

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 08.604.187/0001-44

Publicly-Held Company

NIRE 35300010230

CORPORATE CONDUCT, INTEGRITY AND ETHICS POLICY

1. OBJECTIVE

Establishing additional guidelines to Itaú Unibanco Ethics Code regarding Itaú Unibanco's Integrity and Ethics Program as well as setting conduct standards for relationships with stakeholders and in situations related to conflicts of interest. It also refers to prevention of illicit acts, distribution and securities trading rules, and social and environmental responsibility.

2. TARGET AUDIENCE

Applicable, in Brazil and abroad, to all Itaú Unibanco Holding S. A. administrators and employees including any interaction that the conglomerate maintains with customers, partners, suppliers and other relationship audiences.

3. INTRODUCTION

Our Vision -- "To be the leading bank in sustainable performance and customer satisfaction" -- expresses the conviction that organizations wishing to be perennial do not admit gains at any price, while relating their success to their ability to lead with integrity and ethics. Our corporate culture considers such values non-negotiable.

Society demands large companies to be transparent and committed to the undertaken objectives and commitments. Small flaws can almost instantly ruin a good reputation and a brand built over decades.

With this and Itaú Unibanco's corporate social responsibility before society in mind, we drive our business, processes and relationships in the direction of establishing lasting connections and generating shared value with our stakeholders. We are committed to high standards of business conduct, respecting sustainable relationships and adhering to laws, norms and regulations in all locations where we are present or establish business relationships.

Through acquired trust and the quality of our products and services we guarantee continuity of business and customer satisfaction, understood as the customer's perception of meeting expected requirements for provision of a given service.

These traces of our identity are reflected mainly in the organizational culture, Ethics Code principles and corporate governance guidelines and practices. All these values, principles and guidelines are key premises of our Integrity and Ethics Program.

4. GUIDELINES

4.1 Integrity and Ethics Program

Our Integrity and Ethics Program, drawn up on the basis of national and international good market practices, consists of the following dimensions:

4.1.1 Senior Administration Commitment

The Board of Administration, through Itaú Unibanco's Ethics Code and the conglomerate's policies, defines conduct guidelines and attitudes considered appropriate to the values of the organization in what concerns, for example, the relationship with stakeholders, corporate social responsibility, corporate security, professional posture and the administration of conflicts of interest.

4.1.2 Policies and Procedures

It involves the elaboration and updating of guidelines related to the conglomerate's conduct, integrity and ethics. These guidelines shall be guided by compliance with the Ethics Code, applicable law and good market practice at national and international level.

These guidelines are detailed in this policy and in specific policies and procedures.

4.1.3 Education and Communication

Education and communication actions are part of the Integrity and Ethics Program. These actions deal with a wide range of issues contributing so that administrators and employees:

- Deepen knowledge about the concepts and guidelines of integrity and ethics, as well as their application to business and the management of processes and relationships.
- Be able to identify, prevent and solve ethical dilemmas, conflicts of interest, interpersonal conflicts and deviations of conduct inherent in their daily activities.
- Know the channels for claims and resolution of doubts.

4.1.4 Integrity and Ethics Program Monitoring

Monitoring aims to observe effectiveness of the Integrity and Ethics Program and to identify possible needs for adaptation and improvement of practices, with regular reporting to the appropriate forums.

4.1.5 Channels for Claims of Ethical deviations, Doubts and Illicit Behavior

All employees, administrators, customers, partners, suppliers and anyone else can report, without need for identification, suspicions or violations of Itaú Unibanco's Ethics Code. They may also report evidence of illicit behavior of any kind related to the activities of the conglomerate, and confidential treatment and protection of the identity of the complainant shall be ensured.

The claims channels provide timely, independent, impartial, and confidential information on the communications received and keep a record of the identified situations, statements and decisions taken. Claims must have as much information as possible attached, such as:

- Objective and impartial description of the fact;
- Where and when the claim occurred or is still being carried out;
- Who are the people / organizations involved;
- Documents that assist in the assessment of the case and proper direction of actions; etc

4.1.5.1 Channels for Claims

Channel	Topics	Contacts
Ethics Consultancy	Doubts about: <ul style="list-style-type: none">- Itaú Unibanco's Ethics Code- Corporate Policy on Integrity, Ethics and Conduct- Corporate Policy on Preventing Corruption.- Conflicts of Interest- Ethical dilemmas.	comitedeintegridadeetica@itau-unibanco.com.br
Ombudsman Oversight	Questions, red flags, reports, and complaints about: <ul style="list-style-type: none">- Interpersonal and interest conflicts in the work environment.- Ethical deviations and behavior contrary to institutional policies, such as moral harassment, sexual harassment, discrimination, disrespect, intimidation, patronage, etc.- Behavior contrary to risk management	<ul style="list-style-type: none">- External emails: ombudsman@ombudsman.itau-unibanco.com.br or ombudsman.itub@terra.com.br- Letter/Pouch Praça Alfredo Egydio de Souza Aranha, 100 – Jabaquara Torre Alfredo Egydio, Piso 1º Intermediário CEP 04344-902 - São Paulo, SP Personal contact.

Inspector's oversight	Doubts, suspicions and complaints about: - Misrepresentation of employees. - Fraud on electronical channels. - Documentary fraud in its various forms. - Acts of corruption and bribe. - Theft and theft on units and extensions, clients and employees. - Break-ins in general. - Extortion by kidnapping. - Information, physical, personal, and property security incidents.	- Phone: 0800-723-0010 and 0300 100 0341; - Website: https://www.itaunet.com.br/atendimento-itaunet/para-voce/denuncia ; - Internal email: Oversight box; - External email: inspetoria@itaunet.com.br and fornecedor_relatos@itaunet.com.br ; - Express mail: receiver: Oversight Inspection/São Paulo; - Mail address: - A/C Inspeção - Av. Dr. Hugo Boelchi, 900 - Torre Eudoro Villela - piso -1, São Paulo - SP - CEP: 04310-030
Preventing Money Laundering and Combating Financing of Terrorism	Questions, red flags, and reports for situations that involve preventing money laundering and combating the financing of terrorism.	Phone: +55 (11) 2757-6753
Audit Committee	Suspicious and claims about: - Legal or regulatory breach. - Fraud and errors in audit, accounting and internal controls activities.	Internal e-mail: box AUDIT COMMITTEE. External email: comite.auditoria@itaunet.com.br . Correspondence: A/C Audit Committee Itaú Unibanco Holding S. A.-Praça Alfredo Egydio de Souza Aranha, 100-Torre Olavo Setúbal, Piso PM, São Paulo-SP-CEP 04344-902.
Control Room	Questions about personal investments: - securities of the conglomerate. - Assets of other companies.	Internal email: CONTROLROOMMONITORAMENTO@itaunet.com.br

OBS.: At International Units, the claimer may communicate to one or more of the following channels: (i) local channels made available in the local Codes of Ethics (ii) the following channels of the Matrix: Oversight, Audit Committee and Ombudsman for cases according to specific governance.

4.1.5.2. Protection of Whistleblowers

- Managers and employees may not perform acts of Retaliation against those who, in good faith, report or express a complaint, suspicion, doubt, or concern regarding possible violations of the guidelines of this Policy; and provide information or assistance in investigations regarding possible violations.
- Managers and Employees must preserve information confidentiality related to the investigation of possible violations of this Policy's guidelines.
- The Whistleblower Channels accept anonymous claims and preserve the whistleblowers' anonymity.
- Disciplinary sanctions will be applied to managers or employees who attempt or retaliate against anyone who, in good faith, reports possible violations of this Policy's guidelines.
- Sanctions should also be applied to managers or employees who are proven to be in bad faith when reporting possible violations of this Policy's guidelines or reporting facts known to be false.

Every Itaú Unibanco Conglomerate manager and employee must adhere to integrity. You can access the Term by clicking [here](#).

In international units, adherence to the Term will be carried out following local legislation, and there may be adjustments to the content of the Term.

4.2 Relationship with Stakeholders

The following items express our way of doing business and relating to our stakeholders, including customers, suppliers, service providers, partners, shareholders, investors, public sector, Press, Media, third sector, and even with employees and administrators.

