respective contract may be applied. These practices apply to all units in Brazil.

3.2.7 Corruption Prevention (Third Parties)

In addition to actions with employees, we apply the [Corporate Policy for the Prevention of Unlawful Acts](#), which establishes guidelines on anti-money laundering, counter terrorism financing, and prevention of fraud, in compliance with the legislation and regulations in effect and the best local and foreign market practices. This policy encompasses a set of actions that must be adopted to identify clients, suppliers, including outsourced service providers, partners and employees, based on the following pillars:

- Client Identification Process;
- “Know Your Customer” (KYC) process;
- “Know Your Partner” (KYP) process;
- “Know Your Supplier” (KYS) process;
- “Know Your Employee” (KYE) process;
- Monitoring, Selection and Analysis of Suspicious Operations or Situations;
- Reporting Suspicious Transactions to Regulatory Bodies.

3.2.8 Working with the Community and the Government

We assumed the commitment to maintain an active dialogue with our stakeholders as a way of developing opportunities, fostering a positive impact, reducing risks and bringing about new prospects and innovation. We recognize that we are an important part of our society and we have the opportunity to influence it and be influenced by it. Our engagement is established through dialogue with the many different stakeholders to take into account different points of view and needs, and to share our initiatives in order to learn and share best practices, share common values and build long-lasting relationships that ensure respect and promotion of Human Rights.

We are always attentive to the needs and opportunities in the regions where we have large operational and business centers. This process enables us to study ways of working with the organized civil society and government bodies to support and implement projects in these locations. We maintain contact with government entities for the purpose of contributing to the development of public policies that converge with the interests of the organization and society on topics such as safety, consumer rights, urban mobility, fiscal and tax issues and the environment, so that our institutional environment keeps constantly evolving.

3.2.9 Data Privacy (Use by Third Parties)

In line with the expanded perimeter concept, which includes outsourced companies in our scope of operation, we improved our risk management associated with service providers and business partners. This includes the improvement of the governance of third parties and the monitoring of a cyber security rating for highly-critical service providers, including the adoption of new solutions to monitor the security stance in cloud environments of our critical supply chain, thus allowing for better visibility and significant reduction of security risks at service providers.

Our contracts with third parties – service providers and partners – have confidentiality and privacy clauses that must be strictly followed. Third parties are classified based on criteria such as type of information to which they have access, the size of the company and the type of service. Depending on the classification, the requirements regarding the protection of the third party infrastructure range from the provision of security technical recommendations to onsite validation of the controls declared, with the monitoring of any corrections and improvements implemented by third parties.

For the service providers classified as most critical, we perform periodical scans of their technological environments and monitor the corrections of any vulnerability identified.

This aims at ensuring, in a sustainable and collaborative manner, the protection of business information, data from clients, employees and our computational environment, as well as at meeting the applicable regulatory and legal requirements.

In addition, we have a structured privacy risk assessment flow that is applied to our service providers involved in processing any personal data or sensitive personal data. After this assessment, third parties are rated by risk level for the purpose of fostering and strengthening the reliability of our flows also in the third-party environment.

We adopt the main market frameworks as the basis to ensure the implementation of processes that mitigate risks. Our main processes are certified by an independent entity in the following standards: ISO 27001⁵ and ISO 27701⁶. The certifications apply to our Integrated Management System (SGI), considering the processes of information security governance, information security risk assessment, Security Operation Center (SOC), handling of information security incidents, information security architecture, computing environment vulnerabilities, logical access management, and the governance processes for the processing of personal data at Itaú Unibanco, in our capacity as Controller of personal data.

⁵ ISO 27001: defines best practices for identifying, reviewing, and implementing controls to manage information security risks and protect the confidentiality, integrity, and availability of business-critical data.

⁶ISO 27701: extension of ISO 27001, provides for guidelines and requirements on the protection of the data subjects' privacy, ensuring the reliability of our flows and engagement with the topic, with security in our governance and personal data management for compliance with the General Personal Data Protection Law (LGPD).

4. WHISTLEBLOWING CHANNELS

We have whistleblowing channels that are able to identify, investigate, and forward to the relevant departments in charge, conducts contrary to this Commitment in a respectful and ethical manner. These channels are open to all clients, non-clients, employees, suppliers, partners, and society.

