

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Companhia Aberta

NIRE 35300010230

GOVERNMENT AND INSTITUTIONAL RELATIONS POLICY

1 OBJECTIVE

This policy establishes the main guidelines to be followed in the relationship of the Itaú Unibanco Conglomerate with public officials and in the contribution of funds to civil society organizations and associations, in order to ensure that management personnel and employees work in an ethical and transparent manner, as well as to prevent and fight against fraud and illegal acts in bidding processes, administrative contracts, donations, and contributions to associations.

2 TARGET AUDIENCE

This policy applies to all employees of Itaú Unibanco Holding S.A. and its subsidiaries in Brazil, except for the section that addresses the relationship with public officials, which applies to International Units as well.

3 INTRODUÇÃO

Government and Institutional Relations are all interactions with governments and other institutions, whether public or private, in order to defend the interests of Itaú Unibanco, the financial sector and the domestic economic environment, and establish partnerships in social responsibility actions, activities or programs through donations, contributions or sponsorship.

Example: payroll contract with the City Administration.

Relationship with public officials and biddings: Interaction of Itaú Unibanco with Public Officials (i) in Government Relations Activities and/or (ii) in the acquisition of products and services by Agencies, Entities and Companies of the Direct and Indirect Public Administration.

Example: Meeting with a Congressperson.

Public Officials are all natural persons who hold, even temporarily, with or without remuneration, by election, appointment, assignment, hiring or any other form of selection or employment contract, a mandate, position, job or role in Agencies, Entities and Companies that are part of the Direct and Indirect Public Administration.

Donation: Contribution of financial resources to projects and/or activities without benefits/consideration to the donor.

Example: Itaú Unibanco's voluntary contribution to institutions related to our causes and program platform, such as the United Nations Development Programme for debates and creation of tools in connection with the Sustainable Development Objectives or support to other civil society organizations.

Contribution to associations: Financial contribution made by Itaú to join entities, granting a consideration for this participation.

This support is contingent on our participation in Associations that represent the industry or topics that are relevant to the society. Examples: Brazilian Federation of Bank Associations (Febraban), Brazilian Federation of Private Pension and Life Insurance (FENAPREVI), Brazilian Business Council for Sustainable Development (CEBDS), and Ethos Institute for Corporate Social Responsibility.

4 RELATIONSHIP WITH PUBLIC OFFICIALS

The relationship with public entities and with partner institutions shall follow the principles below:

- Establish and ensure that any type of interaction with all Public Officials shall be guided by the maintenance of an ethical and transparent relationship, following the rules governing the public administration, the laws and regulations in force and the principles established by the Itaú Unibanco Code of Ethics, such as lawfulness, morality and administrative integrity;
- Conduct Government Relations Activities impartially and independently, without attachment to political or partisan ideologies, for the sole purpose of defending the legitimate interests of Itaú Unibanco, the financial industry and the country;
- It is not allowed to interfere in or obstruct inspection or investigation by any public, oversight or regulatory bodies;
- Offering, promising, delivering or accepting, directly or through third parties, financial benefits or undue advantages of any kind to Public Officials as a way of facilitating business, omitting acts or obtaining benefits for the Itaú Conglomerate Unibanco, such as obtaining authorization, licenses, permits and certificates, is not allowed;
- Conducting or contributing to acts that may be considered harmful to the public administration is not allowed;
- Ensure that the content of technical opinions, clarifications, suggestions and information provided to Public Officials is complete and up to date; falsifying facts, data and arguments is not allowed.
- It is important to follow the procedures relating to the recording of interactions so as to avoid the risk of such interaction being seen as an act of corruption.
- The Institutional Relations and Corporate Communications Department shall clarify any doubts of management personnel and employees relating to the form and feasibility of the relationship with Public Officials.
- All employees and management personnel who relate with Public Officials in Relevant Positions shall necessarily receive specialized training in order to ensure that they act in accordance with the ethics and transparency guidelines of the Itaú Unibanco Conglomerate.

Arrangements with Public Administration Agencies and Companies, involving any products and services provided by the Itaú Unibanco Conglomerate, shall be subject to the following rules:

