



Guidelines on **Harassment and Discrimination in Work Relationships**

Annex to the Code of Ethics and Conduct
of the Itaú Unibanco Conglomerate

■ May/2023

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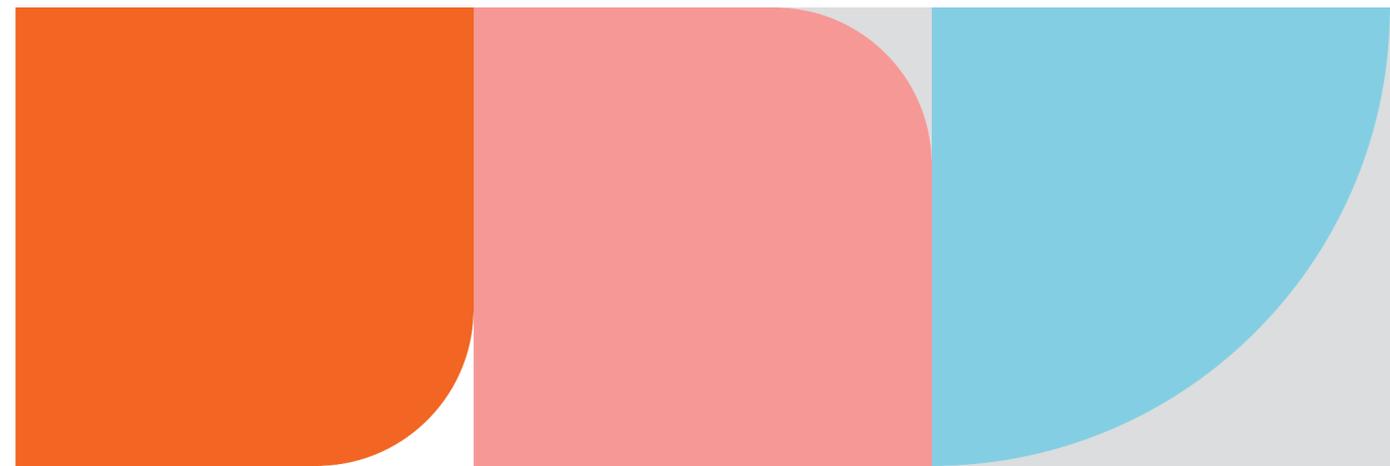
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Our commitment to fight harassment and discrimination

Our commitment to fight harassment and discrimination

This guide is a consultation document. You will find guidelines and can clarify frequently asked questions.

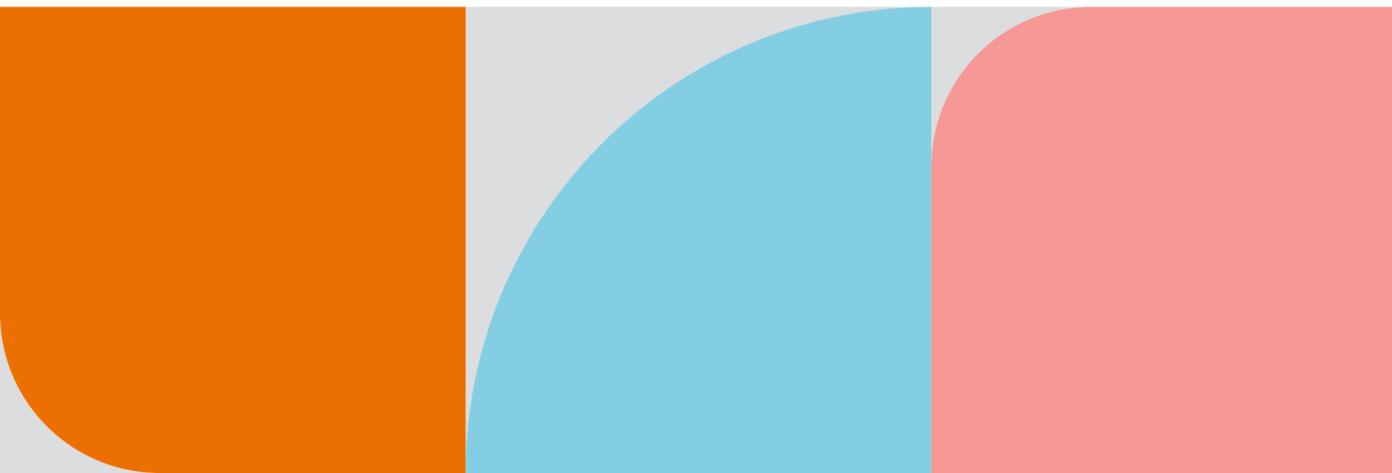
For the Itaú Unibanco Conglomerate, communication with employees is fundamental and includes the dissemination of materials aimed at guiding the behavior of the entire team.

