



Itaú Unibanco's Commitment to Human Rights

Summary

1. General Principles	2
2. Scope and Objectives	2
3. Institutional Policies	2
3.1 Due Diligence Process	3
3.2. Guidelines.....	4
4. Implementation and Monitoring	16
4.1 For employees.....	16
4.2 For suppliers	18
4.3 For clients	19
4.4 For society	20
4.5 For Business	21
4.6 Reporting channels.....	22
5. Mitigation and Remediation	25
5.1 Employees.....	25
5.2 Suppliers	25
5.3 Clients.....	26
6. Final Considerations.....	27

1. General Principles

The purpose of this document is to reinforce the commitment of Itaú Unibanco Holding S.A. to respecting human rights in its relations with our employees, clients, suppliers, partners and society. This commitment is guided by the UN Guiding Principles on Business and Human Rights, according to the “Protect, Respect and Remedy” pillars formulated in John Ruggie’s Final Report and approved by the UN Human Rights Council on June 16, 2011, and by our Sustainability and Environmental, Social and Climate Responsibility Policy (PRSAC).

We are committed to respecting Human Rights as provided for in the UN International Charter of Human Rights, which comprises the UN Universal Declaration of Human Rights of 1948, the International Covenant on Civil and Political Rights of 1966 and the International Covenant on Economic, Social and Cultural Rights of 1966. We also signed up to the UN Global Compact, the Women’s Empowerment Principles (WEPIs), proposed by UN Women and the Global Compact, the Corporate Charter for Human Rights and the Promotion of Decent Work of the Ethos Institute, managed by the Institute of the same name, and the Standards of Conduct for Companies proposed by UN Free & Equal.

2. Scope and Objectives

This document covers our business and relationships with stakeholders and is aimed at providing guidelines for the prevention of risks to Human Rights, to which we are exposed, as well as disclosing good practices on this agenda. In this document, we are guided by recommendations from the United Nations (UN), by agencies that guide our actions on critical topics, the identification of opportunities, mitigation practices, remediation and monitoring and work with vulnerable groups, such as children, adolescents, the elderly, native peoples, migrants, women, black people, people with disabilities, LGBTQIA+ and others.

3. Institutional Policies

Respect for Human Rights permeates our policies and is in harmony with the best corporate governance, sustainable development and social responsibility practices. Accordingly, our Code of Ethics is based on principles that support an organizational culture aimed at the

appreciation of people, strict compliance with rules and regulations and the permanent search for development.

Our Sustainability and Environmental, Social and Climate Responsibility Policy (PRSAC) has principles and guidelines to be followed when carrying out our business, activities and processes, as well as in the relationship with our stakeholders. Respect for and protection of Human Rights through the promotion of diversity, equity and inclusion, prevention of moral and sexual harassment, discrimination of any nature and work in degrading conditions, in conflict with legislation (child, forced or compulsory labor) and commitment to an ethical and transparent conduct are some of the topics that are present in this policy, which also addresses the treatment of climate change, biodiversity and natural resources.

3.1 Due Diligence Process

Since 2015, the bank has been carrying out, on a regular basis, a Due Diligence process in human rights to identify, prevent, mitigate and account for how the direct and indirect impact on the human rights of its employees, clients, suppliers and society is addressed.

Through the contracting of an independent consulting firm, the bank assessed its exposure to and treatment of the main affronts to and violations of human rights over the past two years related to its activities, considering Brazil only.

The assessment took into consideration both the direct risks, which are associated with the operations of and services provided by the bank itself, and indirect risks, which are the responsibility of clients, suppliers or partners with whom we have commercial relations.

Interviews were carried out with different departments of the bank on the main topics of the human rights agenda, such as working conditions (right to association and unionization, collective negotiation of working conditions, pay equity, physical and mental health), data privacy and security, discrimination at the workplace, use of force in property security services, human trafficking, corruption and supplier management.