4.2.1 Relationship with customers and users

At Itaú Unibanco, we focus on client and user satisfaction at all stages of their relationship with the Institution. We place them at the center of our activities to identify and meet their expectations and needs and constantly improve our actions. For this reason, our performance is guided by good business conduct and by looking toward sustainable growth and development in our business and relationships. To that end, we are

committed to maintaining high standards of business conduct, monitoring the quality of sales, and adhering to laws, standards, and regulations in all jurisdictions in which we operate and establish business relationships. The design, offer, simulation, contracting, and post-contracting of our products and services must be guided by the principles of ethics, transparency, responsibility, and diligence, ensuring our commitment to keep the best relationship with clients and users. Such procedures should allow clients to make decisions freely and consciously about the products and services that best suit their interests, needs, and goals.

In the case of the provision of cross-border (international) customer services and relationships by any conglomerate employee, the specific rules applicable to the execution of the business shall be observed.

4.2.2 Relationship with suppliers, service providers and partners

With our suppliers, service providers and partners we seek the same transparency, legality, quality and reliability achieved with our customers.

For this purpose, the Supplier Relationship Code * guides the interactions between our employees and suppliers. We have a structured process for assessment of suppliers and service providers whose goal is to mitigate risks in our supply chain, which consider both the scale and complexity of their activities.

Regarding interaction with Business Partners and other partners: they are also subject to a risk assessment process to ensure the proper relationship.

(*) although the Supplier Relationship Code is not applicable to international units, they must have practices for assessing suppliers, service providers and commercial partners in line with the guidelines applied in the Matrix.

4.2.3 Relationship with shareholders and investors

In order to preserve the specific interests of shareholders and investors, we undertake to disclose relevant information in a proper and timely manner to our shareholders and investors, regardless of their participation.

The expected conduct of investor relations professional is defined in the Code of Conduct for Investor Relations available at the investor relationship website:

<https://www.itaubank.com.br/relacoes-com-investidores/Download.aspx?Arquivo=4ikpB/KzBaOhLHclJ4T4Wg==&IdCanal=jjCFHS5ladmGCLdvw2zldg==>

4.2.4 Relationship with the public sector

The relationships and contacts maintained with public agents in Brazil and abroad, regardless of the position or hierarchy, require from us broad transparency and rigorous accountability, with the aim of guaranteeing lawfulness and cooperation in these interactions.

At Itaú Unibanco, we have rules for relationships and contracts with public agents and companies that are members of the direct and indirect public administration. These rules include Government Relations activities, public bidding procedures, the conclusion of administrative contracts and the service of regulators.

The expected conduct for the relationship with the members of the public sector is defined in the Government and Institutional Relations Policy.

4.2.5 Relationship with the press, media, and third sector

Relations with the press/influencers and third sector, as in the processes of donations and sponsorships, are important aspects of our relationship with society. For this reason, they are governed by the guidelines of the Code of ethics and specific internal procedures.

4.2.6 Relationship with employees and administrators

Every interaction with and between employees and managers must always be guided by respect for Human Rights and the promotion of social diversity, fighting against any form of discrimination, harassment, prejudice, and unworthy work conditions.

These precepts are set out in the Itaú Unibanco Code of Ethics, Human Rights Commitment and, in cases where it is necessary, in specific conduct procedures.

Observation: for areas where it is necessary to have a Conduct Procedure with specific business guidelines, these should be consulted in the area itself (e.g. area intranet or internal documents).

5. PREVENTION OF ILLICIT BEHAVIOR

It is unacceptable to engage in or tolerate business and operations that may contribute to the performance of illicit or criminal acts. To comply with this fence, Itaú Unibanco has specific procedures for preventing, detecting and Fighting Against Money Laundering, Fraud, financing terrorism and corruption. These procedures are part of a governance structure guided by national and international best practices aiming at transparency, compliance with standards and regulations and cooperation with police and judicial authorities.

For more information on this subject, access the policies of preventing illicit acts and preventing corruption.

6. DISCLOSURE AND TRADING OF SECURITIES AND PERSONAL INVESTMENTS

The personal investments of employees and administrators must be long-term oriented, maintaining the solvency and credibility of the adherents, in order to avoid any reputational risk for Itaú Unibanco.

We have specific internal policies and procedures on conduct in securities and Securities Trading and on the segregation of activities between areas in order to ensure the secrecy of non-public securities information and to ensure the fairness and proper functioning of markets.

The information held by the administrators and employees as a result of their professional activities in the conglomerate Itaú Unibanco must be kept secret and cannot be used as a basis for decision-making for their own personal investments, avoiding Insider Trading and other unfair practices.

Securities Transactions of Open Companies Related to Itaú Unibanco Holding S. A. or referred to therein shall comply with the rules laid down in the Securities Trading Policy of Itaú Unibanco Holding S. A. .

Compliance Term signed by the employee will identify the respective set of rules that must be followed to guide their personal investments. International Units must observe local rules regarding personal investments and the employees of these units must seek to be aware of the standards in the area of local Compliance.

7. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Our goal goes beyond the financial results, seeking to generate shared value, through which we conduct our actions. We want to be partners in the development of people, society and the countries where we operate. In this context, we recognize our responsibility to exercise a transformative role, acting beyond our operations and contributing to generate positive impacts on the market and society.

To this end, we promote financial education, the integration of socio-environmental issues to business and activities and value transparency in our practices, building sustainable relationships.

For more information on this subject, please access the Social and Environmental Responsibility Policy.

8. CONFLICT OF INTEREST

Where the personal interests of an administrator or employee are not compliant with those of the institution or its stakeholders, a conflict shall arise. Such situations could jeopardize our reputation.

Any type of conflict, in addition to being promptly communicated to management and competent channels, needs to be managed effectively and transparently. Persons involved in potential conflicts of interest shall abstain from the decisions involving them and shall be absent from the forum at times when such decisions are addressed.

Below are some examples of situations that may characterize conflicts of interest:

- Use of information, registries and know-how of the conglomerate (e.g. conducting academic work, external lectures, interviews, benchmarking meetings, etc.)

- Participation in business and in activities outside of work (Ex. the opening of business outside of, or participation in an activity that is in conflict with the nature of the activities carried out in the Conglomerate, or that do not interfere with the work hours)

- Relationship of kinship and the closeness of the Group (Ex. the situations of the family or close relations in the same hierarchy, or they may lead to favoritism)

- Offering and receiving of business courtesies (Ex. accepting or giving gifts, invitations to lunch or dinner, admission tickets or invitations to trips, lectures, cultural events, sports, etc.).

- Relationships with customers, suppliers, partners, employees and competitors (e.g.: private relationship with third parties in order to generate conflicts of interest, manage their own bank or third party accounts, etc.)

For more information on the conflicts of interest above, please refer to the conflict of interest internal procedure.

There are guidelines for specific topics related to conflicts of interest. The following are some specific examples:

- Hiring Nondisclosure Agreement (NDA) – legal contract that defends the rights of a particular company that binds to another to the obligation to keep secret certain information that is passed to it in the framework of a service or business).

- Provision and receipt of Soft Dollar – market practice through which third party resource managers use the brokerage fee paid to obtain, from the brokers with whom they operate, products and/or services related to the execution of orders and to the analysis of securities (feeders, conferences, systems for calculating market risk, subscription of periodicals).
- Conflicts between areas (Investment Banking and Research): Itaú broker has internal procedures to identify the circumstances that may generate conflict of interest in Research activities, including those involving material risk to customer interests.
- Chinese Wall - internal rules and procedures that limit the flow of confidential information involving areas or departments of the institution with the aim of avoiding inappropriate action in situations of conflict of interest or misuse of Inside Information. These rules and procedures establish control mechanisms aimed at the protection and proper use of information, protecting the interests of customers, the institution and its employees, preventing and managing any conflicts of interest.

9. DISCIPLINARY MEASURES

Managers and employees who violate this Policy's terms are subject to the disciplinary sanctions provided for in internal policy companies of the Itaú Unibanco Conglomerate.

10. SECTORAL GUIDELINES

More restrictive guidelines than those of this policy may be established in internal rules of the companies or areas of the conglomerate. In the event of conflict between the guidelines of this policy and the local laws of foreign representations, the strictest standard will prevail, provided that it does not infringe local legislation.

