



# Banco do Brasil's Compliance and Integrity Program



November | 2024



# Message from Senior Management

Banco do Brasil is an institution with over 200 years of history, widely recognized for its essential role in the socioeconomic and cultural development of the country. We are a benchmark in reliability and solidity in all the segments in which we operate.

Our purpose reflects the reason for our existence: To be close to people, and relevant to their lives at all times. To achieve this, we base our actions on values such as proximity, integrity, diversity, and commitment to society.

For us, integrity is an essential value; it is the foundation of our legitimacy and permeates our entire governance and management structure. The promotion of integrity by Senior Management reinforces Banco do Brasil's commitment to ethics, values, and principles that guide our actions.

Our Compliance and Integrity Program, through integrated principles and guidelines, serves as a guide for the development of best practices in corporate management. The Program's objective is to prevent, detect, and address the Institution's exposure to non-compliance with laws, rules, and external and internal regulations, as well as with the Code of Ethics. Additionally, it encompasses important aspects of risk management and internal controls; the prevention and combat of illicit activities, conflicts of interest, unsustainable practices, and inappropriate conduct, including harassment and discrimination.

Banco do Brasil's Senior Management, by approving this new edition of the Compliance and Integrity Program, reaffirms its commitment to ethics, transparency, and sustainability in business, while providing all the necessary resources to ensure the Bank remains a benchmark for integrity and transparency in the market.

*Board of  
Directors*

*Executive  
Office*

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# Integrity at Banco do Brasil

**We operate based on respect, trust, ethics, and transparency.**

Integrity management at Banco do Brasil encompasses institutional measures and actions aimed at preventing corruption, fraud, conflicts of interest, and other types of misconduct. Additionally, we promote respect for human rights, diversity, and equity within the corporate environment, across the entire value chain, and throughout the supply chain. This commitment is reinforced by our Compliance and Integrity Program, supported by Senior Management.





# Compliance at Banco do Brasil

Being in compliance means adopting a set of policies, procedures, and practices that ensure adherence to laws, regulations, norms, and ethical standards applicable to our field of operation.

We are committed to implementing effective internal measures that guarantee our business is conducted within legal standards, balancing efficiency and control, and fostering an environment of integrity and transparency.



# Principles of the Compliance and Integrity Program



## Integrity

This principle guides the choice of actions that are not only legal but also honest and fair. It represents the consistency between what a person or institution says and its actions, staying true to principles and values, even when faced with challenges or opportunities for personal or organizational gain.



## Ethics

To talk about ethics is to talk about values. These values guide interpersonal relationships and are grounded in ethical behavior, integrity, and transparency, as well as respect for laws and internal regulations. The ethical conduct of each employee plays a decisive role in fostering a healthy and sustainable organizational culture.



## Regulatory Compliance

Its objective is to ensure compliance with the laws and regulations applicable to our area of operation, strengthening the pursuit of sustainable business practices while mitigating operational and reputational risks.



## Social, Environmental, and Climate Responsibility

It incorporates social, environmental, and climate aspects into business operations and administrative practices, aiming to create value for stakeholders and minimize potential negative impacts of business activities on the environment and society.



## Corporate Governance

Banco do Brasil is one of the largest financial institutions in Latin America, standing out in its areas of operation. This achievement is attributed to its robust governance system, comprised of rules, structures, and processes that guide and oversee the Bank's management.

# Banco do Brasil's Compliance and Integrity Program

Banco do Brasil's Compliance and Integrity Program aims to contribute to the organization's sustainability. Through a set of guidelines, tools, and procedures, it supports risk management and internal controls, focusing on achieving compliance and ensuring the security of business operations, processes, products, services, and channels. The program also addresses aspects of social, environmental, and climate responsibility, prevention of illicit acts, misconduct, and reputational damage.

Additionally, it helps to reduce financial losses and provides the Bank with the credibility needed to demonstrate its ethical stance and its responsible, integral, and sustainable business practices.

Acting with integrity and compliance is a responsibility that rests within each of us, including Senior Management, all employees (in Brazil and abroad), collaborators, and anyone acting on behalf of or providing services to Banco do Brasil, regardless of their role. Each individual is primarily responsible for managing their processes, controls, and risks.



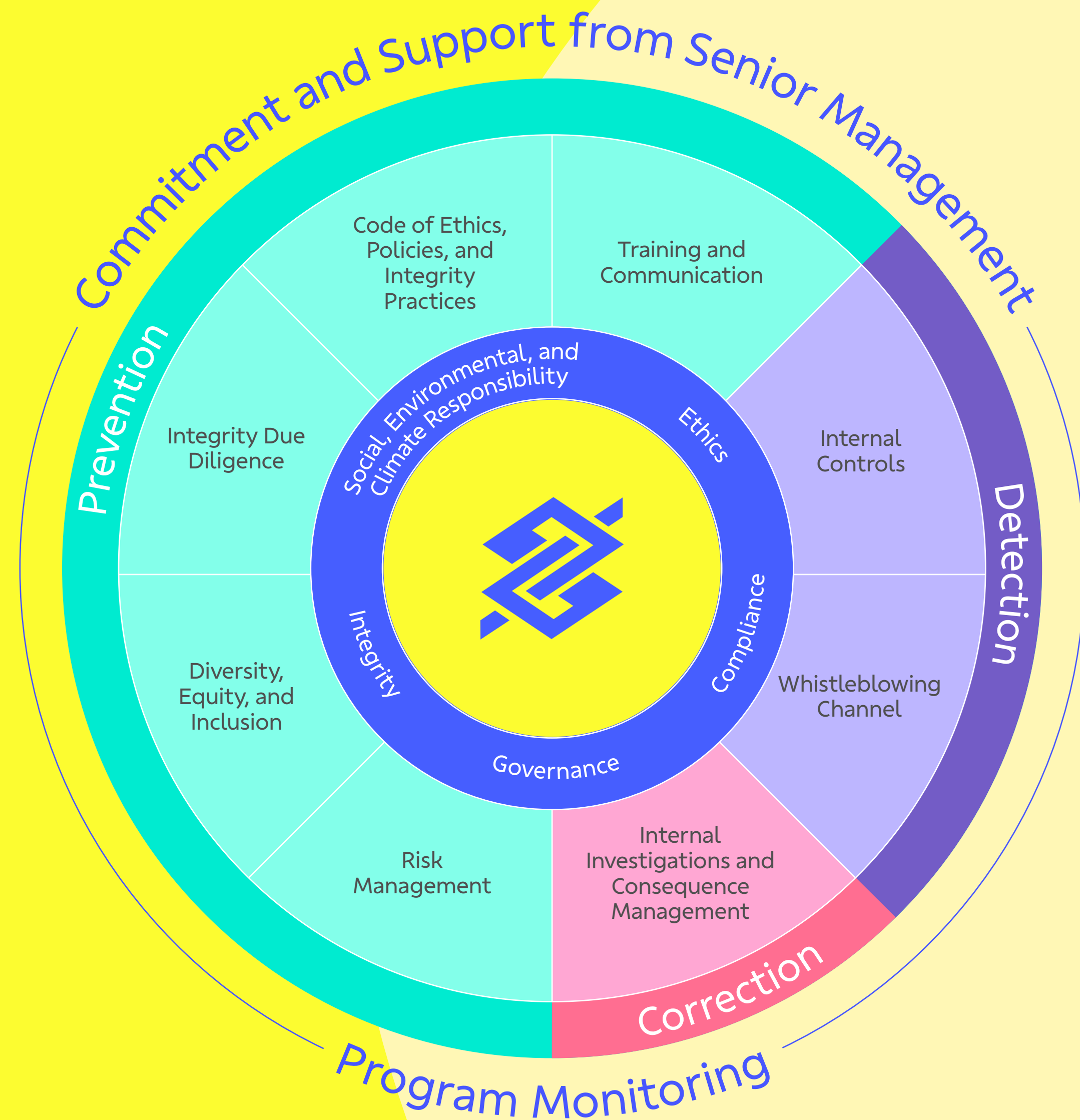
The Program also applies to units located abroad, adhering to respective local laws and international best practices. It is expected that BB-affiliated entities (ELBBs) establish their directives based on these guidelines, considering their specific needs as well as the legal and regulatory aspects to which they are subject.

