

Compliance *and Integrity* Program

Approved by the Board of Directors
on December 11, 2025.

Message from Senior Management

In an increasingly challenging business environment, marked by regulatory complexity, technological transformation and society's growing expectations, Banco do Brasil reaffirms its historic commitment to ethics, integrity and responsible business conduct. Our Compliance and Integrity Program expresses, in a concrete way, the values that have guided BB's operations for more than two centuries: customer respect, transparency, solid governance and a permanent focus on creating sustainable value.

Integrity is not just a normative requirement; it is a strategic pillar that underpins the trust that millions of Brazilians place in Banco do Brasil every day. That is why we are continuously strengthening our prevention, detection and response structures, improving internal controls, *due diligence* processes, risk monitoring, rules of conduct and *suitability*, as well as mechanisms of *accountability*.

This renewed and more robust *Compliance* and Integrity Program is aligned with international guidelines, Brazilian regulations and best practices in the global financial market.

Banco do Brasil's leadership acts with clarity of purpose, demonstrating in every action that ethical and responsible conduct is non-negotiable. The culture of integrity is built on a daily basis, starting with the behavior of the people who represent BB at all levels, beginning, above all, with Senior Management.

We will continue to move forward. We will continuously invest in corporate education, innovation, *digital com- pliance,* advanced risk analysis, improved *due dili- gence,* AI governance mechanisms and initiatives to strengthen psychological safety and organizational culture.

We know that integrity is an indispensable strategic asset for Banco do Brasil's sustainability and for the country's development.

Banco do Brasil is, and will continue to be, a national and international benchmark in integrity, governance and corporate responsibility. Together with our teams, clients, partners and society, we reaffirm our commitment to doing the right thing, always.

Board of Directors ***Executive Office***

Index

1. The *Compliance* and Integrity System at Banco do Brasil 6

1.1 Compliance and Integrity Program 7
1.2 Reference Model of Lines (MRL)
1.3 Code of Ethics
1.4 General and specific policies, protocols and institutional commitments
1.5 Pacts, Agreements and Public Commitments
1.6 Tools and mechanisms for monitoring atypicalities
1.7 Indicators for monitoring the program and its effectiveness
1.8 Tools for prospecting and managing standards
1.9 Integrity Risk Management Framework and Integrity Plan
1.10 People's daily attitudes that make BB a company of integrity

2. Principles of the *Compliance* and Integrity Program 8
2.1 Integrity
2.2 Ethics
2.3 Regulatory Compliance
2.4 Corporate Governance
2.5 Social, Environmental and Climate Responsibility

3. Banco do Brasil's *Compliance* and Integrity Program 10
3.1 Why is it important?
3.2 Who is part of it?

3.3 Scope 11
3.4 Legal Basis and Reference Standards
3.5 Governance

Index

4. Guidelines for the *Compliance* and Integrity Program 12

4.1 Senior Management Commitment and Support 13
4.1.1 Concept of Senior Management
4.1.1.1 Appointment of Senior Management
4.1.1.2 Supervision and Monitoring of the Compliance and Integrity Program

4.2 Risk Management 14
4.2.1 The Reference Model of Lines (MRL)
4.2.2 Regulatory Monitoring as a Pillar of Risk Prevention

4.3 Code of Ethics, Integrity Policies and Practices 15
4.3.1 Banco do Brasil's Code of Ethics
4.3.2 Institutional Policies: Guidelines for Integrity
4.3.2.1 General Policies
4.3.2.2 Specific Policies
4.3.3 Integrity Practices
4.3.3.1 Prevention of Fraud, Corruption, Money Laundering and Terrorist Financing

Index

4.3.3.2 Conflict of Interest 16
4.3.3.3 Contracting and Government Relations
4.3.3.4 Donations to Political Parties and Candidates
4.3.3.5 Philanthropic Donations and Private Social Investment (PSI)
4.3.3.6 Gifts, Hospitality and Favors
4.3.3.7 Sponsorship and Promotion of Events
4.3.3.8 Misconduct, Labor Violence and Discrimination
4.3.3.9 Ethics and Reporting Channel
4.3.3.10 Ethics in Artificial Intelligence
4.3.3.11 Integrity Action Plan

4.4 Human Rights 17

4.5 Training and Communication 18
4.5.1 Senior Management Training
4.5.2 Employee and Collaborator Training
4.5.3 Training for Suppliers and Third Parties

4.6 Integrity Due Diligence 19
4.6.1 Third Party Risk Management
4.6.2 Corporate Operations Management
4.6.3 Management of Tenders and Contracts

4.7 Internal Controls 20

Index

4.8 Ethics and Reporting Channel 21
4.8.1 Whistleblower Protection and Non-Retaliation Commitment
4.8.2 Anti-Discrimination Protocol
4.2.3 Protocol to Support Victims of Domestic Violence

4.9 Internal Investigations and Consequence Management 22
4.9.1 Administrative Accountability Process (PAR)
4.9.2 Tenders and Contracts (Law on State-Owned Companies and RLBB)
4,9,3 Violations of the Code of Ethics and the Program
4,9,4 Leniency and Ethical Cooperation

4.10 Program Monitoring 23

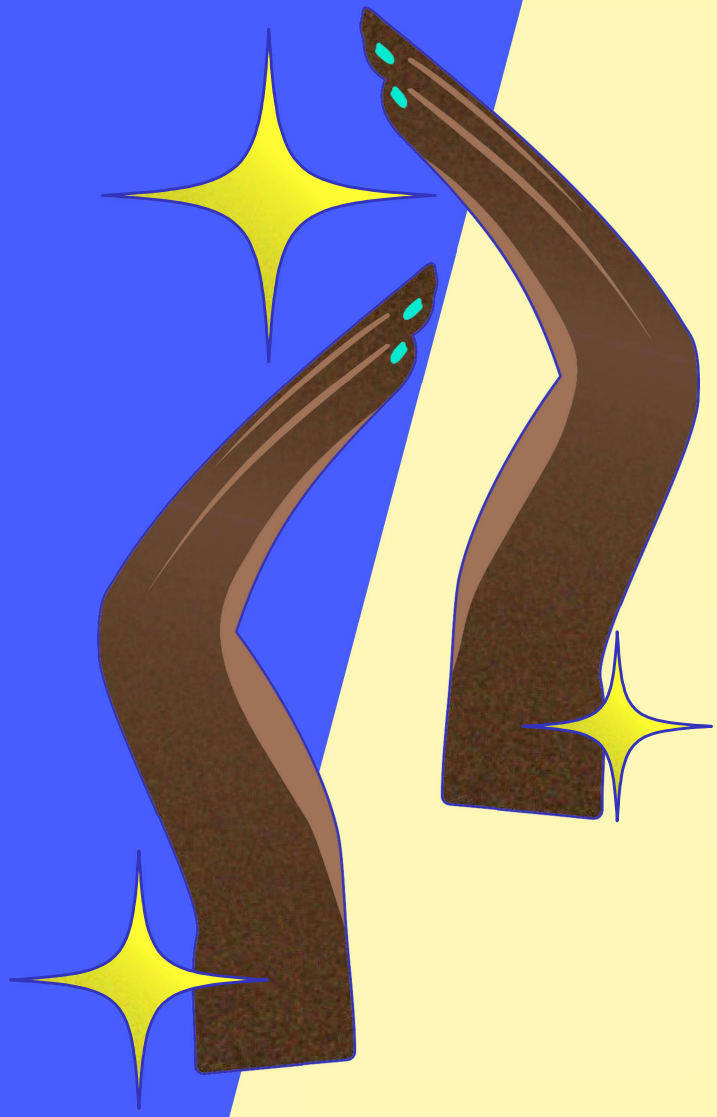
5. Consultations and Additional Information 24

1. *Compliance* and Integrity System at Banco do Brasil

Banco do Brasil's *Compliance* and Integrity System is made up of an integrated set of governance structures, standards, practices and management instruments, whose objective is to prevent risks from materializing and ensure that all Banco do Brasil's activities are conducted ethically, responsibly, safely and transparently. It acts as the foundation of the corporate strategy and therefore functions like a living organism: it evolves continuously, incorporates the institution's values and adapts to changes in the regulatory, social and technological environment.

