

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 08.604.187/0001-44

Companhia Aberta

NIRE 35300010230

CORPORATE CONDUCT, INTEGRITY AND ETHICS POLICY

OBJECTIVE

Establish supplementary guidelines to the Itaú Unibanco Code of Ethics in connection with Itaú Unibanco's Integrity and Ethics Program, to the conduct in the relationship with stakeholders and situations relating to conflicts of interest. In addition, the policy mentions the prevention of illegal acts, securities brokerage and trading rules, and social and environmental responsibility..

TARGET AUDIENCE

This Policy applies, in Brazil and abroad, to the management and employees of the Itaú Unibanco Conglomerate and any interaction that the conglomerate has with customers, partners, suppliers and other stakeholders.

INTRODUCTION

Our Vision, "Be the leading bank in sustainable performance and customer satisfaction", expresses our conviction that organizations that wish to last do not admit gain at any price, and that their success depends on their ability to lead with integrity and ethics. In our corporate culture such values are non-negotiable.

Society demands from large companies transparency and commitment to the objectives and commitments assumed. The slightest mistake could ruin a good reputation and a brand built over decades in a few hours.

Having this in mind, as well as Itaú Unibanco' corporate social responsibility, we conduct our business, processes and relationships aiming at establishing long-lasting bonds and generating value shared with our stakeholders. We are committed to high standards of business conduct and cherish sustainable relationships and compliance with laws, standards and regulations everywhere we operate or establish business relationships.

Through the trust earned and the quality of our products and services, we ensure business continuity and customer satisfaction, that is, the customers' perception of the fulfillment of the requirements expected by them from a service.

These traits of our identity are reflected, above all, on the organizational culture, on the principles of the Code of Ethics and on the corporate governance guidelines and practices. All of these values, principles and guidelines are key assumptions of our Integrity and Ethics Program.

GUIDELINES

Integrity and Ethics Program

Our Integrity and Ethics Program, which was prepared based on domestic and international best market practices, has the following dimensions:

Commitment of Senior Management

Based on the Itaú Unibanco Code of Ethics and the Conglomerate Policies, the Board of Directors defines the conduct guidelines and approach considered appropriate to the organization's values with regard to, for instance, relationship with stakeholders, corporate social responsibility, professional attitude and administration of conflicts of interest.

Policies and Procedures

They involve the preparation and updating of the guidelines relating to conduct, integrity and ethics of the conglomerate. These shall be based on compliance with the Code of Ethics, the applicable legislation and domestic and international best market practices.

These guidelines will be detailed in this policy and in specific policies and procedures

Education and Communication

As part of the Program, education and communication actions are prepared addressing various subjects that help the management and employees to:

- Improve their knowledge about the concepts and guidelines of integrity and ethics, as well as their application to business and process and relationship management.
- Be capable of identifying, preventing and resolving ethical dilemmas, conflicts of interest, interpersonal conflicts, and misconduct inherent in their daily activities.
- Be aware of the whistleblower and doubt helplines.

Monitoring of the Integrity and Ethics Program

The purpose of monitoring is to follow up the effectiveness of the Integrity and Ethics Program and identify a possible need for adjustment and improvement of its practices, with periodic reporting to the appropriate forums.

Channels for Reporting Unethical Behaviors, Doubts and Illegal Acts

All employees, management personnel, customers, partners, suppliers and any other person may report, without identifying themselves, suspected violations or violations of the Itaú Unibanco Code of Ethics, situations indicating illegal acts of any nature in connection with the Conglomerate's activities, and confidential treatment and identity protection will be ensured to those who report.

The Reporting Channels investigate the communications received on a timely basis and with independence, impartiality and confidentiality, and keeps records of all identified situations, investigations and decisions. Complaints must be accompanied by as much information as possible, such as:

- Objective and impartial description of the fact;
- Where and when the violation happened or is happening;
- Who are the people/organizations involved;
- Documents that help assess the case and implementation of actions etc.

Reporting Channels

Channel	Subject	Contact
Ethics Advisory	Questions about: <ul style="list-style-type: none">- Code of Ethics of Itaú Unibanco- Corporate Integrity, Ethics and Conduct Policy- Corporate Anti-Corruption Policy- Conflict of Interest- Ethical dilemmas.	comitedeintegridadeetica@itau-unibanco.com.br
Ombudsman Supervisory Department	Reporting of suspicions, accusations, and complaints about: <ul style="list-style-type: none">- Interpersonal conflicts.- Conflict of interest in the work environment.	Telephone: 0800 721 4040. External emails: ombudsman@ombudsman.itauunibanco.com.br ou ombudsman.itub@terra.com.br Internal email: inbox Ombudsman. Intranet: Portal Digital Itaú > Ombudsman > Site/Blog. Personal contact
Investigation Supervisory Department	Doubts, suspicions and accusations of: <ul style="list-style-type: none">- Misconduct of employees.- Fraud in electronic channels.- Document fraud, in various modalities.- Corruption and bribery.	- Telephone: 0800-723-0010 and 0300 100 0341; - Website: www.itau.com.br/atendimento/pravoce/Denuncia; - External email: inspetoria@itau-unibanco.com.br and fornecedor_relatos@itau-unibanco.com.br;