**This Program complies with applicable regulations, such as Law No. 12,846/2013 (Anti-Corruption Law), Decree No. 11,129/2022, Law No. 12,813/2013 (Conflict of Interest Law), and FEBRABAN's SARB Normative 021/2019. Additionally, it follows market best practices, including ISO 37.301:2021, ISO 26.000:2010, ISO 30.415:2021 standards, FEBRABAN's Competitive Compliance Policy, and the CGU's Manual for Implementing Integrity Programs.**

*\* Interns, apprentices, executives, and employees of contracted companies.*



Banco do Brasil's Compliance and Integrity Program can be represented by the adjacent framework.





# The Compliance and Integrity Program of Banco do Brasil

"Article 56 of Decree No. 11,129/2022, which regulates Law No. 12,846/2013, defines the "Integrity Program" as, within the scope of a legal entity, a set of internal mechanisms and procedures for integrity, auditing, and the encouragement of reporting irregularities, along with the effective application of codes of ethics and conduct, policies, and guidelines, with the purpose of: I – Preventing, detecting, and addressing misconduct, fraud, irregularities, and illegal acts committed against the public administration, whether domestic or foreign; and II – Promoting and maintaining a culture of integrity within the organizational environment. Furthermore, Article 57 outlines the parameters that must be included in the Integrity Program. At Banco do Brasil, these integrity parameters are incorporated into this Compliance and Integrity Program."

**At Banco do Brasil, these integrity parameters are incorporated into this Compliance and Integrity Program.**

## **Independence, Structure, and Authority of the Internal Body Responsible for Implementing the Integrity Program and Monitoring its Compliance.**

In public administration, any fraud committed against an agency is considered an act against public administration itself and is, therefore, addressed from the same perspective as an act of corruption. It may be understood that, in public administration, the concepts of fraud and corruption, in a broad sense, are intertwined, encompassing actions that grant undue advantages to an individual or entity to the detriment of society or public assets.

The Internal Controls and Compliance Board (Dicoi) is the body responsible for the Compliance and Integrity Program, conducting monitoring, evaluation, investigation, and reporting on the Bank's compliance status.

In its institutional role, this area operates independently, with the autonomy to recommend necessary changes, as well as allocated human and material resources to support its activities. Learn more about our internal structure at:

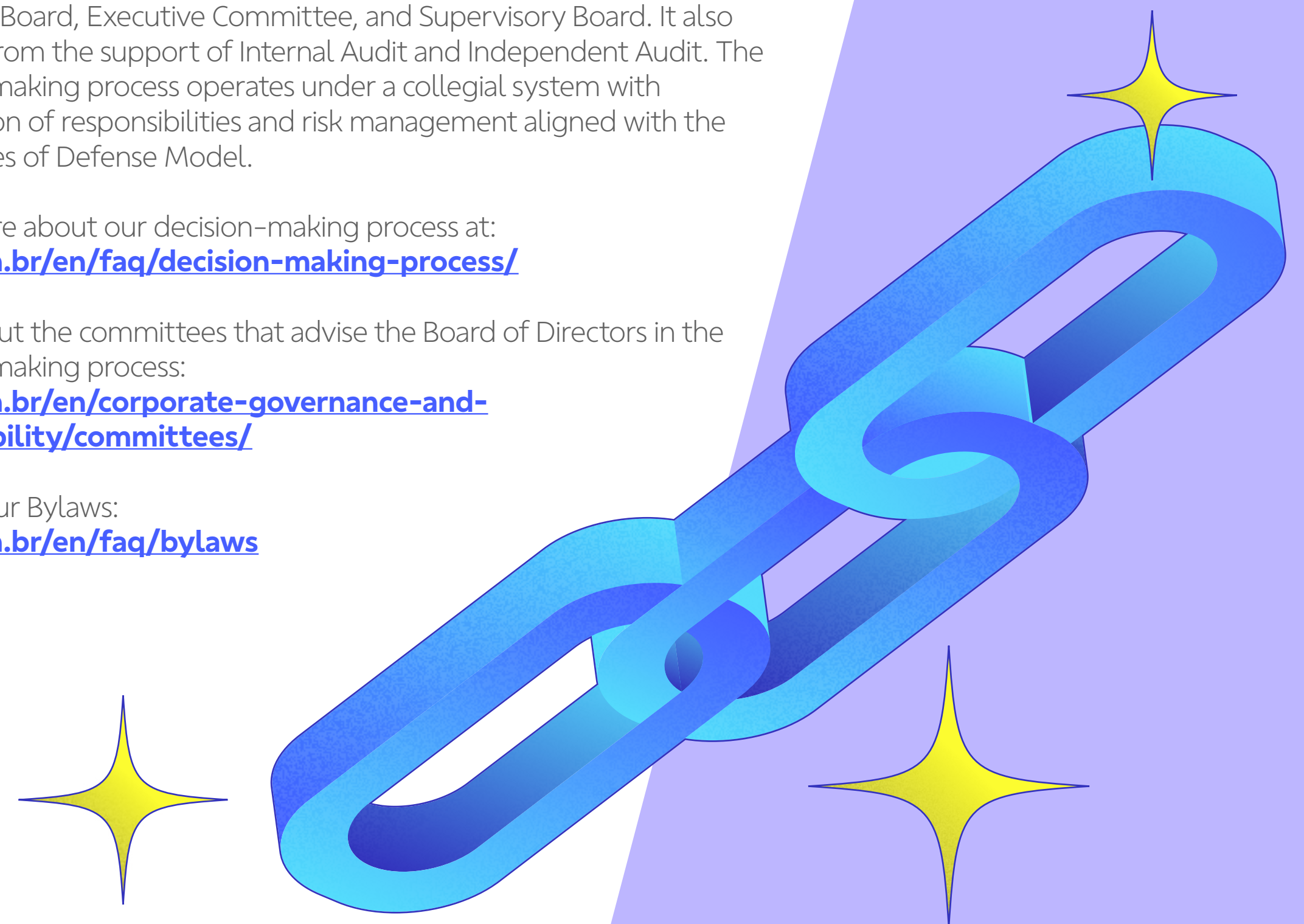
[ri.bb.com.br/en/banco-do-brasil/organizational-structure-2](https://ri.bb.com.br/en/banco-do-brasil/organizational-structure-2)