11. DOUBTS AND EXCEPTIONS

Doubts and exceptions assessments regarding the topics of this policy and its procedures or possible issues not contemplated must be referred to the Ethics Consultancy, the Relationship Oversight for Regulators and Compliance, through the email key INTEGRITY AND ETHICS COMMITTEE (Brazil) or the local Compliance Officer available at the international units. If needed, the Ethics Advisory or the local Compliance Officer may refer the case to a collegiate body of integrity and ethics.

Comments:

Arguments or disagreements regarding this policy or the opinions issued by the Ethics Advisory should be referred to the sectoral Committee on integrity and Ethics for assessment and deliberation.

Approved by the Board of Directors on 10/27/2020.

INTEGRITY AND ETHICS PROGRAM PROCEDURE

1. INTEGRITY AND ETHICS PROGRAM OBJECTIVE

Establishing additional guidelines to Itaú Unibanco Code of Ethics related to the Integrity and Ethics Corporate Program.

Note:

- a) Situations about conflicts of interest (e.g., using the institution's information, records and know-how, external activities/societies, kinship and proximity relationships, offering and receiving presents, etc.) and ethical dilemmas are addressed in the Procedure for Conflicts of Interest.
- b) Guidelines to prevent money laundering, terrorism funding, and fraud are addressed in the Corporate Policy for Preventing Unlawful Acts; Information Security guidelines are addressed in the Corporate Information Security and Cyber Security Policy.

2. TARGET AUDIENCE

This Procedure applies, in Brazil and abroad, to all Itaú Unibanco Conglomerate managers and employees and any interaction that the Conglomerate maintains with clients, partners, suppliers, and other stakeholders.

3. INTEGRITY AND ETHICS CORPORATE PROGRAM

A set of guidelines and processes that aims to ensure compliance with the Code of Ethics and the principles and values of the Itaú Unibanco conglomerate.

The Integrity and Ethics Corporate Program are comprised of the following pillars:

3.1. Senior Management Commitment

Through the Itaú Unibanco Code of Ethics, the Board of Directors defines the guidelines for behavior. Attitudes considered most appropriate to and coherent with the organization's values regarding, for example, a professional attitude and ways of managing conflicts of interest, relationships with stakeholders, and corporate social responsibility.

Integrity and Ethics Committee Members in Brazil define the program's guidelines and practices and monitor its compliance and other necessary actions for managing the program. When applicable, the same actions are carried out in International Units by local integrity and ethics committee members.

3.2. Policies and Procedures

These encompass the creation of and updates to the Conglomerate's integrity and ethical guidelines to conform them to the Code of Ethics, applicable legislation, and good national and international market practices.

Policies and procedures related to the program are listed in the Integrity, Ethics, and Good Conduct Corporate Policy. Furthermore, the following conflicts of interest situations are addressed in internal policy.

- Use of the Conglomerate's information, registrations, and know-how.
- Having an interest in external activities and companies.
- Political activities (running for public office).
- Kinships and proximity within the Conglomerate.
- Relations with customers, suppliers, business partners, and employees.
- Presents: offering and receiving.
- Lunches and dinners
- Tickets/invitations: offering and receiving.
- Presents between employees
- Contributions (donations and sponsorships): offering and receiving.
- Personal investments.

3.3. Education and Communication

It aims to increase knowledge of integrity policies' guidelines so that managers and employees are trained to act in accordance with the values and principles of the Itaú Unibanco Code of Ethics in their business, relationships, and other activities. Furthermore, it helps to identify and report adverse situations that may pose risks to Itaú Unibanco Conglomerate business, relationships, and operations, as well as affect its image and reputation.

Educating and communicating about the program helps administrators and employees to:

- Increase their knowledge on integrity and ethics concepts and guidelines and how they apply to business and process and people management to mitigate risks related to those aspects.
- Be able to identify, prevent and resolve/communicate ethical dilemmas, conflicts of interest, interpersonal conflicts, and misconduct inherent to their daily activities, even extending to unlawful acts.
- Know the channels for reporting and resolving questions.

Each year, the Relations with Regulators and Compliance Superintendence, together with the IOX - Training Department, coordinate the creation of a Training Program and an Institutional Communication Plan along with the Live Marketing and Internal Marketing Superintendence, obtaining its approval from the Ethics and Sustainability Superior Commission. The main topics related to the Code of Ethics, the Corporate Corruption Prevention Policy, and the Corporate Policy on Integrity, Ethics, and Conduct, among others, are communicated to employees and administrators monthly. An annual report is also prepared on the application of the program and the training and communication plan to the integrity committee members, the Audit Committee, and the Board of Directors.

Communication and training practices include:

- Institutional Communication Plan: this involves awareness campaigns, communication on specific topics related to the Integrity and Ethics Program, emphasizing raising awareness, disclosing rules and guidelines, and mitigating risks. It is carried out by the Relations with Regulators and Compliance Superintendence, the Cross-border Compliance Management, and other departments participating in the program, in partnership with the Compliance Officer for the International Units and with the Live Marketing and Internal Marketing Superintendence.

- Integrity and Ethics Training Program: this consists on distance and face-to-face training initiatives. It is carried out by the Relations with Regulators and Compliance Superintendence, the Cross-border Compliance Management in partnership with the Compliance Officer for the International Units and the IOX - Training Department. Other departments in the bank also participate in the training program, such as the Corporate Security Department, the Money Laundering Prevention Department, and the Purchasing Department, among others. See the **governance for the Integrity Program related to face-to-face and distance training** below:

3.3.1. Course topics

The Integrity and Ethics Training Program is divided into larger topics: Prevention of Unlawful Acts, Data Security and Privacy, Ethical Relationships daily, and Our Commitment. Within these significant topics, the program includes modules on the subjects of Business Ethics, Conflicts of Interest, Prevention of Corruption, Money Laundering Prevention (AML) / Terrorism Funding Prevention (CFT), Sustainability, Information Security, LGPD, Relationship with Suppliers, Customer Relations and Occupational Safety and Health, among others. If other issues or risks that affect the organization's integrity are identified, they will also be included within this training program within their respective macro topics.

3.3.2. Target Audience

The integrity program's mandatory distance training eligibility extends to the Executive Director level in Brazil and in the International Units. Face-to-face modules are dedicated to specific departments and audiences, such as managers, General Directors, VPs, and the Board of Directors.

3.3.3. Methodology

The Integrity Program trainings are structured around learning trails containing distance and face-to-face learning content (available on the training platform – SABA, and the local platforms for International Units). Distance learning content includes e-learning, which covers concepts, practice case studies, and the application of knowledge testing; videos and articles, all available on SABA training platform.

Face-to-face content includes face-to-face training and lectures (in person or in a virtual room) that also address concepts, videos, case studies, and reflections on practical situations. Distance training lasts an average of 3 hours (taking the training itself and the support materials into account) and face-to-face training around one hour and thirty minutes. Content review for each module of the program takes place every two years from the date of launching. Distance trainings have a retention assessment with a minimum percentage of correct answers to questions on knowledge on the topics. Failure to reach this percentage will lead to re-taking the training until the minimum percentage of knowledge is reached.

3.3.4. Training controls

The performance and use of training sessions are controlled by indicators generated by IOX - Training Area i with the People Telemetry department. They are monitored periodically by the topics' managing departments. Management (immediate manager, superintendent, and director) will be made aware of any pending training or unsatisfactory results through alerts sent by the People Telemetry department to raise awareness among employees, and managerial results will be presented to Integrity and Ethics Committee Members in the executive department and the Bank.

In International Units, the performance and use of training sessions are controlled through indicators generated by the IOX - Training Area alongside with the Cross-Border Compliance Management and local Compliance Officer. Reinforcement and awareness actions for employees are carried out locally.

The Integrity and Ethics Training Program also involves managing consequences in cases of non-completion or non-realization of mandatory distance training. More severe consequence management can be adopted by departments participating in the Integrity and Ethics Program.

3.4. Monitoring the Integrity and Ethics Program

The ongoing monitoring of the effectiveness of the program and possible adaptation needs will be coordinated by the Operational Risk and Compliance Executive Board (DEROC), with the direct action of the various departments within the organization, in Brazil and abroad, and periodic reporting by the DERO to the Audit Committee and the Committee Members handling matters related to Integrity and Ethics, as defined in the Corporate Policy on Integrity, Ethics and Conduct. Monitoring includes Internal Controls and Compliance testing processes, monitoring indicators, information from channels of doubts and complaints, and treatment of new regulations that impact the program.