This system applies to the entire Banco do Brasil Conglomerate, in Brazil and abroad. *Compliance* means following policies, rules and practices that ensure compliance with laws, regulations, internal standards and high standards of integrity. To this end, Banco do Brasil adopts effective actions that balance efficiency, control, sustainability and transparency, ensuring that its business is conducted within the highest legal and ethical standards.

At Banco do Brasil, we act preventively to avoid unsustainable practices and inappropriate conduct, such as corruption, fraud, conflict of interest, harassment, discrimination and deviations in business conduct. We seek to continuously strengthen the culture of integrity, respect human rights and promote diversity and equity both within the organization and throughout the value and supply chain.



The System has components that connect and strengthen each other:

1. *Compliance* and Integrity Program

Approved by the Board of Directors, it is made up of integrated and complementary guidelines, aligned with international standards and best practices. It is based on pillars aimed at preventing, detecting and correcting improper practices in the institution's operational and business activities. These pillars are underpinned by a culture of internal controls, ethical principles, social, environmental and climate responsibility and good corporate governance practices.

The Program generates efficiency and value by reducing sanction costs, mitigating risks to administrators, safeguarding institutional reputation and promoting the continuous improvement of organizational processes.

2. Reference Model of Lines (MRL)

It clearly defines the responsibilities and interactions between the governance and control structures, ensuring the effective performance of the three lines. The MRL establishes coordination, segregation of duties, adequate supervision and continuous strengthening of control mechanisms.

3. Code of Ethics

A document that guides behavior, values and principles in all internal and external relations. The Code reinforces our commitment to ethics, integrity, respect, transparency and responsible business conduct.

4. General and specific policies, protocols and institutional commitments

Set of internal rules that establish guidelines, criteria, protocols and standards of conduct. It includes corporate policies and specific regulations aimed at integrity and *compliance*, anti-corruption, fraud prevention, risk management, con-

internal controls, compliance, privacy, relations with third parties and conflicts of interest, among others.

This component includes the **Anti-Discrimination Protocol** and the **Whistleblower Protection and Non-Retaliation Commitment**, which reinforce the safety, fairness, and freedom to report concerns without any risk of retaliation.

1.5 Public Pacts, Agreements and Commitments

Instruments that formalize Banco do Brasil's commitment to nationally and internationally recognized ethical, environmental, social and regulatory standards. They include pacts, subscriptions, voluntary commitments and other public declarations of integrity. Joining the Global Compact and the Brazil Integrity Pact are examples of this action.

1.6 Tools and mechanisms for monitoring atypicalities

A set of tools and processes capable of identifying movements, behaviors, transactions and events that deviate from the specified standard. It includes automatic mechanisms and specialized analyses that enable preventive, timely and proportional action.

The Atypicality Monitoring Panel (PMA) and the Sales Quality Index (IQV) are part of this set.

7.Indicators for monitoring the program and its effectiveness

Instruments that measure the adherence, performance and impact of the *Compliance* and Integrity Program, including the Maturity Assessment of BB's *Compliance* and Integrity Program.

8.Tools for prospecting and managing regulations

The Regulatory Radar is a system for prospecting and analyzing regulations. In the search and screening process,

has highly accurate artificial intelligence that assesses the applicability of standards to the BB context. When applicable, the tool directs the standard to an impact assessment which takes place in two stages: preliminary analysis, carried out by the Compliance area; validation, carried out by the unit specializing in the subject, responsible for drawing up the action plan needed to ensure regulatory adherence.

Through the SIGAS system, these action plans are managed and certified by the *Com- pliance* area. These instruments make it possible to anticipate legal requirements, adjust internal procedures and ensure convergence with national and international regulations.

The prospecting and management of regulations, as well as the set of recommendations and regulatory demands, are inputs for calculating the Compliance Index (iConf), which is also measured by area.

1.9 Framework of System Integrity Risk and Integrity Plan

It includes models, taxonomies, criteria and evaluation mechanisms to identify, measure, treat and monitor risks related to corruption, fraud, conflict of interest, harassment, discrimination, business deviations and other practices that could jeopardize corporate integrity. The deficiencies identified are corrected by means of the actions set out in the Integrity Plan.

1.10 Daily attitudes of the people who make BB a company of integrity

It is the living and essential component of the System. It involves daily behavior, individual responsibility, coherence with Banco do Brasil's values and an ethical stance in decisions and interactions. These attitudes underpin the culture of integrity and ensure that the System works in practice, going beyond standards and processes.

2. Principles of the *Compliance* and Integrity Program

2.1 Integrity

Integrity guides the choice of actions which, in addition to being legal, are honest, fair and consistent with the institution's values. It is the consistency between what a person or organization says and does, maintaining fidelity to ethical principles even in the face of pressures, challenges or opportunities for personal or institutional benefit. Integrity is the foundation that sustains Banco do Brasil's credibility and reputation.

2.2 Ethics

To speak of ethics is to speak of values that guide relationships and decisions. This principle is based on acting ethically, transparency, respect for people and internal rules. The ethical attitude of each employee contributes directly to building a healthy, safe and sustainable organizational environment, reinforcing the institution's trust and credibility in society.

2.3 Regulatory Compliance

Its objective is to ensure compliance with the laws, rules and regulations applicable to Banco do Brasil's area of activity, contributing to sustainable business. Regulatory compliance strengthens the mitigation of legal, operational, reputational, socio-environmental, climate and other risks, ensuring alignment with legal requirements and the expectations of society and regulatory bodies.

2.4 Corporate Governance

It is represented by a set of mechanisms, structures, processes, and controls designed to guide, monitor, and align the actions of internal agents (administrators, managers, employees) with the interests of the organization, shareholders, and society. Its central role is to mitigate the conflict of agency, ensuring that decisions are made to the benefit of Banco do Brasil, in a fair, transparent and responsible manner.

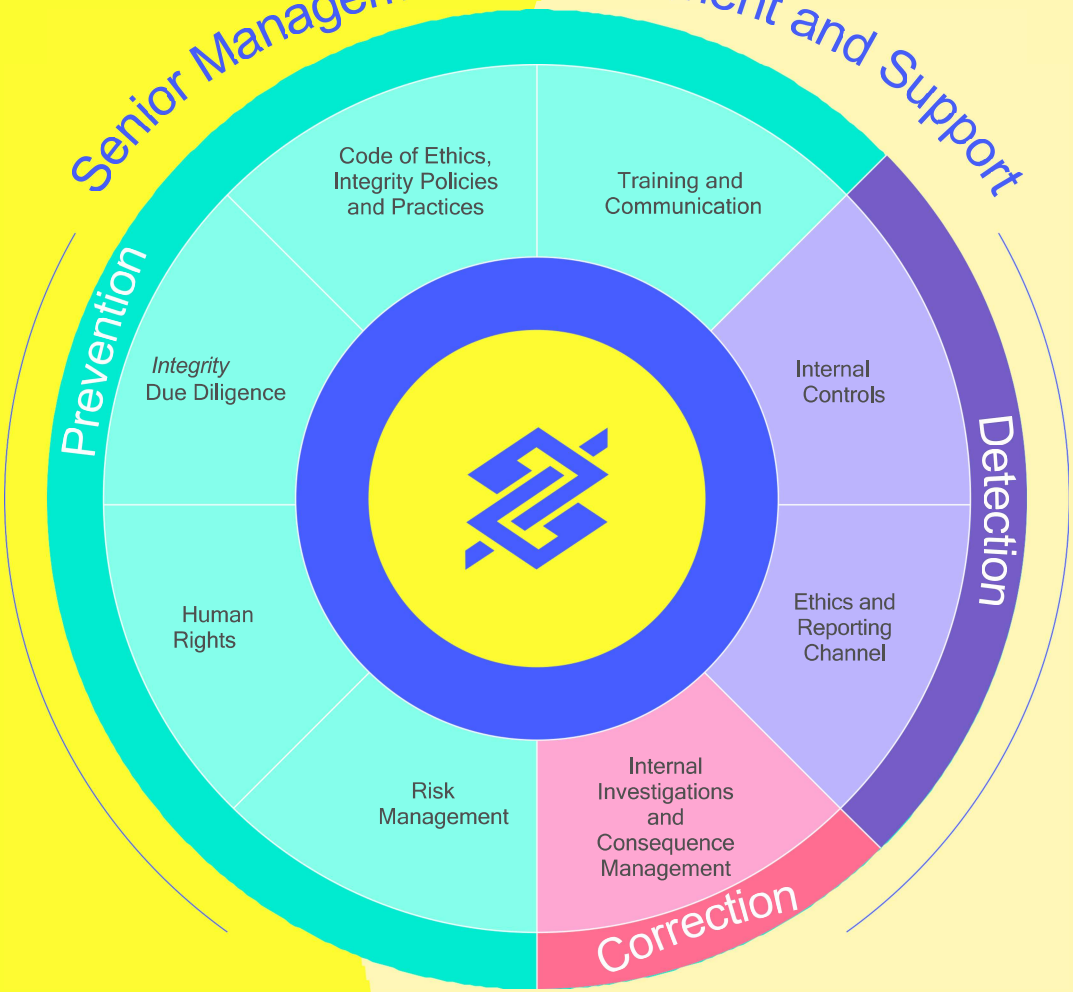
Banco do Brasil stands out for its robust governance system, made up of rules, decision-making levels, strategic and statutory committees, which act on decisions and monitor the institution's management.