Our Corporate Governance structure comprises the General Meeting of Shareholders, Board of Directors (BoD), Advisory Committees to the BoD, Executive Board, Executive Committee, and Supervisory Board. It also benefits from the support of Internal Audit and Independent Audit. The decision-making process operates under a collegial system with segregation of responsibilities and risk management aligned with the Three Lines of Defense Model.

Learn more about our decision-making process at:  
[ri.bb.com.br/en/faq/decision-making-process/](https://ri.bb.com.br/en/faq/decision-making-process/)

Learn about the committees that advise the Board of Directors in the decision-making process:  
[ri.bb.com.br/en/corporate-governance-and-sustainability/committees/](https://ri.bb.com.br/en/corporate-governance-and-sustainability/committees/)

Explore our Bylaws:  
[ri.bb.com.br/en/faq/bylaws](https://ri.bb.com.br/en/faq/bylaws)





# Guidelines

# Commitment and Support from Senior Management

Banco do Brasil's Senior Management, including the Supervisory Board, demonstrates its unwavering commitment to ethics and integrity. It fosters an organizational culture of integrity that values diversity and inclusion, psychological safety, and the adoption of ESG practices.

To ensure the effectiveness and dissemination of the Program, Banco do Brasil's Senior Management provides resources, which are allocated to annual training programs for all audiences, tools for evaluating the program's effectiveness, and monitoring indicators.

The dissemination of the Program occurs continuously, both internally and externally, with strategic indicators reported to Banco do Brasil's Senior Management. In addition to this Program, we highlight other actions below that demonstrate the management's commitment.

## Concept of Senior Management

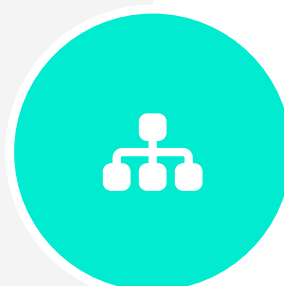
Members of the Board of Directors (BoD) and the Executive Board, as established in Article 16 of Law No. 13,303/16 and Article 11 of Banco do Brasil's Bylaws.

## Selection of Senior Management

The nomination, election, and appointment of members of the Board of Directors (BoD), Advisory Committees linked to the BoD, Supervisory Board (SB), Executive Board (Direx), and the heads of Internal Audit and the Ombudsman at Banco do Brasil are conducted in accordance with the Appointment and Succession Policy.

Learn about our Appointment and Succession Policy at: <https://ri.bb.com.br/en/faq/politicas-diretrizes-e-com-promissos/>

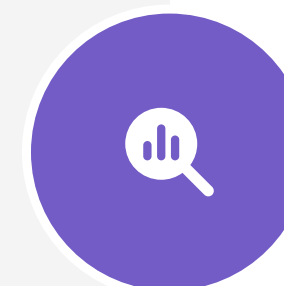
Provision of a dedicated structure for the establishment, implementation, maintenance, and continuous improvement of the integrity and compliance system.



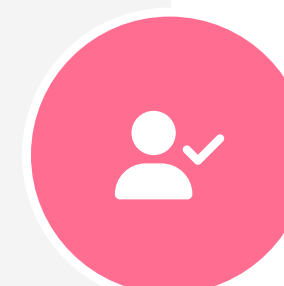
Approval by the Board of Directors, with prior review by the Executive Committee, of the General Policy and all Specific Policies of the Bank.



Supervision of the Compliance and Integrity Program through periodic reports.



Among the criteria for nomination, disqualifications, and prohibitions for participation in administrative bodies and advisory committees to the Board of Directors, integrity stands out, along with requirements such as extensive knowledge of corporate governance, compliance, corporate accountability, experience, moral integrity, an unblemished reputation, and technical expertise compatible with the position. The documents comprising the Bank's Governance Framework also establish rules to prevent conflicts of interest, ensure self-regulation, and segregate functions.





# Risk Management

## Risk Assessment

Risk management at Banco do Brasil includes a dedicated structure for periodic analysis and reassessment to make the necessary adjustments to the Compliance and Integrity Program.

Risk is the possibility that the actual outcome of a given event differs from the expected outcome, negatively impacting the organization's ability to achieve its objectives.

Understanding the threats, risks, and objectives of the organization is essential for structuring an accurate assessment, combining the likelihood of occurrence with the potential impacts such events would have if they were to materialize.

Regarding integrity, Banco do Brasil conducts continuous assessments of events related to integrity risks.

The risk management culture is continuously promoted within the Bank, aiming to enhance professional development and to raise awareness among all employees about the importance of risk management.

