

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Companhia Aberta

NIRE 35300010230

POLICY ON GOVERNMENTAL AND INSTITUTIONAL RELATIONS

1. OBJECTIVE

This policy establishes the main guidelines to be observed in the governmental and institutional relationship of the Itaú Unibanco Conglomerate, as defined in the target audience, with public officials and in the allocation of resources to civil society organizations and associative entities, aiming to guarantee the performance of administrators and employees in an ethical and transparent manner, as well as preventing and combating fraud and illegal acts in the context of bidding procedures, execution of administrative contracts, donations and associative contributions.

2. TARGET AUDIENCE

This policy applies to all employees of the Itaú Unibanco Conglomerate. The item that provides for Interaction with Public Officials also applies to International Units.

3. INTRODUCTION

Governmental and Institutional Relations are understood to be all Interactions with Public Sector Agencies or Entities and other institutions - whether public or private - in order to defend the interests of the Itaú Unibanco Conglomerate, the financial sector and the national economic environment. The activities also include the establishment of partnerships in social responsibility actions, activities or programs through donations, contributions or sponsorships.

The relationship of the Itaú Unibanco Conglomerate with Public Officials occurs both in Interactions with the nature of Governmental and Institutional Relations Activities, as well as in participation in Bidding Procedures.

Example: i) Meeting with Federal Deputy, ii) Joint preparation of an impact program on public policies for the population or [iii) Contracting of payroll with City Hall.

Donation is the contribution of financial resources to projects and/or activities without benefits/counterparts expectation to the donor.

Example: Contribution of voluntary resources by the Itaú Unibanco Conglomerate to institutions linked to our causes and operating platform, such as the collaboration with the United Nations Development Program (UNDP) to carry out debates and formulate tools related to the Sustainable Development Goals (SDG) or support to other civil society organizations.

Associative Contribution: It is the financial contribution made by the Itaú Unibanco Conglomerate to join entities, providing compensation for this participation. Support is linked to our participation in the framework of Associations that may represent the sector or topics of relevance to society.

Examples: Brazilian Federation of Banks (Febraban), National Federation of Private Pension Plans and Life (FENAPREVI), Brazilian Business Council for Sustainable Development (CEBDS) or Ethos Institute of Companies and Social Responsibility. For International Units, the local Compliance Officer must be consulted.

4. RELATIONSHIPS WITH PUBLIC OFFICIALS

4.1 The relationship with Public Sector Bodies or Entities, national or foreign, and with partner institutions, even when carried out on behalf of professional entities or associations, must observe the following principles:

- Establish and ensure that any type of interaction with all Public Officials will be guided by the maintenance of an ethical and transparent relationship, respecting the rules governing public administration, the laws and regulations in force and the principles established by the Itaú Unibanco Code of Ethics, such as legality, impersonality, publicity, morality and administrative probity;
- Carrying out Governmental and Institutional Relations Activities in an impartial, democratic and independent manner, without attachment to political or party ideologies, aiming exclusively at defending the legitimate interests of the Itaú Unibanco Conglomerate, the financial sector, society and the country;
- It is not allowed to impede, interfere or hinder the investigation or inspection activity of Public Officials, Bodies or Entities of the Public Sector, inspection or regulatory bodies, including within the scope of regulatory agencies and inspection bodies of the national financial system.

- The offer, promise, delivery or acceptance, directly or through third parties, of economic benefits or undue advantages of any kind to Public Officials, or the third person related to them, as a way of facilitating business is not allowed, omitting acts or obtaining benefits for the Itaú Unibanco Conglomerate, such as obtaining authorizations, licenses, permits and certificates;
- It is not allowed to practice or contribute, finance, fund, sponsor or in any way subsidize the practice of Acts Harmful to the Public Administration.
- It is not allowed to use an intermediary, a natural or legal person to hide or conceal their real interests or the identity of the beneficiaries of the acts performed.
- Ensuring that the content of technical opinions, clarifications, suggestions and information provided to Public Officials is complete and up-to-date, not allowing for falsifying facts, data and arguments.
- The Responsible Department for the activities of Government Relations, Institutional Relations and Corporate Communications should clarify any questions of management and employees related to the form and viability of the relationship with Public Officials. For International Units, the local Compliance Officer must be consulted.
- Employees and administrators who have recurrent relationships with Public Officials with Relevant Functions must necessarily receive specialized training, in order to guarantee their performance in accordance with the ethical and transparency guidelines of the Itaú Unibanco Conglomerate.
- Contribution, directly or indirectly, by all companies of the Conglomerate in Brazil and abroad to electoral campaigns, candidates for public office and political parties is prohibited.
- It is prohibited, in electoral years, the contribution - by directors of the Itaú Unibanco Conglomerate, as well as by members of the Board of Directors who are part of the company's controlling block, and managers of its parent company IUPAR - Itaú Unibanco Participações SA, and their respective spouses - to parties, candidates for political office and electoral campaigns of any kind, promoted by the Brazilian Electoral Justice, as well as for supplementary elections that may or may not take place in election years. The International Units are subject to the rules set out above, being prohibited the donation in election years in Brazil and abroad, being certain that the local rules must be observed and any exception must be analyzed by the local Compliance Officer.

