



Banco do Brasil' s Compliance Program



Message from Senior Management

The Brazil we carry in our name brings with it, in addition to great pride, a huge responsibility: to be the Bank that is part, directly or indirectly, of the lives of more than 200 million Brazilians.

The healthy growth of a company like ours is closely linked to principles that we never give up: ethics, integrity, transparency and accountability.

In this way, we, the Board of Directors and the Board of Administration, ratify and reinforce, in this document, our commitment and support to Banco do Brasil's *Compliance* Program, which aims to guide and disseminate the seriousness with which we treat the risks inherent in our work.

Following the best market practices and the Bank's values, our *Compliance* Program permeates all areas of the company and continuously prevents, detects and corrects inadequacies in processes and behaviors that daily impact the decision-making of our employees, collaborators and others (those who are acting or providing services on behalf of Banco do Brasil or for Banco do Brasil), regardless of the positions they hold.

The Program is responsible for monitoring the legislation, global trends and demands of our society, aligning the Bank's actions with the values and expectations of our customers.

Thus, in the 2023 review, we present two major updates: the first is that we highlight the importance, for the future of the planet, of

discussing the subject of "climate", and we highlight this by adjusting the title of one of our principles to "**Social, Environmental and Climate Responsibility**".

The second concerns the relevance of the theme "**Diversity, Equity and Inclusion**" for our institution by making it, from now on, one of the Program's advisors independently of the others.

Increasingly mature, Banco do Brasil's *Compliance* Program is a fundamental piece in the governance of a company that today is a reference for its national and international peers.

But we need to be aware that it only comes to life when we put it into practice, routinely, during our work.

This is a responsibility for all of us.

Board of Directors

Board of Administration



Compliance at Banco do Brasil

Compliance means to comply with laws, regulations, standards, policies and procedures and, additionally, complying with the principles of integrity, ethical conduct and efficiency.

Compliance at the Bank is the responsibility of everyone, Senior Management, employees, collaborators and others*, regardless of the function performed, as each one is primarily responsible for conducting its processes, controls and risks.

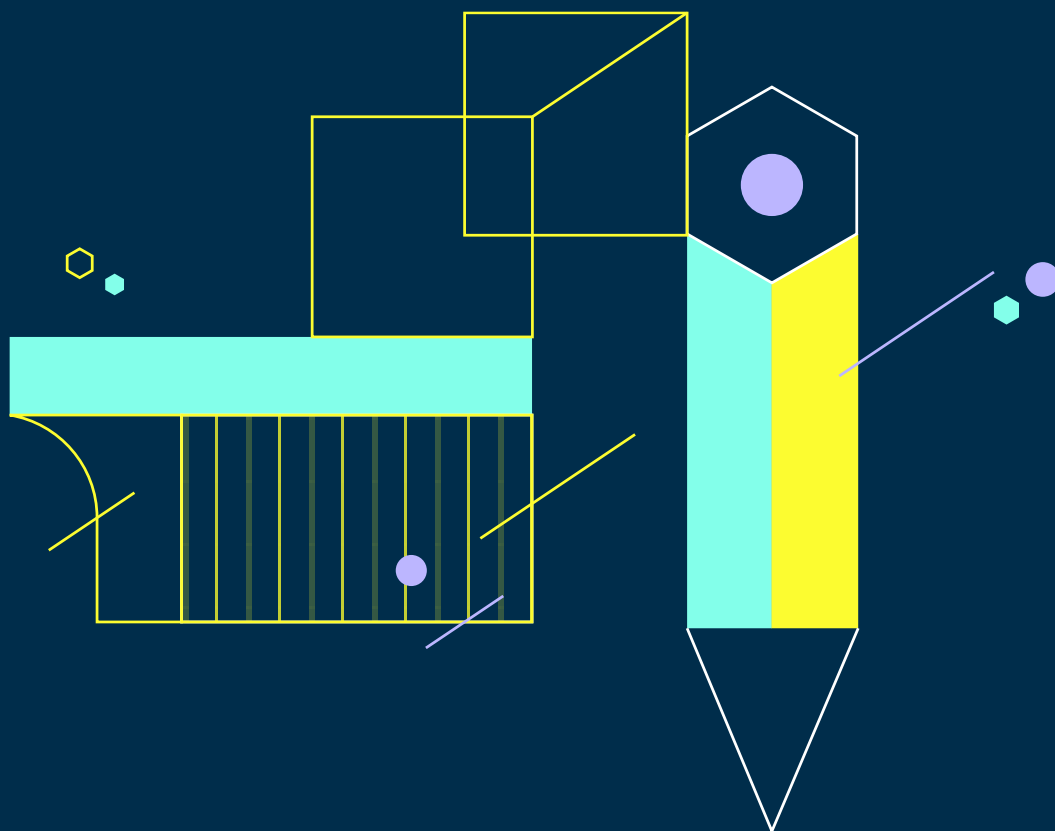
The Bank's compliance is strengthened by the principles of regulatory compliance, ethics, social, environmental and climate responsibility, integrity and corporate governance.