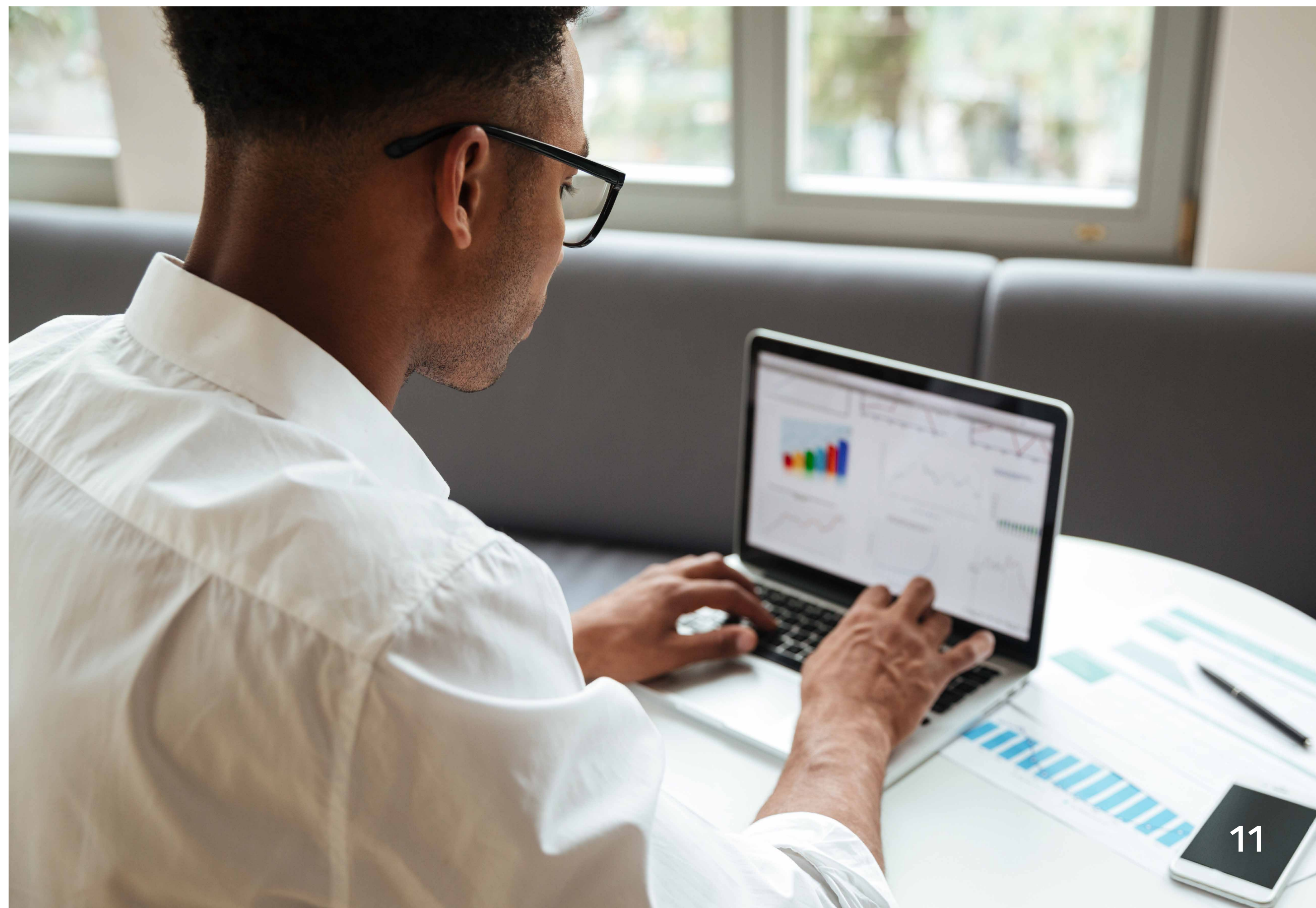
## Three Lines of Defense Model

The Three Lines of Defense Model (MRLD) is a best practice adopted by Banco do Brasil for an integrated and efficient risk and internal control management. The model defines the roles and responsibilities of the different areas and processes that make up the lines, as well as their interaction, to provide greater security and to ensure the achievement of strategic objectives.

## Regulatory Monitoring

Regulatory monitoring is a systematic and continuous process of collecting relevant data on regulatory changes that may impact Banco do Brasil's activities. The objective is to ensure regulatory compliance across the Bank's various processes, products, services, and channels, thereby mitigating compliance risks.

Additionally, continuous and timely monitoring aims to ensure that any changes in regulations are properly internalized, with processes adjusted in a timely manner.





# Code of Ethics, Policies, and Integrity Practices

## Code of Ethics

The Code of Ethics of Banco do Brasil is the document that outlines the Bank's commitments and guidelines regarding its stakeholders and society. It presents its purpose, values, and principles. The document is periodically reviewed to provide guidance on how the company should act in the face of contemporary challenges, and its approval is the responsibility of Banco do Brasil's Board of Directors.

The assumptions and guidelines outlined in Banco do Brasil's Code of Ethics must be preemptively observed with attention and care, as the responsibility for its application and dissemination lies with all Bank employees.

At Banco do Brasil, it is expected that members of all units, as well as suppliers, service providers, and others (those acting on behalf of or providing services to Banco do Brasil), act in alignment with the ethical principles, norms, policies, and culture of the organization. These guidelines should govern both the conduct of employees and the activities carried out in the workplace, in interactions with the public sector, and in competitive market practices.

The Code of Ethics can be found on the following website: [ri.bb.com.br/en/banco-do-brasil/ethics/](https://ri.bb.com.br/en/banco-do-brasil/ethics/).

## Policies

Policies are guidelines on conduct that Banco do Brasil adopts in specific pre-defined situations, defining the scope of action and reflecting the general behavioral standards of a lasting nature. They are classified into two types:

### General Policies

They guide organizational behavior on matters of interest to all areas of Banco do Brasil.

### Specific Policies

They guide the behavior of specific areas.

All General and Specific Policies of the Bank are part of the Institution's Governance Framework and are approved by the Board of Directors. Banco do Brasil's policies can be found at: [ri.bb.com.br/en/corporate-governance-and-sustainability/bylaws-policies/](https://ri.bb.com.br/en/corporate-governance-and-sustainability/bylaws-policies/).

# Code of Ethics, Policies, and Integrity Practices

## Integrity Practices

Banco do Brasil has specific procedures and policies in place to prevent and combat Money Laundering, Fraud, Terrorism Financing, and Corruption.

Additionally, it also has specific procedures to prevent fraud and illegal activities in public procurement processes, as well as rules governing relationships, contracting, and interactions with the public sector (even when intermediated by third parties), public officials, and companies within the direct and indirect public administration. These rules encompass Government Relations activities, public procurement procedures, the execution of administrative contracts, and interactions with regulatory authorities.

Additionally, it also has specific procedures to prevent fraud and illegal activities in public procurement processes, along with rules for managing relationships, contracting, and interactions with the public sector (even when intermediated by third parties), public officials, and entities within the direct and indirect public administration. These rules include activities related to Government Relations, public procurement procedures, the execution of administrative contracts, and compliance with regulatory authorities.