As a result of this process, eight risks have been listed as agendas for improvement and the implementation of the actions plans will take place over the course of 2023 and 2024 with a focus on strengthening the already existing prevention and mitigation mechanisms. Further details on the process were presented in our ESG Report. Please access [here](#).

3.2. Guidelines

Diversity

We are 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 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 with clients, encouraging uniqueness and equal treatment for all. To this end, we have adopted policies and practices that reinforce our ethical and social commitment in an agenda of transformation for our employees and society as a whole.

Equal treatment among employees and third parties

The respect and equal treatment topics are provided for in our Code of Ethics, under the following topics:

- **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, when hiring third parties, measures are adopted to promote such practices, such as the inclusion of specific clauses in contracts to ensure compliance with labor legislation, as well as adherence to sustainability recommendations (e.g., combating moral and sexual harassment and any form of discrimination, promoting a safe and respectful environment, appreciating, training and employing people with disabilities, appreciating diversity, ensuring inclusion and equal opportunities for all, including in leadership positions, ensuring proper working conditions and combating child, forced or compulsory labor).

Therefore, we understand that it is the responsibility of everyone to ensure that there is equal treatment among employees and third parties.

Accessibility for clients

Accessibility is a constant concern in our work with clients. The concept goes beyond disability-related aspects and we believe that it plays an essential role in the ability to exercise financial citizenship. For our clients to be able to effectively manage their resources, 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 accessibility testing in Technology, which includes people with disabilities, who ensure that all our products, services and journeys in our applications and websites are developed in an accessible way, allowing any user to be able to perform any type of transaction, contract services or manage their finances in an independent, agile and secure way.

To this end, we follow the international WCAG - Web Content Accessibility Guidelines standard, which is currently in the 2.1 version. We implemented guidelines provided for in this standard in our channels and carried out tests for the implemented guidelines so as to ensure that they have all been correctly applied. Accessibility is evolving and we still have opportunities to improve accessibility in our channels. However, today, we are already accessible through accessory tools, such as the Chat or videoconference.

In addition to the concern with digital clients, we seek to ensure accessibility at our branches, including for our employees. To this end, we comply with, among other laws, Federal Law No.

13.146-2015 - Brazilian Law for the Inclusion of People with Disabilities (Statute of People with Disabilities), which in turn requests adherence to Technical Standard of the Brazilian Association of Technical Standards (ABNT NBR) No. 9050:2020 - Accessibility to buildings, furniture, spaces and urban equipment. Our accessibility initiatives include:

- Architectural and furniture accessibility for people with disabilities;
- Branches with ATMs that can be independently and safely used regardless of their level of mobility or perception limitations;
- Accessible equipment (water fountains and available wheelchairs);
- Credit card bills printed in Braille and/or large print for blind or visually-impaired clients. Additionally, these bills are available in our digital channels;
- Checking account, card, consortium, payroll, vehicle and real estate clients, both individuals and companies, are provided with accessible service through voice 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.

Engagement with Stakeholders (dialogue with internal and external stakeholders)

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. Accordingly, our interaction with our employees, clients, stockholders, suppliers and society when it comes to Human Rights is essential. 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.

Education and Culture

We recognize the human right to education and seek to promote it with our employees and society, with a focus on projects to improve Brazilian public education, contributing to expand learning with equity, reducing inequalities and ensuring full development and dignified social inclusion for children, adolescents and young people. Investing in education is one of the driving forces for social transformation and a basic pillar of a country's sustainable development. We also recognize that everyone has the right to culture and leisure and, in order to contribute to the exercise of these rights, we promote actions aimed at society, our employees and our clients. Increasing people's contact with cultural diversity is a way to create paths to social development.

Free Union Association

We assure our employees the right to free union association, as well as absolute freedom to participate in union activities, always recognizing the rights and prerogatives of those elected to executive positions in the unions, in compliance with the Brazilian legislation in effect and the collective bargaining agreement of each professional category to which we are a party in the industry we operate.

The practice of discrimination against employees who are members and/or representatives of the trade union of the professional category is prohibited and subjects the violator to the application of disciplinary penalties.