Through monitoring, the need to adapt and improve the Integrity and Ethics Program are identified. DERO must submit the following to the Audit Committee and the Integrity and Ethics Board, as applicable: (i) an annual monitoring plan for the year to follow before it starts; and (ii) an annual report with the effective execution of the plan, the relevant situations identified in the previous year and adaptation needs identified in the Integrity and Ethics Program, during the first quarter of the year,.

Internal Audit must conduct a yearly independent assessment of the Integrity and Ethics Program and the reports mentioned in the previous paragraph. Compliance with the program and possible improvement opportunities can also be assessed by an external audit, certification, or accreditation company.

It is important to note that the 1st line of defense (business and operational departments) plays an essential role in creating and enforcing internal controls related to the Integrity and Ethics Program, for both controls related to raising awareness (e.g., adherence to terms, training, and communications) and those that aim to ensure proper progress of processes and other activities, as well as the mitigation of risks inherent to them.

3.4.1. Monitoring and Managing Conflicts of Interest

There will be a conflict of interest when private interests, whether personal or group ones, clash or overlap with the Itaú Unibanco conglomerate or its stakeholders' interests.

3.5. Questions and Ethical Deviations Reporting Channels

See channels for questions and for reporting ethical deviations in the Itaú Unibanco Code of Ethics and Corporate Policy on Integrity, Ethics, and Conduct.

In the International Units, local channels for questions and reports are available in the local Codes of Ethics and also in internal policy

4. RESPONSIBILITIES

4.1. Board of Directors

Approving the Conglomerate's integrity and ethics guidelines and their respective amendments.

4.2. Audit Committee

Monitoring the Integrity and Ethics Program through reports from the Internal Audit, Internal Controls and Compliance, the Corporate Security Department, and the Ombudsman Superintendence and other mechanisms at its disposal.

4.3. Internal Audit

Conducting a yearly independent assessment of the Integrity and Ethics Program.

4.4. Integrity and Ethics Committee Members

The primary responsibilities of the Ethics and Sustainability Superior Commission and the Integrity and Ethics Committee Members in Brazil and abroad are described in internal policy.

4.5. Operational Risk and Compliance Executive Board (DEROC)

The Regulator and Compliance Relations Superintendence (SRRC) is responsible for managing the Integrity and Ethics Program. Its main attributions are:

- a) Coordinate the Integrity and Ethics Committee Members in Brazil and abroad and their regulations, and monitor the compliance with the deliberations.
- b) Develop and provide integrity and ethics training and awareness campaigns, along with DSC, as per the established parameters, and make them available to managers and employees in Brazil and abroad.
- c) Clarify doubts about this Procedure and its application, as well as the Procedure for Conflicts of Interest through email for the Ethics Consulting: comitedeintegridadeetica@itau-unibanco.com.br, or through local channels in the International Units. If necessary, employees or administrators of the International Units can turn to the local Compliance Officer or the Ethics Consultancy in Brazil for assistance.
- d) Support managers and employees with doubts regarding ethical dilemmas, conflicts of interest, misconduct, and other practices that conflict with related institutional policies.
- e) Monitor and reporting on compliance with the guidelines related to the Integrity and Ethics Program to Integrity and Ethics Committee Members.
- f) Submit the annual reports provided for in this policy to the consideration of the Board of Directors and the Audit Committee.
- g) Report potentially significant situations related to this policy to the Audit Committee and appropriate Integrity and Ethics Committee Members in a timely manner.
- h) answer questionnaires, market researches, and internal and external reports related to integrity and ethics.

4.6. Wholesale Compliance Superintendence

- a) Coordinate the implementation, monitoring, and development of the Integrity and Ethics Corporate Program in International Units, as aligned with the SRRC.
- b) Answer questionnaires, market research, and internal and external reports related to integrity and ethics regarding International Units according to SRRC demands.
- c) Assist in clarifying doubts about this Procedure and the Procedure for Conflicts of Interest and its implementation.

4.7. Corporate Security Department (DSC)

- a) Maintain a specific channel for receiving and investigating complaints with evidence of illegal actions of any nature to possible violations of this policy's guidelines and the Code of Ethics, concerning deviations in conduct, as provided for in internal policy.
- b) Develop and provide corporate integrity training and awareness campaigns to managers and employees, according to parameters established by the Corporate Security Department.
- c) Report potentially significant situations related to this policy to the Audit Committee and appropriate Integrity and Ethics Committee Members in a timely manner.

4.8. Ombudsman Superintendence

- a) Welcome and deal with the manifestations of interpersonal and interest conflicts by the administrators and employees in Brazil* in the work environment.
- b) Report channel information at least every six months to the Integrity and Ethics Committee Members and the Audit Committee.
- c) Report potentially significant situations related to this policy to the Audit Committee and appropriate Integrity and Ethics Committee Members in a timely manner.

Important note: for the International Units, the Ombudsman becomes an exception only for cases related to:

- Complaints related to international CEOs;
- Complaints about expatriates who have returned to Brazil and have had a case occur abroad, or a foreigner who is in the Head Office;

- Requests made by the Heads responsible for the operations (DEs / VPs);
- Reports of non-standard situations by the CEOs of the International Units and agreed with the DE / VP;
- In cases where there may be a conflict of interest in the local reporting channels.

4.9. Attraction, Selection, and Training Superintendence

Enable the integrity and ethics training for the Conglomerate in Brazil and abroad.

4.10. Live Marketing and Internal Marketing Superintendence

Enable the transmission of corporate communication on the topics of integrity and ethics in the Conglomerate, in Brazil and abroad (with the help of the country's focal points for translating, producing, and disseminating the content - according to the available channels).

4.11. Administrators and Managers

- a) Know and follow the Code of Ethics and this Procedure's guidelines.
- b) Disseminate their principles and guidelines and encouraging the expected attitudes and behaviors.
- c) Conduct integrity and ethics training sessions that are available.
- d) Sign the **Term - Integrity Policies** attesting their knowledge of and agreement with their contents.

4.12. Employees

- a) Know and following the Code of Ethics and this Procedure's guidelines.
- b) Conduct integrity and ethics training sessions that are available.
- c) Sign the **Term - Integrity Policies** attesting their knowledge of and agreement with their contents.

5. DISCIPLINARY SANCTIONS

Managers and employees who violate the terms of this Procedure are subject to the disciplinary sanctions provided in internal policy and in the specific rules for each external unit.

6. QUESTIONS AND EXCEPTIONS

Questions and exceptional assessments related to this Procedure topics, or possible matters not covered, should be referred to the Ethics Consultancy at the Regulatory and Compliance Relationship Superintendence using the email key INTEGRITY AND ETHICS COMMITTEE in Brazil or the local Compliance Officer at International Units. If necessary, the Ethics Consultancy or the local Compliance Officer may refer the case for deliberation in an integrity and ethics collegiate body.

Note:

Claims or disagreements related to this policy or the opinions issued by the Ethics Consultancy must be forwarded to the Sector Integrity and Ethics Committee for assessment and deliberation.

7. SECTOR GUIDELINES

Guidelines more restrictive than those in this Procedure can be established in the company or areas of the Conglomerate's internal standards. In case of conflict between the guidelines of this Procedure and the local laws of the representations abroad, the most stringent standard will prevail, as long as it does not violate local law.

Approved by the director of Corporate Compliance on 02/12/2021.

PROCEDURE FOR CONFLICTS OF INTEREST

Whenever a manager or employee's personal interests are not in line with those of the Itaú Unibanco Conglomerate (Conglomerate) or its stakeholders, there is a conflict. These situations can jeopardize the Conglomerate's integrity and reputation. That is why they must be enforced effectively and transparently, in addition to being promptly communicated to management and competent channels.

Furthermore, the people involved in possible conflicts of interest should refrain from decisions that involve them, leaving the forum when such decisions are dealt with (in internal meetings like, for example, integrity and ethics committees or other similar meetings; or even external forums like Executive Board and Board of Directors meetings, and Partners' Assemblies/Meetings where the party involved is a member).