### Conflict of Interest

At BB, Conflict of Interest is monitored and addressed across various contexts. We implement measures to identify, classify, and detail situations that contravene Article 5 of Law No. 12,813 of May 16, 2013 (Conflict of Interest). Additionally, we guide our employees on the implications of involvement in conflict of interest situations, such as:

- Procurement Processes
- Contract Management
- Supplier Relations
- Transactions with Related Parties
- Sponsorship and Promotion
- Parallel Employment Activities, whether paid or unpaid

### Donations to Candidates and Political Parties

BB does not make donations to candidates or political parties, as stated in its Code of Ethics (“We do not fund political parties or candidates for public office in Brazil or in the countries where we operate”) and in the Private Social Investment Guidelines, which can be accessed at:

[bb.com.br/docs/portal/pub/DiretrizesInvestimentosSocialPrivado.pdf](http://bb.com.br/docs/portal/pub/DiretrizesInvestimentosSocialPrivado.pdf).

### Philanthropic Donations

The Private Social Investment (PSI) Guidelines stipulate that donations and partnerships must comply with the legal and regulatory requirements applicable to the Conglomerate and adhere to the Institution’s General Policies. These policies guide its behavior concerning ethics, and social, environmental, and climate responsibility. The achievement of social objectives aligns with state priorities, the expectations of BB’s stakeholders, and the needs of the communities involved, while remaining consistent with the Institution’s business objectives.

### Gifts, Hospitality, and Favors

As a mixed-capital company and part of the indirect federal public administration, Banco do Brasil adheres to rules for receiving gifts and hospitality similar to those established by the Public Ethics Commission of the Brazilian Government. These same rules guide the conduct of our departments and employees in offering gifts and promotional actions to public officials.

The Code of Ethics establishes guidelines for giving and receiving gifts and favors, while internal normative instructions provide detailed rules for participation in events, seminars, and trips sponsored by third parties.

### Sponsorship and Event Promotion

In interactions with public entities and officials, promotional activities adhere to the limits and guidelines established by specific legislation, including those addressing national and foreign anti-corruption practices.

### Unacceptable Behavioral Deviations and Combating Discrimination

To strengthen the culture of integrity, actions are implemented to promote awareness, literacy, leadership training, and non-violent communication. Additionally, unsustainable behaviors and practices are monitored, including those related to unacceptable conduct, such as workplace violence, harassment, and discrimination. Reporting of intolerable conduct and practices is encouraged. The Whistleblower Channel is available 24/7 to all audiences, and BB’s Whistleblower Protection and Non-Retaliation Commitment serves as an important incentive for employees and collaborators to contribute to maintaining the culture of integrity within our company.

### Ethics in Artificial Intelligence

Banco do Brasil also has guidelines for the ethical use of artificial intelligence, aimed at guiding the development of AI solutions, systems, and models. These guidelines are applied throughout all phases of the AI lifecycle, from problem understanding and solution planning to development, implementation, evaluation, and monitoring. The principles include transparency, explainability, fairness, security, reliability, autonomy, accountability, data and model privacy, guaranteed benefit to stakeholders, and social and environmental well-being.



# Diversity, Equity, and Inclusion | DE&I

Each of us is an essential part of diversity. Together, we build a more inclusive future.

## **Diversity**

Recognition of differences that manifest in multiple aspects, such as origins, cultures, beliefs, color, race, ethnicity, creed, religion, disabilities, physical, mental, or psychological conditions, gender, affective-sexual orientations, generations, language, among others.

## **Equity**

Promotion of fair and equitable treatment among diverse social groups and individuals, with the goal of equalizing opportunities.

## **Inclusion**

Development of processes, practices, and policies that foster a safe and welcoming environment, enabling diverse groups to coexist, grow, and actively participate in the company's initiatives on an equitable basis.

## **Diversity, Equity, and Inclusion**

Banco do Brasil respects, encourages, and values diversity and inclusion in relationships, while strongly opposing any behavior that could constitute harassment or discrimination of any kind.

Diversity is a core organizational value in Banco do Brasil's Corporate Strategy (ECBB) and one of BB's 12 Long-Term Sustainability Commitments. It guides the Bank's actions in alignment with societal demands and the United Nations' Sustainable Development Goals (SDGs).

Diversity, equity, and inclusion are essential principles for a company like Banco do Brasil, which values what matters most to people. The Compliance and Integrity Program supports demonstrating BB's commitment to DE&I, ensuring opportunities are distributed fairly and equitably, without any form of discrimination.

We reaffirm our commitment to respecting the dignity of all human beings. Our diversity, equity, and inclusion goals aim to increase the representation of society within our organization and promote initiatives on these topics among our internal and external audiences.

# Training and Communication

Training programs and communication initiatives are essential for promoting a culture of compliance and integrity. As part of the Program and a factor for cultural transformation and strengthening, we have structured initiatives focused on deepening knowledge on these topics and their application in business, process management, and relationships with diverse stakeholders.

The communication and education practices include a communication plan focused on compliance, ethics, and integrity.

## **Executive Leadership Training**

The participation of Executive Leadership members in training related to compliance, ethics, and integrity management is one of the practices that reinforce the support of senior management.

## **Training for Suppliers and Third Parties**

Banco do Brasil offers various courses under the "Courses Open to the Community" section of the UniBB Portal, providing learning opportunities for the external audience and sharing the knowledge developed by the Bank.

Banco do Brasil maintains a "Suppliers" page on the BB Portal, which provides, among other resources: guidance on how to become a BB supplier, instructions for service providers, the Bank's Specific Relationship Policy with Third Parties, Standards for Sustainable Procurement and Disposal, BB's Code of Ethics, institutional programs, information on ethics and integrity, and privacy and data protection. These resources aim to encourage companies to adopt best practices.

[UniBB - Banco do Brasil University](#)





# Integrity Due Diligence

Due Diligence is defined by the Office of the Comptroller General (CGU) as “the process of conducting prior verifications before engaging third parties and implementing measures to supervise those contractors, especially in situations with a high risk to integrity.”

In the due diligence process, we identify Politically Exposed Persons (PEPs).

**Third-Party Risk Management:** suppliers, correspondents, strategic partners, sponsored entities, donation beneficiaries, and other counterparties seeking to establish or maintain a relationship with Banco do Brasil are subject to an Integrity Due Diligence process, both prior to and throughout the duration of the contract. This procedure aims to assess the counterparty’s integrity and reputation, identifying potential risks that could impact the bank's integrity and strategic objectives.

