

# ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Publicly-Held Company

NIRE 35300010230

## CORPORATE CORRUPTION PREVENTION POLICY

### SUMMARY

This document establishes guidelines for preventing and fighting corruption at Itaú Unibanco.

### TARGET AUDIENCE

This policy applies to Itaú Unibanco Holding S.A. and its subsidiaries in Brazil and abroad. The guidelines within this policy must be followed by all managers and employees in Brazil and abroad, as well as the Conglomerate's controllers and by related non-profit entities in Brazil, in interactions with customers, partners, suppliers and other stakeholders, including public entities.

### INTRODUCTION

Itaú Unibanco is subject to several national and international rules, including, at a national level, Law 12.846/13, known as the Anti-Corruption Law, which establishes that legal entities have strict liability (regardless of intention, guilt or negligence) for their involvement in any form of corruption or other harmful acts against Brazilian or foreign public administration, such as fraud bidding and obstruction of justice, and provides for penalties for practicing acts of corruption, such as the suspension of activities or dissolution of the company. Internationally, the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act stand out, among other regulations in countries where we are present.

Itaú Unibanco rejects any form of direct or indirect, active, or passive corruption, and always seeks to establish fair and transparent relations. In this way, Itaú structures its processes and practices based on global market corruption prevention standards, jurisprudence, and information. Additionally, while only deviations in the relations between

public and private agents are considered as crimes of corruption by Brazilian legislation, the Conglomerate considers both deviations between public and private agents and those between private agents.

In that sense, the Corporate Corruption Prevention Policy ("Policy") is one of the components of the Integrity and Ethics Program, and aims to reinforce Itaú Unibanco's commitment ("Conglomerate") to preventing and fighting corruption, in any shape or form. The Policy establishes guidelines and procedures for preventing and fighting corruption, such as training, communication and channels for questions and complaints, procedures to avoid conflicts of interest in relations with our stakeholders (customers, suppliers, partners, non-profit entities, among others) in the public and private sectors.

### PROHIBITIONS

It is prohibited:

- a) To suggest, offer, promise or grant, directly or indirectly, upon demand or not, undue advantages of any nature (financial or not) to individuals and companies in the public, private and third sector organizations, in Brazil and abroad, as well as **between people, companies and organizations from different countries, including transnationally**, in exchange for carrying out or omitting acts inherent to their assignments, operations or activities for the Conglomerate or seeking benefits for themselves or for third parties.
- b) To suggest, request, demand, accept or receive undue advantages of any nature (financial or not) for/from people and companies from the public, private and third sector organizations, in Brazil and abroad, as well as **between people, companies and organizations from different countries**, directly or indirectly, in exchange for carrying out or omitting acts inherent to its assignments, operations or activities for the Conglomerate or seeking benefits for itself or for third parties.
- c) The above prohibitions must be observed by Itaú Unibanco's suppliers and partners.

The rules established in the internal policies must also be observed in relation to other acts harmful to the public administration.

### PRINCIPLES, GUIDELINES AND PROCEDURES

The following items are principles, guidelines and procedures that guide the Conglomerate's activities in preventing and fighting corruption, which are part of the Integrity and Ethics Program.

The Conglomerate adopts procedures proportional to the risks of corruption related to the nature, scale, and complexity of its activities.

### Senior Management Commitment

The Board of Directors (CA) defines guidelines for the organization's conduct and values, which must be observed by all managers, employees, suppliers, and partners in any relationship, in order to prevent and fight all forms of corruption or other acts illicit. The Board of Directors also ensures the allocation of financial, material and human resources for implementing the Institution's Integrity and Ethics Program,

maintenance and evolution through monitoring actions linked to it. These guidelines are formalized in this policy, in the internal and in the Itaú Unibanco Code of Ethics.