	<ul style="list-style-type: none"> - Theft and robbery of units and extensions, customers and employees. - Break-in in general. - Extortion by kidnapping. - Incidents of information, physical, personal and property security. 	<ul style="list-style-type: none"> - Courier: addressee: Investigation Manager/São Paulo; - Address: - C/O Investigation Department - Av. Dr. Hugo Beolchi, 900 - Torre Eudoro Villela – piso -1, São Paulo - SP - CEP: 04310-030
Control Room	<p>Questions about personal investments:</p> <ul style="list-style-type: none"> - Securities of the conglomerate. - Assets of other companies 	Internal email: CONTROL ROOM MONITORAMENTO
Audit Committee	<p>Suspensions and accusations of:</p> <ul style="list-style-type: none"> - Legal or regulatory non-compliance. - Fraud and errors in audit, accounting and internal control activities. 	<p>External email: comite.auditoria@itau-unibanco.com.br.</p> <p>Mail: C/O 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.</p>

NOTE: At International Units, whistleblowers may communicate to one or more of the following channels: (i) local channels described in the local Codes of Ethics (ii) the following channels of the head office: Investigation Department, Audit Committee and Ombudsman for cases according to specific governance.

Attachment XXX contains the reporting channels used by each international unit.

Protection of Whistleblowers

Acts of retaliation, revenge or harassment cannot be committed against anyone who identifies oneself and in good faith:

- Report a complaint, suspicion, doubt or concern relating to situations of unethical behavior or other misconduct;
- Provide information or assistance in assessing unethical behavior and other misconduct.

Management personnel and employees shall preserve the confidentiality of the information they may have access to relating to the investigation of unethical behavior and other misconduct.

Anonymous reporting shall be accepted through the Reporting Channels and must be treated in the same way identified reporting is treated.

Disciplinary sanction shall be applied to the management personnel or employees who attempt to retaliate or retaliate those who, in good faith, communicate unethical behavior and other misconduct.

Disciplinary sanction shall be applied to management personnel or employees who are proven to act in bad faith when reporting unethical behavior and other misconduct.

Every management personnel and employee of the Itaú Unibanco Conglomerate shall accept the Integrity Policy Statement on an annual basis. At the international units, such statement will be accepted in accordance with the local legislation, and there may be adjustments in the content of that Statement.

Relationship with Stakeholders

The items below express how we do business and relate to our stakeholders, including customers, suppliers, service providers, partners, shareholders, investors, the public sector, the press, the media, the third sector, and even employees and management personnel.

Relationship with customers

At Itaú Unibanco we are focused on customer and user satisfaction, and our activities are based on good corporate conduct and sustainable development. We are committed to maintaining high standards of business conduct and compliance with the laws, rules and regulations in all jurisdictions in which we do business and have business relationships. The design, offering, sale and after sales of our products and services shall be guided by the principles of ethics, transparency, responsibility and due diligence, ensuring our commitment to

better relate to customers and users, allowing them to make a free and conscious decision as regards products that are more suited to their interests, needs and objectives, refer to the Code of Ethics of Itaú Unibanco, principle of interdependence.

In case of provision of services to and relationship with cross-border customers by any employee of the Conglomerate, the specific rules applicable to conduct the business must be followed;

Relationship with suppliers, service providers and partners

For our suppliers, service providers and partners, we seek the same transparency, lawfulness, quality and reliability achieved for our customers.

To that end, we have developed our Supplier Relationship Code that guides the interactions between our employees and suppliers. We have a structured process to evaluate suppliers and service providers intended to mitigate risks in our supply chain, which considers both scale and complexity of their activities.

Regarding our interaction with Business Partners and other partners, they are also subject to a risk analysis process in order to ensure an appropriate relationship.

Overseas units have specific evaluation practices for suppliers, service providers and partners.

Relationship with shareholders and investors

In order to preserve the specific interests of shareholders and investors, we undertake to disclose material information in a timely and correct manner to our shareholders and investors, regardless of the ownership interest held by them.

The expected conduct of the investor relations professional is defined in the Investor Relations Code of Conduct.

Relationship with the public sector

The relationship and contact maintained with public agents in Brazil and abroad, regardless of their position or hierarchy, require transparency and strict accountability from us, with the purpose of ensuring the legality of and cooperation in these interactions.

At Itaú Unibanco we have rules for maintaining a relationship with and engaging public agents and companies that are part of the direct and indirect public administration, which includes Government Relations, bidding procedures, administrative contracts, and engaging regulatory agencies.

Relationship with the press, the media and the third sector

Relationships with the press and the third sector, as in the processes of donations and sponsorships, are important aspects in our relationship with society, and for this reason are based on the guidelines of the Code of Ethics and on specific internal procedures.

Relationship with employees and management personnel

All interaction with and among employees and management personnel shall be based on respect for Human Rights and on the promotion of social diversity, fighting all forms of discrimination, harassment, prejudice and unworthy working conditions.

These precepts are defined in the Itaú Unibanco Code of Ethics and the Human Rights Commitment, and in internal procedures.