As a way to ensure the preservation of this right and in order to identify any misconduct or affront to the right to free union association, we maintain internal channels that can be used by our employees who feel harmed, persecuted or discriminated against due to the exercise of their option, ensuring, if they so wish, the right to anonymity.

In Brazil, we have 1,032 active employees with duties on the different boards of the unions that represent them. As provided for in the collective bargaining agreement for bank employees, 480 employees work full time for these unions. In addition, we allow unions the possibility of carrying out unionization campaigns and, when requested, hold occasional meetings with the unions, our supervisors and employees, in order to seek negotiable 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.

Privacy and Information Security

Information is one of the main assets of the institution and privacy and security are pillars that compose Itaú Unibanco's Commitment to Human Rights. We are committed to treating the topic with rigor, adopting the measures necessary to ensure a safe and reliable environment for protecting the privacy of our clients, employees, suppliers, society and other personal data owners.

Our data privacy and protection strategies involve the awareness of the staff as a focus point, including these topics in the daily routine of the business and technology staff, supporting them in questions during the definition of the architecture of the initiatives and constantly reviewing our processes to provide a friendly experience on the topic from the conception of the projects. Since 2018, our Privacy Program has brought together a multidisciplinary group, led by the Technology, Legal, Compliance and Risk and Security departments, which works 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.

Meanwhile, the cyber security management seeks to prevent violations of data, minimize risks of service unavailability, 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 – within the Bank's infrastructure, in a cloud service at a service provider or in an international unit – taking into account the entire lifecycle of the information, from its collection, and then through processing, transmission, storage, analysis and destruction. 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.

The Bank's information security strategy for cyber security is approved by the Board of Directors and monitored by the Audit Committee. Both are periodically updated on the evolution of the environment. Our Chief Security Officer (CSO) is responsible for the topic and reports to our Chief Risk Officer (CRO), who is a member of the Executive Committee.

We have a set of policies and documents that are publicly available and periodically updated that 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. For example, the privacy policy describes our commitments and management guidelines, points out how personal data owners can exercise their rights and indicates the available contact channel, not only in its complete version but also in versions intended for stakeholders who own the rights. We also have a user friendly version of the document, which summarizes the complete version of the policy, providing personal data owners with more easily understandable wording.

Taking into consideration the data lifecycle, we also maintain an elimination routine for the personal information of data owners, with procedures designed to maintain only the necessary information in our environments.

We have a robust and friendly awareness raising program with training programs that strengthen the importance of the privacy, data protection and cyber security topics throughout the institution. 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 institution's Code of Ethics and principles and values. Additionally, there is also the Privacy Champion training program with agents that disseminate knowledge of data privacy and protection to the business, technology and operational staff and that support us in the understanding that the knowledge of privacy must be everywhere.

To mitigate the main risks related to information and cyber security to which we are exposed during the entire information lifecycle and promote information security, privacy and cyber security, we have many control practices and procedures that are carried out on an integrated basis with the business areas and Technology Department to maintain the architecture of

solutions and products with a higher level of security, monitoring the trends and ensuring data control and protection.

In line with the expanded perimeter concept, which includes outsourced companies in the management processes, we improved our risk management at service providers and partners with the improvement of the governance of third parties and the monitoring of a cyber security rating for highly-critical services providers, 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 observed and the third parties are classified in accordance with 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 recommendations to onsite validation of the controls informed, in addition to the monitoring of any corrections and improvements implemented by third parties.

For those classified as more critical, we perform periodical scans in their environments and monitor the corrections of any vulnerabilities identified in order to ensure, in a sustainable and collaborative manner, the protection of the information on the business, clients, employees and our computational environment and meet the applicable regulatory and legal requirements.

In the regulatory field, we comply with the requirements of the General Personal Data Protection Law (LGPD) and corresponding laws, Resolution No. 4,893/2021 of the National Monetary Council (CMN) and Resolution No. 85/2021 of the Central Bank of Brazil (Bacen), which address the adoption of a cyber security policy and the contracting of relevant data processing and storage and cloud computing services.