The Entities Linked to Banco do Brasil (ELBBs) reflect the same ethical matrix as the Conglomerate and share the responsibilities of the *Compliance* and Integrity Program. Banco do Brasil, as the controlling shareholder, guides, monitors and supervises the actions of the group's companies, ensuring that these actions are always upright and transparent, without prejudice to the autonomy of the subsidiaries.

3.5 Social Responsibility Environment and Climate

This principle guides the incorporation of social, environmental and climatic aspects into business and administrative practices, with the aim of generating value for all stakeholders and minimizing the negative impacts of business operations. It reinforces Banco do Brasil's commitment to sustainable development and to promoting actions that respect people, communities, territories and the environment.

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



3. Banco do Brasil's *Compliance* and Integrity Program

Created in 2017, Banco do Brasil's *Compliance* and Integrity Program follows national and international regulations and best market practices. It brings together internal mechanisms and procedures aimed at integrity, auditing, encouraging reporting and the effective application of codes of ethics, policies and guidelines.

Its aim is to prevent, detect and correct deviations, fraud, irregularities and illegal acts, as well as strengthening and spreading the culture of integrity throughout Banco do Brasil.

3.1 Why is it important?

The program contributes directly to:

a) Sustainability of the organization and strengthening risk management;

Safety and suitability of business, processes, products and services;

c) Social, environmental and climate responsibility, in line with BB's strategic commitments;

d) Prevention of illicit behavior, misconduct and reputational damage;

e) Reduction of financial losses and reinforcement of BB's credibility as an ethical, upright and trustworthy institution.

3.2 Who is part of it?

Integrity is everyone's commitment.

Senior management, employees, trainees, third parties, partners and collaborators, in Brazil and abroad, are responsible for the ethical conduct of their processes, controls and risks.

Each person contributes directly to the effectiveness of the Program and to maintaining a healthy and safe environment.



** Trainees, apprentices, managers and employees of contracted companies.*

3.3 Scope

The Program applies to all Banco do Brasil units in Brazil and abroad, respecting local legislation and international best practices.

The Entities Linked to Banco do Brasil (ELBBs) must also follow these guidelines, adapting them to their operational realities and specific legal requirements.

3.4 Legal Basis and Reference Standards

The Program is aligned with the main national and international integrity standards, including:

- Law No. 12.846/2013 - Anti-Corruption Law
- Decree No. 11.129/2022 - regulates the Anti-Corruption Law
- Law No. 14.133/2021 - New Bidding Law
- Decree No. 12.304/2024 - regulates integrity in the New Bidding Law
- Law No. 13.303/2016 - Law on State-Owned Companies
- Decree No. 8.945/2016 - regulates the State-Owned Companies Law
- Decree No. 9.203/2017 - Federal Public Governance
- CGU Ordinance No. 1.089/2018
- CGU Ordinance No. 57/2019
- Decree No. 11.529/2023 - SITAI
- CMN Resolution No. 4.595/2017
- CMN Resolution No. 4.968/2021
- BCB Resolution No. 65/2021 (and amendments, e.g. BCB Res. 368/2024)
- SARB Regulation 21/2019 - Febraban
- Competition *Compliance* Policy - Febraban
- ISO 37301 (*Compliance* Management) / ISO 37001 (Anti-Bribery) / ISO 26000 (Social Responsibility) / ISO 37015 (Reporting) / ISO 31000 (Risk Management)
- CGU Guides and Manuals - Integrity Program

These references strengthen the Program's credibility and adherence to the highest standards of corporate integrity.

3.5. Governance

The Internal Controls and *Compliance* Department (Dicoi) is responsible for managing, monitoring and reporting on the Program, and has the autonomy, structure and resources necessary to guarantee its effectiveness and technical independence.

Decisions are taken as a collegiate body, with segregation of responsibilities, compliance with the Reference Model of Lines, and integration between risk management, internal controls and *Compliance*.

Read more:

ORGANIZATIONAL STRUCTURE

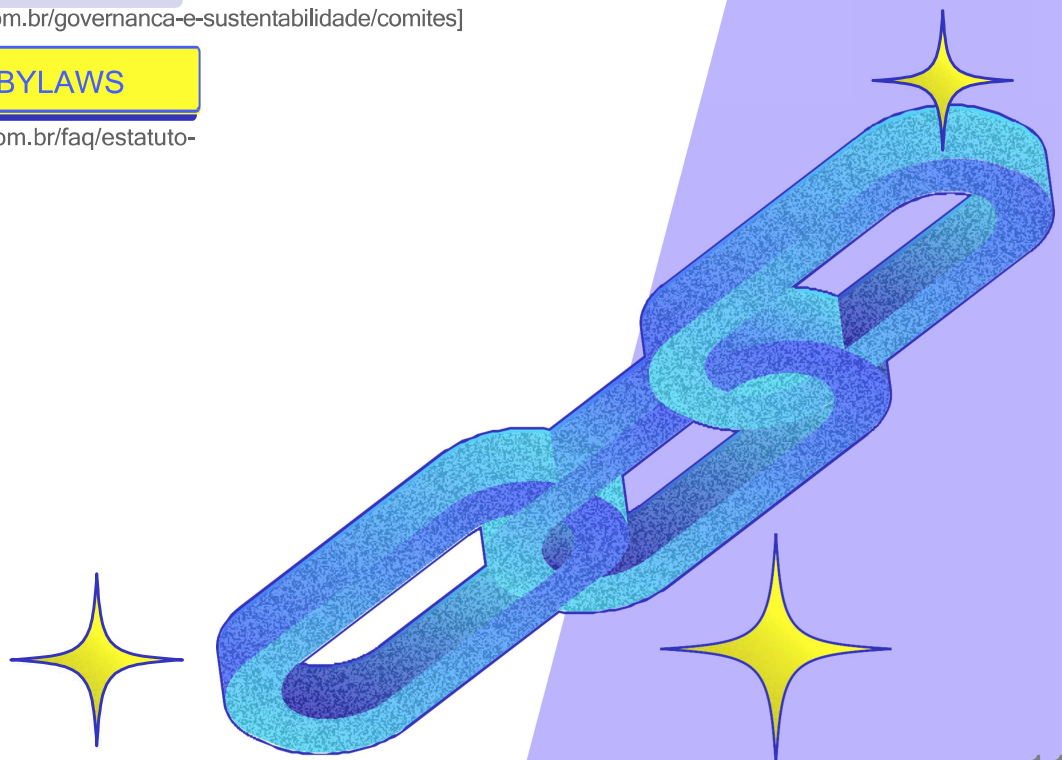
[ri.bb.com.br/o-banco-do-brasil/estrutura-organizacional]

COMMITTEES

[ri.bb.com.br/governanca-e-sustentabilidade/comites]

BYLAWS

[ri.bb.com.br/faq/estatuto-social]



4. Compliance and Integrity Program Mentors

4.1 Commitment and Support from Senior Management

Banco do Brasil's senior management is unequivocally committed to ethics, integrity and good corporate governance. Through collegiate decisions and actions aligned with the guidelines of the Bylaws, Law no. 13.303/2016 and best governance practices, the Senior Management promotes an upstanding organizational culture based on values, diversity, inclusiveness, psychological safety and good corporate governance.and the consistent incorporation of ESG principles into the strategies and operations of the BB Conglomerate.