PREVENTION OF ILLEGAL ACTS

It is unacceptable for us to conduct or tolerate business and transactions that may contribute to illegal or criminal acts. We have specific procedures for the prevention and detection of, and fight against Money Laundering, Fraud, Terrorism Financing, and Corruption, through a governance structure guided by domestic and international best practices for transparency, compliance with rules and regulations, and cooperation with law enforcement and judicial authorities.

DISCLOSURE AND TRADING OF SECURITIES AND PERSONAL INVESTMENTS

Investments must look at the long term, maintaining the solvency and credibility of investors, and avoiding any reputational risk to the Conglomerate.

We have internal policies and specific procedures on the conduct in trading of securities and on segregation of activities between functions, in order to ensure the confidentiality of non-public information on securities, and ensure the fairness and operations of markets.

Any information held by management personnel and employees as a result of their professional activities in the Itaú Unibanco Conglomerate must be kept confidential and cannot be used as a basis to make decisions on their personal investments, avoiding Insider Trading and other unfair practices.

Transactions with Securities of Listed Companies Related to Itaú Unibanco Holding S.A., or securities for which they are used as benchmark, shall comply with the rules set forth in the Policy on Trading of Securities Issued by Itaú Unibanco Holding S.A.

The statement of acknowledgement signed by the employee will identify the respective set of rules that employees shall follow for their personal investments. The International Units shall follow their local rules regarding Personal Investments and the employees of such units shall seek information on the rules with the local Compliance.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Our purpose goes beyond financial results, and seeks to generate shared value, by which we perform actions and wish to be partners in the development of people, society and the countries where we operate. In this context, we recognize our responsibility of playing a transformative role, going beyond our operations and contributing to generate positive impacts on the market and society.

With this objective, we promote financial education, integration of social and environmental issues into business and activities, and we cherish transparency in our practices, building sustainable relationships.

CONFLICT OF INTEREST

Whenever the personal interests of management personnel or an employee do not agree with those of the institution or with those of its stakeholders, a conflict sets in. Such situations may jeopardize our reputation.

Any type of conflict needs to be managed effectively and transparently, in addition to being promptly communicated to management and the relevant channels. In addition, those involved shall abstain from decisions that involve them, by not attending forums when such decisions are made.

The following are some examples of situations that may characterize conflicts of interest:

- Use of information, registers and know-how of the conglomerate (e.g. conducting academic studies, external lectures, interviews, benchmarking meetings, etc.)
- Participation in companies and external activities (e.g. opening of external businesses or participation in activities that conflict with the nature of the activities conducted in the conglomerate or that interfere with the working hours)
- Family and close relationships in the conglomerate (e.g. situations of family and close relationship in the same hierarchical relationship or that may generate favoritism)
- Offering and receiving courtesies (e.g. accepting or offering gifts, invitations for lunch or dinner, tickets or invitations for travel, lectures, cultural and sports events, etc.)

In addition, there are guidelines for specific topics related to conflicts of interest, such as:

- Nondisclosure Agreement (NDA) – legal agreement that defends the rights of a certain company that binds itself to another, to the obligation of maintaining confidentiality of certain information that is passed to it in the scope of a service or business).
- Soft Dollar offer and receipt – a market practice through which third-party asset managers use the brokerage fee paid to obtain products and/or services relating to order execution and securities analysis from the brokers with which they operate (feeders, conferences, systems for calculating market risk, subscription of newspapers).
- Conflict of interest between functions (Investment Banking and Research): Itaú Corretora has internal procedures to identify the circumstances that may generate situations of conflict of interest in the Research function's activities, including those that involve a material risk to the interests of customers.
- Chinese Wall - rules and internal procedures that limit the flow of confidential information involving the Institution's functions or departments, in order to avoid inappropriate action in situations of Conflict of Interest or the misuse of Privileged Information, as well as to establish control mechanisms intended for the protection and proper use of information, thus protecting the interests of customers, the institution and its employees, preventing and managing any situations of conflict of interest.

DISCIPLINARY SANCTIONS

Management personnel and employees who violate the terms of this Policy are subject to the disciplinary sanctions provided for in the internal rules of the Itaú Unibanco Conglomerate companies.

SECTOR GUIDELINES

Guidelines that are more restrictive than those of this Policy may be set forth in internal rules of the companies or functions of the conglomerate. In case of conflict between the guidelines of this Policy and the local legislations of foreign representations, the stricter rule shall prevail, provided it does not violate local legislation.

DOUBTS AND EXCEPTIONS

Doubts and exception evaluations regarding the topics of this Policy and its procedures or possible non-covered matters shall be sent to the Ethics Advisory at the Supervisory Department of Relationship with Regulatory Agencies and Compliance, by means of the email key INTEGRITY AND ETHICS COMMITTEE (Brazil), or to the local Compliance Officer of the international units. If necessary, the Ethics Advisory or the local Compliance Officer may refer the case for deliberation by an integrity and ethics committee.

Note:

Claims or disagreements relating to this policy, or the opinions issued by the Ethics Advisory, shall be referred to the Sector Integrity and Ethics Committee for evaluation and deliberation.

Approved by the Board of Directors in 25/10/2018.