We also comply with Resolution No. 35/2021 of the Brazilian Securities and Exchange Commission (CVM), which establishes rules and procedures for operations with marketable securities in regulated markets and Circular No. 638/2021 of the Superintendency of Private

Insurance (Susep), which provides for the cyber security requirements to be complied with by insurance companies, open pension entities, premium bond companies and local reinsurance companies.

We adopt the main market frameworks as the basis to ensure processes that mitigate risks. Our main processes are certified by an independent entity in the following standards:

- ISO 27001: defines the best practices to identify, analyze and implement controls to manage information security risks and protect the confidentiality, integrity and availability of data that are essential for the business.
- ISO 27701: extension of ISO 27001, it provides guidelines and requirements on the protection of the data owner's 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).

The certification applies to our Information Security Management System (SGSI) and to the Privacy Management System (SGPI), taking into consideration the information security governance processes, information security risk assessment, Security Operation Center (SOC), treatment of information security incidents, information security architecture, vulnerabilities in the computational environment and logical access management and Itaú Unibanco's governance processes for personal data treatment.

Child and Compulsory Labor

We recognize that all forms of compulsory labor are serious violations of Human Rights, as well as the use of child labor in conflict with the legislation of each country. To this end, we seek to mitigate risks of violations of this nature as a result of our work, which is reinforced through the principle of "Respect for and protection of human rights through the promotion of diversity, equity and inclusion and prevention of moral and sexual harassment, discrimination of any nature and work in degrading conditions, in conflict with legislation (child, forced or compulsory labor)", which is present in our Environmental, Social and Climate Responsibility Policy (PR SAC) applicable worldwide.

Moral and Sexual Harassment

We do not tolerate moral or sexual harassment or any behavior that may cause damage to the personal integrity of any individual in the workplace.

According to the Code of Ethics, the Internal Ombudsman's Office is the channel that must be used to receive questions, complaints and suggestions related to moral and sexual harassment. In the Foreign Units, our employees may use the whistleblowing channels that are locally available.

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.

With the constant evolution of these topics, in order to ensure that our personnel have a good conduct in their daily routine and to reinforce our commitment to fighting any type of harassment and discrimination in the workplace, in 2022, the Internal Ombudsman's Office prepared, with the support of many departments of the Organization, the new Manual of Guidance on Harassment and Discrimination in the Workplace, which complements the Code of Ethics and Conduct.

The manual presents guidance on how to put into practice, as a result of moral or sexual harassment or discrimination, through proper attitudes that are consistent with our culture, the values we cultivated over the course of our history and that are essential to ensure an increasingly sounder Organization, which cares for a healthy work environment that respects human rights, diversity, freedom, dignity and physical, intellectual and moral integrity of people in all relationships.

Health and Safety

We recognize that enjoying physical and mental health is essential for a dignified existence. To preserve health and safety in the work environment, we carry out inspections to assess the workplaces, regularly survey strategic indicators and maintain open communication channels with employees to manage the actions. The information is discussed by a team of experts to define priorities and provides for the involvement of the bank's senior management for topics with greater impact or that involve change 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 are the program of support to return to work, program of support to the employee and their dependents with a multi-professional team (psychologists, social workers, nutritionists, physical educators, lawyers and veterinarians), occupational medical exams (essential in all spheres of health and safety prevention strategy), Risk Management Program (PGR), which identifies all risks in the work environment, including proposals of adjustments for exposure control), training and supporting materials on mental health, the “Internal Work-Related Accident Prevention Week” (SIPAT), the investigations of Work-Related Accidents and the ergonomic analyses of work stations. In addition to these initiatives, we also encourage and support the adoption of habits that generate well-being. In this context, we disseminate the ideal that self-care is a career driver of any professional. Therefore, we have a number of benefits, rules and procedures to equip our employees in the search for balance: medical and dental care available to all employees (including telemedicine), offer of fitness center plans with broad national coverage, outpatient clinics at the main administrative centers and vaccines against flu.

