



BB Complainant Protection Commitment and Non-Retaliation Commitment

Ética e
Ouvidoria Interna



GOAL

Present Banco do Brasil's position regarding measures to promote the protection of complainant, witnesses and/or deponents in good faith and mitigate possible retaliation, contributing to the maintenance and improvement of the ethical environment at Banco do Brasil.

Context

Banco do Brasil, adhering to the best market practices and ESG (Environmental, Social and Governance) guidelines, constantly seeks to develop actions that guarantee the company's sustainability, integrity and reliability.

In addition, it observes the need to consolidate an ethical and harmonious environment for all stakeholders and any other groups and people with whom it relates.

Since BB is a company that follows and adheres to the Novo Mercado guidelines and has a consistent and widely disseminated Code of Ethics, the present document represents yet another step forward for the organization.



TO WHOM IT APPLIES

Banco do Brasil declares this commitment and directs its provisions to the following public:

- Complainants
- Witnesses
- Deponents
- Employees in charge of ethical and disciplinary processes



GENERAL ASPECTS

Banco do Brasil values the manifestation of complainants and deponents in good faith and understands that this role contributes to the improvement of internal processes and the mitigation of risks. Therefore, it is our commitment to protect those who rely on available channels to report malpractice.



Premise

BB declares its repudiation of acts motivated by revenge and/or persecution against the employee who makes a complaint through the Internal Ombudsman or the Reporting Channel, and of witnesses and/or deponents who collaborate in the elucidation of the facts.

Careful

Banco do Brasil adopts measures to protect the identity of the complainant and the information received from the moment the complaint is received, including anonymously, until the outcome of the cases.

Integrity

The care and protection of these colleagues contribute to a dignified, safe and comfortable work environment, in addition to being aligned with the Integrity value and the Code of Ethics.



Protection to the Complainants, Witnesses and Deponents

Complainants and other people who contribute to denouncing and clarifying irregular practices, misconduct, maladministration and other irregularities play a fundamental role, as they help in mitigating and dealing with situations that may threaten BB's reputation, its results, its integrity and its perpetuity.

However, those who decide to report may be exposed to personal risks that must be considered by our organization.

Confidentiality

Banco do Brasil guarantees confidentiality of the source and anonymity. Only the employees responsible for conducting or deciding on the solution have access to the identity of the complainant, the witness and the deponent so that it is possible to clarify doubts and to have as much information as possible.

Consent

In any case, even those in which the identification of the complainant, the witness or the deponent is implied, the identification will only be given with their consent. Failure to state your identification will be considered as non-agreement.





Retaliation

Retaliation is the intentional action to cause harm to a co-worker who reported or presented evidence of an irregular practice or non-compliance with BB's Code of Ethics.

Description

The act of reprisal is characterized when an employee involved in Disciplinary Action or demands from the Internal Ombudsman, or, even, an employee under his guidance, intentionally adopts behaviors that aim to harm the complainant, claimant, witness, deponent or investigator of the complaint under analysis.

Attention!

An attitude is not always retaliation

Actions and attitudes can be interpreted in different ways.

Administrative decisions inherent to the employment relationship are part of everyday life.

It is important to observe each concrete situation carefully and impartially to identify whether it is in fact an act of retaliation.



Exemplos

Retaliation can be configured by behaviors such as:

- Sending messages with derogatory or threatening content
- The disproportionate reduction or elevation of functional responsibilities in relation to those previously delegated
- The sudden change and without apparent reason of the employee's attributions
- Issuing or reproducing derogatory comments that harm the honor and reputation of a colleague
- The evaluation of performance by goals and competences in a way that is different from reality
- The exclusion of the colleague from work meetings previously correlated to his activities
- Failure to share strategic information related to topics under your responsibility with a colleague
- The lack of communication necessary for the development of professional activities
- Explicit threats of revenge and hostile treatment



Specialized Teams

The employees in charge of are trained and stand out for their discretion, impartiality and multidisciplinary perspective, and their work is guided by integrity and a sense of justice.



Investigating Instances

When it is necessary to forward the process to another instance, the identification elements that allow the association of the complaint to the complainant will be deleted or blacked out. Narratives that associate the complainants with specific individuals, places, times or facts will also be preserved.





Employee Responsibility

BB employees are expected to be committed to the truth and not to omit in the face of irregularities or their suspicion, including fraud and corruption.

Commitment of Complainants, Witnesses and Deponents

The responsibility of complainants, deponents and witnesses covers:

- ✓ Commitment to secrecy, refraining from commenting on their contribution to the process and/or on the reputation of the accused
- ✓ The duty to cooperate with investigations as a way of supporting Banco do Brasil's integrity and institutional ethics
- ✓ The obligation to continue performing their professional activities on a regular basis.





Provisions

The combat or mitigation measures, as well as the respective protective measures for the complainant, witness and deponent may vary according to the context, severity, risk of conduct and/or security.



Protective Measures

Protective measures may include processes linked to the Culture and People Management Board, without prejudice to other processes deemed relevant, or involving other areas of BB.

Systemic View

The multidisciplinary team will be responsible for adopting actions that allow the cessation of any damage to the complainants or other people who contributed to the conduct of the complaints.

Timing

Situations of possible retaliation must be immediately reported and evaluated, with objective and effective referrals.



Measures

The repudiation of any act of persecution or retaliation materializes from the guidelines contained in BB's Code of Ethics.

Mitigation

When it is evidenced that an employee has committed an act of reprisal against a complainants, witness or deponent, the agent will be subject to the Ethics/Disciplinary Assessment, considering the seriousness and impact of his/her conduct.

Sanctions

After a rigorous evaluation of the deviation, those involved may receive ethical and disciplinary penalties, such as a Term of Acknowledgment, Warning, Suspension, Dismissal, among others.

Scope

The measures provided for in this commitment apply to all BB employees and members of Senior Management, wherever they are working and whatever their role.

If any retaliation comes from a member of the Executive Board or a member of the Board of Directors, the incident will be forwarded to the Reporting Channel.





Doubts

- What's the best way to avoid retaliation?

Banco do Brasil guarantees the confidentiality of the source. Only employees directly involved in fact-checking have access to this information so that, if necessary, they can contact you to clarify questions or request evidence. However, if disclosing your identity is uncomfortable for you, we encourage you to submit your claim anonymously.

- How long does it take between reception of the retaliation demand, analysis of the complaint and application of a protection measure?

Each case will be evaluated according to its severity and impact. Remembering that analysis is a thorough verification of facts and context. Several areas can be triggered until the effective application of a protection measure. Our efforts are aimed at speeding up the process and providing the best possible experience for employees.

- What happens if I report misconduct and the allegation is found to be unfounded and I then face retaliation?

Regardless of the outcome of your good faith report, whether upheld, partially upheld or unfounded, you can ask for help and ask for protection from retaliation.



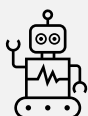
Report retaliation

The employee who identifies situations of possible retaliation must activate the Bank's internal channels and immediately report the occurrence.

Internal Ombudsman



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Ethics and Integrity are the foundations of trust