PROCEDURE OF CONFLICT OF INTERESTS

PURPOSE

To set complementary guidelines to the Itaú Unibanco Code of Ethics regarding conflicts of interest situations (e.g., use of information, registers and know-how of the institution, external activities/partnerships, kinship and proximity relations, offer and receipt of courtesies, etc.) and ethical dilemmas.

TARGET AUDIENCE

This Procedure applies in Brazil and abroad to all the administrators and employees of the Itaú Unibanco Conglomerate, including also any interaction that the Conglomerate maintains with customers, partners, suppliers and other stakeholders.

USE OF INFORMATION, REGISTRATION AND KNOW-HOW OF THE CONGLOMERATE AND THIRD PARTIES

This Procedure applies in Brazil and abroad to all the administrators and employees of the Itaú Unibanco Conglomerate, including also any interaction that the Conglomerate maintains with customers, partners, suppliers and other stakeholders.

The information, the registrations of people and companies (employees, customers, suppliers, competitors, etc.) and the know-how (knowledge, technologies, models, systems, policies, etc.) circulating internally are properties of the conglomerate. Therefore, administrators and employees must:

- a) Use information, registers and know-how of the conglomerate in accordance with internal information security legislation and standards.
- b) Protect the information, registrations and know-how of the conglomerate and prevent its misuse and leakage.
- c) Obtain authorization, by e-mail, from its superintendent (or higher level) and the director of the area of information before using information, including databases of any nature (internal and confidential) in activities and publications (paper, electronic or internet), as:
 1. Lectures, debates, seminars, courses, congresses, interviews, etc.
 2. Academic works, monographs, dissertations, articles, theses, books and handouts, etc.
 3. Newspapers, magazines, social networks, websites, blogs, chats, etc.
 4. To provide bank information to third parties.
 5. Benchmarking* with market companies.

Important remarks:

- i) Information classified as confidential may only be used in outside activities and publications after formal authorization of the owner of the information (director or equivalent). In case the information is classified as restricted, it can only be used with the formal approval of a director general or vice president.
- ii) Even if the activity or publication is carried out in the name or in the interest of the conglomerate, the authorization for use must be obtained.
- iii) The same rules should be applied in case the request for the use of information from the conglomerate from third parties.
- iv) Additionally, for items c) 1 and c) 3 above, the guidelines of the internal regulations regarding press relations for Brazil and local guidelines for international units should be followed.
- v) Administrators and employees may not use the information, registers and know-how of the conglomerate for private purposes, nor pass them on to third parties without prior authorization, even after they have left the conglomerate.
- vi) If sensitive or confidential information is received from third parties (e.g. customers, business partners, suppliers, etc.), even if the receipt is given involuntarily, such information should not be passed on or used internally or externally.

* Employees must request authorization from the superintendent or senior level prior to conducting benchmarking meetings.

SOCIETY IN COMPANIES

Officers

Members of the Board must inform the Corporate Governance and Nomination Committee their proprietary participation in other organizations for analysis and eventual reporting regarding potential conflict of interests situation.

Employees and Administrators (except for Officers)

a) May not constitute participation or have a stake* in companies or enterprises with the same business activity as the Conglomerate or whose activities conflict in any way with its own activities performed at Itaú Unibanco (eg activities with financial products and services).

(*) exception made for investment purposes in organized securities markets.

a.1) May have participation in companies or make investments in startups, fintechs, P2P lending platforms and similar, since that:

- There is no conflict with the employee's own activities at Itaú Unibanco;
- Their participation in the business are minority and the employee has no management function in the business;
- Participations are not made jointly by employees of the same area.

b) May have participation in companies or enterprises with different business activities of the Conglomerate since that:

- There is no conflict of interest between the activities performed at the Conglomerate and those performed at these companies and enterprises;
- The working hours established in the employment contract are not impaired;
- Participations are not made jointly by employees of the same area;
- There is no internal advertisement of this activity among employees or even with customers, suppliers or business partners;
- Do not use equipment, machines, systems, office supplies, etc. of the Conglomerate for the benefit of the external activity or enterprise;
- The rules of item 1 above in this procedure are respected;
- The direct manager is informed.

Before forming a society, regardless of its modality, in case of doubt as to whether or not there is a conflict of interest, you must consult the Ethics Consultancy channel through the e-mail address: COMITE DE INTEGRIDADE E ETICA.

Registration of Society in the Company

In Brazil, participation in companies in which there is doubt about potential conflict of interests with their own activities in the bank, should be informed, at any time, to the Ethics Department by means of the e-mail key COMITE DE INTEGRIDADE E ETICA.

EXTERNAL ACTIVITIES

Officers

Members of the Board must inform the Corporate Governance and Nomination Committee external activities that they perform in other organizations for analysis and eventual reporting regarding potential conflict of interest.

