

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

A Publicly-Held Company

NIRE 35300010230

CORPORATE BUSINESS CONTINUITY POLICY (GLOBAL)

1. OBJECTIVE

Establish the Itaú Unibanco Holding SA Business Continuity Program, with a goal of developing the resilience and sustainability of essential services for our customers and for the financial system.

This policy takes into consideration the best market practices and specific regulatory requirements.

2. TARGET AUDIENCE

Applies to all companies controlled by Itaú Unibanco Holding SA in Brazil and abroad (Conglomerate).

3. INTRODUCTION

Business Continuity at Itaú Unibanco is the ability to anticipate events that could interrupt services essential for our customers, being prepared to act and maintain the progress of our critical processes.

The unavailability of services causes negative and adverse impacts on our customers, with the potential for rapid and large-scale dissemination, capable of exposing the Institution's image and reputation, in various channels, including on social networks, subjecting it to customer complaints and to corporate crises.

Itaú Unibanco's Business Continuity Program was developed to protect our customers and employees, ensure the continuity and data integrity of our critical processes at tolerable levels of impact, safeguard revenues and sustain both the stability of the markets in which we operate and the trust of our customers, shareholders and strategic partners.

Management of the Corporate Business Continuity Program assesses regulatory aspects, determines policies, develops methodology, training, awareness, responds to regulatory bodies and institutional customers and evaluates new products and services.

The Program is continuous and is divided into the following fronts:

- i. **Establishment of the program:** directs those responsible involved in the Management of Banco Itaú Unibanco's Business Continuity Program.
- ii. **Awareness and acculturation:** incorporates business continuity into the bank's culture, focusing on customer needs.
- iii. **Organization analysis:** identifies and evaluates the impacts in face of a possible interruption.
- iv. **Definition of strategies:** defines feasible strategies for the continuity of operations, considering the technical and financial aspects.
- v. **Solution Implementation:** responds resiliently to an event so that critical business activities are maintained within previously defined and acceptable levels and times.
- vi. **Continuous improvement assurance:** ensures that business continuity solutions and the response structure reflect the bank requirements, and that plans are effective and efficient.

The Itaú Unibanco Business Continuity Program applied to the departments is evaluated by internal and external audit, regulatory bodies and institutional clients.

4. BUSINESS CONTINUITY MANAGEMENT GUIDELINES

The main guidelines of the Business Continuity Program are outlined in the following steps:

- i. **Business Impact Analysis (BIA):** process that assesses the potential effects of an interruption on critical business services, identifying the operations that are vital to the organization's survival and estimating the

impact of not being able to perform these functions during a specific time. This interruption may be caused by failures arising from human, natural, climatic, environmental, social, technological risks or due to data integrity failure.

Used to determine the minimum requirements for defining the business continuity plan. The procedures are described in internal procedure.

- ii. **Third Party Assessment:** assesses the resilience of the third party and its ability to continue providing the services contracted by Itaú Unibanco, even in the face of unavailability, as described in internal procedure.
- iii. **Operational Resilience Maturity:** assesses the maturity of each critical asset described in the BIA.
- iv. **Operational Resilience Score:** result of the resilience maturity of critical assets.
- v. **Business Continuity Plan (BCP):** Documents contingency strategies, the communication process to customers, regulators, among other strategic partners, roles and responsibilities, among other information, developed, consolidated and maintained so that it is available for use in possible interruptions.

Plans are developed in a modular way, depending on the type of interruption, and one or more modules can be activated.

Periodically, exercises to evaluate the effectiveness of plans and identify points for improvement of contingency actions must be carried out. The periodicity of the exercises is established by the plan manager, which can be: annual, semi-annual or shorter intervals (bimonthly, quarterly, monthly, etc.), taking into account the criticality of the process or the complexity of the contingency.

The BCP consists of the main plans:

- **Operational Contingency Plan (OCP):** alternatives for executing critical processes, whether systemic, procedural or emergency response alternatives, are in internal procedure.
- **Workplace Contingency Plan (WCP):** Defined strategies so that critical processes and products/services continue to operate at an alternative workplace if the primary location becomes inoperative or inaccessible, according to internal procedure.
- **Disaster Recovery Plan (DRP):** resilience strategies that, after technological failures or interruption of the main datacenter, resume and reestablish critical processes, activities and resources (technological infrastructure, telecommunications, systems, applications and data), are in internal procedure.