Therefore, to ensure that the good conduct of our people is practiced on a daily basis, we have created this guide – a supplementary document to our Code of Ethics and Conduct.

The guide has an orientation character, reinforces our commitment to combating all types of harassment and discrimination at work and guides us on how to put it into practice through appropriate postures consistent with our values.

Values that we have cultivated throughout our history and that are fundamental to ensure an increasingly solid organization, which values a healthy work environment and respect for human rights, diversity, freedom, dignity, and physical, intellectual and moral integrity of people – in all relationships.

It is important to bear in mind that this guide is a document for constant consultation and that, regardless of your area of expertise, here you will find corporate guidelines that can help to clarify frequent questions.



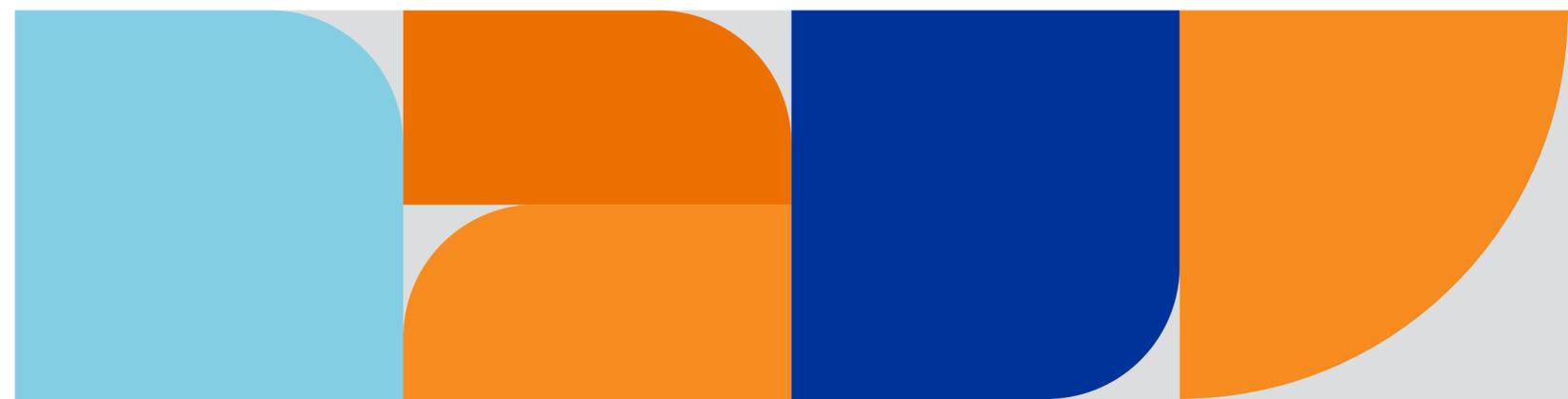
Respect comes first

We are a company that values respect and integrity in all relationships, that promotes diversity and inclusion and that seeks to achieve its goals without deviating from our values.

In addition to being part of our culture, we believe that this **contributes to the organizational atmosphere, increases creative potential, increases psychological safety, encourages the creation of value and promotes the attraction of talent to our institution.**

For this reason, we started this guide with an emphasis on the attitudes that must – on a daily basis – permeate our activities:

- **Promote relationships based on respect.**
Dignity and kindness in treatment contribute to an environment conducive to development with equity for all people and maintains a healthy, collaborative and cordial atmosphere.
- **Enable interactions based on trust.**
Cooperation and connection are essential and strengthen, in each of the daily attitudes, the construction of trusting relationships.
- **Prefer dialogue to the imposition of ideas.**
Being open to accepting divergent opinions relaxes the work environment, favors social coexistence, opens up perspectives and multiplies opportunities for collaboration and innovation.



Never forget!

For us,
ethics is non-negotiable.

This value must be present in everything we do.

Even so, if you are faced with a situation that goes against these attitudes, we make the Ombudsman available to listen, welcome and deal with your doubts, complaints and reports. **A secure and confidential channel that will ensure the ethical treatment of the situation.**

Moral harassment at work



What is moral harassment?

It is the exposure to humiliating and embarrassing situations, in a repetitive and prolonged way, manifesting itself through behaviors, words and acts that hurt the person's psychological and physical integrity, personality or dignity. It is a form of violence that intends to destabilize the individual emotionally and professionally.

Is moral harassment only characterized when practiced by the manager?

No. Managers, subordinates, peers, partners and co-workers can be perpetrators or victims of moral harassment.

Which examples of practices can constitute moral harassment?