4.2 Contracting with Public Sector Bodies or Entities, national or foreign, for any products and services made available by the Itaú Unibanco Conglomerate must be subject to the rules below:

- The contracting of products and services made by Public Sector Agencies or Entities depends on a previous Bidding Procedure, so that this will only be mandatory or expendable in the cases provided for by law. The Legal Department must analyze whether the hypothesis of waiver and/or non-enforceability in hiring can be considered. In international units, the local Legal department must analyze the contract in accordance with the applicable legislation.
- The participation of the Itaú Unibanco Conglomerate in Bidding Procedures is allowed, subject to the following conditions:
 - a) the performance of the Itaú Unibanco Conglomerate, as well as any employee or manager representing it in Bidding Procedures, shall be guided by an honest and ethical posture, with respect to the principles governing public administration, and any participation in fraudulent schemes of payment, establishment of preference, combination of values or business conditions, aiming at obtaining an undue advantage or favoring the Itaú Unibanco Conglomerate or any employee or manager representing it. The principles established in the Code of Ethics and in the Corporate Corruption Prevention Policy must be observed, available on the Corporate Portal and on the website <https://www.itaubr.com.br/relacoes-com-investidores>
 - b) the competitive nature of the Bidding Procedures must be strictly respected, observing, among others, the guidelines and general rules to guarantee the defense of competition according to the internal procedures. For international units, local antitrust (antitrust) rules must be observed;
 - c) the values/prices offered in the Bidding Procedures must be compatible with the values practiced in the market for the same purpose, allowing competition and respecting the minimum and maximum values provided for in the Bidding Procedure, if applicable.
- It is expressly prohibited:
 - a). Prevent, disturb or frustrate any act of the Public Bidding Procedure;
 - b). Withdraw or seek to withdraw a bidder, through fraud or offering undue advantages of any kind;
 - c). Prevent, frustrate, manipulate or defraud the competitive nature of the Bidding Procedure by adjustment, combination or any other means;

d). Create, fraudulently or irregularly, a legal entity to participate in a Bidding Procedure or to enter into an administrative contract;

e). Obtain economic benefits or undue advantages, fraudulently, from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the summoning act of the public bidding or in the respective contractual instruments;

f). Manipulate or defraud the economic and financial balance of contracts signed with Public Sector Agencies or Entities.

- The monitoring of contractual obligations is the responsibility of the contract management area, in order to ensure compliance with these. The guidelines contained in this Policy, the Corporate Integrity and Ethics Policy and the Code of Ethics must be observed, in addition to complying with the laws, rules and regulations in force in order to ensure the maintenance of an ethical and transparent relationship.

4.3 In order to hire Public Officials, former Public Agents or people who have a relationship or family relationship as employees of the Itaú Unibanco Conglomerate, the following rules must be considered:

a). Observe the same selection and hiring criteria adopted by the Itaú Unibanco Conglomerate for candidates in general, without any type of privilege or benefit, respecting the determinations of internal procedures. For the International Units, the criteria will follow the established in the local policies and standards.

b). The hiring of Public Officials, former Public Officials or persons who have a relationship or family relationship who have held a mandate, position, employment or function in Regulatory Agencies, Supervisors and Supervising Bodies must be preceded by an assessment of any conflict of interest, carried out jointly by the Executive Board of Operational Risk and Compliance, by the Legal Department, by the Institutional Relations and Corporate Communication Department and by the HR Department, and hiring for positions from the Superintendent (including) the Vice President/General Director must be approved by the Executive Committee.

c). The proposal for the election of Public Officials, former Public Officials or persons who have a relationship or kinship as members of the Board of Directors, the Committees that report to the Board of Directors or the Executive Committee of Itaú Unibanco must be preceded by an assessment of any conflict of interests, carried out by the Nominations and Corporate Governance Committee, with the support of the Legal Department and the Institutional Relations and Corporate Communication Department.

4.4 When offering or receiving Gifts, Courtesies, Invitations to technical and non-technical events, lunches and dinners, among others, to or from Public Officials, provisions contained in internal policy must be observed.