Below are some of the most common conflict of interest situations identifiable in the Conglomerate:

1. USE OF CONGLOMERATE AND THIRD-PARTY INFORMATION, REGISTRATIONS, AND KNOW-HOW.

2. HOLDINGS IN COMPANIES

3. EXTERNAL ACTIVITIES

4. PUBLIC OFFICE CANDIDACY AND ELECTION

5. KINSHIPS AND PROXIMITY RELATIONS

6. RELATIONS WITH CUSTOMERS, SUPPLIERS, BUSINESS PARTNERS, AND EMPLOYEES.

7. GIFTS, INVITATIONS, AND HOSPITALITIES

8. GIFTS BETWEEN EMPLOYEES

9. CONTRIBUTIONS (DONATIONS AND SPONSORSHIPS): OFFERINGS AND RECEIVING.

10. PERSONAL INVESTMENTS.

11. QUESTIONS AND EXCEPTIONS

1. USE OF CONGLOMERATE AND THIRD-PARTY INFORMATION, REGISTRATIONS, AND KNOW-HOW

Information, including databases of any kind (internal and confidential), records of people and companies (employees, clients, suppliers, competitors, etc.), and know-how (knowledge, technologies, methods, models, systems, policies, etc.) that circulate internally are the responsibility of the Conglomerate.

Therefore, managers and employees must use this information, records, and know-how in accordance with the law and internal standards regarding information security and privacy, avoiding its misuse and leakage.

Managers and employees may not use the Conglomerate's Information, records, and know-how for private purposes or pass it on to third parties without prior authorization, even after leaving the Conglomerate.

When voluntarily or involuntarily receiving sensitive or confidential information regarding competitors from third parties (e.g., customers, business partners, suppliers, etc.), this information must not be passed on or used internally or externally to the organization.

1.1 Authorization for external use

The use of information or know-how in external activities and publications, such as those listed below, must be previously authorized.

1. Lectures, debates, seminars, courses, congresses, interviews, external projects, etc.

2. Academic papers, monographs, dissertations, articles, theses, books, handouts, etc.

3. Newspapers, magazines, social media, websites, blogs, chats, etc.

4. Offering the bank's information and know-how to third parties.

5. *Benchmarking** with companies in the market.

The use of information classified as internal or confidential must be authorized via email by (i) the director of the department that owns the Information and (ii) the superintendent (or higher hierarchical level) of the employee/administrator, or by the general director or vice president for information classified as restricted.

That authorization must be obtained even if the activity or publication is carried out on behalf or in the Conglomerate's interest.

The same rules must apply when third parties request the use of the Conglomerate's Information. Additionally, for items 1 and 3 above, the Press Relations and Participation in Awards and Recognition Policy guidelines for Brazil and local guidelines for international units must be followed.

*Employees must request authorization from a superintendent or someone higher in the hierarchy before conducting *benchmarking* meetings.

Articles publication, participation in interviews on any media vehicle (print, electronic, internet or television), even if they use only public information, where the employee identifies himself as being from Itaú Unibanco (in a signature, in mentions in the text, etc.) must be submitted to the Corporate Communication Superintendence for approval through the email key IMPRENSA ITAU UNIBANCO before publication.

2. HOLDINGS IN COMPANIES

2.1. Board Members

Board members must inform the Nomination and Corporate Governance Committee of any interest they hold in other organizations for analysis and possible reporting of potential conflicts of interest.

2.2. Employees and Administrators (except Board members)

a) May not form a company or have holdings* in companies or undertakings in the same business lines as the institution or whose activities conflict in any way with the activities developed at Itaú Unibanco (e.g., activities involving financial products and services).

(*) exceptions are made to invest in an organized securities market.

b) May be partners in companies or undertakings in different lines of business than that of the institution, provided that:

- There is no conflict of interest between the activities carried out at the institution and those carried out in these companies and undertakings;
- The work hours established in the employment contract are not interfered with.
- Partnerships are not formed jointly by employees in the same department;
- There is no internal advertising of this activity among employees or even with customers, suppliers, or business partners;
- No equipment, machines, systems, office supplies, etc. from the institution is used for the benefit of the external activity or enterprise;
- The rules of item 1 above are followed.
- The direct manager is informed.

b.1) Furthermore, in addition to the guidelines above, they may participate in companies or invest in *startups*, *FinTech's*, *P2P lending* platforms, and the like, provided that:

- There is no conflict with the employee's activities;
- Those are minority stakes, and the employee has no management authority in the business;
- Investments are not made jointly by employees in the same department;

b.2) For enterprises or external companies whose purpose is to provide services related to lectures, *live streams*, consultancies, courses focused on financial management/planning, to individuals or companies, on websites, blogs, social media, etc., in addition to guidelines of item b) above, the following practices should also be followed:

- The shared content must cover only **general market information**, which does not refer to internal, confidential, or restricted practices/information (e.g., knowledge, data, techniques, technologies, methods, strategies, systems, software, among others) of the Conglomerate, or its customers, partners, suppliers, and competitors;
- The Conglomerate's or competitors' products or services may not be offered;
- The employee/administrator will not be able to identify himself or herself and speak on behalf of the Conglomerate;
- Whether it is included on their page, profile, presentation, or any other expositive material, a disclaimer warning that the contents or presentation bears no relation with the official stance of the Conglomerate.
- Private services (paid or unpaid) cannot be provided to other employees, customers, suppliers, or business partners, in a way that generates a conflict of interest (see item 6 k) below).

Before starting a company, regardless of its type, should there be questions about the existence or not of a conflict of interest, employees must inform management and consult the Ethics Consultancy, using the key: INTEGRITY AND ETHICS COMMITTEE requesting an assessment of the situation.

2.3. Registering holdings in companies

In Brazil, holdings in companies or ventures in which there is a question about a potential conflict of interest with their activities in the bank or the same branches of activity in the institution must be registered (only by employees of the Central Administration in the positions of managers/specialists II and above) in internal website.

In case of doubt, contact the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE of this procedure. If the manager does not have external management in companies or enterprises, he/she must register the option "I don't have". Outdated records must be immediately corrected or deleted from the register.

3. EXTERNAL ACTIVITIES

3.1. Board Members

Board members must inform the Nomination and Corporate Governance Committee of any external activities they perform in other organizations for analysis and possible reporting of potential conflicts of interest.

3.2. Employees and Administrators (except Board members)

a) Cannot perform external activities to assist in or directly contribute to the management of companies or enterprises that conflict with the activities performed within the institution.

b) Should consult the Ethics Consultancy to:

b1) Perform activities in companies or ventures that conflict with business lines as the institution, even if they do not conflict with their activities (e.g., activities involving financial products and services).

b2) Perform activities in companies owned by the institution's clients, suppliers, business partners, and competitors in a way that creates a conflict of interest.

b3) Participate in company boards, professional activities in the media, advertising companies, business associations, and professional associations. Activities involving the media, advertising companies, and interviews should also be reported to the Corporate Communication Area to obtain a specialized opinion.

c) May perform external activities in companies and ventures with different fields of activity to those of the institution, and which do not conflict with their activities, such as, for example, educational institutions, third sector companies, businesses, and services, provided that:

- There is no conflict of interest between the activities carried out at the institution and those carried out in these companies and ventures.

- The work hours established in the employment contract are not interfered with.

- There is no internal advertising of this activity among employees or customers, suppliers, or business partners.

No resources, equipment, machines, systems, office supplies, etc. from the institution are used to benefit the external activity or enterprise.

- The rules of item 1 above are followed.