- Arrangements involving products and services entered into with Agencies, Entities and Companies that are part of the Direct and Indirect Public Administration are subject to a bidding process, and such process will be unenforceable or dispensable only in the cases provided for by law. The Legal Department shall analyze whether such arrangement could be considered as a case of dispensable or unenforceable bidding process;
- The participation of the Itaú Unibanco Conglomerate in Bidding Processes is allowed, subject to the following conditions:
 - a) The Itaú Unibanco Conglomerate or any employee or management personnel that represents it in bidding processes shall behave honestly and ethically, following the principles governing the public administration, and any participation in fraudulent payment schemes, or combination of prices or negotiation conditions, with the purpose of obtaining an undue advantage or benefiting the Itaú Unibanco Conglomerate or any employee or management personnel that represents it is prohibited, subject to the principles established in the Code of Ethics and the Corporate Anti-Corruption Policy available at Corporate Portal and on the website <https://www.itaubr.com/relacoes-com-investidores>;
 - b) the competitive nature of bidding processes shall be strictly observed, by following the general guidelines and rules for ensuring fair competition, among other internal rules;
 - c) The amounts/prices offered in bidding processes shall be compatible with the amounts adopted by the market for the same purpose, without discrepancies, thus allowing fair competition and complying with the minimum and maximum amounts provided for by the bidding process, where applicable.
- It is expressly prohibited to:
 - a) Prevent, disturb or frustrate any act of the public bidding process;
 - b) Remove or seek to remove a bidder by fraud or by offering undue advantages;
 - c) Prevent, frustrate, manipulate, defraud the competitive nature of the bidding process by means of arrangement, combination or any other means;
 - d) Create, fraudulently or irregularly, a legal entity to participate in bidding process or to enter into an administrative contract;
 - e) Manipulate or defraud the economic and financial balance of contracts entered into with Agencies and Companies of the Direct and Indirect Public Administration, making contractual obligations disproportionate.

In order to hire public officials or former public officials as employees of the Itaú Unibanco Conglomerate, it is necessary to consider the following rules:

- a) Follow the same selection and recruitment criteria adopted by the Conglomerate for applicants in general, without any type of privilege or benefit, subject to the determinations at internal policies;
- b) The recruitment of Public Officials or former Public Officials who have held a mandate, position, job or role in Regulatory, Supervisory and Inspection Agencies shall be preceded by an evaluation of any conflict of interests, conducted jointly by the Internal Control and Compliance Department, the Legal Department, the Institutional Relations and Communications Department, and the Personnel Department; recruitment for the positions of Supervising Officer and above shall be approved by the Executive Committee.

In offering and receiving of Gifts, Courtesies, Invitations for technical and non-technical events, lunches and dinners, among others, to and from Public Officials, the provisions contained in the Corporate Ethics Policy shall be followed.

5 DONATIONS

Donation is the act by which, at its discretion, an individual or legal entity transfers to another financial resources, services and/or goods. Donations are made free of charge, with no benefits/consideration to the donor. Itaú's donation strategy is related to the following topics:

- (i) Projects related to the UN Sustainable Development Goals;
- (ii) Priority private social investment causes such as education, culture, sports, urban mobility, senior citizens, diversity and sustainability;
- (iii) Projects related to public policies and to the community and surrounding areas;
- (iv) Assistance to the support functions that work on topics of interest to Itaú Unibanco such as consumer, labor, tax and other related topics;

There are two types of donations:

a) Without Incentive

Donations made without tax benefits to Itaú, both in kind and in goods and services.

b) With Incentive

Donations that generate some kind of tax benefit, either deductibility of expenses in the calculation of income and social contribution taxes, or the possibility of reducing taxes by deducting the amount donated. Donations with incentives are made in accordance with certain incentive laws, such as the Rouanet law, Sports law, FUMCAD, PRONON, PRONAS/PCD, law for the Elderly, and donations deductible from operating income.

If there is interest, follow the sponsorship policy.

6 CONTRIBUTIONS

Membership in entities has two natures:

6.1 Entities for Representation Purposes:

Entities of the financial industry or related to the activities or interests of Itaú Unibanco, whose purpose is to promote greater interaction between the State, civil society and stakeholders. With authority and legitimacy to represent its members, the Representative Entities are intended to:

- Set an identity for the industry;
- Represent the general interests of members;
- Improve the system that impacts financial institutions;
- Focus the efforts of financial institutions on the population's access to financial products and services;
- Support and act for the enrichment of the public debate;
- Articulate and conclude collective bargaining agreements between the players;
- Prepare technical content on topics related to the activities developed by the industry.

Examples: FEBRABAN (Brazilian Federation of Bank Associations), FENSEG (Brazilian Federation of General Insurance), and FENACAP (Brazilian Capitalization Federation)

6.2 Entities not for Representation Purposes:

Entities that do not represent the financial industry nor are they related to the activities or interests of Itaú Unibanco; their purpose is to congregate, foster, support and develop activities of a civic, business or institutional nature, in order to create and add value to society. These Non-Representative Entities do not represent Itaú, although they recognize and promote actions that are in line with Itaú's institutional pillars.

Exemplos: ABRIG (Brazilian Association of Institutional and Government Relations), IBGC (Brazilian Corporate Governance Institute), Brazilian Business Council for Sustainable Development (CEBDS), and Ethos Institute for Corporate Social Responsibility

Its attributions are to provide places for socialization, discussion, dialogue and participation of members of the industry and the society in order to guide:

- Achievement of common purposes and conceptions;
- Organization and improvement of work practices;
- Promotion and exchange of knowledge, experience and trends;
- Building of affirmative policies, actions and behaviors..

7 CANAIS DE DENÚNCIA

Suspensions or evidence of fraud and illicit activities under this Policy shall be reported directly to the Corporate Security Department, through the Investigation Department in Brazil. At international units, the whistleblower may also communicate the local Compliance Officer, who shall report the case immediately to the Investigation Department, if the latter has not been copied/communicated.