**Corporate Transactions Management:** this includes measures to mitigate integrity risks, including corruption, in processes such as mergers, acquisitions, and other corporate restructuring activities.

**Procurement and Contract Management:** this encompasses specific procedures designed to ensure ethical participation in public tenders and the execution of contracts with the public sector. These procedures include prior assessment of the potential supplier’s integrity and reputation, as well as the fairness of the procurement process, prohibiting practices that violate the principles of equality and free competition.





# Internal Controls

These are processes and practices through which Banco do Brasil seeks to ensure that all planned and approved actions are properly executed. The aim is to safeguard assets, manage risks effectively, ensure the accuracy and reliability of reports and financial records, promote operational efficiency, and ensure adherence to the organization's policies.

Their purpose is to contribute to the achievement of strategic objectives and the long-term sustainability of the company, as they aim to mitigate significant risks.

Banco do Brasil has an Internal Control System tailored to its size and complexity, meeting regulatory requirements and aligning with the best governance practices.

## Financial Records

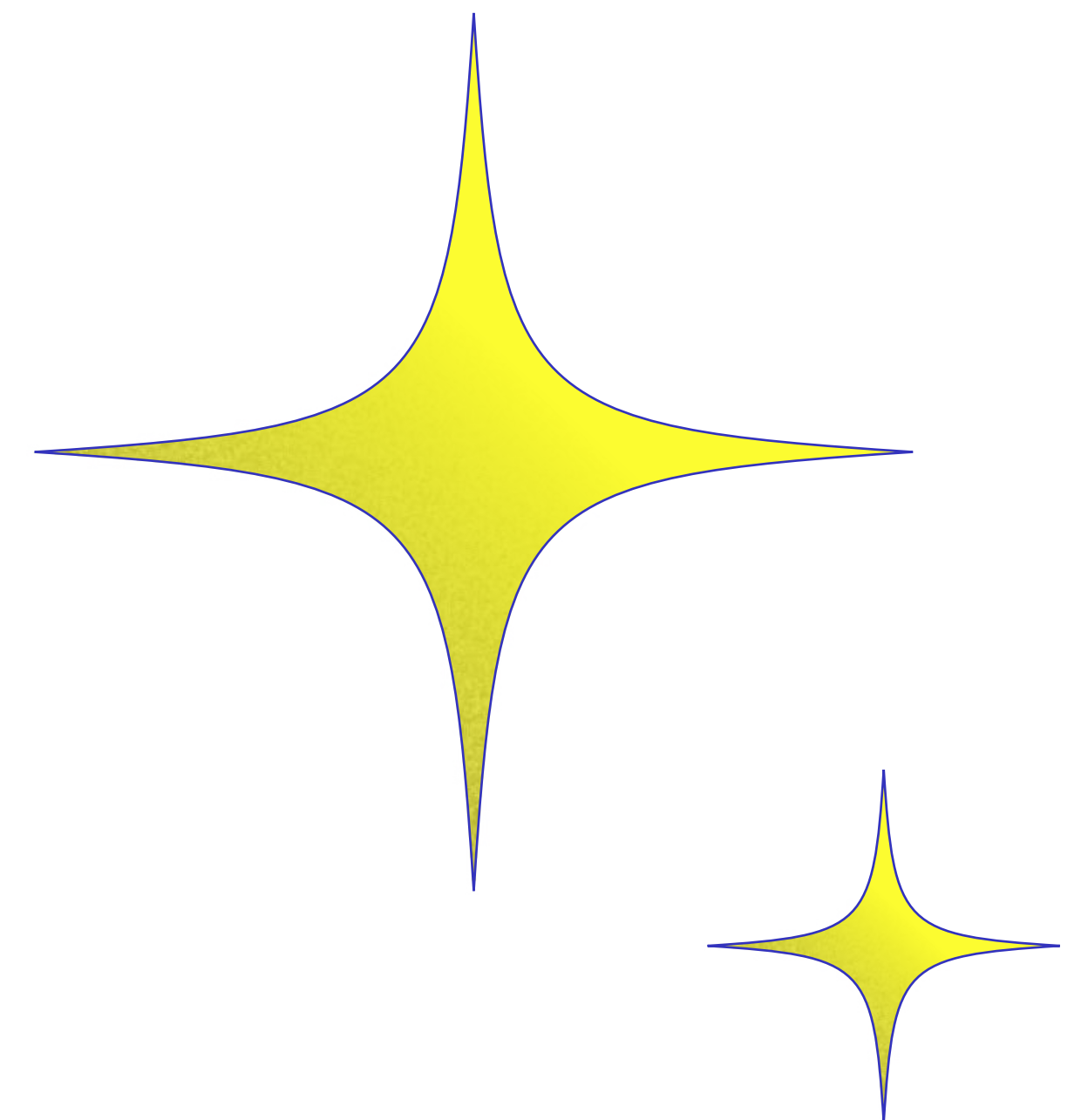
Banco do Brasil prepares its financial statements in compliance with the Brazilian Corporate Law, adhering to the rules and guidelines of the National Monetary Council (CMN), the Central Bank of Brazil (Bacen), and the Brazilian Securities and Exchange Commission (CVM). Additionally, it follows the International Financial Reporting Standards (IFRS), where applicable, to appropriately represent the company's operating results, cash flows, and financial and equity position.

Banco do Brasil monitors regulations issued by supervisory and regulatory bodies, assessing their accounting and tax impacts and making the necessary adjustments to internal policies and procedures used in the preparation of financial statements. Additionally, it maintains a schedule for closing trial balances and financial statements, which involves the systematic planning and control of the process for determining results and accounting disclosures. This schedule is integrated with the areas involved in the preparation of financial statements to ensure that activities are executed within the deadlines established by regulatory bodies.

The accounting process is embedded within Banco do Brasil's Corporate Governance structure through financial reporting to the Board of Directors, Executive Board, Audit Committee, and Supervisory Board. Additionally, the process involves internal audits, external audits, and control assessments conducted by the Internal Controls and Compliance Directorate.

The Bank's financial statements are accompanied by reports and opinions issued by the entities responsible for reviewing financial information. These reports assess compliance with the applicable financial reporting framework, as well as the accuracy and completeness of the disclosed records.

The Bank is committed to providing the market with objective, reliable, and timely corporate information, in line with legal requirements, to enable informed investment decisions. Additionally, the company adopts procedures and internal controls to ensure the accuracy, truthfulness, and transparency of its financial statements.