- The direct manager is informed.

c1) For external activities related to lectures, *live streams*, consultancies, courses focused on financial management/planning, to individuals or companies, on websites, blogs, social networks, etc., in addition to the guidelines above, the following practices should also be followed:

- The shared content must cover only general market information, which does not refer to internal, confidential, or restricted practices/information (e.g., knowledge, data, techniques, technologies, methods, strategies, systems, software, among others) of the Conglomerate, or its customers, partners, suppliers, and competitors;
- The Conglomerate's or competitors' products and services may not be offered;
- Employee/administrator will not be able to identify himself or herself and speak on behalf of the Conglomerate;
- Whether it is included on their page, profile, presentation, or any other expositive material, a disclaimer warning that the contents or presentation bears no relation with the official stance of the Conglomerate.
- Private services (paid or unpaid) cannot be provided to other employees, customers, suppliers, or business partners, in a way that generates a conflict of interest (see item 6 k) below).

d) May perform activities in non-profit institutions of public or community interest: religious and third sector institutions, political parties, associations, clubs, condominiums, neighborhood associations, etc., provided that:

- There is no conflict of interest between the activities carried out at the institution and those carried out in these institutions.
- The work hours established in the employment contract are not interfered with.
- The rules on item 1 above are followed.

e) Must consult the Ethics Consultancy and inform a director or someone at a higher hierarchical level before performing professional activities in (or connected to) public office, open positions, commissioned or appointed, or as a service provider (self-employed or through a legal entity) to the public agency.

f) Must also request prior authorization from a director or someone at a higher hierarchical level before giving lectures or presentations on behalf of the Conglomerate, even if they do so at events by representative entities such as, for example, Febraban and Anbima.

g) When performing activities on behalf of the Conglomerate or in a business association in the financial sector, managers (or employees) must: (a) waive the remuneration offered in exchange for the activity, using the pattern template for this purpose; or (b) receive the compensation and inform Compliance (using the email key: Representative Entities Compliance) and the HR Department (compensation) so that this sum is deducted from their "total cash" in the Conglomerate.

3.3. Employees and Administrators (except Board members) civil servants or former civil servants

Administrators and employees must inform the manager if they hold or held a public service position from which they were exonerated less than five years ago, which may represent a conflict of interest with the bank's activities. Should there be questions about the existence or not of a conflict of interest, consult the Ethics Consultancy, using the email key INTEGRITY AND ETHICS COMMITTEE requesting an assessment of the situation.

3.4. Registering external activities (including public office)

In Brazil, external activities in private, public (even if the employee/administrator has been exonerated within the past five years), or third sector bodies in which there is a question about a potential conflict of interest with their activities in the bank or the same branches of activity as the institution, must be registered (only by employees of the Central Administration in the positions of managers/specialists II and above) in internal website.

In case of doubt, contact the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE. If the manager does not have external activity, he/she must register the option "I don't have". Outdated records must be immediately corrected or deleted from the register.

4. PUBLIC OFFICE CANDIDACY AND ELECTION

4.1 In Brazil

a) Administrators and employees who are running for or elected to public office must apply for unpaid leave immediately after the Electoral Court confirms their candidacy during:

- the period extending between their electoral campaign and the day of the 1st round of the election and the runoff election if there is one.
- the period extending between the campaign and the beginning of their term in office if they are elected.
- exercising public office.

b) Administrators and employees who run for public office must observe the internal institutional standards, as well as those specific to the company, and cannot receive any kind of contribution or support to their candidacy from it, nor carry out an electoral campaign on the bank's premises.

In Brazil, for more information, access the Government and Institutional Relations Procedure.

4.2. In International Units

Local rules regarding candidacy for public office must be followed. Refer to the local Compliance Officer for any questions.

5. KINSHIPS AND PROXIMITY RELATIONS

5.1. - Kinships and proximity within the conglomerate.

Administrators and employees can indicate*, maintain or become relatives or have close relationships within the Conglomerate, as long as there is no conflict of interest.

(*)the indication can be made internally or externally to the organization.

In indications for hiring or transferring with the potential to generate a conflict of interest, the Ethics Consultancy's opinion must be requested, and the people in charge of hiring must be informed.

Any kinship or proximity relationships in the Conglomerate must be reported to the direct manager.

Kinship and proximity relationships described in the internal policy are not allowed when there is a hierarchical relationship between those involved. Other kinship situations (consanguineous or by affinity) involving a hierarchical relation, and that are not provided by in the Annex 2, should be evaluated by a manager and the Ethics Consultancy.

Administrators and employees must inform the Ethics Consultancy and the respective HR Consultant about possible conflicts of interest of which they are aware.

Kinship or proximity relationships within the same board should be reported by management to the department's director, regardless of whether there is a conflict of interest or not.

Employees cannot authorize the hiring of relatives and people in their proximity, nor can they appoint a relative or person in proximity to them for the Y-axis evaluation (or similar forms of evaluation) and performance evaluation surveys.

In the branch network (individual or legal entity), kinship or proximity relationships are not allowed in the same agency or similar physical locations (e.g., platforms, centers, digital branches, investment advisory, and USO). Kinship or proximity relationships are also not allowed between employees who participate in communities that work in collaborative work models, whose activities result in a potential conflict of interest.

The situations below involve kinship and proximity relationships, even if there is no hierarchical relation between those involved, they should be evaluated by management and by the Ethics Consultancy to identify possible conflicts of interest:

- Supplementary activities or those related to each other (e.g., done and checked, approvals of processes and payments, sales and processing, processes and controls, interaction in communities, relations between the activities of the 1st, 2nd, or 3rd line of defenses, etc.).
- Performance evaluations, merits, and promotions, as well as access to information related to these matters.
- Situations that can affect the health of the work environment.

Note: The KYE (Know Your Employee) Corporate Policy describes the process of identifying, analyzing, and solving situations of conflict of interest in the selection and hiring process.

5.1.1 Kinship and proximity relationships with public agents

Administrators and employees must inform the manager if they have a kinship or proximity relationship with public agents or former public agents - who have been exonerated less than five years ago - which may represent a conflict of interest with the activities in the bank. In case of questions about the existence or not of a conflict of interest, consult the Ethics Consultancy, using the email key INTEGRITY AND ETHICS COMMITTEE requesting an assessment of the situation.

5.2 Registering kinship or proximity relationships (including public officials)

In Brazil, it is mandatory that all employees and administrators register kinship and proximity relationships in the conglomerate in internal website.

Relationship or close relationships with public agents (even if they have been exonerated in the last five years) must also be recorded.

When in doubt, contact the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE.

6. RELATIONSHIP WITH CUSTOMERS, SUPPLIERS, BUSINESS PARTNERS, COMPETITORS, AND EMPLOYEES

Managers and Employees must:

- a) Keep the confidentiality of the Conglomerate's customers', suppliers', business partners' and employees' information, registrations, operations, hired services, etc.
- b) Refrain from conducting private business - in their name, their relatives, or on behalf of organizations or enterprises in which they are executives or partners - with individuals, professionals, companies, and managers of companies that are clients, suppliers, or business partners of the Conglomerate, or even use their position for that purpose, to generate a conflict of interest or another kind (e.g., situations that may negatively impact on our relationship with customers and other stakeholders). Suppose they have prior or subsequent knowledge of any such situation. In that case, the immediate manager must be notified and must request an opinion from the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE. Questions should also be referred to the Ethics Consultancy.

Managers and Employees may not:

- a) Hire suppliers, service providers, or business partners who have a relationship with administrators or employees (e.g., kinship or proximity, interest in the company, etc.) to generate a conflict of interest.
 - b) Enter into agreements, contracts, or commitments with customers, suppliers, or business partners that imply reciprocity and an exchange of favors or personal advantages for themselves or third parties or that may seem like they do.
 - c) Sign or manage negotiations, be responsible for relationship management or have active and constant contact with client companies, suppliers, or business partners which:
 - c.1) They are a partner or representative of the company.
 - c.2) Their spouse (partner), relatives, or people in a close relationship are administrators (e.g., in the role of director or business manager).
- Important note:** if the employee is in this situation (or a similar one) where they have access to business information, leading to a potential or actual conflict of interest with a third party (e.g., customer, supplier, business partner, etc.), they or the manager must immediately contact the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE to request an assessment of the situation.
- d) Carry out transactions with related parties without taking the corporate policy rules on Transactions with Related Parties into account.
 - e) Unduly facilitate business on behalf of the Conglomerate's customers, suppliers, or business partners.
 - f) Request employment for relatives and people in close relationships with them from companies owned by clients, suppliers, or business partners with whom they have direct contact in the exercise of their job in the Conglomerate.
 - g) Request gifts or contributions from customers, suppliers, and business partners.
 - h) Manage bank accounts (current, savings, investment, etc.) and other products and services of the Conglomerate, belonging to themselves (individual or legal entity), their relatives, or persons in close relationships with them.
 - (i) Manage employees' current or investment accounts under their direct management, requiring the transfer of portfolios to other managers or physical or digital branches.
 - j) Provide services to the institution as third parties.
 - k) Provide private services (paid or unpaid) to other employees or administrators, for themselves or on behalf of their company, in a way that generates a conflict of interest.