- Threatening, frightening, embarrassing, mocking, exposing, harassing or insulting others;
- Practice stress management by making demands in an abusive, offensive, humiliating, rude, harsh, intimidating or aggressive manner;
- Inappropriate provocations and jokes, such as assigning nicknames that ridicule, for example, some physical or personality attribute, with the aim of belittling, embarrassing and humiliating the person;
- Purposely withhold information or deprive the employee of access to the instruments or resources necessary for good professional performance;
- Refusing direct communication, excluding, isolating or ignoring the person's presence;
- Carrying out group dynamics with activities that humiliate morals or values, as well as imposing vexatious punishments or demanding punishment to the least productive (example: doing push-ups, wearing costumes, dancing on tables; receiving a derogatory trophy etc.);
- Physical, psychological or verbal aggression.

Which examples of situations do not constitute moral harassment?

We are a company of unique and plural people at the same time, therefore, on a day-to-day basis, we may occasionally come across occasional conflicts in work relationships.

Although it is not appropriate and should be managed in the best way to avoid future misunderstandings, it is important to emphasize that **this type of situation does not constitute moral harassment.**

As well as specific conflicts, the pressure to reach targets, when carried out properly, does not constitute moral harassment either. **Pressure to reach targets is a legitimate and necessary practice for corporate life, which must be carried out ethically, transparently, with respect and education** and which must be a daily construction, based on trust, partnership, encouragement and guidance, aimed at the development of people and the engagement of the team in the search for good results.

In addition to the situations described, acts such as the ones below do not constitute moral harassment:

- Assignment of tasks;
- Demands, constructive criticism or negative evaluations about work and professional behavior, carried out in an individual and respectful manner;
- Application of penalties in case of non-compliance with legal and/or internal rules.

Do not forget!

Even if it does not constitute moral harassment, any behavior that goes against the values and culture of the Itaú Unibanco Conglomerate must be evaluated by the Ombudsman. Therefore, if there is any doubt or need for support on how to handle any type of conflict, look for this channel.

Sexual harassment

What is sexual harassment?

Sexual harassment is the act of threatening, persecuting or harassing the person, through pretensions (verbal or physical) with a sexual connotation, explicit or implicit.

In the professional environment it can manifest itself:

- Through approaches in order to obtain a sexual advantage or favor in exchange for benefits or to avoid career losses - **situations that can generate the feeling of blackmail.**
- Through inappropriate sexual provocations and impertinent attitudes in the work environment, such as inappropriate sexual jokes, pickup lines and embarrassing “compliments” – **situations that can generate feelings of intimidation or humiliation.**



Which examples of practices can constitute sexual harassment?

- Unwanted conversations about intimate matters of a sexual nature causing embarrassment;
- Jokes or use of expressions that contain sexual content;
- Insinuations, explicit or veiled, of a sexual nature;
- Inappropriate jokes and comments of a sexual nature about the appearance, clothing or physical characteristics of the person, made in an insistent and/or embarrassing manner;
- Mischievous looks, derogatory gestures or facial expressions with sexual overtones;
- Exhibition and/or sending of pornographic or erotic material such as magazines, photos, videos, websites etc. with own or third-party content;
- Invitations, compliments, flirting, pickup lines, performed in an inappropriate, insistent and/or embarrassing way;
- Forced, unwanted and not allowed physical contact;
- Blackmail, threat, retaliation, persecution or harassing an employee aiming, explicitly or implicitly, at sexual advantage for the granting of benefits, permanence or promotion in the job.

Attention:

Harassment presupposes unwanted sexual conduct by the victim and the objective on the part of the harasser to obtain sexual advantage or favors, not being considered harassment the simple flirting, compliments without sexual content, or dating proposals **made with respect and without any kind of harassment, pressure or constraint.**

In which relationships can sexual harassment happen?

Sexual harassment can occur both in the relationship between staff and management and in relationships between peers, partners and co-workers.

Don't forget:

Sexual harassment practiced by a person taking advantage of their status as hierarchical superior in relation to the victim, in addition to being subject to fair dismissal, it can also be considered a crime!

To be characterized, does sexual harassment need to occur within the workplace?

No, sexual harassment can also occur outside the workplace if the act occurs on account of work, which could happen, for example, in the following events:

- Social gatherings and corporate happy hours (even if informal);
- Breaks, before the start or after the end of working hours;
- Rides or transportation between work and home;
- Business trips;
- And other social activities of a professional nature.

Is physical contact necessary to characterize sexual harassment?

No, many behaviors can constitute sexual harassment, even without physical contact, such as insinuations, comments and inappropriate gestures, of a sexual nature.