### **Communication and Training**

Education and communication actions are part of the Integrity and Ethics Program and are created in accordance with the rules and guidelines of this policy and the internal policy, in line with the risks to which company is exposed. These actions deal with a variety of subjects, helping managers and employees to:

- Incorporate increasingly more corporate culture and awareness in preventing and fighting corruption in its practices;
- Deepen knowledge about concepts and guidelines related to integrity and ethics and preventing corruption, as well as their application to business and to process and relationship management.
- Be able to identify, prevent, report, and resolve misconduct inherent to their daily activities.
- Know the channels for reporting and resolving doubts.
- Know publicly available information about the Integrity and Ethics Program.

### **Relationship with customers**

In accordance with our internal policy, we base our actions on the satisfaction and protection of customers and users. To this end, the institution has established processes to ensure diligence and transparency in relationships, such as:

- Customer assessment procedures, also known as Know Your Client (KYC);
- Diligence to identify public agents / Politically Exposed People;
- Monitoring transactions with Politically Exposed People

Additionally, when applicable, a corruption prevention clause is also included in agreements with clients.

### **Relationship with Third Parties**

Itaú Unibanco seeks the same transparency, quality and reliability achieved with its customers in relations with suppliers and partners. To this end, the following processes were established:

- Procedures for assessing suppliers, also known as Know Your Supplier (KYS) and business partners, also known as Know Your Partner (KYP), as established in the internal policy
  - Procedures for registering, approving, hiring and monitoring suppliers and service providers and specific practices for Business Units abroad.
- Specific rules for hiring or inviting speakers by Itaú Unibanco departments in accordance internal policy.
- Availability and disclosure, for suppliers in Brazil, of Itaú Unibanco and Supplier Relationship Codes of Ethics on the website [www.itau.com.br/forneceedores](http://www.itau.com.br/forneceedores).
- Workshops or other events in Brazil to disseminate, among other subjects, the institution's principles, and values to its suppliers
- Procedure for sponsored and grantees, among other partners, reputational assessment and specific practices in Business Units abroad.
- Inclusion, when applicable, of a corruption prevention clause in contracts with third parties.
- Rules and criteria for accepting and offering contributions, benefits, invitations and hospitality.

### **Hiring Employees**

Itaú Unibanco has corporate guidelines and standards for the Meet Your Employee process, also known as Know Your Employee (KYE), in order to prevent conflicts of interest and involvement in illegal activities. In accordance with the internal policies guidelines and Code of Ethics, a set of rules, procedures and controls that must be adopted for the selection, contracting and monitoring of situations that may characterize some type of risk or misconduct by employees, as well as possible conflicts of interest in the selection and hiring of new employees (from the private or public sector, or who have a relationship with a public agent), respecting the provisions of the internal policy , and specific practices in Business Units abroad.

### **Senior management nomination**

NOMINATION POLICY FOR THE MEMBERS OF THE BOARD OF DIRECTORS AND COMMITTEES RELATED TO THE BOARD OF DIRECTORS AND THE BOARD OF DIRECTORS OF ITAÚ UNIBANCO HOLDING SA, defines the minimum requirements for appointing the members to the Board of Directors, Committees related to the Board of Directors and Itaú Unibanco Holding S.A. Executive Board. Among others, it establishes that the nominated professionals must observe their ability to harmoniously combine the interests of the Company, shareholders, managers, and employees, as well as the social and environmental responsibility of the Company, guided by legality and ethics.

### **Relationship with Public Agents**

The relations and contacts maintained with public agents in Brazil and abroad, regardless of the position or hierarchy, require on our part ample transparency, collaboration, and accountability, in order to guarantee the lawfulness and cooperation in these interactions. In this regard, Itaú Unibanco established the following procedures:

- Rules for relationship and contracting with public agents and companies that are part of the public administration, direct and indirect, including activities of government relations, registration of interactions, bidding procedures and execution of administrative contracts defined in specific internal policy.
- Guidelines for the relationship with Regulatory Bodies, Self-regulators, Supervisors and Supervisors
- Criteria for dealing with documents from government agencies, the judiciary, other authorities, third parties and specific practices in Business Units .
- Rules and criteria for accepting and offering contributions, benefits, invitations and hospitality, as described in the Itaú Unibanco Code of Ethics and internal policy.