# Whistleblower Channel

The Whistleblower Channel of Banco do Brasil, available in three languages (Portuguese, English, and Spanish), is the communication channel through which employees, collaborators, clients, users, partners, or suppliers can report situations with indications of wrongdoing of any nature related to the activities of the institution.

All employees, administrators, clients, partners, suppliers, and any other individuals can anonymously report inquiries or violations of the Code of Ethics.

The channel receives the reports and forwards them to the responsible areas for investigation and/or response to the whistleblower in good faith.

## **Whistleblower Protection and Non-Retaliation Commitment**

Banco do Brasil values the input of whistleblowers and good-faith witnesses and understands that this role contributes to the improvement of internal processes and risk mitigation.

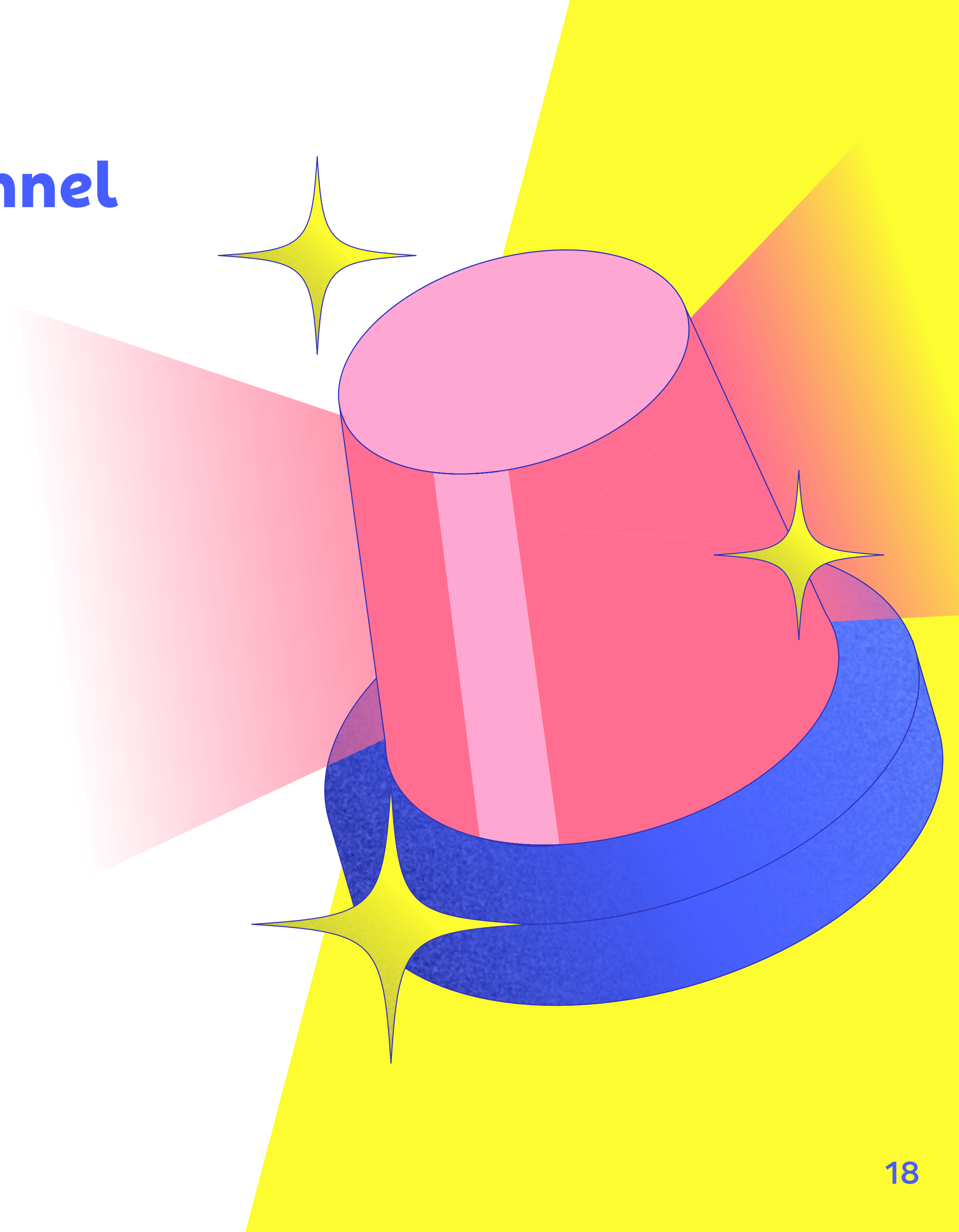
It is the Bank's commitment to protect those who trust the available channels to report irregular practices.

Protection is guaranteed to the good-faith whistleblower, whether identified or anonymous, against any form of retaliation that may result from their report.

The breach of confidentiality of the report's data, including the information of the good-faith whistleblower, is treated internally from a disciplinary perspective.

Reports can be submitted through the BB Portal, via the website:

[bb.com.br/site/pra-voce/atendimento/canal-de-denuncias](https://bb.com.br/site/pra-voce/atendimento/canal-de-denuncias)





# Internal Investigations and Management of Consequences

Banco do Brasil has a process called Disciplinary Control, which governs discipline in relation to employees and former employees involved in irregularities.

An irregularity is any proven action or omission that is in disagreement with the laws, the Code of Ethics, or internal regulations, resulting in damage to the Bank or exposing it to risks.

The Disciplinary Control process begins with the identification of an irregularity, either through internal controls, reports, or proof of authorship and materiality. The process involves independent instances for investigation, analysis, judgment, and review, ensuring confidentiality and impartiality.

After confirming the employee's responsibility for the irregularity, the measures may range from a formal, educational guidance to the application of a punitive sanction.

Banco do Brasil establishes procedures to ensure the prompt interruption of detected irregularities and the timely remediation of the resulting damages.

Through internal procedures, we investigate indications of harmful acts committed by legal entities that violate the principles of public administration or the international commitments assumed by Brazil, as defined in Article 5 of Law 12.846/13.





# Internal Investigations and Consequence Management

## Administrative Liability Process (PAR)

We adopt measures to prevent and detect transactional bribery and commit to cooperating with the competent authorities by providing relevant information for investigations into bribery and other unlawful acts.

We manage our relationships with clients and Politically Exposed Persons (PEPs) in accordance with the best security practices and in line with the procedures set forth in SARB 011/2013 regarding the prevention and combating of money laundering and the financing of terrorism.

In accordance with Decree 11.129/22, we commit to reporting to the CGU any indications of harmful acts committed by Brazilian legal entities against foreign public administration.