*Others: those who are acting or providing services on behalf of Banco do Brasil or for Banco do Brasil.





Principles



Regulatory Compliance

It describes the objective of achieving a strengthened organization, in order to take measures to comply with the laws, policies and regulations that guide the activities and business.

Ethics

To talk about ethics is to talk about values. The values guide the relationships between people and are guided by ethical action, integrity and transparency, respect for legislation and internal rules. Everyone's ethical attitude contributes decisively to the development of a healthy organizational culture. Thus, the company gains respect for the conduct of its business and receives the approval of society.

Integrity

Integrity is an ethical principle that helps to choose actions that, in addition to being legal, are also honest and fair. One who obeys this principle is an ethical and incorruptible individual. Due to this behavior, a high standard of planning, performance and control of institutional actions is expected.

Social, Environmental and Climate Responsibility

Social, environmental and climate responsibility refers to the incorporation of social, environmental and climate aspects in business and administrative practices, to generate value for stakeholders and minimize any negative impacts of business performance on the environment and society.

Corporate Governance

Corporate governance is the system by which companies and other organizations are managed, monitored and encouraged, involving the relationship between partners, board of directors, executive board, supervisory and control bodies and other stakeholders. It is a broad view of principles and practices that contribute to strengthening management transparency and increasing the institutional value of an organization.

The Corporate Governance Code presents a simplified overview and consultation on BB's principles and practices, contributing to strengthen the transparency of its management and facilitate access to its capital.



Banco do Brasil's Compliance Program

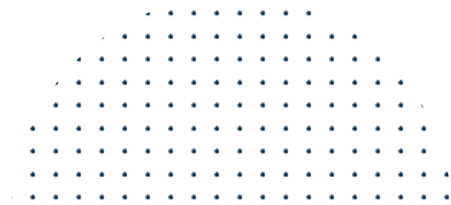
BB's Compliance Program aims to contribute to risk management, focusing on achieving the state of compliance, safety in business, processes, products, services and channels, observing aspects of social, environmental and climate responsibility, also enabling reinforcement in the prevention of illegal acts, misconduct and damage to reputation, contributing to the reduction of financial losses.

The Compliance Program gives the Bank the necessary credibility to demonstrate its ethical positioning and its responsible, fair and sustainable practices in the conduct of business.

The policies that guide the behavior of Banco do Brasil's employees, collaborators, other service providers and businesses are described in corporate documents approved by the company's Senior Management and reviewed periodically.

The *Compliance* Program also applies to units located abroad, subject to the respective local laws and good international practices.