Training and Awareness: The Operational Resilience Portal contains explanations of the Business Continuity disciplines and on the IOX platform awareness materials are available for all itubers who wish to delve deeper into the topic.

5. MAIN ROLES AND RESPONSIBILITIES

The specific roles and duties of the departments involved in business continuity activities are described in procedures.

Management Board: approves and reviews policies for the management of business continuity in Itaú Unibanco at minimum on an annual basis;

Business Departments or Business Support:

- **Executives:** directors define and approve the products/essential services and critical processes that will be prioritized in the application of the business continuity methodology. Present a diagnosis of relevant unavailability events that generate significant impacts on our customers, the financial system and/or the market.
- **Community Leaders:** Community leaders (LNCs - Community Business Leaders and Community CIOs - Community Technology Leaders) have the role of disseminating Business Continuity guidelines and challenging the prioritizations of critical processes.
- **International Unit:** Each unit is responsible for managing the Business Continuity Program in compliance with the guidelines of this policy.

Business Continuity Management: manages the Business Continuity Program, defines and verifies compliance with policies, procedures, methodology, meets the demands of regulatory bodies and institutional clients for the discipline, trains the Business Continuity focal points, develops awareness materials for the Business Continuity disciplines, evaluates new products and projects.

Technology Continuity Management: manages IT continuity, defines the disaster recovery plan, governance of the DR environment and the continuity testing calendar.

Crisis Management: supports Business Continuity in the activations and deactivations of contingencies, if necessary.

Business and Technology Resilience Community: aims to create a stable and reliable environment for our customers, strengthening resilience in the face of challenges and adversities.

6. GLOSSARY

Crises: These are rare events that interrupt business, infrastructure/operational (including information technology), natural disasters, environmental, social impacts or impacts of any other nature that threaten the strategy, objective, feasibility of the organization or the image and reputation before its employees, customers, society, strategic partners and regulators, with timely and integrated responses.

Critical: A process is considered critical when, upon the occurrence of an interruption event can compromise the continuity of service provision or product availability and cause quantitative and/or qualitative impacts above the business' risk appetite.

Essential: a service is considered essential when this service is prioritized by Executives, considering tolerance to impacts over time for our customers, regulators, the market and other strategic partners, in the face of unavailability events.

Relevant: unavailability events that generate significant impacts on our customers, the financial system and/or the market.

7. RELATED EXTERNAL RULES

- ANBIMA - Brazilian Association of Financial and Capital Markets Entities:
 - ANBIMA Code of Regulation and Best Practices for the Management of Third-Party Assets
 - -Anbima Code of Regulation and Best Practices for the Distribution of Investment Products;
 - ANBIMA Regulation and Best Practices Code for Trading Financial Instruments
 - ANBIMA Regulation and Best Practices Code for Public Offerings
 - ANBIMA Code for the Distribution of Investment Products
- Central Bank of Brazil - BACEN CMN Resolution No. 4557 / 4943
- Central Bank of Brazil - BACEN CMN Resolution No. 4893
- Basel - Pillar 3
- B3 Market Supervision (BSM) - Basic Roadmap Operational Qualification Program (PQO)
- Securities and Exchange Commission (CVM) - Instruction 35
- Securities and Exchange Commission (CVM) - Instruction 32
- Securities and Exchange Commission (CVM) - Instruction 33
- Securities and Exchange Commission (CVM) – Instruction 21 ANBIMA Market Index (IMA)
- Securities and Exchange Commission (CVM) – Instruction 160
- Internal Capital Adequacy Assessment Process (ICAAP)
- Reinsurance Institute of Brazil (IRB) Agribusiness
- International Organization for Standardization - ISO 22301:2019 Security and resilience — Business continuity management systems — Requirements
- Superintendence of Private Insurance (SUSEP) - Circular 648
- Superintendence of Private Insurance (SUSEP) - Circular 638

8. QUESTIONS AND SUGGESTIONS CHANNELS

The internal e-mail is available for clarifying any questions and suggestions about Business Continuity: Business Continuity Management (business.continuity@itau-unibanco.com.br).

Approved by the Board of Directors on 2024, July.