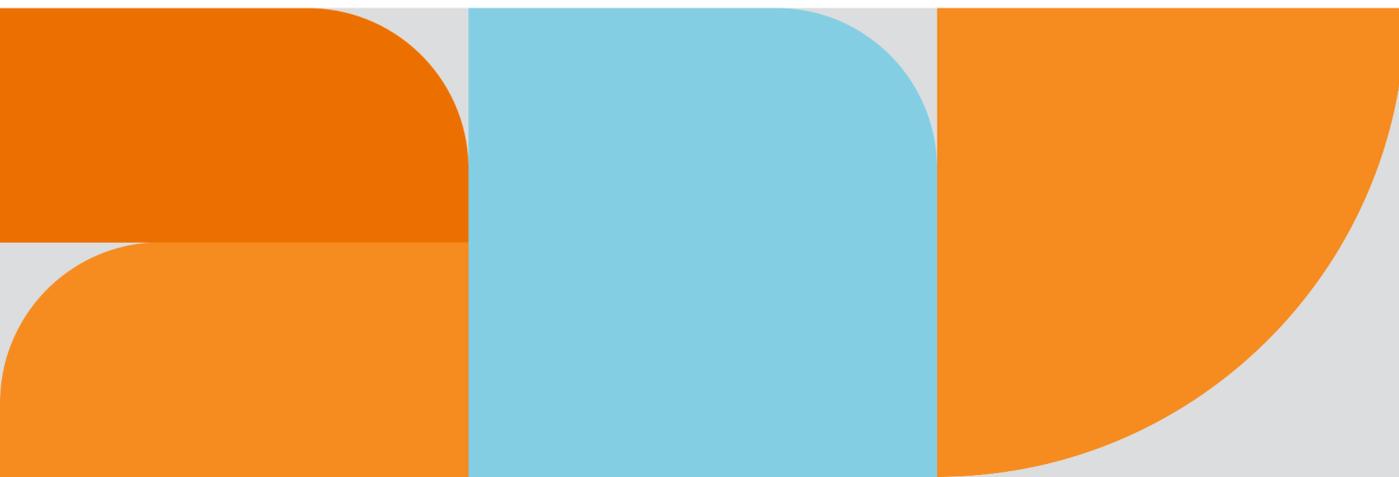
Discrimination

What is discrimination?

Discrimination consists of the distinction, exclusion, offense, depreciation, embarrassment or preference to a person or a group of people, motivated by race, color, ethnicity, marital status, gender identity, affective-sexual orientation, disability or health condition, appearance, religion, political opinion, national origin, social origin, age – among other characteristics of the person – that has the purpose of diminishing the person or the group.

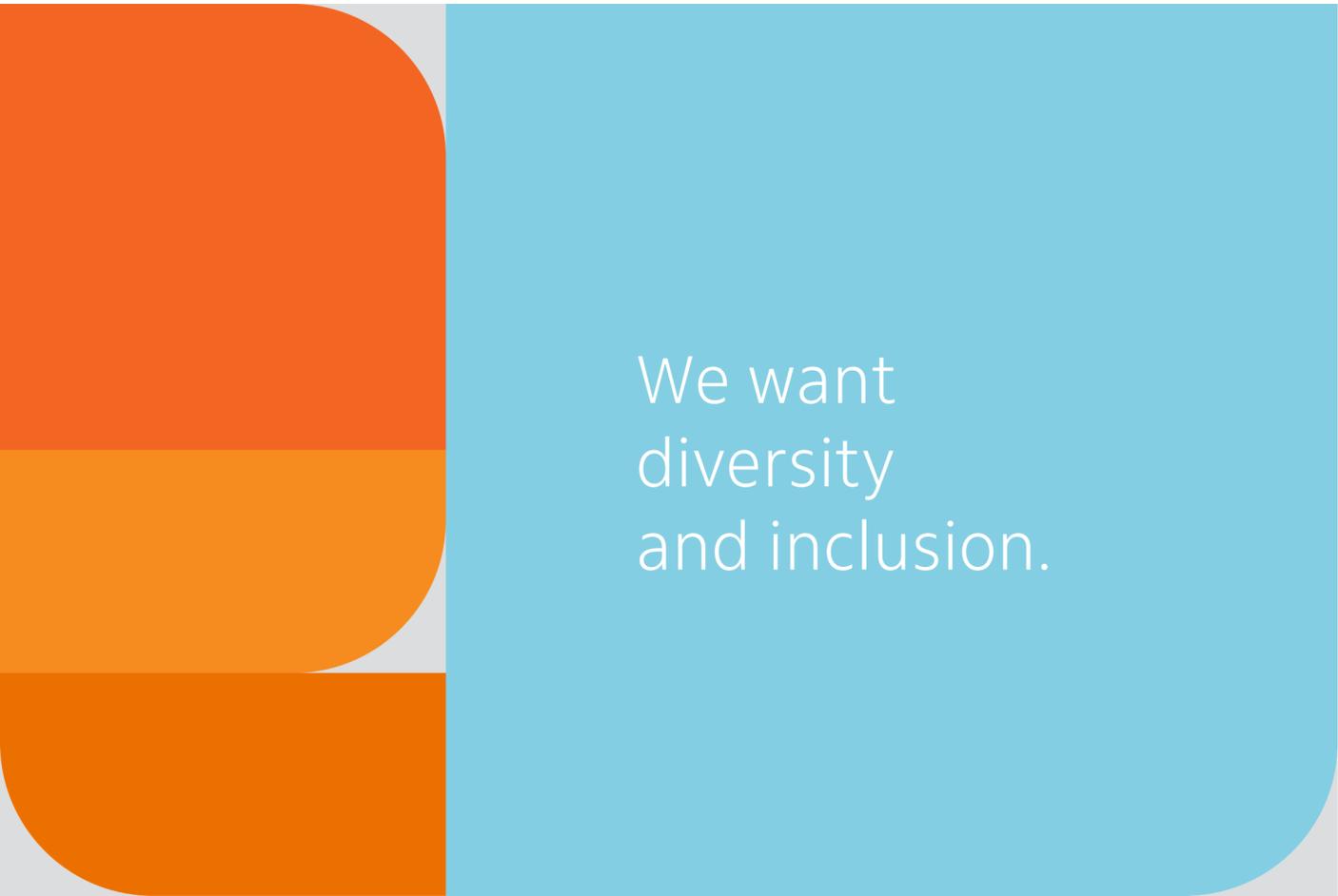
In the professional field, it has the effect of excluding or altering equality of opportunity and treatment in the employment, service or functions on account of the characteristics of the person.