Management, employees, customers, service providers of the Itaú Unibanco Conglomerate, and the public in general may use any of the following channels to report to the Investigation Department:

- Telephone: 0800-723-0010;
- Internal email: inbox Inspetoria;
- External email: inspetoria@itau-unibanco.com.br;
- Courier: addressee: Investigation Manager/São Paulo;
- Address: A/C Inspetoria - Av. Dr. Hugo Boelchi, 900 - piso 1 - Torre Eudoro Villela - São Paulo - SP - CEP: 04310-030

8 SANCTIONS

Failure to comply with the legal and regulatory provisions described herein subjects the management personnel and employees to sanctions ranging from administrative penalties to criminal penalties for fraud and corruption. Negligence and voluntary noncompliance are considered noncompliance with this policy and the Code of Ethics, and may be subject to the disciplinary measures provided for in internal regulations.

9 GLOSSARY

Public Official: all natural persons who hold, even temporarily, with or without remuneration, by election, appointment, assignment, hiring or any other form of selection or employment contract, a mandate, position, job or role in Agencies, Entities and Companies that are part of the Direct or Indirect Public Administration.

Public Official in Relevant Positions: Public Officials who are members of the Executive, Judicial, and Legislative Branches and the Public Prosecutor's Office who hold, in Brazil, relevant positions, jobs or public roles, such as: I - holders of elective offices of the Executive and Legislative Branches; II – holders of the following positions in the Executive Branch of Federal, State, and Municipal Governments: a) Minister of State or equivalent position; b) of a special nature (political appointees) at a high level, capable of making decisions (e.g. presidents, secretaries and equivalent positions); c) president, vice-president and director, or equivalent position, of government bodies (except those with a regulatory, supervisory or oversight role), public foundations, public companies or semi-public companies; III - members and presidents of the Federal Court of Auditors, of state, district and municipal courts or

board of auditors; IV - members of the National Council of the Public Prosecutor's Office, the Attorney General, the Labor Attorney General, the Attorney General of the Military Justice, the Deputy Attorneys General, and the Attorneys General of States and the Federal District; and V - president and members of the National Council of Justice, ministers of the superior courts (Federal Supreme Court - STF, High Court of Justice - STJ, High Court of Labor - TST, High Electoral Court - TSE, High Military Court - STM , High Council of Labor and Federal Court Council), the judges of the Federal Courts, State Courts and courts of the Federal District and Territories, and the Regional Electoral Courts.

Government Relations Activities: representing the institutional interests of the Itaú Unibanco Conglomerate and the financial system in general, in an organized and transparent manner, by following up the regulatory and legislative processes, as well as the provision of information and technical suggestions in order to contribute to the improvement of the Brazilian regulatory scenario, complying with the applicable legal and ethical rules at all times.

Itaú Unibanco Conglomerate: Itaú Unibanco Holding S.A. and its subsidiaries and affiliates in Brazil and, where applicable, abroad.

Administrative contract: any contract or contractual instrument whose contracting party or contractor is any Agency, Entity or Company of the Direct and Indirect Public Administration.

Corruption: all and any action, either involuntary or voluntary, involving suggestion, offer, promise, granting (active) or solicitation, demand, acceptance or receipt (passive) of undue advantages, whether of a financial nature or not, such as bribe, influence peddling and favors, in exchange for the accomplishment or omission of acts or facilitation of business, transactions or activities for the Itaú Unibanco Conglomerate or for the benefit of employees or management personnel, or of third parties.

Interaction: contact with a public official, face to face or remotely, regardless of the place and the occasion (including meetings, social events, technical and non-technical events, conferences, lunches, dinners, etc.).

Regulatory, Self-Regulatory, Oversight and Inspection Agencies: entities responsible for regulating, self-regulating, supervising and inspecting the activities conducted by the Itaú Unibanco Conglomerate, in its various business segments, as defined in internal policy.

Direct Administration Agencies: comprises the direct public administration, composed of entities and bodies of the Executive, Legislative and Judicial branches, including the Public Prosecutor's Office, at all levels, whether federal, state or municipal.

Entities and Companies of the Indirect Administration: comprises entities created with their own legal personality to conduct activities of public interest or economic activities conducted by the State that need to have autonomy and operate in a decentralized manner, i.e. Autonomous Public Entities, Foundations, Public Companies (entity with a legal personality under the private law, created under the law and with its own equity, whose share capital is wholly owned by the Federal, State, Municipal or the Federal District government), and Semi-Public Companies (entities with legal personality under the private law, created under the law as a corporation, the majority of voting shares of which belong to the Federal, State, Municipal or the Federal District government, or an indirect administration entity).

Tender process: administrative procedure for selection of the most advantageous proposal for a public body or entity, based on predetermined criteria. Examples of tender processes include competition, request for price quote, auction, reverse auction, invitation, and the "request for proposal" and "request for information" procedures.

Approved by the Board of Directors in 25.10.2018.