In order to ensure the effectiveness of the *Com- pliance* and Integrity Program, Senior Management provides adequate resources, guarantees technical autonomy to the structures responsible and ensures continuous investment in training, specialized monitoring tools, strategic indicators and methodologies for evaluating effectiveness. These efforts allow the Program to be disseminated continuously, internally and externally, with periodic, timely and transparent reports to senior management and statutory bodies.

1. Concept of Senior Management

Pursuant to Article 16 of Law No. 13.303/2016 and Article 11 of Banco do Brasil's Bylaws, the following are members of the Senior Management:

- the Board of Directors (BoD)
- the Executive Board (Direx)

These bodies are responsible for guiding strategy, supervising management, approving general and specific policies and ensuring that Banco do Brasil acts in accordance with ethical principles, internal standards and external regulations. In addition, they ensure a dedicated, independent and resourced structure for the establishment, implementation, maintenance and continuous improvement of the Integrity, *Com- pliance*, Internal Controls and Compliance System.

4.1.1.1. Nomination and appointment

The nomination, election, and appointment of members of the Board of Directors, the Advisory Committees to the Board of Directors, the Fiscal Council, the Executive Board, as well as the heads of Internal Audit and the Ombudsman's Office, strictly follow the Specific Nomination and Succession Policy, which establishes objective, transparent criteria aligned with best corporate governance practices.

The criteria include:

- integrity and an unblemished reputation;
- compatible professional experience;
- knowledge of corporate governance, *compliance*, risks and accountability;
- technical capacity;
- moral integrity;
- no conflicts of interest, impediments or legal prohibitions.

The rules that make up Banco do Brasil's corporate governance architecture establish clear rules to prevent conflicts of interest, ensure the segregation of functions, guarantee self-regulation and protect the integrity of decision-making processes.

Get to know the Specific Policy on Appointment and Succession:

POLICIES, GUIDELINES AND COMMITMENTS

[ri.bb.com.br/faq/politicas-diretrizes-e-compromissos]

4.1.1.2 Supervision and Monitoring of the *Compliance* and Integrity Program

Senior management supervises the *Compliance* and Integrity Program through:

- periodic and timely reports;
- analysis of strategic indicators;
- monitoring the effectiveness of controls;
- monitoring integrity risks;
- annual maturity assessments;
- collegiate deliberations in committees and statutory bodies.

This continuous supervision ensures that the Program evolves in a consistent manner, in line with regulatory requirements and the best international references and the public commitments made by the Conglomerate.

4.2 Integrated Risk Management at Banco do Brasil with a Focus on Institutional Integrity

Banco do Brasil's risk management is structured to protect corporate strategy, support decision-making and promote business sustainability. As set out in the 2025 Reference Form, BB manages financial and non-financial risks, including credit, market, liquidity, contagion, strategic, operational, legal, reputational, social, environmental and climate risks, through consolidated identification, assessment, monitoring and reporting processes. This architecture follows the Lines of Reference Model (MRL), in which Diris acts as a corporate risk manager in different categories, supporting specific managers in identifying events, causes, vulnerabilities and impacts for each type of risk.

Risk management involves structuring instruments such as the Risk Appetite and Tolerance Statement, which defines limits and indicators for managing exposure to corporate risks.

In this context, risk management also incorporates a human approach, recognizing that negative events are influenced by psychosocial, cultural and organizational factors.

Banco do Brasil understands that risks are not limited to numbers: they reflect behaviors, decisions, internal and external pressures that can affect people, customers, suppliers, partners and society. Risk management therefore acts as a mechanism for care, prevention and strengthening the organizational culture.

This broader vision makes it possible to identify, among all corporate risks, those that represent a risk to institutional integrity. These include fraud events (mainly internal), conflicts of interest, inappropriate practices, legal risks, third-party risks, environmental, social and climatic events with the potential to impact credibility and institutional trust.

Based on this identification, the Internal Controls and *Compliance* Department (Dicoi) articulates corrective and preventive actions that include improving controls, training, reinforcing the ethical culture and directing governance. The aim is to mitigate risks that compromise institutional integrity, ensuring that Banco do Brasil as a whole operates in compliance with laws, regulations, internal standards and the highest ethical standards.

These actions are defined in conjunction with the areas evaluated and monitored through the Institutional Integrity Plan, with reporting to Senior Management.

The Reference Model of Lines (MRL)

Banco do Brasil's risk framework operates in line with the Three Lines model, inspired by the Institute of Internal Auditors - IIA (2020), and consists of:

1st Line - Operational and Business Management

Responsible for carrying out activities, controls and initial identification of risks, including those that may constitute integrity risks, such as conflicts of interest, process failures, inappropriate conduct and violations of standards.

2nd Line - Risks, Compliance, Integrity and Internal Controls

Responsible for standardizing, guiding, monitoring and evaluating the effectiveness of controls, working directly on regulatory interpretation, impact analysis, monitoring atypicalities and identifying integrity risks associated with the various risk categories.

3rd Line - Internal Audit

Guarantees an independent assessment of the adequacy of controls, governance and the effectiveness of the risk and integrity system.

The continuous interaction between the lines strengthens Banco do Brasil's ability to identify events which, originating in different corporate risks, expose the institution to integrity risks.

Regulatory Monitoring as a Pillar of Risk Prevention

Regulatory monitoring is an essential part of BB's risk management and functions as a structured and continuous system:

- prospecting national and international regulations;
- regulatory impact assessment;
- prevention of compliance risks;
- anticipating legal requirements that may affect processes, products, services, channels and organizational practices.

Tools such as the Regulatory Radar and SIGAS help manage risks arising from regulatory changes, which reduces Banco do Brasil's exposure to legal sanctions, reputational risks and integrity risks.

4.3 Code of Ethics, Integrity Policies and Practices

1. Banco do Brasil's Code of Ethics

Banco do Brasil's Code of Ethics is more than a document: it is the expression of our institutional character and the guide that directs our choices, relationships and decisions. It reflects Banco do Brasil's commitment to ethics, integrity, respect and transparency, defining the purpose, values and principles that guide our actions towards society and all our stakeholders.

Revised periodically to keep up with social, regulatory and strategic changes, the Code of Ethics is approved by the Board of Directors, reinforcing its centrality in the governance of the BB Conglomerate.

Why is it important?

The principles and guidelines of the Code must be followed responsibly by all employees, managers, partners, trainees, apprentices and contractors. Each person is a protagonist in promoting a healthy, respectful and safe environment.

At Banco do Brasil, it is expected that:

- All members, in any unit or function, act in accordance with ethical principles, policies, internal rules and applicable legislation;
- Suppliers, service providers and partners also comply with these guidelines, ensuring integrity throughout the value chain.

The Code provides guidance on key issues such as:

- posture in the workplace;
- relationship with the public sector;
- fair competition practices;
- preventing conflicts of interest;
- proper use of information and assets;
- responsible conduct in communication and institutional representation.

Access the Code of Ethics:

CODE OF ETHICS

[ri.bb.com.br/o-banco-do-brasil/etica]

[bb.com.br/pbb/pagina-inicial/sobre-nos/etica-e-integridade/etica]

2. Institutional Policies: Guidelines for Integrity

The General Policies and Specific Policies complement the Code of Ethics, translating values and principles into concrete guidelines for decision-making. They define criteria, standards of conduct, limits and responsibilities, ensuring performance in line with integrity, compliance and best governance practices.

1. General Policies

They establish cross-cutting guidelines that apply to the entire organization. They guide behavior, decisions and positions on strategic and permanent issues.

2. Specific Policies

They direct conduct towards specific areas, themes or processes. They regulate issues that require specialized treatment or in-depth standardization.

All General and Specific Policies are part of Banco do Brasil's governance architecture are approved by the Board of Directors, ensuring alignment with Banco do Brasil's strategy and institutional commitment to integrity, transparency and corporate responsibility.