We work in all stages of health and safety governance, from prevention to rehabilitation, aimed at controlling the impacts of preventable illnesses and disabilities of our employees, observing different indicators such as absenteeism rate and the epidemiologic profile of the population.

Compensation

To ensure to our employees fair working conditions and equitable compensation, we promote meritocracy and transparency. To actively avoid any form of discrimination, we maintain compensation policies and processes that respect diversity and the Personnel Department, through meetings of joint bodies, monitors compliance with them, curbing discrimination and prejudice in compensation practices.

Compensation principles and practices are consolidated in a Compensation Policy so as to attract, reward, retain and encourage management members and employees to carry out the business in a sustainable manner. Compensation and benefit strategies are adopted through

parameters such as: salary surveys in the market, participation in surveys carried out in the industry and participation in specialized forums.

Prevention of Corruption

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 (financial or not) in exchange for the performance or omission to perform acts that are inherent to their duties, operations or activities for the Organization or aimed at benefits for themselves or third parties.

Accordingly, our anti-corruption procedures are based on the best global practices so as to combat misconducts, whether between public and private agents or between private agents, although Brazilian legislation currently in effect considers as corruption only the misconducts between public and private agents. In order to prevent and combat this practice, the Corporate Anti-Corruption Policy, which reinforces our commitment to working proactively on the prevention and combat of corruption in all of its forms was implemented. This document establishes guidelines and procedures that are proportional to the risks related to the nature, scale and complexity of the activities carried out by the Bank, training, communication and channels for questions and complaints, in addition to procedures aimed at avoiding and solving any conflicts of interests in the relations with our stakeholders (clients, suppliers, partners, non-profit entities, among others) in the public and private sectors. In order to coordinate the actions and comply with legislation in force and internal policies, Itaú Unibanco has an Integrity and Ethics Program (Program), provided for in the Corporate Integrity, Ethics and Conducts Policy, applicable to all employees and management members in Brazil and abroad.

The Program, managed by the Corporate Anti-Money Laundering 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, and its governance is composed of the Board of Directors, the Audit Committee, the Superior ESG Council and the Integrity and Ethics Committee.

Additionally, we apply the Corporate Policy for the Prevention and Combat of Illicit Acts, which establishes guidelines on anti-money laundering, counter terrorism financing, proliferation of weapons of mass destruction, prevention of fraud and combat of claims, in compliance with the legislation and regulations in effect and with 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 by covering the capture and confirmation of information and the periodic update and storage of registration file data.

For Itaú Unibanco to comply with the guidelines of this corporate policy, a program was established to prevent and combat illicit acts, based on the following pillars:

Policies and procedures;

Client Identification Process;

“Know Your Customer” (KYC) process;

“Know Your Partner” (KYP) process;

“Know Your Supplier” (KYS) process;

“Know Your Employee” (KYE) process;

Assessment of New Products and Services;

Compliance with Penalties;

Monitoring, Selection and Analysis of Suspicious Operations or Situations;

Reporting Suspicious Transactions to Regulatory Bodies; and

Training.

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.

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, exploitation of prostitution, compulsory labor, corruption, fraud and money laundering, among others.

In retaliation against these economic, political, social or warlike actions, 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 Her Majesty's Treasury (HMT). Additionally, we also observe the "Cuba Restricted List", which is exclusively published by the U.S. Department of State.

4. Implementation and Monitoring

The implementation, observance and monitoring of guidelines on Human Rights are carried out by our proper governance departments and forums, which must internalize them in their policies and processes in effect. We present below some examples of the internalization of the topic in the institution.

4.1 For employees

Personal Support Program

We offer to our employees and their dependents the Personal Support Program for the purpose of embracing and guiding those who are going through personal, family and professional conflict situations, as to the best way to manage such situations.

This service offers advice to people around the clock through the support of a multidisciplinary team of professionals, including psychologists, social workers, lawyers, nutritionists, physiotherapists, personal trainers, pet consultants and financial advisors. The service is

provided by phone, WhatsApp or application and is available throughout Brazil, free of charge and with the guarantee of confidentiality.