Employees and Administrators (except for Officers)

a) May not engage in activities with the objective of assisting or directly contributing to the management of companies or enterprises that conflict with its own activities performed at Itaú Unibanco.

b) They should consult the Ethics Consultancy channel for:

- Performing activities in companies or enterprises that conflict with the Conglomerate's business activities, even if they do not conflict with their own activities (eg activities with financial products and services);
- To carry out activities in companies of customers, suppliers and commercial partners of the institution;
- To engage in business councils, professional activities in the media, advertising companies, business associations and class entities. Activities that involve the media, advertising companies, interviews in general should be reported to the Corporate Communication Area to obtain an opinion.

c) They may carry out external activities in companies and ventures with branches other than those of the institution and that do not conflict with their own activities, such as educational institutions, third sector companies, provided that:

- There is no conflict of interest between the activities carried out in the institution and those carried out in these companies and enterprises.
- The journey established in the contract of employment is not impaired.
- There is no internal advertising of this activity among employees or even with customers, suppliers or business partners.
- Do not use equipment, machines, systems, office supplies, etc. of the institution for the benefit of the external activity or enterprise.
- The rules of item 1 above are respected.
- The direct manager is informed.

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

- The journey established in the contract of employment is not impaired.
- There is no conflict of interest between the activities carried out in the institution and those institutions.
- The rules of item 1 above are respected.

e) They should consult the Ethics Department and inform the director or higher hierarchical level before carrying out professional activities in the (or linked to) civil service, in positions that are bankrupt, commissioned or appointed, or as a service provider (autonomous or through a legal entity) to the public body.

f) They must also request prior authorization from a director or higher hierarchical level to hold lectures or presentations on behalf of the conglomerate, even in events of representative entities as Febraban and Anbima.

g) When conducting activities on behalf of the conglomerate or in a business association of the financial sector, the administrators (or employees) must: (a) waive receiving the remuneration offered for the exercise of the activity, according to the standard model for this purpose (see Attachment M- 4); or (b) receive the remuneration and inform the Personnel Area (remuneration) so that this amount is deducted from its "total cash" in the conglomerate.

Registration of External Activities

In Brazil, external activities in which there is doubt about potential conflict of interests with their own activities in the bank, must be informed, at any time, to the Ethics Department by means of the e-mail key COMITÊ DE INTEGRIDADE E ÉTICA.

POLITICAL ACTIVITY (APPLICATION FOR PUBLIC OFFICES)

In Brazil

a) Administrators and employees who are candidates or elected to public office must apply for unpaid leave:

- During the election campaign period.
- During holding the public office.

b) Administrators and employees who apply for public positions must comply with the internal institutional norms and the specific ones of the company and cannot receive from it any type of contribution or support to the candidacy.

In International Units

The local standards regarding the application to public offices should be respected.

CLOSE AND KINSHIP RELATIONSHIPS

In the conglomerate: Employees may indicate, maintain or become related or have close relationships in the conglomerate, as long as it does not result in a conflict of interest. However:- Indications for hiring or transfer or if you are aware of hiring or moving that may generate a conflict of interests, you must be informed to the hiring manager (Manager and People Area) and request an opinion from the Ethics Department.

- Any situation of kinship or proximity relations in the conglomerate must be informed to the direct manager. Situations of kinship or relationship of proximity in the same board should be informed by the management to the director of the area regardless of the existence of conflict of interests or not.
- Employees may not authorize the hiring of close relatives and persons, nor may they appoint a close relative or person for the evaluation on the Y axis.

- Kinship and proximity relations are not allowed when there is hierarchical relationship between the involved parties, as per internal regulations.

- Other situations of kinship (inbreeding or affinity) that involve a hierarchical relationship, and which are not described in internal documents, must be evaluated by the manager and by the Ethics Department.

In the branch network, no kinship or proximity relationships are allowed in the same agency or in similar physical locations (e.g., platforms, hubs, digital agencies, investment consulting and USE). It is also not allowed relations of kinship or proximity between employees who participate in communities that work in models of collaborative work (squads).

The following situations, if they involve relations of kinship and proximity, even if there is no hierarchical relationship between those involved, should be evaluated by the management and by the Ethics Consulting with the objective of identifying possible conflicts of interests:

- Complementary activities (e.g., done and checked, approvals of processes and payments, etc.).

- Evaluations of performance, merits and promotions, as well as the confidentiality of information related to these subjects.

- Situations that may affect the healthy climate in the work environment.

- Kinship register or close relations

In Brazil, it is mandatory to register kinship and close relations by employees and administrators (up to the director level) on the Itaú Unibanco intranet. If the employee has no relative or close relationship, he/she must register the option "Não tenho conhecimento" [I'm not aware].

With public agents:

Administrators and employees must inform the manager if they are related to, or have a close relationship with, public agents or former public agents who have been exonerated for less than five years to identify the existence of a conflict of interests. In case of doubt about the existence or non-existence of a conflict of interests, consult the Ethics Department by means of the e-mail key COMITE DE INTEGRIDADE E ETICA.

RELATIONS WITH CUSTOMERS, SUPPLIERS, BUSINESS PARTNERS AND EMPLOYEES

Administrators and employees should:

a) Keep confidential information, registration, operations, contracted services, etc. of customers, suppliers, business partners and employees of the conglomerate.

b) Refrain from conducting private business - on their own behalf, from 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 customers, suppliers or commercial partners of the conglomerate, or even use the position for such purpose, to generate conflict of interest or other order (e.g. situations that may affect the good relationship with customers and other stakeholders). Doubts should be directed to the Ethics Department.