Banco do Brasil's policies can be consulted at:

BYLAWS AND POLICIES

[ri.bb.com.br/governanca-e-sustentabilidade/estatuto-e-políticas]

3. Integrity Practices

Banco do Brasil has adopted a structured set of practices, policies and procedures aimed at integrity, the prevention of illicit activities and the promotion of an ethical, transparent and safe environment.

These practices include preventing money laundering, fighting corruption, integrity in relations with the public sector, preventing conflicts of interest, responsible conduct in the workplace and compliance with national and international legislation.

1. Prevention of Fraud, Corruption, Money Laundering and Terrorist Financing

BB has specific policies and regulations to prevent and combat Money Laundering, Financing of Terrorism (PLD/FT), internal and external fraud and acts of corruption. These controls include mechanisms for identifying, monitoring and analyzing atypical operations, as well as protocols for reporting and forwarding them to the relevant authorities, when necessary.

There are also specific procedures in place to prevent illegal activities in bidding processes, contracting, execution of administrative contracts, and interactions with public officials, in accordance with the principles of the Anti-Corruption Law, the State-Owned Enterprises Law, the Bidding Law, and the Code of Ethics for Senior Federal Public Administration.

All interactions with public agents–in Brazil or abroad– require transparency, traceability and strict accountability, guaranteeing the lawfulness and full integrity of these relationships.

4.3.3.2 Conflict of Interest

Banco do Brasil has adopted specific guidelines to comply with Law No. 12.813/2013, strengthening mechanisms to prevent, identify and deal with situations that could compromise impartiality, generate undue advantages or impact institutional integrity.

Employees receive ongoing guidance on risks, responsibilities and applicable procedures.

The Electronic Conflict of Interest System (SECI) is the channel for consulting on:

- relationships with suppliers and third parties, including the receipt of gifts and hospitality;
- parallel work activities (paid or unpaid);
- any situation that could generate a private benefit as a result of the public function.

Statutory employees should make their inquiries through SECI, while other employees can use the Fale com a Gepes channel to clarify doubts and deal with situations related to conflicts of interest.

4.3.3.3 Tenders, Contracts and Government Relations

Banco do Brasil has detailed rules to prevent fraud and irregularities in tenders, contracts and the execution of administrative agreements. These rules include:

- specific governance for government relations;
- guidelines for interaction with public agents;
- formal procedures for contracts and sponsorships;
- transparency and control mechanisms throughout the contracting cycle.

4.3.3.4 Donations to Political Parties and Candidates

Banco do Brasil does not make donations to political parties or candidates, as expressly provided for in the Code of Ethics and the Private Social Investment (PSI) Guidelines. This guarantees party political neutrality and strengthens institutional integrity.

4.3.3.5 Philanthropic Donations and Private Social Investment (PSI)

Donations and partnerships made through the ISP follow criteria of legality, transparency, and integrity, adhering to:

- applicable legislation;
- General Policies of the Institution;
- social, environmental and climate commitments;
- the state's social priorities;
- stakeholder expectations;
- alignment with the Bank's strategy and business objectives.

4.3.3.6 Gifts, Hospitality and Favors

As a mixed-capital company that is part of the indirect federal public administration, BB adopts rules equivalent to those of the Public Ethics Commission (CEP), determining limits, prohibitions and controls for:

- receiving gifts and hospitality;
- gift giving and promotional activities;
- participation in sponsored events;
- formal interactions with public officials.

The Code of Ethics presents the general principles, while internal normative instructions detail procedures, records and responsibilities.

4.3.3.7 Sponsorship and Promotion of Events

The granting of sponsorships and the carrying out of promotional actions with public agents follow strict guidelines, in line with anti-corruption legislation, electoral rules and internal integrity rules, ensuring transparency and preventing the risk of undue favoritism.This guarantees transparency and the prevention of risks of undue favoritism.

4.3.3.8 Misconduct, Violence at Work and Discrimination

To strengthen the culture of integrity, Banco do Brasil promotes:

- literacy actions and ongoing training;
- non-violent communication;
- programs to prevent harassment and discrimination;
- awareness and belonging campaigns;
- monitoring non-tolerable behavior and inappropriate conduct.

Inappropriate conduct, unsustainable practices, harassment, discrimination or any form of workplace violence are not tolerated.

4.3.3.9 Ethics and Reporting Channel

The Ethics and Reporting Channel operates 24 hours a day and is accessible to all publics.

BB's Whistleblower Protection and Non-Retaliation Commitment guarantees the safety, secrecy, confidentiality and acceptance of people who report facts, strengthening the culture of responsibility and integrity.

4.3.3.10 Ethics in Artificial Intelligence

Banco do Brasil adopts specific guidelines for the ethical, safe and responsible use of Artificial Intelligence, applicable to all stages of the solutions' life cycle.

These guidelines cover:

- transparency;
- explainability;
- fairness and absence of bias;
- safety and reliability;
- autonomy and responsibility;
- privacy and data protection;
- social, environmental and stakeholder well-being.

4.3.3.11 Integrity Action Plan

The Integrity Action Plan is part of the strategy of BB's Compliance and Integrity Program and brings together concrete initiatives aimed at:

- spreading ethical culture;
- strengthening integrity;
- improving processes and controls;
- leadership engagement;
- preventing fragility;
- and monitoring of effectiveness indicators.

This plan reinforces Banco do Brasil's commitment to transparent and responsible practices, consolidating an organizational environment of integrity and security.

4.4 Human Rights

The promotion, protection and defense of human rights are fundamental pillars of Banco do Brasil's *Compliance* and Integrity Program. These principles guide our institutional strategy and permeate our practices, decisions and relationships.

For BB, acting with integrity means recognizing human dignity as a core value and ensuring that all processes, policies, interactions and business models are aligned with national and international human rights standards.

Banco do Brasil's commitment is formalized in various global instruments, including the UN Global Compact, of which BB is a signatory and a thematic ambassador for strategic agendas. Our practices also incorporate guidelines from the Sustainable Development Goals (SDGs) – especially SDG 5 (Gender Equality), SDG 8 (Decent Work), SDG 10 (Reduced Inequalities), and SDG 16 (Strong Institutions) – and the Women's Empowerment Principles (WEPs), promoted by UN Women.

BB's work on human rights is directly linked to integrity risk management, corporate governance, Diversity, Equity and Inclusion (DEI) practices and the protection of people in all stakeholders. This approach is reflected in our human rights due diligence processes, which assess risks and impacts related to decent work, non-discrimination, third-party practices, privacy, psychological safety, organizational behaviour and socio-environmental impacts.

Our essential guidelines are:

a) Respect for human dignity

We are guided by the principles of integrity, ethics, legality and absolute respect for the value of life and people. This includes welcoming practices, respectful communication, protection of physical and emotional integrity and the promotion of psychologically safe environments.

b) Equal opportunities and DEI

We promote diversity, equity and inclusion as core values of institutional integrity. We believe that plural teams strengthen governance, increase innovation and reduce ethical and organizational risks. Our practices include affirmative action, training programs, anti-discrimination policies and permanent diversity literacy initiatives.

c) Combating any form of harassment, discrimination or violence

We repudiate practices of moral harassment and sexual harassment, discrimination of any kind, workplace violence and behavior incompatible with ethics. We monitor inappropriate conduct, follow up on complaints, apply consequence management and promote a culture of respect and accountability.

d) Promoting safe, inclusive and welcoming environments

We offer environments that value psychological safety, emotional integrity, cooperation and the development of people. We guarantee whistleblower protection and non-retaliation, safe speech channels, caring practices and ongoing initiatives to strengthen the culture of integrity.

e) Integration with due diligence and integrity risks

Banco do Brasil conducts structured human rights due diligence processes, in line with UN and OECD recommendations, which include:

- analysis of labor and psychosocial risks throughout the value chain;
- assessment of third parties, suppliers and partners;
- mitigating the risks of discrimination, violence, harassment and exploitation;
- preventing negative impacts on the communities and territories where we operate;
- response and redress mechanisms, when necessary.

These practices reinforce the prevention of integrity risks, ensuring that decisions and operations do not compromise ethical principles, institutional values, regulatory compliance and BB's reputation.