#### **Due diligence**

The Conglomerate adopts due diligence procedures corresponding to the business risk, activities and in the jurisdictions in which it operates. Thus, the conglomerate:

- Includes, when applicable, in the drafts of strategic partnership agreements and mergers and acquisitions, clauses that promote the protection of Itaú Unibanco for violations of the law, including Law 12,846 / 13.
- Performs, when applicable, in the course of proprietary Mergers and Acquisitions deals, due diligence to identify possible signs of corruption and other illicit acts.

#### **Transparency and Accountability in Financial Management**

Preparing accounting and financial statements in the Conglomerate must comply with the laws, standards and regulations in force in the countries in which it operates, and accurately and clearly translates the transactions carried out by the Conglomerate, in order to ensure equality and transparency to stakeholders in accordance with the internal policy

Internal Audit assesses the effectiveness of controls related to accounting management and generation of financial reports; the governance structure designed to ensure compliance by the Conglomerate with legal and regulatory standards; and verifies the accuracy, reliability and timeliness of relevant information, of an accounting, managerial and operational nature

The Independent Audit performs mandatory recurring audits of financial statements of the Conglomerate's companies.

Additionally, Itaú Unibanco also follows rules defined to comply with the Sarbanes-Oxley Law.

#### **Risk Assessment and Monitoring**

The Conglomerate assesses the risks related to the topics of this Policy through its risk management, internal controls, and compliance structure,

Periodic monitoring and assessments are carried out to verify the effectiveness of controls and, considering the institution's risk profile, according to internal policies

There is governance for assessment and approval of Products with a focus on risk management, observing the applicable standards and regulations and the best market practices, defined in the internal policy.

The risk assessment takes into account aspects related to the interaction with the public sector, sectors, and business partners, in addition to the nature of the transaction.

### **RESPONSIBILITIES**

#### **Comitê de Auditoria and Board of Directors**

To approve the guidelines of this Policy and monitor the Integrity and Ethics Program.

#### **Comissão Superior de Ética e Sustentabilidade**

To evaluate and decide on corporate topics that involve business and workplace ethics.

To establish guidelines and approval authorities for processes related to the Integrity and Ethics Program, including those related to corruption prevention.

#### **Comitê de Integridade e Ética**

To discuss legal understandings of matters related to the Integrity and Ethics Program, including with regard to corruption prevention.

To indicate and approve process improvements due to regulation, identified risks, complaints, among others.

To monitor compliance with policies and procedures related to preventing corruption.

#### **Comitês Setoriais de Integridade e Ética**

To assess and decide on specific topics in the areas of the conglomerate that involve conflicts related to business ethics and in the work environment.

To assess compliance with integrity and ethics institutional policies in their operations.

To submit proposals to other Committees.

#### **Diretoria Risco Operacional**

To certify, in its competence, the efficiency of the control environment through monitoring programs, control tests, independent residual risk reports, as defined in the internal policie.

#### **Diretoria Compliance Corporativo**

To certify, in its competence, the efficiency of the control environment through monitoring programs, control tests, independent residual risk reports, as defined in the internal policie.

To coordinate the Integrity and Ethics Program implementation, monitoring and evolution, being independent in the exercise of its functions and having direct communication with any manager or employee and access to any necessary information within the scope of its responsibilities.

To establish parameters, coordinate preparation and implementation of corruption prevention training for managers and employees, as well as awareness campaigns in Brazil and International Business Units.

To answer questionnaires, market research, internal and external reports related to preventing and fighting corruption, as required.

To coordinate the Itaú Unibanco representatives participation in the representative entities of their industry sectors to participate in meetings, committees, commissions, subcommittees and working groups, or to occupy positions and functions in these entities, enabling the assessment and recommendation of proposals related to this Policy topic, as defined in the internal policy.