This program adheres to applicable regulations and best market practices, such as: ISO 37.301:2021, ISO 26.000:2010, ISO 30.415:2021, *The Federal Sentencing Guidelines*, FCPA – *Foreign Corrupt Practices Act*, UKBA – *The United Kingdom Bribery Act*, Law No. 12.846/2013 – *Anti-Corruption Law*, Decree No. 11.129/2022, Law No. 9.613/1998, Law No. 13.260/2016, CVM Instruction 50/2021 and Bacen Circular No. 3.978/2020.





Banco do Brasil's Compliance Program



Banco do Brasil's Compliance Program aims to prevent, detect and correct the institution's exposure to situations of non-compliance with laws, standards, external/internal regulations and the Code of Ethics. For this reason, these three verbs involve the entire representation of the Program.

The alignment with the Corporate Strategy is emphasized, reflecting BB's purpose, values and vision.

As a way of operationalizing its objective, the Program has **ten integrated and complementary advisors**, who guide the Bank's operational activities and business practices, promoting the development of best corporate management practices.

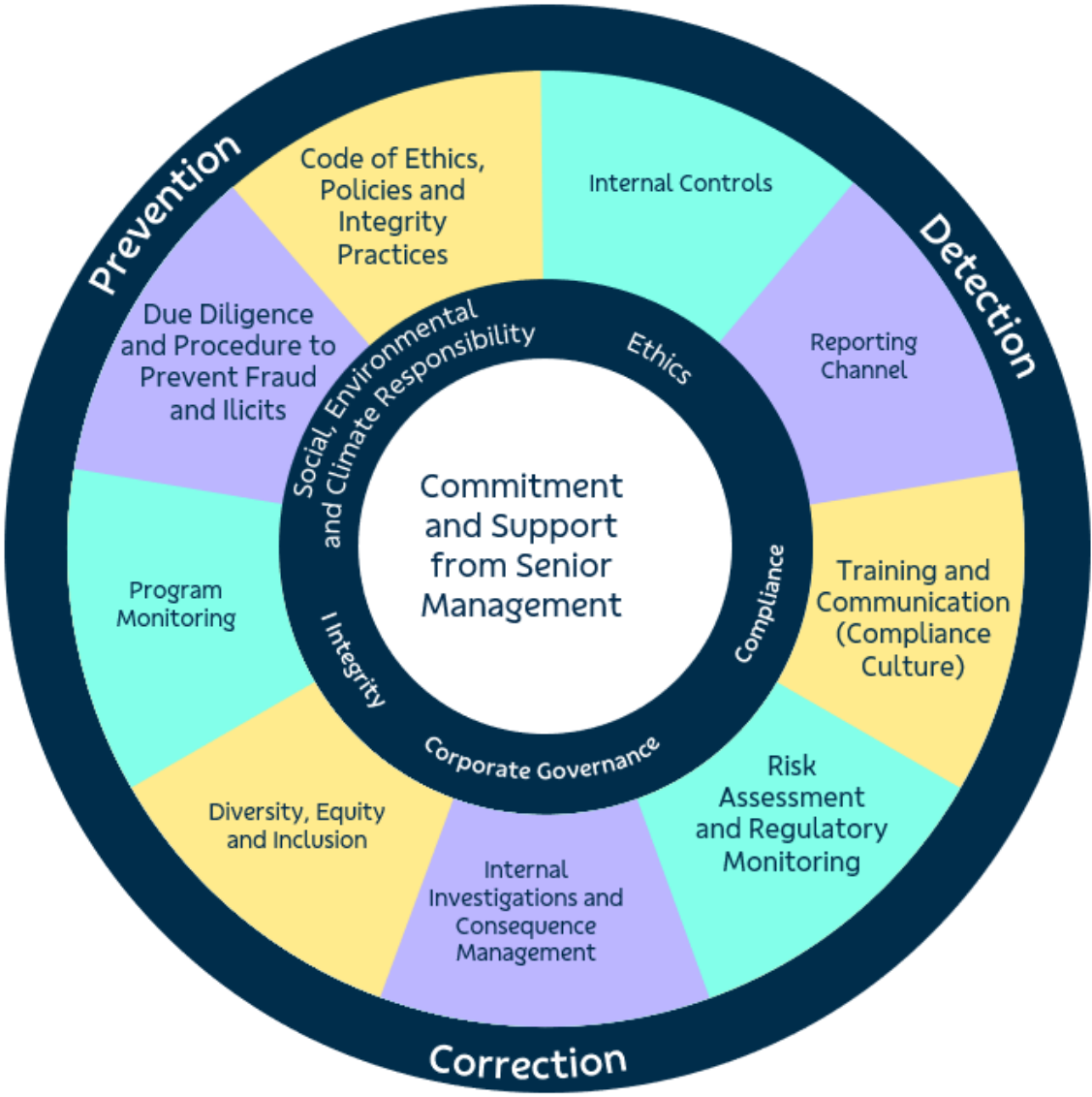
At the center is the advisor "Commitment and Support of Senior Management", since the tone of leadership is decisive in the implementation process of the Program.