4.5 Training and Communication

Training programs and communication actions are fundamental to strengthening the culture of *compliance*, ethics and integrity at Banco do Brasil. As a structural part of the *Compliance* and Integrity Program, these initiatives function as instruments of cultural transformation, expanding people's knowledge, awareness and critical capacity on topics essential to responsible management, regulatory compliance and ethical behavior.

Education and communication practices include ongoing campaigns, dissemination of educational materials, learning paths, ethical alerts, governance content, and risk management guidance, always strategically articulated to promote engagement, institutional alignment, and prevention of vulnerabilities.

1. Senior Management Training

The active participation of senior management in training actions related to ethics, integrity, *compliance*, risks and governance reinforces the institutional example and commitment. This continuous training ensures that Banco do Brasil's strategic direction is led by leaders who are aware, up-to-date and aligned with regulatory standards, international best practices and the public commitments made by BB, including Agenda 2030, the SDGs and the Global Compact.

2. Employee and Staff Training

Through the Banco do Brasil Corporate University (UniBB), Banco do Brasil offers complete training programs aimed at:

- ethics and conduct;
- *compliance* and integrity;
- preventing harassment and discrimination;
- risk management and internal controls;
- governance and corporate responsibility;
- privacy and data protection;
- Diversity, Equity and Inclusion (DEI).

These trainings use modern methodologies, including self-instructional courses, videos, *podcasts*, webinars and support materials, contributing to the evolution of the ethical culture, the appreciation of diversity and the prevention of integrity risks.

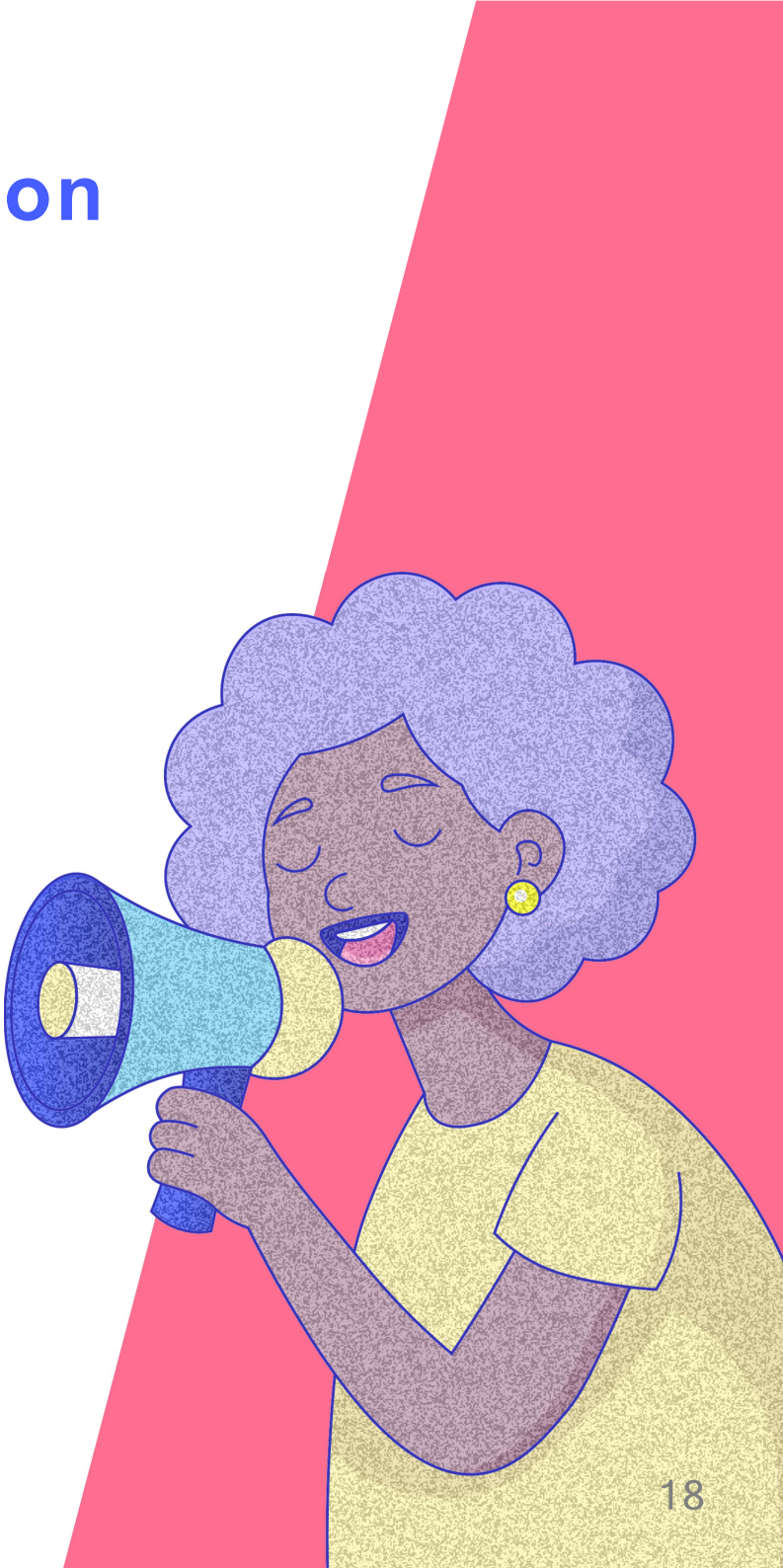
4.5.3 Training for Suppliers and Third Parties

Banco do Brasil works to disseminate good integrity practices beyond its organizational boundaries. On the UniBB Portal, the "Courses open to the community" tab provides free educational content for suppliers, partners, service providers and the general public, promoting shared responsibility throughout the value chain.

In addition, the BB - Suppliers Portal contains:

- guidelines on registration and relationships with the Bank;
- the Specific Policy for Relations with Third Parties;
- the Sustainable Purchasing and Disposal Standard;
- the Banco do Brasil Code of Ethics;
- information on ethics, integrity and anti-corruption;
- privacy and data protection guidelines;
- institutional programs and ESG commitments.

This set of information supports third parties in adopting high standards of governance, social responsibility and integrity, strengthening the BB Conglomerate's ethical ecosystem and reducing risks associated with inappropriate practices in the supply chain.



4.6 Integrity Due *Diligence*

Banco do Brasil conducts rigorous integrity, reputation and compliance analyses before entering into relationships with suppliers, correspondents, strategic partners, sponsors, beneficiaries of donations and other counterparties.

Integrity *Due Diligence* includes:

- verification of sanctions, legal impediments and reputational history;
- presence on national and international restrictive lists;
- compliance with socio-environmental, climate and human rights standards;
- monitoring of Politically Exposed Persons (PEPs);

BB is a national reference in *due diligence* and acts as an agent of transformation, encouraging suppliers, partners and supported organizations to adopt ethical, sustainable and socially responsible practices.

In 2025 alone two important agreements took place, which ratified our commitment to integrity. In the first half of the year, we joined the Brazil Pact and in the second, during COP 30, we announced that we had joined the Global Pact's 100% Transparency Movement.

4.6.1 Third Party Risk Management

To protect institutional integrity, Banco do Brasil applies structured *due diligence* processes before contracting and throughout the relationship cycle. The aim is to verify the suitability, reputation and compliance of counterparties, identifying risks that may arise:

- compromise the strategic objectives;
- expose Banco do Brasil to integrity risks;
- generate legal, reputational or socio-environmental liabilities;
- violate ethical, regulatory or DEI principles;
- affect customers, communities or the public sector.

Monitoring is continuous and adjusted according to the level of risk, ensuring traceability and timely responses to any weaknesses.

4.6.2 Corporate Operations Management

In corporate operations, such as mergers, acquisitions, in-corporations and restructurings, Banco do Brasil adopts specific *due diligence* processes to prevent risks of:

- corruption and fraud;
- money laundering;
- conflicts of interest;
- socio-environmental and climate liabilities;
- human rights violations;
- reputational and strategic risks.