Employees or administrators who are in personal relationships with people from our competitors (e.g., as relatives, close relations, partners or sharing a common external activity) in a way that creates a conflict of interest, they or their manager must immediately involve the Ethics Consultancy using the email key INTEGRITY AND ETHICS COMMITTEE, requesting an assessment of the situation.

Private business relationships between employees, employees, and managers, or between managers who have a hierarchical relationship with each other, must be avoided to avoid conflicts of interest or undesirable situations that may affect the work environment's health.

6.1. Registering Relationships with Suppliers

In Brazil, relationship with suppliers in which there is a question about a potential conflict of interest concerning the third party's role in their department or a different department in the bank must be registered in IU Conecta.

When in doubt, contact the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE.

Note: The KYE (Know Your Employee) Corporate Policy describes the process of identifying, analyzing, and solving situations of conflict of interest in the hiring process.

7. GIFTS, INVITATIONS, AND HOSPITALITIES

7.1. Gifts – offering

a) **Prohibition:** managers and employees are prohibited to offer gifts of any nature to influence decisions, facilitate businesses that initially wouldn't be realized or obtain any improper advantage (financial or not) for yourself, third parties or the Conglomerate, directly or indirectly, to private agents or public agents, from Brazil or any other country.

b) **Gifts in cash:** managers and employees may not offer gifts in cash, favors, or the equivalent of any amount (e.g., present or prepaid cards, *vouchers* convertible into cash, etc.) to third parties from Brazil or any other country, regardless of the recipient of the Offer.

c) **Physical gifts:** offering physical gifts (e.g., presents, books, diaries, and other items of small value, acquired under the terms of the Privacy Policy or local policy applicable to the international unit) to private agents or public agents from Brazil or any other country, are allowed only when the following items are cumulatively observed:

c.1) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the gift is found.

c.2) It is linked to institutional or business relations initiatives.

c.3) Each individual gift is limited to a R\$ 400.00 value for private agents; R\$ 100.00 for public agents in Brazil; and US\$ 100.00 in international units (for public or private agents) or if it has no market value.

c.4) The department's manager offering the present with a minimum superintendent level has approved of it.

d) **Exceptions:** if the object of the gift is not acquired via the Purchasing Department or if it individually exceeds the price limits established above, the Offer must be submitted to the evaluation of the Ethics Consultancy and the approval of a director or someone at a higher hierarchical level in the department offering the gift.

e) The rules above does not apply, for example, to situations when gifts or even money are offered for massive customer and user loyalty campaigns (e.g., *iti*, *cash backs*, payment of slips, offers from the investment office, etc.). Questions about offering cash values that differ from the campaign average, recurrence, and the number of gifts allowed to the same beneficiary, must be addressed to the Ethics Consultancy..

f) **Purchase Equity and Assets Board:** management and employees of this division cannot offer presents.

7.2. Gifts: Receiving

a) **Prohibition:** managers and employees are prohibited to receive presents of any nature from private agents or public agents to influence decisions, facilitate businesses or grant any improper advantage (financial or not) for who is offering the gift, directly or indirectly.

b) **Gifts in cash:** managers and employees may not accept gifts in cash (any amount), favors, or the equivalent of any amount (e.g., gift or prepaid cards, *vouchers* convertible into cash) to third parties regardless of who makes the Offer.

c) **Physical Gifts:** receiving institutional material or relationship presents (e.g., presents, books, calendars, and other items of small value) is allowed, provided that the value of the gift does not exceed R\$ 400.00 per person in Brazil and US\$ 100.00 per person (for public or private agents) in international units.

c.1) Institutional gifts in large quantities for several employees should not be accepted, even if their value does not exceed the value stipulated in item c). Possible situations that occur must be submitted to the Ethics Consultancy for evaluation.

c.2) Material presents whose individual value exceeds the values of item "c)" must be refused.

c.3) In situations where refusing a present will cause significant discomfort, seen as an offense, or if it is not possible to return it, the administrator or collaborator must thank and inform the gift giver about the institution's determination to donate the gift to a social service institute supported by the institution. In these situations, the administrator or employee must send an email to the key "INTEGRITY AND ETHICS COMMITTEE" for consultation and guidance on refusing, returning, or even donating the gift through a specific term.

c.4) The Procedure for refusing and returning the present must be accompanied by a letter for which the

model is attached to this Policy. According to the model attached to this Policy, the donation must be made by signing a Term of Delivery of Donations.

d) **Purchase Equity and Assets Board:** management and employees of this division cannot receive gifts.

e) **External awards:** gifts received in connection with Itaú Unibanco's participation in external awards not promoted by the Conglomerate must be forwarded for evaluation by the Ethics Consultancy.

7.3. Lunches and dinners

Participating in lunches and dinners with private agents and/or public agents is allowed to maintain institutional, commercial, and customer prospecting relationships. In these situations, it is preferable that the companies or parties involved bear their participants' expenses. In exceptional cases where the bank employee or administration or the counterparty offers to pay:

a) The amount offered and received must be compatible with the position and role of the person offering/receiving the invitation in the Conglomerate.

b) The cost must be reasonable.

c) The employee must communicate the fact to their immediate superior with a minimum hierarchical level of superintendent when involving public agents.

d) There must be caution with expenses and location choice (noting whether it is suitable for the public involved). It is acceptable to consume alcoholic beverages during meals, in extreme moderation, and if there is justification for the consumption, the reason and relationship between the participants, as defined in an internal notice in Brazil, or the local standards applicable to the international unit.

These payments must not be made unreasonably. They must follow the internal payment rules (see Displacement, Food, and Accommodation Procedure and, when applicable, also the rules for relationships with public authorities described in the Governmental and Institutional Relationship Policy and the respective Procedure. In international units, local standards and applicable guidelines must be followed.

7.4 Tickets/invitations: offering and receiving

7.4.1. Offer

a) **Tickets /Invitations linked to events sponsored by the Conglomerate:** people from the private sector, from Brazil or any other country, are allowed to offer tickets/invitations linked to events sponsored by the Conglomerate (e.g., invitations to congresses, lectures, forums, cultural or sporting events, etc.), provided that, cumulatively:

a.1) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the present is found.

a.2) The guest's reputational assessment is carried out according to criteria and rules defined in Brazil's Sponsorship Policy or the local rules applicable to the international unit.

a.3) Delivering tickets/invitations to events sponsored by the Conglomerate to public agents is not allowed, even if clients of the Conglomerate, or to employees or administrators of self-regulatory entities or other entities that act as self-regulatory.

a.4) Delivering tickets/invitations for events sponsored by the Conglomerate to public agents for institutional events of the Conglomerate for which tickets are not sold, such as the opening of new units, is allowed.

b) **Tickets/Invitations linked to events sponsored by the Conglomerate:** tickets linked to events sponsored by the Conglomerate (e.g., invitations to congresses, lectures, forums, cultural or sporting events, etc.) can be offered to people from the public or private sector, from Brazil or any other country, provided that, cumulatively:

b.1) The invitation is addressed to the highest authority of the public body or entity.

b.2) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the present is found.

c) Other invitations or tickets to events not sponsored or promoted by the Conglomerate, to promote technical and market development (e.g., invitations to fairs, seminars, congresses, forums, meetings, etc.) can be offered to private agents in Brazil and abroad, provided that:

c.1) The ticket/invitation offered is not intended to influence decisions.

c.2) It is possible to verify that this is a customary practice aimed at a broad public or a particular category of people, in which the beneficiary of the gift is found.

c.3) Gifts are not offered with unreasonable frequency, to the same person or in disproportionate amounts.

c.4) A collaborator with a minimum position of director or someone at a higher hierarchical level has approved it.

d) **Hospitality:** offering tickets/invitations includes offering hospitality (e.g., travel expenses, transportation,

accommodation, meals, among others), provided that those are offered under conditions similar to those practiced by the Conglomerate for its administrators and employees and provided a director or someone at a higher hierarchical level approves it. Guidance on offering hospitality to speakers can be obtained from the Events Procedure in the Conglomerate. In international units, local standards and applicable guidelines must be followed.

e) The person making the Offer must be comfortable in publicly justifying the guest's participation in the event.

f) The Offer must not be provided with unreasonable frequency to the same guest in a way that may raise any suspicion of undue advantage.

g) The Offer can be made if the person making it is not aware of relevant ongoing negotiations, of any interest to the Conglomerate and the guest, that depends on them or their influence to be sorted.

h) **Non-institutional events:** offering tickets/invitations to sports or cultural events, with no link to the actions listed in items a), b) and c) above, must be evaluated by the Ethics Consultancy (using the email "INTEGRITY AND ETHICS COMMITTEE") and deliberated by the Integrity and Ethics Committee of the Executive Department or external unit. This assessment must be preceded by a reputational analysis of the recipient by the Corporate Security Directorate (DSC).