To assess eventual adoption to voluntary commitments for preventing and fighting corruption.

To clarify doubts about this Policy and its application as well as receive contributions for this policy or for the Integrity and Ethics Program, through e-mail: [COMITEDEINTEGRIDADEEEETICA@itau-unibanco.com.br](mailto:COMITEDEINTEGRIDADEEEETICA@itau-unibanco.com.br)

To report the Program activities to the Audit Committee, Board of Directors and Ethics and Sustainability Superior Commission and coordinate the Comitês de Integridade e Ética and sector Integrity and Ethics Committees.

To coordinate the Integrity and Ethics Program implementation, monitoring and evolution in International Units.

This Department is prohibited from managing any business that may compromise its independence or generate conflicts of interest, as defined in the internal policy.

#### **Diretoria de Segurança Corporativa**

To keep the reporting channel for receiving suspicions and reports related to possible violations of this Policy guidelines accessible to all.

To investigate the complaint and assess responsibilities of suspected or confirmed situations and take the necessary measures.

To provide confidential handling of corruption or bribery reports, whether identified or anonymous, regardless of the stakeholder reporting a complaint or a suspicion.

To maintain a history of procedures and decisions taken to handle the complaint.

#### **Diretoria de Risco de Crédito, Modelagem e PLD**

To performs the evaluation of KYs described in this policy in accordance with the internal policie and other related documents.

#### **Diretoria Jurídica**

Interpret changes in regulations to support the updating of this Policy, the Integrity and Ethics Program and guidelines on the subject.

To clarify specific questions related to regulations involving the issue of corruption prevention, when requested.

To Prepare, establish, and review, when necessary, anti-corruption clauses to be included in contracts.

To assist in preparing and reviewing corruption prevention training and awareness campaigns.

To assist in preparing responses to questionnaires, surveys received from the market and internal and external reports related to the topic of corruption prevention, when requested.

To assist in reviewing and discussing proposals related to the topics of this Policy discussed in the representative entities.

#### **Internal Audit**

To evaluate, in its competence, the effectiveness of controls related to this policy.

#### **Conglomerate Internal Departments**

To follow this Policy guidelines and other related documents.

To assist in raising the awareness of people with whom you have a relationship, including customers, partners, suppliers, and other stakeholders, about the guidelines of this Policy.

To define and implement policies, procedures, and controls compatible with the complexity and risks associated with its operations and in accordance with the guidelines of this policy and other related documents.

#### **Managers and Employees**

To know and follow this Policy guidelines.

To know and follow the local regulations applicable to the country in which they operate.

To report immediately to the competent channels any and all suspicions or non-compliance with this policy, related to the practice of corruption or bribery or related activities such as atypical transactions, money laundering and other illegal activities.

To conduct the mandatory corruption prevention training provided by Itaú Unibanco.

To sign, annually the Term - Integrity Policies attesting your knowledge and agreement with this Policy provisions.