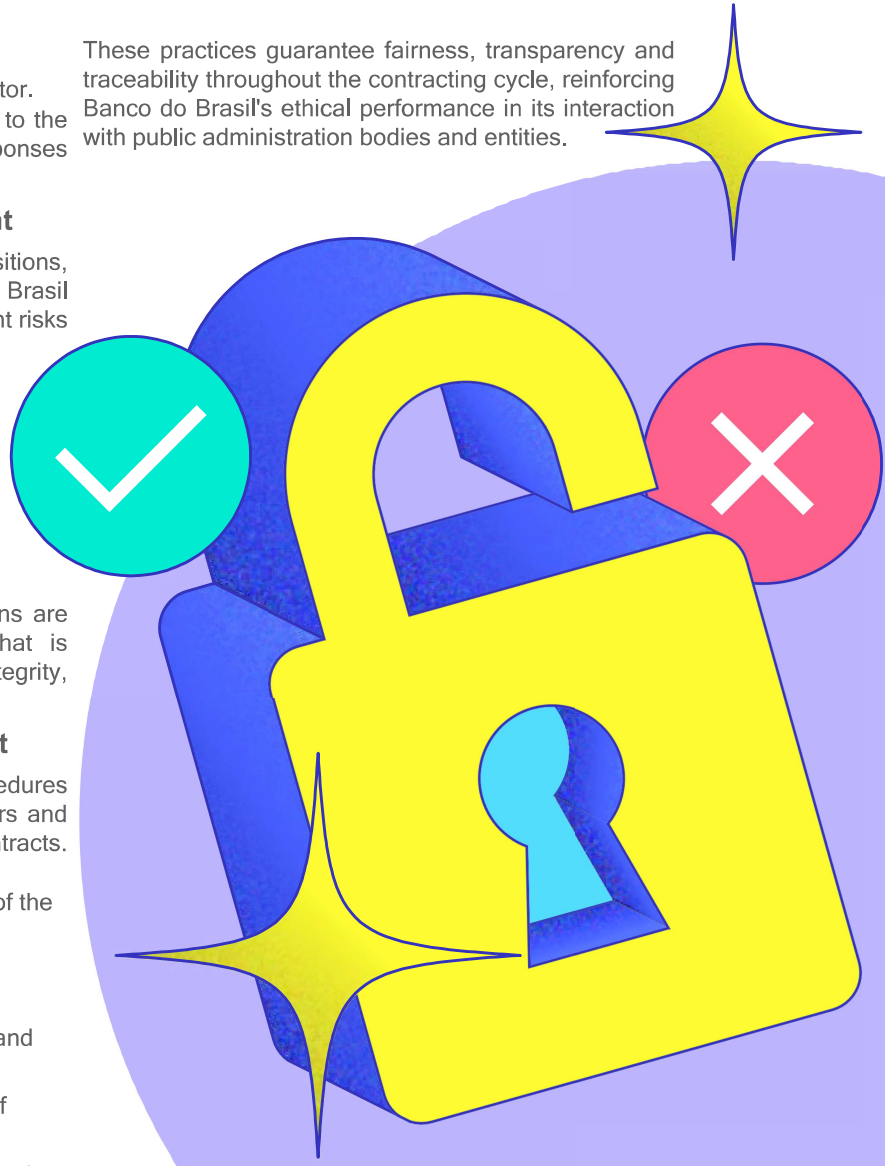
This assessment ensures that corporate decisions are supported by complete, reliable information that is aligned with Banco do Brasil's commitment to integrity, sustainability and robust governance.

4.6.3 Bidding and Contract Management

Banco do Brasil maintains integrity procedures designed to ensure ethical participation in tenders and the responsible conclusion of administrative contracts. The guidelines include:

- prior assessment of the suitability and integrity of the potential supplier;
- verification of ethical practices and reputational history;
- requirement of compliance with anti-corruption and competition rules;
- preventing conduct that violates the principles of equality and free competition;
- continuous monitoring of contract execution to prevent fraud, deviations and irregularities.

These practices guarantee fairness, transparency and traceability throughout the contracting cycle, reinforcing Banco do Brasil's ethical performance in its interaction with public administration bodies and entities.



4.7 Internal Controls

Banco do Brasil's Internal Controls are a set of processes, practices and mechanisms designed to ensure that all planned and approved actions are properly executed. Its aim is to protect assets, mitigate risks, guarantee the accuracy and reliability of information, promote operational efficiency and ensure adherence to internal policies and regulations.

This system strengthens the achievement of strategic objectives and contributes to the organization's longevity by mitigating relevant risks and ensuring compliance with national and international regulations.

The model adopted by BB is compatible with its size and complexity and is aligned with the best corporate governance practices.

Accounting Records

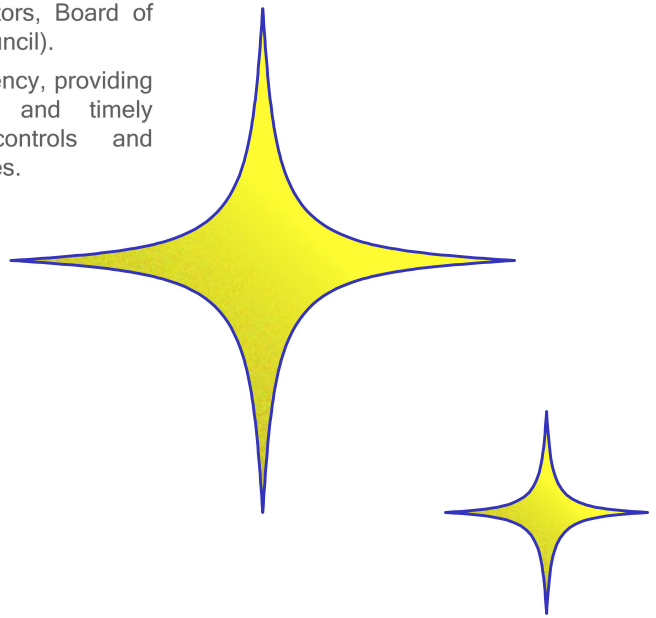
Banco do Brasil prepares its financial statements in accordance with the Brazilian Corporate Law, in compliance with CMN, Central Bank, CVM and, where applicable, International Financial Reporting Standards (IFRS).

This set of standards guarantees an adequate representation of the institution's economic performance, cash flows and equity and financial position.

BB continuously monitors regulatory changes, assessing their accounting and tax impacts and promoting the necessary adjustments to internal rules and procedures in a timely manner.

The results calculation process follows a structured timetable, integrated with the intervening areas and subject to reviews by internal and external audits and by the governance bodies (Board of Directors, Board of Directors, Audit Committee and Fiscal Council).

Banco do Brasil is committed to transparency, providing the market with objective, reliable and timely information, ensured by robust controls and consolidated financial governance practices.



4.8 Ethics and Reporting Channel

BB's Ethics and Reporting Channel is available in three languages (Portuguese, English and Spanish) and can be accessed by any person, employee, client or user
–employee, collaborator, client, user, supplier, partner or third party.

Complaints can be anonymous and cover evidence of wrongdoing, irregularities or violations of the Code of Ethics and internal rules.

The channel is operated by an independent company, works 24 hours a day, every day of the week, and allows the process to be followed through to its conclusion, guaranteeing transparency, traceability and confidentiality.

4.8.1. Whistleblower Protection and Non-Retaliation Commitment

Banco do Brasil ensures full protection for bona fide whistleblowers, whether identified or anonymous, in line with international best practices and CGU recommendations.

Any form of retaliation, direct or indirect, is forbidden and breaches of confidentiality are dealt with under strict disciplinary procedures.

Complaints can be registered through the BB Portal or through the official channels described.

The commitment can be accessed via the link:

COMMITMENT

[api.mziq.com/mzfilemanager/v2/d/5760dff3-15e1-4962-9e81-322a0b3d0bbd/4f19fb2c-6d0e-9438-6d7c-8927fc1ae65d?origin=2]

4.8.2 Anti-Discrimination Protocol

Banco do Brasil adopts a policy of zero tolerance for discrimination and maintains the Anti-Discrimination Protocol as an institutional instrument for prevention, acceptance and accountability.