To investigate the practice of a harmful act qualifying as corruption, as outlined in Article 5 of Law 12.846/2013, by a legal entity against the Bank, the Administrative Liability Process (PAR) may be initiated. The authority responsible for deciding on the initiation, judgment, and closure of the PAR is the CEPI (Executive Committee for the Prevention of Financial and Foreign Exchange Offenses).

## Laws of State-Owned Enterprises and the Procurement Regulation at Banco do Brasil (RLBB)

The investigation of responsibilities of bidders and suppliers is conducted through a sanctioning process that, in turn, follows the principles of impartiality, morality, equality, publicity, efficiency, administrative integrity, economy, and adherence to the invitation instrument, as provided in the RLBB. The following sanctions may be applied: (i) warning; (ii) fine; (iii) temporary suspension of participation in bidding and prohibition of contracting with Banco do Brasil, for a period not exceeding 2 (two) years. The list of companies prohibited from bidding and contracting with Banco do Brasil, along with their respective periods, is available for consultation on the BB website.

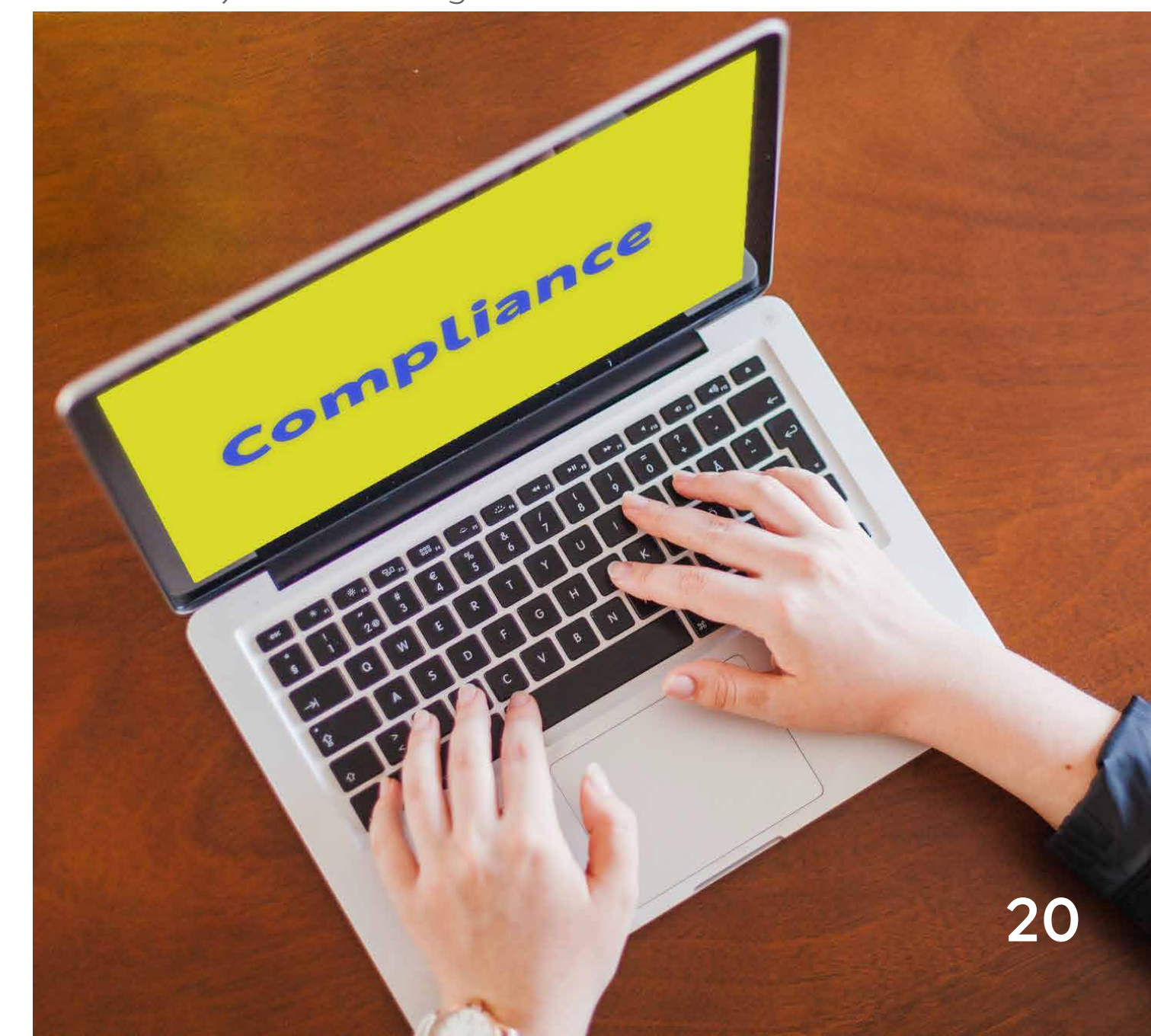
Contracts may be terminated in the following situations: (i) unilaterally, at the initiative of Banco do Brasil, in accordance with the circumstances provided in the contract, at any time, through a unilateral act, duly formalized; (ii) amicably, formalized with written and reasoned authorization; and (iii) judicially, in accordance with applicable legislation.

## Violations of the Code of Ethics and the Compliance and Integrity Program

Employees or former employees who commit irregularities are also included in harmful acts against public administration as defined in Article 5 of Law 12.846/2013, and their conduct may be evaluated through the Disciplinary Control process.

The determination of the solution to be applied takes into account the nature and materiality of the proven facts in relation to the involvement of the individual, any identified mitigating or aggravating factors, as well as the impact of the actions on Banco do Brasil and its values.

In cases where the authorship and materiality of an offense are proven, both judicial and extrajudicial measures are also adopted for criminal accountability and the recovery of the damages caused.





# Monitoring of the Program

With the goal of continuous improvement and enhancing prevention, detection, and combating of harmful acts as outlined in Article 5 of Law No. 12,846/2013, and addressing new regulations that may impact the Program, Dicoi performs continuous monitoring of the Compliance and Integrity Program. This involves periodic evaluations of the processes that make up the Compliance and Integrity

Program, and based on this monitoring, issuing Technical Control Recommendations (RTC) to address identified deficiencies or non-conformities.

This monitoring allows for tracking the effectiveness of the program and is carried out through the collection and analysis of specific information and indicators.





# Questions about the Compliance and Integrity Program

Questions from internal and external audiences regarding the application of the Compliance and Integrity Program, or other topics related to the Program, should be sent to the email address [dicoi.integridade@bb.com.br](mailto:dicoi.integridade@bb.com.br).