Note:

1) Particularities regarding the approval flow for offering invitations at events sponsored or promoted by Itaú Unibanco in international units can be found in an attachment to this Procedure.

2) Other informations regarding events and contracting speakers can be obtained in the Events Procedure in the Itaú Unibanco Conglomerate.

7.4.2. Receiving

a) **Technical Events:** the Conglomerate's managers and employees can receive tickets/invitations to technical events (e.g., lectures, congresses, forums, visits to companies, business meetings, etc.) from private or public agents to publicize the brand, products, services and undertakings, technology, techniques, provided that:

a.1) It is compatible with the position and role of the recipient of the gift and with Itaú Unibanco's objectives and needs.

a.2) It must not be received with unreasonable frequency in disproportionate quantities in a way that may raise any suspicion of undue advantage.

a.3) The ticket/invitation offered is not intended to influence decisions and does not raise suspicion of undue advantages.

a.4) There is approval from the immediate manager.

b) **Institutional, marketing, cultural and sporting events:** administrators and employees may, as a result of their condition as administrators or employees at the Conglomerate, receive tickets/invitations linked to institutional, marketing, events from private agents or public agents cultural and sporting events, celebrations, or celebrations, aiming to strengthen the relationship, provided that:

b.1) The ticket/invitation received is not intended to influence decisions.

b.2) It must not be received with unreasonable frequency in disproportionate quantities in a way that may raise any suspicion of undue advantage.

b.3) The ticket/invitation is compatible with the position and role of the recipient.

b.4) An email is sent to the Ethics Consultancy for their assessment using the key "INTEGRITY AND ETHICS COMMITTEE."

b.5) A collaborator with a minimum position of director or someone at a higher hierarchical level has approved it. Invitations to general directors, vice-presidents, and the president must be approved by the Executive Committee, with email key information "INTEGRITY AND ETHICS COMMITTEE."

c) **Non-institutional cultural and sports events (not related to item b):** tickets/invitations to sports or cultural events should not be accepted if they are not linked to institutional, marketing, or technical events by customers, suppliers, or partners commercials (including companions or not). Exceptional cases must be evaluated by the Ethics Consultancy with subsequent submission for deliberation by the Integrity and Ethics Committee of the Executive Department or external unit.

d) **Hospitality:** in any situation of receiving tickets/invitations, expenses with travel, transportation, accommodation, meals, etc., must be covered by the Conglomerate.

d.1) If it is not possible to refuse the Offer (e.g., the Offer is made in the form of a "package") or if the refusal causes discomfort, acceptance will be conditioned to prior evaluation and registration by the Ethics Consultancy using the email key "INTEGRITY AND ETHICS COMMITTEE" and approval by the executive director of the department or someone at a higher hierarchical level.

d.2) Acceptance of invitations to general directors, vice-presidents, and the president is conditioned to the Executive Committee's approval, with email key information "INTEGRITY AND ETHICS COMMITTEE."
e) Receiving tickets/invitations linked to events sponsored by the Conglomerate and offered by third parties (e.g., suppliers, business partners, and customers) is not allowed, except when the third party is also a sponsor of the event.

7.5 Other prohibitions

No alternative form of offering gifts and amenities will be allowed as a way of violating the above rules and restrictions, such as, for example, offering presents to relatives of recipients who could not receive it, recurring offers, or disproportionate quantities of them.

No alternative form of receiving gifts and amenities will be allowed as a way of violating the above rules and restrictions, such as, for example, receiving gifts from relatives of administrators or employees who could not receive them, forwarding them to places other than the office or residence (when working from home), recurring receipts or disproportionate quantities of them. Any unusual events must be communicated to the employee's immediate manager and the Ethics Consultancy through the email key INTEGRITY AND ETHICS COMMITTEE.

8. GIFTS BETWEEN EMPLOYEES

Prudence and moderation are advised both when offering and accepting gifts exchanged in the work environment or internal and external gatherings (birthdays, weddings, lunches or dinners, farewell parties, visits or gifts to managers or member(s) of the team, etc.) to avoid exaggeration, suspicion, misunderstanding, and rumors. The price of gifts exchanged or invitations must not exceed the sum stipulated in item 7.2 c)

Furthermore, optional and voluntary participation in allotments or collections to fund internal celebrations, gifts for colleagues, secret Santa, or donations must be guaranteed and respected, without allowing the disbursed amounts to be disclosed, to maintain a healthy and cordial atmosphere.

9. CONTRIBUTIONS (DONATIONS AND SPONSORSHIPS): OFFERING AND RECEIVING.

a) Contributions made by the Conglomerate, in financial or non-financial resources, must comply with the provisions of the Sponsorship Policy and the Donation Policy or in each unit's sectoral policies and be subject to the authority and approvals stipulated in these policies.

b) Contributions must not be offered or accepted - or allow for this interpretation - to exchange favors, facilitate business or operations, or any other improper benefit or advantage (financial or not) for the institution or third parties.

c) Contributions must not be offered or accepted according to the laws and regulations of the countries in which the institution is present and with the institution's companies' internal rules.

d) To avoid suspicion of favor in audits, inspections, and negotiations, contributions of any kind to regulatory or supervisory bodies, as well as to employers' and employees' unions, are forbidden.

e) Contributions to the Conglomerate must be made through its foundations and social and cultural institutes.

9.1. Contributions to candidates for public office and political parties

Contributions to election campaigns, candidates for public office, and political parties by Conglomerate companies in Brazil and abroad are prohibited.

9.2. Contributions to the third sector

a) The Conglomerate's contributions to third sector organizations must follow corporate guidelines. (see Donation Policy and Sponsorship Policy in Brazil, or the local standards applicable to the international unit).

b) Third sector organizations, their managers, and other partners or those benefiting from the institution's contributions must have a good reputation.

9.3. Contributions to managers and employees

Contributions to employees (book publishing, art exhibitions, film and play productions, sports events participation, etc.) must be approved by the Integrity and Ethics Committee Members of the Conglomerate companies. All requests must be submitted to the INTEGRITY AND ETHICS COMMITTEE email key.

10. PERSONAL INVESTMENTS

In investments made for their benefit in the financial market, situations that may constitute a conflict of interest concerning the Conglomerate and/or its clients must be avoided. The Personal Investment Policies applicable in Brazil or local standards applicable to the international unit must be followed. When in doubt, contact the Control Room in the Wholesale Compliance Superintendence through the email key: CONTROL ROOM MONITORING. In international units, local standards and applicable guidelines must be followed. Refer to the local Compliance Officer for any questions.

11. QUESTIONS AND EXCEPTIONS

Questions and exceptional assessments related to the Procedure topics, or possible related matters not covered, should be referred to the Ethics Consultancy at the Regulatory and Compliance Relationship Superintendence using the email key INTEGRITY AND ETHICS COMMITTEE (Brazil) or the respective local Compliance Officer for International Units. If necessary, the Ethics Consultancy or the local Compliance Officer may refer the case for deliberation in an integrity and ethics collegiate body.

Situations of conflict or possible conflict of interests identified through the compliance register in the Conecta UI, in addition to the analysis of the Ethics Consultancy, the situation can also be assessed by the Compliance Area or even referred to the Integrity and Ethics Committee for deliberation.

Claims or disagreements related to the topics of this Procedure, or the opinions issued by the Ethics Consultancy, must be deliberated by a specific Sector Integrity and Ethics Committee for the executive department in Brazil or the specific International Unit.

Approved by the director of Corporate Compliance on 02/12/2021.