#### QUESTIONS AND CLAIMS CHANNELS

Channel	Topics	Contacts
Ethics Consulting Email LINK	Questions about: - Itaú Unibanco Code of Ethics - Corporate Policy on Integrity, Ethics and Conduct - Corporate Corruption Prevention Policy. - Conflicts of Interest - Ethical dilemmas.	<a href="mailto:comitedeintegridadeetica@itau-unibanco.com.br">comitedeintegridadeetica@itau-unibanco.com.br</a>
Superintendência de Inspeção LINK to email	Questions, suspicions, and claims about: - Employees behavior deviations. - Fraud in electronic channels. - Documentary fraud, in its various forms. - Acts of corruption and bribery. - Theft and theft to Business Units and extensions, customers, and employees. - Break-ins in general. - Extortion through kidnapping. - Information security incidents, physical, personal and property.	Phone: 0800-723-0010 and 0300 100 0341; - Website: <a href="http://www.itau.com.br/atendimento/pravoce/Denuncia">www.itau.com.br/atendimento/pravoce/Denuncia</a> ; - External e-mail: <a href="mailto:inspetoria@itau-unibanco.com.br">inspetoria@itau-unibanco.com.br</a> and <a href="mailto:fornecedor_relatos@itau-unibanco.com.br">fornecedor_relatos@itau-unibanco.com.br</a> ; Pouch mail: Gerência de Inspeção/São Paulo
Comitê de Auditoria LINK to email	Suspicious and claims: - Legal or regulatory non-compliance. - Fraud and errors in auditing, accounting, and internal controls.	External email: <a href="mailto:comite.auditoria@itau-unibanco.com.br">comite.auditoria@itau-unibanco.com.br</a> . Mailing address: A/C Comitê de Auditoria Itaú Unibanco Holding S.A. - Praça Alfredo Egydio de Souza Aranha, 100 - Torre Olavo Setúbal, Piso PM, São Paulo - SP - CEP 04344-902.

Note: In International Business Units, the whistleblower may communicate to one or more of the following channels: (i) local channels available in the local Codes of Ethics (ii) the following channels of the headquarters: Inspeção and Comitê de Auditoria according to specific governance.

Any irregularities in processes and procedures identified during the assessment investigation are indicated to the departments for timely regularization.

#### PROTECTION FOR CLAIMS

- Managers and employees may not perform acts of Retaliation against anyone who, in good faith, reports or expresses a complaint, suspicion, doubt or concern regarding possible violations of the guidelines of this Policy; and provide information or assistance in investigations regarding such possible violations.
- Managers and Employees must preserve the confidentiality of information related to the guidelines of this Policy possible violations investigation.
- 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 guidelines.
- Sanctions should also be applied to managers or employees who are proven to use bad faith when reporting possible violations of this Policy guidelines or reporting facts known to be false.

## **8. PENALTIES**

Non-compliance with any guidelines or principles established in this Policy is subject to disciplinary sanctions provided, administrative or criminal measures, without prejudice to other penalties or measures applicable in accordance with the legislation in force.

### **RELATED DOCUMENTS**

- United States Foreign Corrupt Practices Act (FCPA).
- UK Bribery Act 2010.
- UN Global Compact
- UN Convention against Corruption.
- Organization for Economic Cooperation and Development Convention on Combating the Corruption of Foreign Public Officials in International Business Transactions (OECD Convention).
- Organization of American States (OAS) Convention against Corruption of the .
- Brazilian Penal Code.
- Administrative Improbability Law - No. 8,429 / 92.
- Conflict of Interest Law - No. 12,813 / 13.
- Law on Administrative and Civil Accountability of Legal Entities - No. 12,846 / 13 and respective regulations at the state and municipal levels.
- Federal Decree - nº 8,420 / 15.
- Ordinance on the evaluation of corporate integrity programs - No. 909/15 of CGU.
- Ordinance on the determination of administrative responsibility and for signing leniency agreement referred to in Law No. 12,846, of August 1, 2013 - No. 910/15 of the CGU.
- Normative Instruction Brazilian Government Accountability Office nº 01/15.
- Integrity Program - Guidelines for Private Companies published by the Brazilian Government Accountability Office on 09/2015.
- Febraban SARB 21 self-regulation - Integrity Program to prevent corruption and other acts harmful to national or foreign public administration.
- International Business Units: Country-specific regulations.
- Global Reporting Initiative (GRI): 205-2, 103-1 Anticorruption, 103-2 Anticorruption and 103-3 Anticorruption.
- Business Pact for Integrity and Against Corruption - Instituto Ethos
- Business Contribution for the Promotion of the Green and Inclusive Economy.
- Pro-Ethical Company 2016 and 2017.
- Positive Impact Commitment: Ethics in relationships and business.

Approved by the Board of Directors on October, 2020.