Discrimination, in addition to being intolerable behavior at the Itaú Unibanco Conglomerate, can be considered a crime under some legislations.



What examples of practices can constitute discrimination?

- Depreciate, offend, reject, dislike, hate, or attack people or social groups because of their skin color, ethnic origin, gender identity, affective-sexual orientation or any other characteristic;
- Promoting or spreading the false idea that people with certain characteristics are superior to others;
- Assuming that there is an ideal pattern of people's characteristics and that not fitting into it makes people unfit to perform certain activities in society;
- Provide people with differentiated treatment in the work environment, demeaning them, segregating or excluding them from others;
- Prevent the employee's functional ascension or impede another form of professional benefit, motivated by race, color, ethnicity, marital status, gender identity, affective-sexual orientation, disability or health condition, appearance, religion, political opinion, national origin, social origin, age – among other characteristics of the person;
- Be opposed to equal rights among people, favoring one person or group over others, on discriminatory grounds;
- Make, in an insistent, offensive and/or embarrassing way, jokes and inappropriate and discriminatory comments about the characteristics of the other.



We want
diversity
and inclusion.

Say no to discrimination

We are made of people. We recognize our role in valuing and promoting diversity, inclusion and equal opportunities in our organization and in society and we believe that having a framework with a plurality of opinions, origins, cultures, beliefs, experiences, races, ethnicities, disabilities, gender identities, affective-sexual orientations, generations and other characteristics broaden perspectives and contribute to an atmosphere of respect and appreciation of differences. **After all, it's part of our culture: we want diversity and inclusion.**

At the Itaú Unibanco Conglomerate, any distinction, exclusion or preference based on race, color, ethnicity, marital status, gender identity, sexual orientation, disability or health condition, appearance, religion, political opinion, social origin, nationality, age – among other characteristics, is unacceptable, which has the effect of destroying or altering the equality of opportunities or treatment in our relationships.

Therefore, it is necessary to act against discrimination and it is essential that we do not connive or ignore discriminatory attitudes. Supporting diverse teams ensures more productive and engaged teams, in addition to an environment of respect and safety for all.

As an organization, we exercise our role of influence to improve people's lives, whether our employees, customers or society in general, through affirmative actions that address the challenges of diversity.

What are affirmative actions?

Affirmative actions are public and private policies that aim to implement the constitutional principle of equality and combat discrimination and are of paramount importance to correct historical inequalities between people, caused by prejudice in relation to certain characteristics.

Examples of affirmative actions are: exclusive positions for people with disabilities or that prioritize people from underprivileged groups.

Actions we should rethink

Jokes with tones of prejudice disrespect those who hear them and only lead to unnecessary pain.

Although some jargons are rooted in society's daily life, it is necessary to pay attention to what they really mean and eliminate them from everyday communication.

Bear in mind that, regardless of your intention, **in a “joke” you may be touching on a sensitive subject and hurting someone's feelings and dignity.** Therefore, avoid this kind of situation. Seek knowledge, understand why some expressions offend those who hear them and always be aware of how to talk to others.

Although the use of certain expressions does not necessarily constitute discrimination, if they offend, disrespect others, a group or go against the values and culture of the Itaú Unibanco Conglomerate, they must be evaluated by the Ombudsman and are subject to disciplinary measures.