Parental support programs

These programs were designed to foster preventive, behavioral and reproductive health actions for women, in addition to promoting equal opportunities and reinforcing our vision and our discourse on equality and welcoming in situations that affect the female population in particular:

- *Bebê a Bordo* (Baby on Board): in-person or remote course carried out with the participation of pregnant employees, employees with pregnant partners and couples in the process of adopting a child. Important topics are addressed, such as nutrition of pregnant women, first care for the newborn, psychological issues, etc.;
- *Canto da Mamãe* (Mother's Corner): area for pumping and storing breast milk during working hours; and
- *Bebê em Casa* (Baby at Home): visits from a specialist nurse to the male or female employee's home in the first postpartum week to advise on breastfeeding and first care for the newborn.

The parental support programs are available to all employees in Brazil in an online format.

Mothers and Pregnant Women Support Policy

The Mothers and Pregnant Women Support Policy sets out benefits for pregnant women and homoaffective couples after the birth or adoption of a child in order to meet their needs in the possible family configurations. For the purpose of readjusting to work, mothers have their working hours reduced during the first month after the end of the maternity leave.

Since 2018, employees who are on maternity leave have had their performance evaluations carried out based on the period that was effectively worked and not on the period of work with reduced hours and targets, with evaluations related to the deliveries in the period prior to leaving for maternity leave. As a result, women's eligibility for career acceleration programs, educational sponsorships and promotions is maintained. In addition, the amount equivalent to the bank's profit sharing started to be paid in full and no longer in proportion to the period

worked. These actions show a progress in the agenda for equal opportunities for men and women and the policy applies to all units in Brazil.

Extended paternity leave

Strengthening our commitment to appreciating Human Rights, as a citizen company, we joined the practice of extending paternity leave for an additional 15 days. Accordingly, in addition to the five days that were already legally provided for, an additional 15 days may be requested, which is also applicable to adoption cases. We joined the practice in January 2017 and this practice applies to all units in Brazil.

4.2 For suppliers

Supplier Relationship Code

This document complements the Code of Ethics and is aimed at disciplining the interactions between employees and 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 the release of this document, in November 2016, the electronic acceptance of these conditions is required from all suppliers.

Environmental and Social Responsibility and Positive Impact Guide for Suppliers

In 2020, we released the Environmental and Social Responsibility and Positive Impact Guide for Suppliers. As a complement to the Supplier Relationship Code, it is 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.

Formalization of Contracts with Suppliers

Our standard contract includes specific provisions on the proper monitoring of issues related to human rights, labor obligations, occupational health and safety standards, environmental and social issues, compliance with environmental legislation, anti-corruption standards, liability for damage and information security, among other provisions applicable to our suppliers and their

supply chain. We periodically carry out external audits at our critical suppliers in order to map and assess respect for human rights, in addition to the environmental and social issues and, if irregularities are identified, action plans may be developed to help the supplier solve the problem or, in certain 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.

4.3 For clients

Credit

Taking into consideration the principle of relevance and proportionality at the time of granting and renewing a credit line, we apply an individualized environmental, social and climate risk assessment methodology for clients from the Corporations segment that operate in industries that are considered sensitive, namely: Agribusiness – Pesticides and Fertilizers, Agribusiness – Cold Storage Plants, Energy, Real Estate, Textile Industry and Apparel Retailing, Wood, Metallurgy and Steel and Iron, Mining, Oil and Gas, Chemical and Petrochemical and Rural Producers (specific analysis methodology). In addition to environmental criteria, practices related to Human Rights, such as indicators of health and security of workers, conflicts with traditional communities and supply chain management are also checked in these assessments.