Administrators and employees should not:

a) Hire suppliers, service providers or business partners who have relationships with administrators or employees (e.g., kinship, participation in society, etc.) in order to generate a conflict of interest.

b) Enter into agreements, contracts or commitments with customers, suppliers or business partners that imply reciprocity and exchange of favors or personal advantages for themselves or third parties or that can give this perception.

c) Sign or manage negotiations or to be responsible for the management of relations with customer companies, suppliers or commercial partners of which:

- it is a partner.

- it is managed (e.g. as director or business manager) by its spouse (partner), relatives or persons of close relationship.

d) Carry out transactions with related parties without taking into account the rules of the Related Party Transactions Policy, item 4.1).

e) Easily facilitate business on behalf of customers, suppliers or business partners of the conglomerate.

f) Apply for a job for spouse (partner), relatives and close associates in companies of customers, suppliers or business partners with whom he has direct contact in the exercise of his position in the institution.

g) Request courtesies or contributions to customers, suppliers and business partners.

h) Manage the bank accounts (current, savings, investment, etc.), and other products and services of the conglomerate, belonging to itself (individual or legal entity), relatives or close people.

i) Provide services to the institution as a third party.

j) Provide themselves (or through their companies) private services (paid or unpaid) to other employees or administrators in a way that creates a conflict of interests.

It is necessary to avoid particular commercial relations between employees or between employees and managers who have a hierarchical relationship between them in order to avoid conflicts of interest or undesirable situations that may affect the interaction within the work environment.

Registration of Relations with Suppliers

In Brazil, relationships with suppliers or business partners that may result in a conflict of interests with their own activities in the bank should be informed to the Ethics Department by means of the email key COMITÊ DE INTEGRIDADE E ÉTICA.

Remarks: The Know-your-Employee (KYE) Corporate Policy describes the identification, analyzes and resolution process on events of conflict of interests during contraction.

COURTESIES, INVITATIONS AND HOSPITALITIES

Courtesies – Offer

a) Prohibition: it is prohibited for administrators and employees to offer, directly or indirectly, to private agents or public agents, from Brazil or any other country, courtesies of any nature for the purpose of influencing decisions, facilitating business that would not originally be performed or obtaining any undue advantage (financial or otherwise) to himself/herself, to third parties or to the conglomerate.

b) Cash Courtesies: administrators and employees cannot offer to third parties, from Brazil or any other country, any kind of money, favors or equivalent of any value (e.g., gift or prepaid cards, voucher), regardless of the recipient of the offer.

c) Physical Courtesies: it shall be allowed to offer, to private agents or public agents, from Brazil or any other country, physical courtesies (e.g., gifts, books, calendars and other items of small value, acquired under Purchase Department internal regulations (or policy applicable to the unit), provided that, cumulatively:

- It is possible to find that this is a standard practice for a broad audience or a certain category of people, in which the recipient of the courtesy is.

- It is related institutional or relationship actions.

- The value of the courtesy, individually, is limited to R\$400.00 for private agents; R\$100.00 for public agents in Brazil; and US\$100.00 in the international units or, still, that does not have commercial value.

- The approval of the manager of the offering area with a minimum superintendent's.

d) Exception: if the courtesy object is not acquired via the Purchase Area or the value individually exceeds the limits set above, the offer must be submitted to the evaluation of the Ethics Department and approval of the director or senior hierarchical level of the offering area.

e) Purchasing and Asset Equity Board: managers and employees of this board of directors must not offer courtesy.

Courtesies – Receiving Them

a) Prohibition: it is prohibited for administrators and employees to receive, directly or indirectly, private agents or public agents, courtesies of any nature for the purpose of influencing decisions, facilitating business or granting any undue advantage (financial or otherwise) to the offering party.

b) Cash Courtesies: administrators and employees must not accept from third parties any kind of money (any value), favors or equivalent of any value (e.g., gift or prepaid cards, voucher), regardless of the offering party.

c) Physical Courtesies: it shall be allowed to receive institutional or relationship materials courtesies (e.g., gifts, books, calendars and other items of small value), provided that the value of the courtesy, per person, does not exceed R\$400.00 in Brazil and US\$100.00 in international units.

- Institutional courtesies should not be accepted in large quantities for several employees, even if the individual value does not exceed the amount set forth in item c. Possible situations that occur should be submitted to the evaluation of the Ethics Department.

- The receipt of materials courtesies, the individual value of which exceeds the values of item c), must not be accepted.

- In situations where the refusal of a courtesy causes great discomfort, may be viewed as an affront or it is not really possible to return it, the administrator or employee should thank and inform the offering party of the institution's determination to donate courtesy to an institution supported by the institution. In these situations, the administrator or employee should send an e-mail to the key "COMITÊ DE INTEGRIDADE E ÉTICA" for the purpose of consultation and guidelines on refusal, return or even donation, by a specific internal term of the Conduct, Integrity and Ethics Policy.

d) Purchasing and Assets Equity Board: administrators and employees of this board shall not accept courtesies.

e) External awards: the reception situations of courtesies related to the participation of Itaú Unibanco in external awards not promoted by the conglomerate should be sent to the Ethics Department.