Therefore, if there is any doubt or need for support on how to handle any type of conflict arising from inconvenient and inappropriate jokes, look for the channel.

Learn something new

Our language is very rich in popular expressions and full of meanings, but some of them can reproduce prejudices and bother those who hear them.

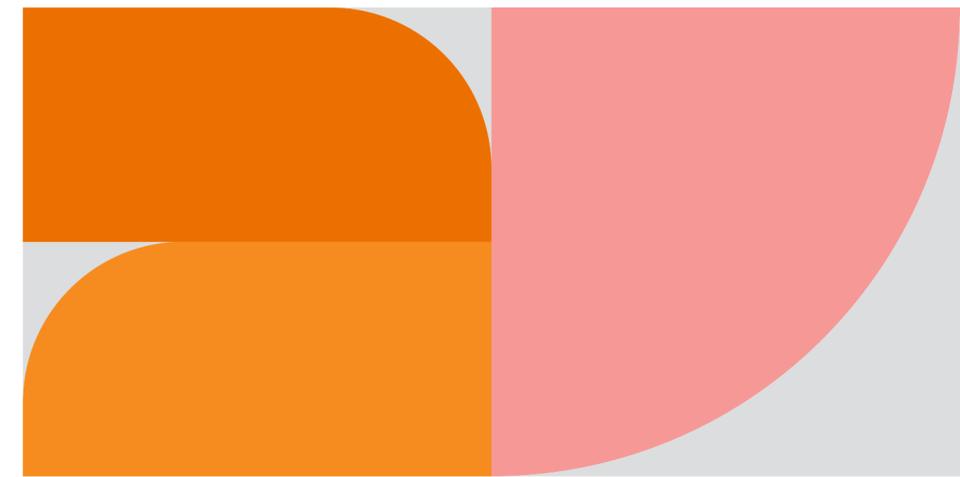
Therefore, avoid comments such as:

- “Denigrate”; “Black list”; “Black market”
- “Nice that you managed to establish yourself in this profession even though you are a woman”
- “She was very manly”
- “Sexual option”
- “Homosexuality”, “bisexuality” or “transsexuality”

In addition to these, some expressions are extremely offensive and may constitute discrimination.

Eliminate comments such as:

- “Are you blind?”
- “Are you deaf?”
- “Slave” and “Master”
- “That’s a woman’s thing”
- “Tranny”, “tomboy”, “fag” or “faggot”



What about the virtual environment?

Can harassment and discrimination also occur in the virtual environment?

Yes. This behavior tends to manifest itself through threats, intimidation, humiliation or embarrassment, carried out by emails, social networks or instant messages, SMS, WhatsApp, Teams, Skype, etc.

These are offensive and abusive acts by colleagues and managers, which take on new dimensions in digital media.

Why should we care?

Harassment and discrimination in the virtual environment deserve special care, because with information and communication technologies increasingly present in the work routine, this type of behavior gains a new dimension.

While some people may feel encouraged to practice them online, when they would never harass a colleague at the office, on the other hand, cases involving these behaviors in digital media can be publicly exposed, which makes the extent of damage bigger for the victim.

Therefore, we clarify: the practice of virtual harassment or discrimination is unacceptable in the Itaú Unibanco Conglomerate and the consequences of negative behavior are the same, whether it occurs in person or virtually.

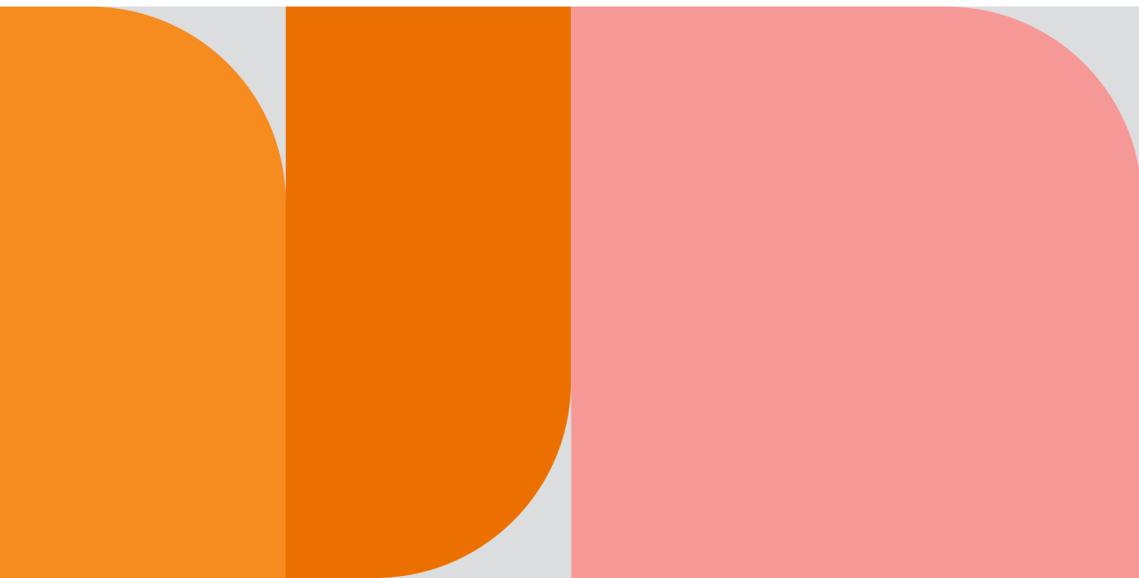
Remember!