This methodology is applied on an annual basis upon the approval or renewal of the credit limit through media surveys, public information and, when necessary, documents and other subsidies provided by clients. The weighting of all these aspects generates an environmental, social and climate risk score that is incorporated into the calculation of the credit risk score of clients from sensitive industries, serving as a basis for capital pricing and allocation. In addition, our environmental, social and climate risk assessment in project financing incorporates material and sensitive topics such as climate change and Human Rights, and requires, without limitations, for example, the mapping of all traditional populations that may be directly or indirectly affected by the project and studies that propose, if necessary, mitigating measures. Also, in order to mitigate risks, operations of this nature may count on specific contractual obligations, such as an Action Plan, with which compliance is monitored during the entire effectiveness of the financing agreement.

Additionally, if, based on media surveys or due to the update of the employer's registration file, we identify employers who have subjected workers to compulsory labor conditions or the

involvement of clients with practices that are considered by Itaú incompatible with its principles and values, that is, the use of compulsory or child labor, in disagreement with the legislation, and encouragement and/or exploitation of prostitution, including child prostitution (List of Excluded Activities), the client is subjected to a rigorous analysis by Itaú and may be blocked in our systems, preventing the contracting of new credit operations.

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, four of which are focused on the relationship with stakeholders – “Workers”, “Communities”, “Clients” and “Suppliers” – and four are 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. Itaú Asset takes into account ESG issues for the exercise of voting rights at general stockholders’ meetings and has partnerships with independent consultants specialized on the topic. These practices apply to all operations in Brazil.

4.4 For society

Working with the community and the government

Our strategy is related to social development actions, such as education, culture, sports, urban mobility, longevity and combating ageism, women entrepreneurship, promotion and protection of Human Rights, as well as the appreciation of diversity and inclusion that are delivered to all communities in which we have operations in Brazil, in partnership with several internal and external institutions. These same actions are extended to the media, opinion makers, the market and several social organizations. We also work together with public authorities, at their many levels, to improve public policy models in Brazil.

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 together

with the leaders of local communities, 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. Our work with public bodies is based on principles of ethics, transparency, morality and legality, ensuring democracy and respect for Brazilian laws and guidelines established by our Code of Ethical Conduct and the policies and commitments associated with the Social Development topic.

We establish many interactions with lawmakers and public administrators on topics such as safety, consumer rights, urban mobility, fiscal and tax issues and the environment.

In 2022, 5,801 legislative proposals were monitored at the National Congress. Meanwhile, at the state and municipal levels, we monitored 17,064 legislative proposals that are being processed at the Legislative Assemblies and in many City Councils in Brazil.

4.5 For Business

Mergers and Acquisitions

Prior to signing any proprietary M&A transaction (including joint ventures), specifically when they involve the acquisition of a pre-existing legal entity, Itaú Unibanco conducts a full due diligence to verify if the Company has been conducting its business in compliance with the applicable law and to identify risks in its operations, including: legal and labor aspects, forced labor, litigation matters, accounting and tax matters, IT and Operations, anticorruption and AML, etc.

If a proprietary M&A transaction involves no pre-existing legal entity acquisition, Itaú Unibanco performs an in-depth counterparty analysis based on both public information and non-public information to fully evaluate risks of any nature.

Itaú Unibanco also requires on its M&A contracts, representations and warranties that counterparties comply with all applicable laws and regulations.

4.6 Reporting channels

We have channels for reports and complaints, identified below, capable of identifying and investigating practices that are contrary to this Commitment to Human Rights.

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.

Among the main objectives of the External Ombudsman's Office is to maintain 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 from the main critical 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 the control of the implementation and effectiveness of the plans.

Access to the External Ombudsman's Office is available via a toll-free phone service (0800 570 0011) from Monday through Friday (working days), from 9 a.m. to 6 p.m., the Internet (www.itaubr.com/ouvidoria) and the Current Account Holder Application.

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 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 noteworthy 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.

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 the Supplier Relationship Code can be made in total secrecy, with anonymity and impartiality, thus ensuring non retaliation. It can be contacted via the email forneceadores_relatos@itau-unibanco.com.br and phone 0800 723 0010 - working days from 8:30 a.m. to 7:00 p.m.