Based on this structure, the implementation of the Program contributes to the construction of an environment whose actions (processes, products, businesses, services and channels) adhere to ethics, integrity, regulatory compliance, corporate governance and social, environmental and climate responsibility.

Banco do Brasil's Compliance Program



The framework of the Bank's Compliance Program can be represented by the figure on the side.



Banco do Brasil's Compliance Program

Art. 56 of Decree No. 11,129/2022, which regulates Law No. 12,846/2013, defines that the "Integrity Program consists, within the scope of a legal entity, of the set of internal mechanisms and procedures for integrity, auditing and encouraging the reporting of irregularities and the effective application of codes of ethics and conduct, policies and guidelines, with the objective of: I - preventing, detecting and remedying deviations, fraud, irregularities and unlawful acts practiced against the public administration, national or foreign; and II - fostering and maintaining a culture of integrity in the organizational environment". In addition, in its art. 57, there is a definition of parameters that should be part of the integrity program. At Banco do Brasil, these integrity parameters are contained in this *Compliance Program*.

Independence, Structure, and Authority of the Internal Body Responsible for Enforcing the Compliance Program and Overseeing Its Compliance

In the direct public administration, any fraud committed against the agency is an act against the public administration and, therefore, treated from the same perspective as acts of corruption. It can be understood that, for direct public administration, the concepts of fraud and corruption (in a broad sense) are intertwined, covering acts that provide undue advantages to a person or entity to the detriment of society, or public assets.

Dicoi – Internal Controls and Compliance Board is responsible for monitoring, evaluating, verifying and reporting the Bank's compliance status.

In its institutional role, this area has independent action, with autonomy to point out the necessary changes, in addition to human and material resources allocated appropriately to the activities conducted.



Guidelines



Commitment and Support from Senior Management

The *Compliance Program* is sponsored by Senior Management, which always seeks to be prepared for the challenge of inserting the culture of social, environmental and climate responsibility, *compliance*, ethics and integrity in everyday life, in addition to being seen as an integral part and partner in business.

Risk Assessment and Regulatory Monitoring

RISK ASSESSMENT

Risk is the possibility that the realized result of a given event is different from the expected result, negatively impacting the company's condition to achieve its objectives.

Knowing the threats, risks and objectives of the company is fundamental to structure an assertive assessment, combining the probability of occurrence and the impacts that such events would have if they were to be observed.

Lines of Defense Reference Model (MRLD)

MRLD is a good practice adopted by Banco do Brasil for risk management and internal controls in an integrated and efficient manner. The model establishes the roles and responsibilities of the different areas and processes that make up the lines of defense, as well as the interaction between them, in order to provide more security, so that the strategic objectives are achieved.