The Ombudsman is also prepared to act in this type of situation, so it is important that the employee, when experiencing or witnessing behavior of this nature, reports it to the channel for handling.

Consequences

What are the damages caused by harassment and discrimination?

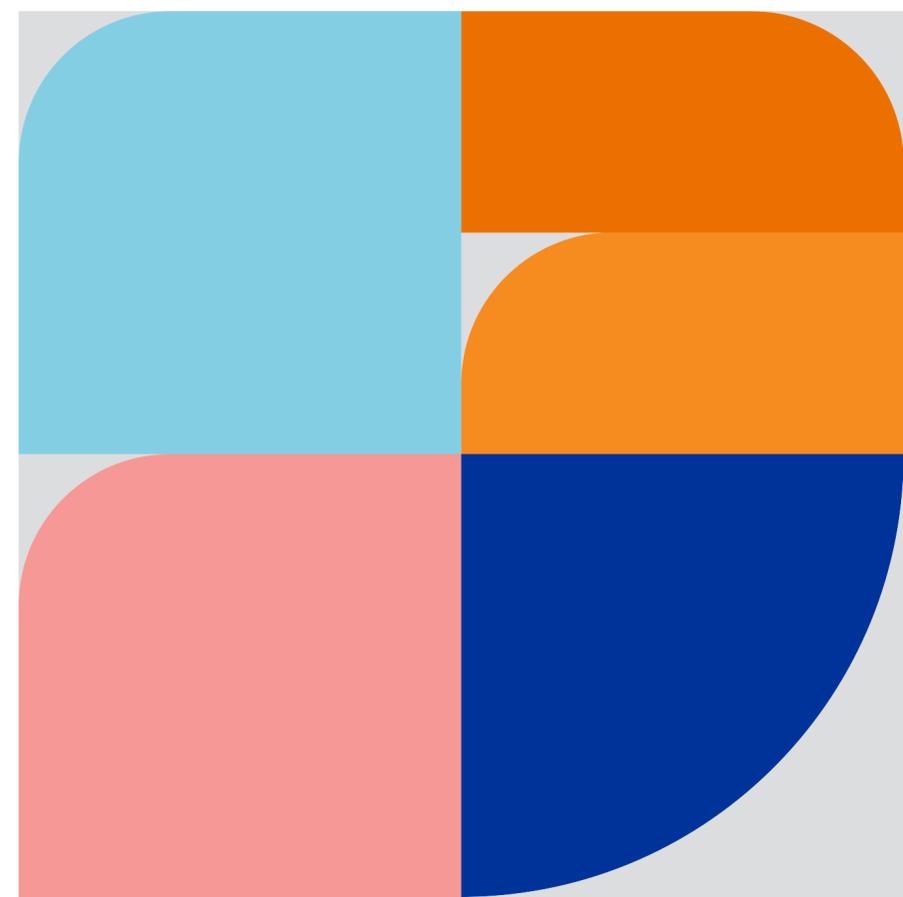
- **Physical**
Digestive disorders, hypertension, palpitations, tremors, generalized pain, phobia, worsening of pre-existing illnesses, sleep disturbances.
- **Psychological**
Guilt, shame, rejection, sadness, inferiority, low self-esteem and depression, internalization of guilt through questioning one's own conduct, impairment of physical and mental health due to the psychological pressure suffered.
- **Social**
Decreased ability to make new friends, withdrawal from relationships with friends, relatives and work colleagues, degradation of family relationships, deprivation of autonomy.
- **Professional**
Reduced ability to concentrate and be productive, recurrence of errors in carrying out tasks, lack of confidence in other employees.
- **The organization is also subject to damages, such as:**
Damage to the image and reputation before society, worsening of the organizational atmosphere, reduction of productivity, absenteeism and increase of professional illnesses and accidents at work.



What are the disciplinary sanctions?

Failure to comply with the guidelines in this Guide, the Code of Ethics and Conduct and the Corporate Policy on Integrity, Ethics and Conduct, as well as its procedures, is subject to administrative sanctions established in internal rules and/or in the legislation in force.