Lunches and Dinners

It shall be allowed the participation in lunches and dinners, with private agents and/or public agents, aiming to maintaining institutional, commercial relationship and prospecting of customers. In the event that the employee or administrator of the bank or the counterparty offers to pay:

- a) Offer and receipt must be compatible with the position and function of the offering party/invitation recipient in the conglomerate.
- b) The cost must be reasonable.
- c) The employee must communicate to the immediate superior with a minimum superintendent position when involving public agents.
- d) There should be caution with expenses and the choice of location (noting if it is appropriate for the public involved). The consumption of alcoholic beverages in meals is acceptable, provided that with extreme moderation, with justification of the consumption, the reason and the relation of the participants, as defined in internal regulations or other norms applicable to the unit.

These payments should not be made with unreasonable frequency and must follow the internal rules of payment, (according to internal regulations and, when applicable, also the rules of relationship with public power described in internal regulations).

Tickets/Invitations – Offering and Receiving

Offering

a) Tickets/Invitations related to events sponsored by the conglomerate: it is allowed to offer, to persons from the private sector, from Brazil or from any other country, tickets/invitations related to events sponsored by the conglomerate (e.g. invitations to congresses, lectures, forums, cultural or sporting events, etc.) provided that, cumulatively:

- It is possible to verify that this is a standard practice for a broad audience or a certain category of people, in which the recipient of the courtesy is.

- Reputation of the guest is carried out following criteria and rules defined in internal regulations.

Tickets/invitations to events sponsored by the Itaú Unibanco Conglomerate shall not be delivered to public agents, even if they are customers of the Itaú Unibanco Conglomerate, except for institutional events of the Itaú Unibanco Conglomerate, in which there are no ticket sales, the inauguration of new units.

b) Tickets/Invitations related to events promoted by the conglomerate: it shall be allowed to offer, from the public or private sector, from Brazil or any other country, tickets/invitations related to events promoted by the Conglomerate (for example: seminars, invitations to congresses, visits, technical meetings, forums, etc.). provided that:

- The invitation is directed to the maximum authority of the public body or entity.

- It is possible to verify that this is a standard practice, intended for a wide audience or a certain category of persons, in which the beneficiary of the courtesy is.

c) Other offers of invitations or tickets for events not sponsored or promoted by the conglomerate, with the purpose of promoting technical and market development (e.g. invitations to fairs, seminars, congresses, forums, meetings, etc.) can be carried out by private agents Brazil and abroad, provided that:

- The ticket/invitation offered is not intended to influence decisions.

- The offer does not occur with unreasonable frequency, for the same guest or in disproportionate quantities.

- It is possible to verify that this is a habitual practice, intended for a wide audience or a certain category of persons, in which the beneficiary of the courtesy is part of.

- There is approval of a employee with a minimum position of director or higher hierarchical level.

d) Non-institutional events: the offering of tickets/invitations for sporting or cultural events, without being linked to institutional, marketing or technical events, to customers, suppliers or business partners (including companions or not) must be evaluated by the Ethics Department (via the e-mail "COMITÊ DE INTEGRIDADE E ÉTICA) and deliberation by the Integrity and Ethics Committee of the Executive Area or external unit. This evaluation shall be preceded by a DSC review by the DSC.

e) Hospitality: When offering tickets/invitations, it shall be allowed to offer hospitalities (e.g. travel expenses, transportation, accommodation, meals, among others), provided that in conditions similar to those practiced by the conglomerate for its own administrators and employees and provided there is director's approval or higher hierarchical level. Guidance on offering hospitality to speakers, are described in internal regulations.

f) The offering party must feel comfortable in publicly justifying the participation of the guest in the event.

g) The offer must not be provided with an unreasonable frequency for the same guest in a way that may generate some suspicion of undue advantage.

h) The offer can be made if the offering party is not aware of relevant negotiations in progress, of interest of the conglomerate with the guest, whose decision depends on him or his influence.

Receiving

a) Technical Events: the administrators and employees of the conglomerate may receive from private agents or public agents tickets/invitations to technical events (e.g. lectures, congresses, forums, business visits, business meetings) to publicize the brand, products, services and enterprises, technology, techniques, provided that:

- The receipt is compatible with the position and function of the recipient of the courtesy and with the objectives and needs of Itaú Unibanco.
- The receipt is not accepted with unreasonable frequency and in disproportionate amounts, in a way that can generate some suspicion of undue advantage.
- The received ticket/invitation is not intended to influence decisions and does not generate suspicion of undue advantage.
- There is prompt approval of the manager.

b) Institutional, marketing, cultural and sporting events: the administrators and employees, due to their status as administrator or employee of the conglomerate, may receive from private agents or public agents tickets/invitations related to institutional, marketing, cultural and sporting events, celebrations or celebrations, with a view to strengthening the relationship, provided that:

- The received ticket/invitation is not intended to influence decisions.
- The receipt does not occur with unreasonable frequency, for the same guest or in disproportionate amounts.
- The receipt of the ticket/invitation is compatible with the position and the function of the recipient.
- Email for Ethics Department evaluation by key "COMITÊ DE INTEGRIDADE E ÉTICA".
- There is the approval of an employee with the minimum position of director of higher level. If general directors, Vice-Presidents and Presidents are invited, the approval should be of the Executive Board, with information to the key of email "COMITÊ DE INTEGRIDADE E ÉTICA".

c) Non-institutional cultural and sporting events (not related to item b): tickets or invitations to sporting or cultural events, not related to institutional, marketing or technical events, of customers, suppliers or business partners (including companions or not) should not be accepted. Exceptions should be evaluated by the Ethics Department and sent to the Integrity and Ethics Committee of the Executive Area or external unit for deliberation.

d) Hospitalities: in any situation of receipt of tickets/invitations, expenses with travel, transportation, accommodation, meal, etc. should be covered by the conglomerate.