4.1 External Ombudsman's Office

The External Ombudsman's Office works as the last resort for the cases in which the client had their complaint addressed by primary channels and was not satisfied with the solution. Additionally, working in partnership with our other departments, the External Ombudsman's Office helps assess the client's vision to create new retail products and services, ensuring compliance with the Consumer Protection Code with a focus on transparency and customer satisfaction.

The main purposes of the External Ombudsman's Office include keeping a constructive relationship with the National Consumer Protection System (SNDC) and regulatory bodies, thus contributing to the development and strengthening of consumer relations.

Another important pillar of the activities of the External Ombudsman's Office is to work as an inducer of improvements within the Institution and ensure the effectiveness of the continuous improvement process (Management of Clients' Requirements) and the involvement of senior management in this agenda. This process comprises: capturing complaints on key issues on the whistleblowing channels, monitoring for analysis and prioritization of critical matters, diagnosis of root causes, definition of action plans to correct or improve products and services in partnership

with all departments of the Institution, in addition to controlling the implementation and effectiveness of the plans.

4.2 Internal Ombudsman's Office

The Internal Ombudsman's Office is our internal ombudsman's channel, an independent department with full autonomy at the organization that reports directly to the CEO. The channel works for the purpose of helping build a company that values respect and integrity in all relationships and seeks to achieve its goals without deviating from ethical values in an environment where everyone is proud to work.

Guided by trust, dialogue, transparency, sense of ownership, integrity and ethics, the Internal Ombudsman's Office addresses reports, suspicions and complaints about interpersonal conflicts and interests at the workplace, ethical misconducts and behaviors that are contrary to the institutional policies and is ready to help our employees – always with confidentiality, neutrality and independence – in different situations, such as:

- guidance, advice and support;
- problems or difficulties in the relationship with peers, partners or managers;
- non-compliance with rules, bad character or any type of unethical behavior;
- critical and unacceptable matters such as moral and sexual harassment and discrimination of any nature.

The means of contacting the Internal Ombudsman's Office are available to all employees in Itaú Unibanco's [Code of Ethics and Conduct](#) and internal corporate portal.

Incidents in Foreign Units are handled through local channels that have structures that are prepared to receive the report, engage partner departments in the investigation, when necessary, and assess the best way to solve them. However, it is important to

emphasize that the Internal Ombudsman's Office may be contacted to help resolve the conflict if there is any impediment in engaging the aforementioned departments, as well as in some specific situations described in internal policies.

4.3 Supplier Reporting Channel

The purpose of the [Supplier Reporting Channel](#) in Brazil is to ensure an ethical environment between us and our suppliers. Through it, reports and complaints on ethical misconducts, illicit acts and non-compliance with our [Code of Ethics and Conduct](#) and the [Supplier Relationship Code](#) can be made in total secrecy, with anonymity and impartiality, thus ensuring non retaliation.

4.4 Inspection Office

The Inspection Office is a function committed to integrity and ethics and acts independently and impartially to ensure that internal rules and regulations are strictly followed by its employees, clients, suppliers, and service providers.

We are dedicated to identifying and/or investigating issues involving misconduct, such as internal fraud, facilitation of money laundering, corruption, cases of harassment and discrimination, or any activity that goes against established ethical principles. Through the Whistleblowing Channel, we offer a secure, confidential medium that ensures the anonymity and protection of whistleblowers.

For further details and contacts for the whistleblowing channels, please see the [ESG Report 2024 \(page 260\)](#).

5. FINAL CONSIDERATIONS

For us, ethics and respect are non-negotiable. Any act that violates the Human Rights inherent in any individual is inadmissible and intolerable. We seek to develop our diligence through the continuous improvement of our risk control mechanisms, actions of reception, investigation, mitigation and remediation of harmful impacts, in addition to the continuous mapping of new work opportunities in order to improve our practices and guarantee the longevity and credibility of our business. For us, respecting and protecting the rights of every human being is a daily commitment to the sustainable development of society. In line with our commitment to transparency, other initiatives based on the guarantee and promotion of Human Rights are presented in Itaú Unibanco's ESG Annual Report. Please access [here](#).

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