The protocol provides for:

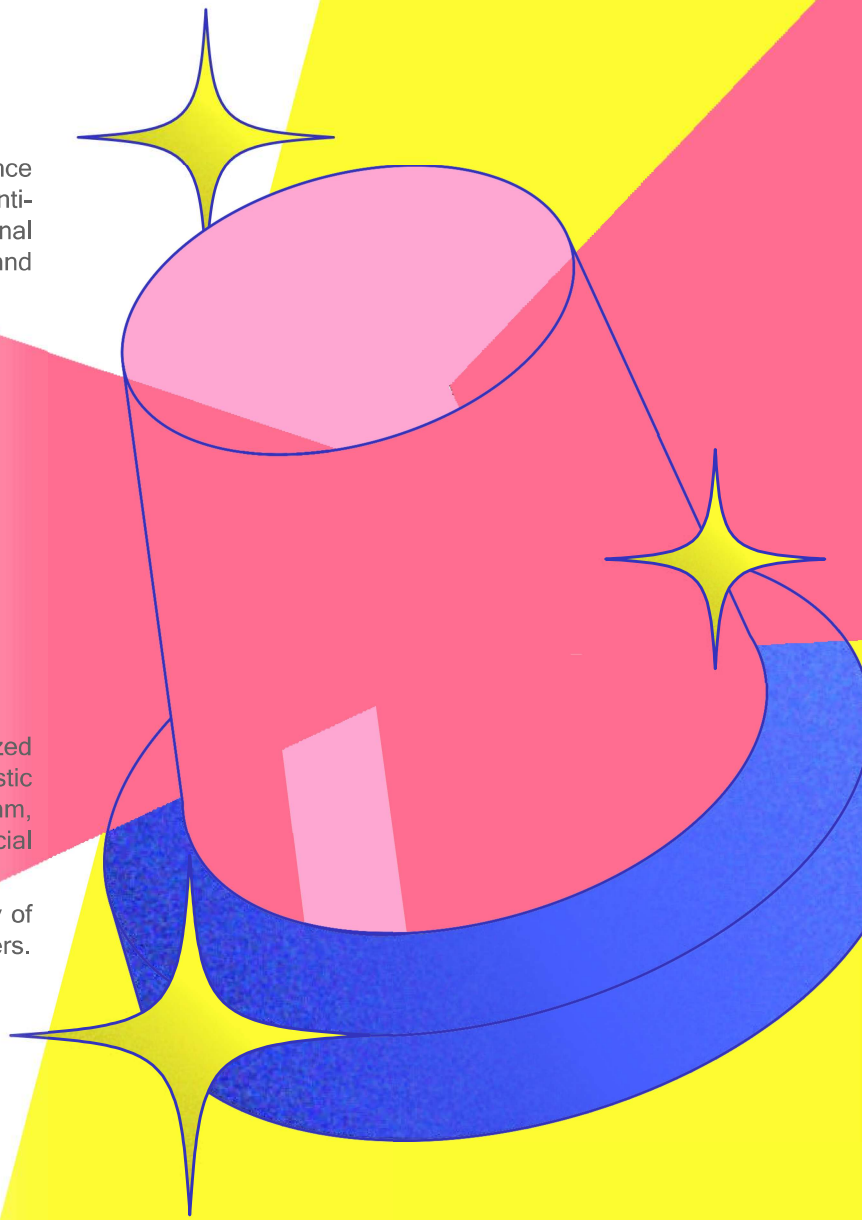
- guidance and reception for victims;
- specialized research;
- proportionate corrective measures;
- protection against retaliation;
- secrecy and transparency in the process.

It applies to all Banco do Brasil's stakeholders, including ELBBs.

4.8.3 Protocol to Support Victims of Domestic Violence

BB offers specialized, confidential and humanized support to employees who are victims of domestic violence, with assistance from a trained team, guaranteeing reception, legal and psychosocial guidance and emergency support.

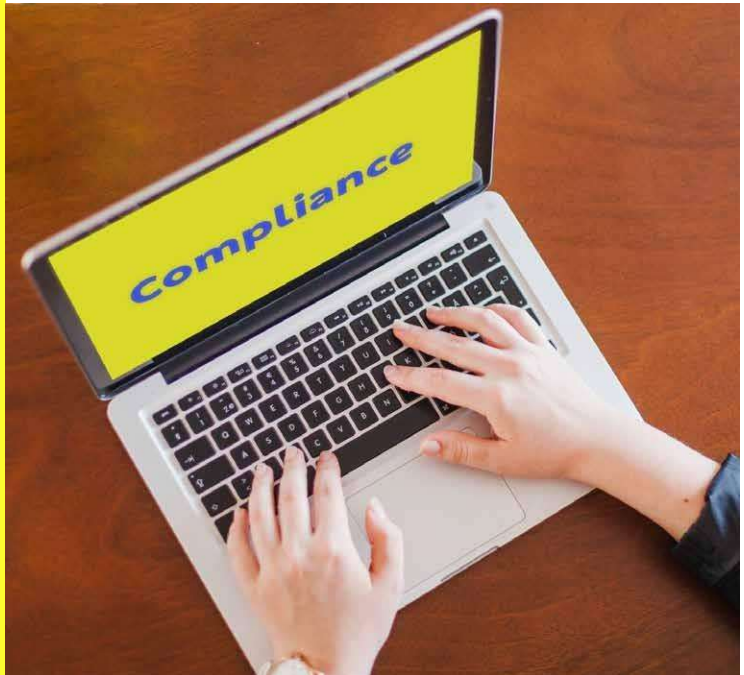
The service recognizes the specific vulnerability of women, without prejudice to access for all genders.



4.9 Internal Investigations and Consequence Management

Banco do Brasil's Disciplinary Control is the process responsible for investigating irregularities committed by employees and former employees.
This process has independent bodies for analysis, judgment and review, guaranteeing impartiality, secrecy and fairness.
The measures applied vary from formal guidance to disciplinary sanctions, depending on the nature, severity, materiality and impact of the conduct.
BB also takes immediate steps to stop irregularities and repair damages.

Banco do Brasil investigates evidence of harmful acts by legal entities that violate public administration principles or Brazil's international commitments, in accordance with the Anti-Corruption Law.



4.9.1 Administrative Accountability Process (PAR)

BB adopts measures to prevent and detect transnational bribery and cooperates with the competent authorities in investigations.

In accordance with Decree No. 11.129/2022, it informs the CGU of indications of harmful acts committed against a foreign public administration.

The PAR can be initiated against legal entities that carry out acts set out in Article 5 of Law 12.846/2013.

Conducting the PAR within BB is the responsibility of the Executive Committee for the Prevention of Financial and Foreign Exchange Illicits (CEPI).

4.9.2 Bids and Contract (State-Owned Enterprises Law and RLBB)

The accountability of bidders and suppliers follows a sanctioning process based on the principles of public administration.
The applicable sanctions include a warning, a fine and temporary suspension and debarment from bidding or contracting.

The presentation of false documents gives rise to liability under the Anti-Corruption Law, regardless of the outcome of the tender.

Contracts can be terminated unilaterally, amicably or judicially, according to legal and contractual hypotheses.

4.9.3 Violations of the Code of Ethics and of the Program

Irregular conduct that is harmful to the Program or the Code of Ethics is assessed based on its authorship, materiality, aggravating factors, mitigating factors and impact on BB.

The measures include civil, administrative and criminal liability, as well as actions to recover losses.

4.9.4 Leniency and Ethical Cooperation

BB recognizes the leniency agreement as a legitimate instrument for accountability, reparation and rebuilding institutional trust.

The Bank values cooperation, transparency and good faith, essential principles for restoring integrity when it is compromised.

4.10 Program Monitoring

The Internal Controls and Compliance Department constantly monitors the Compliance and Integrity Program, including:

a) periodic process evaluations;

b) analysis of effectiveness indicators;

c) issuing Technical Control Recommendations (TCRs); and

d) Monitoring of regulatory compliance and emerging risks.

The use of metrics enables continuous evolution, maintaining a balance between technical rigor and the human commitment that underpins integrity.



5. Consultations and Additional Information

Questions and suggestions about the Program can be sent to:

dicoi.integridade@bb.com.br

BB, as a Conglomerate, recognizes its responsibility to guide and align ethics and compliance among all the companies that make it up.