The practice of moral and sexual harassment and discrimination, in addition to being repudiated by the Itaú Unibanco Conglomerate, constitutes a serious misconduct, which may cause the employee to be fairly dismissed, as described in internal rules and in the current legislation.



Guidance and reporting channels

What should I do in case of harassment or discrimination? What is the channel for guidance and reporting?

If you are experiencing, witnessed or are aware of any attitude related to the practice of moral or sexual harassment or discrimination in the work environment practiced by employees, managers, partners, third parties or customers, do not hesitate to speak with the Ombudsman, the sooner you look for the channel, the better.

The Ombudsman is a welcoming place and you can go there whenever you are faced with a situation of conflict or discomfort, if you have a complaint, need guidance or want to talk and request support on the subject. If you need it, don't think twice, get in touch.

Don't forget:

You can and must report to the channel any inappropriate behavior that you are aware of, even if it happened with someone else.

The analysis and verification of facts will be conducted by the channel always with confidentiality, neutrality, independence and based on the following premises:

Anonymity

- Anonymous complaints will be accepted and treated by the channel in the same way as complaints with identification of the claimant.
- All information received will be treated with discretion and the identity of the claimant (when they decide to remain anonymous) and of the interviewees will be preserved at all stages of the process.

Bad faith complaints

- Complaints or accusations that are proven to have been made in bad faith will be subject to disciplinary sanctions.

Retaliation

- Acts of retaliation, revenge or persecution will not be tolerated against anyone who, in good faith, activates the organization's reporting channels.
- Disciplinary sanctions will be applied when any retaliation attempt resulting from an investigation carried out by the channel is identified.

Message from the Ombudsman

We are an independent reporting channel, with full autonomy within the organization and we are available to assist and support employees in resolving conflicts mentioned in this Guide, among other behavioral situations.

We are prepared to welcome and help employees who feel harassed or discriminated at work and we act in each case with the aim of promoting an environment of integrity, with respect and trust in all relationships.

Therefore, do not hesitate to contact us if you have a complaint, want guidance or even just want to talk and request support on the subject.

Our performance goes beyond fact-finding, it values the well-being and the care and reception of the victim, so we are here to help you!

How can you get in touch?

Brazil

For questions, reports and complaints regarding acts of moral and sexual harassment and discrimination, contact the channel in the following ways:

- Internal e-mail: Ombudsman box
- External e-mail: ombudsman@ombudsman.itaunibanco.com.br
- Phone: 0800 721 4040
- Letter/Mail bag
- Personal Contact – service by appointment, at the address of the Ombudsman or at another Itaú Unibanco unit to be arranged

Address for sending letters/mail bag and in-person service:

- Praça Alfredo Egidio de Souza Aranha, 100 - Jabaquara
Torre Alfredo Egidio, Piso 1º Intermediário
CEP 04344-902 - São Paulo, SP

Opening hours: Monday to Friday, from 9:00 am to 6:00 pm, except holidays.

For information about the International Units' reporting channels, please see PS-10-1 – International Units Reporting Channels or contact your Compliance Officer.

USA and The Caribbean

Reporting Channels

- Compliance Channel: compliance_whistleblowingline@itau.us
- HR Channel: hr_whistleblowingline@itau.us
- Generic Channel: whistleblowingline@itau.us

Switzerland

Reporting Channels

- Compliance Channel: compliance_whistleblowing@itau.ch
- HR Channel: hr_whistleblowing@itau.ch
- Generic Channel: whistleblowing@itau.ch
- Third parties: Zurich.compliance@itau.ch
- Banco Itaú (Suisse) SA
Bleicherweg 30
8002 Zurich

UK

Reporting Channels

- Compliance Channel: Whistle.IBBAInt-Compliance@itaubba.com
- HR Channel: Whistle.IBBAInt-HR@itaubba.com
- Generic Channel: Whistle.IBBAInt-Helpline@itaubba.com
- Internal Extension: 70044 4373
- External Telephone: +44(0)20 7070 4373
- Letter: Compliance IBBAInt
100 Liverpool Street, Level 2
London EC2M 2AT

Europe

Reporting Channels

- Compliance Channel: Whistle.IBBAE-Compliance@itaubba.eu
- Generic Channel: Whistle.IBBAE-Helpline@itaubba.eu
- Fiscal Council Channel: Whistle.IBBAE-CF@itaubba.eu
- Internal Extension: 700 351 041
- External Telephone: + 351 21 381 1041
- Letter: Itaú BBA Europe, S.A.
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1099-048 Lisboa, Portugal
A/C: Departamento de Compliance

**Ethics is non-negotiable,
we count on you.**
Let's go together!