- If it is not possible to refuse the offer (e.g. the offer is made as a "package") or if the refusal causes discomfort, acceptance will be subject to prior evaluation and registration by the Ethics Department by the "COMITÊ DE INTEGRIDADE E ÉTICA" and approval of the area director or higher hierarchical level.

- The acceptance of hospitality by general directors, vice presidents and president is conditioned to the approval of the Executive Committee, with information to the e-mail key "COMMITTEE OF INTEGRITY AND ETHICS".

e) It will not be allowed to receive tickets/invitations linked to events sponsored by the conglomerate offered by third parties (e.g. suppliers, commercial partners and customers).

Remarks: The flow for international units regarding the approval of invitations in the events sponsored or promoted by Itaú Unibanco is described in internal regulations.

Other prohibitions

No alternative form of courtesy shall be allowed as a way to violate the above rules and restrictions, as, for example, the offer of courtesies to relatives of recipients who could not receive it and the recurring or disproportionate supply.

It shall not be accepted any other method to receive courtesies as a way to violate the above rules and restrictions, such as, for example, the receipt of courtesies by relatives of administrators or employees who could not receive it and the recurring receipt or in disproportionate amounts. Any occurrences should be reported to the employee's immediate manager and to the email key "COMITÊ DE INTEGRIDADE E ÉTICA".

COURTESIES BETWEEN EMPLOYEES

It is recommended to use prudence and moderation both in the offer and in the acceptance of gifts exchanged in the work environment or internal and external gatherings (birthday, wedding, lunches or dinners, farewells, visits or gifts to managers, etc.), in order to avoid exaggerations, suspicions, misunderstandings and rumors. The value of gifts exchanged or invitations must not exceed the amount stipulated in "Physical Courtesies" item.

In addition, voluntary and voluntary participation in prorating or collecting to fund internal celebrations, presents for colleagues, hidden friend or donations, must be guaranteed and respected, without allowing the amounts disbursed to be disclosed, in order to maintain a healthy climate of cordiality.

CONTRIBUTIONS (DONATIONS AND SPONSORSHIPS): OFFERING AND RECEIVING

- a) The contributions made by the conglomerate, in financial resources or not, must comply with the provisions of Sponsorship and Donations internal regulations or sectoral policies of each unit and are subject to the limits and approvals stipulated in those internal regulations.
- b) Offers and acceptance of contributions should not be used – or give rise to such interpretation – for the exchange of favors, facilitation of business or operations or any other improper benefit (financial or otherwise) for the institution or third parties.
- c) The offer and acceptance of contributions shall be made in accordance with the laws and regulations of the countries in which the institution is present and with the internal rules of the institution's companies.
- d) To avoid suspicions of favoritism in audits, inspections and negotiations, contributions of any nature are prohibited to regulatory or supervisory authorities, as well as to employers and employees unions.
- e) Contributions to the conglomerate should be made through its foundations and social and cultural institutes.

Contributions to candidates for public office and political parties

It is prohibited the contribution by companies in Brazil and abroad for candidates to public offices and political parties.

Contributions for the third sectors

- a) The institution's contributions to third sector organizations must follow corporate guidelines.
- b) Third sector organizations, their leaders and other partners or benefiting from the contributions of the institution should enjoy a good reputation.

Contributions for administrators and employees

Contributions to employees (publication of books, exhibitions of works of art, production of films and plays, participation in sporting events, etc.) must be approved by the Ethics and Integrity Board of the conglomerate. Requests must be sent to the email key "COMITÊ DE INTEGRIDADE E ÉTICA" and in units for the local administrator compliance.

PERSONAL INVESTMENTS

In applications and investments made for own benefit in the financial market, situations that may conflict with the Itaú Unibanco conglomerate and/or its customers should be avoided and the provisions of the applicable Personal Investment Policies.

DOUBTS AND EXCEPTIONS

Doubts and exception evaluations regarding the themes of this Procedure or possible non-contemplated matters should be sent to the Ethics Department at the Regulatory and Compliance Superintendence by means of the e-mail key COMITÊ DE INTEGRIDADE E ÉTICA (Brazil) or to the local Compliance Administrator available in the international units. In case of need, the Ethics Consulting or local Compliance Administrator may refer the case for deliberation in an integrity and ethics board.

Remarks: disputes or disagreements relating to this Procedure, or to opinions issued by the Ethics Department shall be resolved by the Sectoral Integrity and Ethics Committee.