4.5 The rules to be observed in the relationship between the Itaú Unibanco Conglomerate and its Related Entities with Regulatory, Self-Regulatory, Supervisory and Supervising Bodies are defined in internal policy.

The interactions of Governmental and Institutional Relations of the Itaú Unibanco Conglomerate with Regulatory, Self-Regulatory, Supervisory and Supervising Bodies must observe the principles and provisions of this Policy, as well as the rules defined in the internal policy, where applicable.

5. RECORD OF INTERACTIONS

Recording Interactions with Public Officials with Relevant Functions is extremely important for the monitoring, by the responsible department, of the Institutional and Government Relations Activities of the Itaú Unibanco Conglomerate and of Related Entities, as well as the participation in Bidding Procedures, aiming at resolve risks arising from this activity, reinforcing the ethical and transparent nature of the interactions that took place.

The rules for recording Interactions must be observed, in the situations and in the manner provided for in the procedures of this Policy, applying its concepts and definitions.

6. DONATIONS

Donation is the act by which, by mere liberality, an individual or legal entity transfers financial resources, services and/or goods to the other. Donations are made free of charge, with no provision for benefits/counterparts to the donor. The Itaú Unibanco Conglomerate's donation strategy is related to the following topics:

(i) Projects linked to the UN Sustainable Development Goals;

- (ii) Priority causes of private social investment such as: education, culture, sport, urban mobility, longevity, diversity and sustainability;
- (iii) Projects related to public policies and actions with the community and surroundings;
- (iv) Assistance to support areas that work with topics of interest to the Itaú Unibanco Conglomerate, such as consumer, labor, tax and other related matters;

There are two types of Donations:

a) Not Encouraged

Donations made without tax benefit in favor of Itaú, both in kind and in goods and services.

b) Encouraged

Donations that generate some kind of tax benefit, whether in relation to the deductibility of expenses in the calculation of income tax and social contribution, or the possibility of reducing taxes due, by deducting the amount donated. Incentive donations are made in accordance with some incentive laws, including: Rouanet, Sport, FUMCAD, PRONON, PRONAS/PCD, Elderly and donations deductible from operating profit.

7. CONTRIBUTIONS

Affiliations to entities have two natures:

7.1 Entities With Representation Purposes:

These are entities in the financial sector or those related to the activities or interests of the Itaú Unibanco Conglomerate, whose purpose is to promote greater interaction between the State, civil society and stakeholders. With the authority and legitimacy to represent their affiliates, the Representative Entities act to:

- Constitute an identity for the sector;
- Represent the general interests of members;
- Improve the system that impacts financial institutions;
- Concentrate the efforts of financial institutions in favor of the population's access to financial products and services;
- Support and act to enrich the debate in the public sphere;
- Articulate and celebrate collective work agreements/arrangements between the actors;
- Produce technical content on topics that relate to the activities developed by the sector.

Examples: Brazilian Federation of Banks (FEBRABAN), National Federation of General Insurance (FENSEG) and National Federation of Capitalization (FENACAP).

7.2 Non-Representative Entities:

They are entities that are not representative of the financial sector or related to the activities or interests of the Itaú Unibanco Conglomerate, whose purpose is to gather, nurture, support and develop activities of a civic, business or institutional nature, in order to produce and add value to society. These non-representative entities are not responsible for representing the Itaú Unibanco Conglomerate, although they recognize and promote actions that are consistent with their institutional pillars.

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

Its duties are to provide spaces for socialization, discussion, dialogue and participation between sector and society agents in order to guide:

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

8. REPORTING CHANNELS

Red flags or evidence of fraud and illegal acts within the scope of this Policy must be reported directly to the Corporate Security Department, through the Inspectorate in Brazil. In international units, the whistleblower may also use the reporting channels contained in the Code of Ethics and communicate events to the local Compliance Officer, who must report the case immediately to the Inspectorate, if it has not been copied/informed.

Managers, employees, customers, service providers of the Itaú Unibanco Conglomerate, its Related Entities, and the general public may use any of the following channels to report complaints to the Inspection:

- Phone: 0800-723-0010;

External email: inspetoria@itau-unibanco.com.br;

9. SANCTIONS

Failure to comply with the legal and regulatory provisions set forth herein subjects managers and employees to applicable disciplinary measures, in addition to sanctions ranging from administrative to criminal penalties for fraud and corruption, pursuant to applicable legislation. Negligence and voluntary failure are also considered non-compliance with this Policy and the Code of Ethics, being subject to the application of disciplinary measures provided for in internal regulations.

Approved by the Board of Directors in December 2021.