Inspector's Office

The Inspector's Office works with full independence and impartiality and is responsible for receiving and investigating complaints or occurrences related to illicit acts of any nature, internal and external investigation actions resulting from fraud in its different forms in the electronic or documental channels, misconducts of employees, physical and personal safety and property security incidents and support to the branch network and business areas, as well as for the work on the root cause in the search for the continuous improvement of processes, products and services.

Itaú Unibanco's Corporate Integrity, Ethics and Conduct Policy encourages the timely communication of facts or suspicions of violations of the guidelines, laws, regulations or rules and states that a confidential treatment of the complaint and the protection of the whistleblower's identity is ensured, as well as of the information concerning the investigations of possible misconducts. The complaints can be anonymous or identified and anyone who, in good faith, reports a complaint, suspicion, doubt or concern regarding possible violations of the institution's guidelines must not be subject to retaliations.

To receive complaints, we provide channels for the communication of situations with signs of illegality that involve our employees, management members and service providers.

The Whistleblowing Channel can be accessed through the following means:

- External:
Corporate website: <https://www.itaubr.com.br/atendimento-itaubr/para-voce/denuncia/>
or <https://www.itaubr.com.br/fornecedores/>
Phone: 0800-723-0010 – working days - from 08:30 a.m. to 7:00 p.m.;
Email: inspetoria@itaubr.com.br
- Internal:
Email: Inspector's Office box;
Online Inspector's Office.

If any complaint is received by other means and/or service channels, our internal policy establishes that such complaints must be redirected to the Whistleblowing Channel under the responsibility of the Inspector's Office.

5. Mitigation and Remediation

5.1 Employees

Internal occurrences

Of the 1,779 employees in the reports investigated by the Internal Ombudsman's Office in 2022, 35% showed inappropriate behaviors. The main behaviors identified in legitimate cases were: non-compliance with rules, bad character, lack of effectiveness in management, poor communication, inadequate demands, disrespect and bullying and mean and defamatory comments.

For the purpose of guiding and disciplining our employees who have conducts that were contrary to the principles of the Company's Code of Ethics and rules, and minimizing any resulting risks, in 2022, the Internal Ombudsman's Office recommended the application of 596 guiding/disciplinary measures to those involved in the reports investigated and deemed legitimate.

5.2 Suppliers

In order to be apt to become a supplier of Itaú Unibanco, the companies go through a registration process under which they are assessed called an approval process. When registering in our system, the suppliers must be familiar with and declare their acceptance of the Supplier Relationship Code and Itaú Unibanco's Code of Ethics. We then carry out an approval process to assess the adherence of companies to our environmental, social and climate responsibility practices, as well as legal compliance, by assessing, in accordance with the product or service supplied, the risks related to:

- image and compliance with the legislation in effect
- supplier's financial health
- compliance with labor obligations

In 2022, we launched our new ESG questionnaire, which addresses four big dimensions: Environmental, Social, Governance and Climate, with objective questions that are in line with good market practices that allowed us to know more about the work of our suppliers to guide the planning of more assertive and evolutional engagement actions over the course of 2023.

The approved suppliers are periodically monitored, taking into consideration the same risks observed in the approval and, if relevant non-compliance is identified, they can be blocked for new contracts or have their contracts terminated.

5.2 Clients

As a basic analysis criterion, all of our clients are assessed on the topics in our List of Excluded Activities, namely: the use of compulsory or child labor, in disagreement with legislation, and the encouragement and/or exploitation of prostitution, including child prostitution. In accordance with our PRSAC, we understand that the performance of economic activities in these conditions is contrary to our values and principles and, therefore, leads to the blockage of clients for the performance of new credit operations. Over the course of 2022, 150 clients were blocked due to involvement with some of the activities described in the List of Excluded Activities.

Also, with respect to project finance, the risks that may be identified can be mitigated by means of specific contractual obligations, in particular the Action Plan whose implementation and execution is monitored throughout the financing agreement.

6. Final Considerations

For us, ethics and respect for people are supreme. Any act that violates the fundamental rights inherent to any individual is inadmissible and intolerable. We seek to develop our diligence on Human Rights 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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