REGULATORY MONITORING

Regulatory monitoring is a systematic and continuous process of collecting relevant data about regulatory changes that may impact BB's activities. The objective is to ensure the regulatory adherence of the Bank's various processes, products, services and channels, to mitigate compliance risk. In addition, continuous and timely monitoring aims to ensure that any changes in regulations are properly internalized, with the adequacy of processes in a timely manner.

Guidelines



Code of Ethics, Policies and Integrity Practices

CODE OF ETHICS

Banco do Brasil's Code of Ethics is the document that presents the Bank's commitments and guidelines in relation to its audience and society. It presents the organization's purpose, vision, values and principles. The Code is periodically revised to provide guidelines on how the company should act in the face of current challenges and its approval is the responsibility of BB's Board of Directors.

The assumptions and guidelines contained in BB's Code of Ethics must be observed with attention, care and vision of protagonism, as the responsibility for the application and dissemination lies with all employees of the Bank.

Ethics in Artificial Intelligence

Banco do Brasil also has guidelines for ethics in artificial intelligence, to guide the development of intelligent software. The application of these guidelines occurs at all stages of the AI application lifecycle, from problem understanding and solution planning, development, implementation to application evaluation and monitoring.

The guidelines are: transparency, explainability, fairness, security, reliability, autonomy, responsibility, data and model privacy, guaranteed benefit to stakeholders, social and environmental well-being.

POLICIES

Policies are guidelines on behaviors that the company should adopt in certain previously defined situations and portray the general behavioral pattern. At Banco do Brasil, they are classified into two types:

General Policies: They guide organizational behavior in matters of interest to all administrative areas;

Specific Policies: These guide the development of functions or the behavior of certain areas of business administration, with an emphasis on regulatory body recommendations.

All the Bank's General and Specific Policies make up the Institution's Governance Architecture and are approved by the Board of Administration. The following are the main specific policies related to *compliance* and integrity at BB:

Examples of Specific Policies

- Specific Policy for Internal Controls and Compliance (*Compliance*);
- Specific Customer Identification Policy;
- Specific Credit Policy;
- Specific Policy to Prevent and Combat Money Laundering, Financing of Terrorism, Financing of Proliferation of Weapons of Mass Destruction and Corruption;
- Specific Risk and Capital Management Policy;
- Specific Appointment and Succession Policy;
- Bank's Specific Supplier Relationship Policy;
- Specific Policy on Equity Interests;
- Transaction Policy with Related Parties;
- Specific Social, Environmental and Climate Responsibility Policy - PRSAC;
- Privacy Policy and Personal Data Protection;
- People Management Policy;
- Specific Information Security and Cybersecurity Policy.
- Specific Policy for Relationship with Customers and Users of Products and Services;

Guidelines

Code of Ethics, Policies and Integrity Practices

INTEGRITY PRACTICES

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 finance political parties or candidates for public office in Brazil and the countries in which we operate” and in the Private Social Investment Guidelines (<https://ri.bb.com.br/en/faq/politicas-diretrizes-e-compromissos/>).

Philanthropic Donations

The Private Social Investment (ISP) Guidelines provide that donations and partnerships must be established in compliance with the legal and regulatory aspects to which the Conglomerate is subject and in accordance with the Institution's General Policies, which guide its behavior with respect to ethics and social, environmental and climate responsibility. The achievement of social purposes is in line with the priorities of the State, with the expectations of BB's stakeholders and the communities involved, in line with the Institution's business objectives, as provided for in the Social, Environmental and Climate Responsibility Policy.

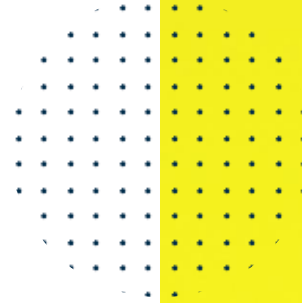
Event Sponsorship and Promotion

The promotional actions in relationships with entities and public officials comply with limits and guidelines set out in specific legislation and those dealing with anti-corruption, domestic or foreign practices.

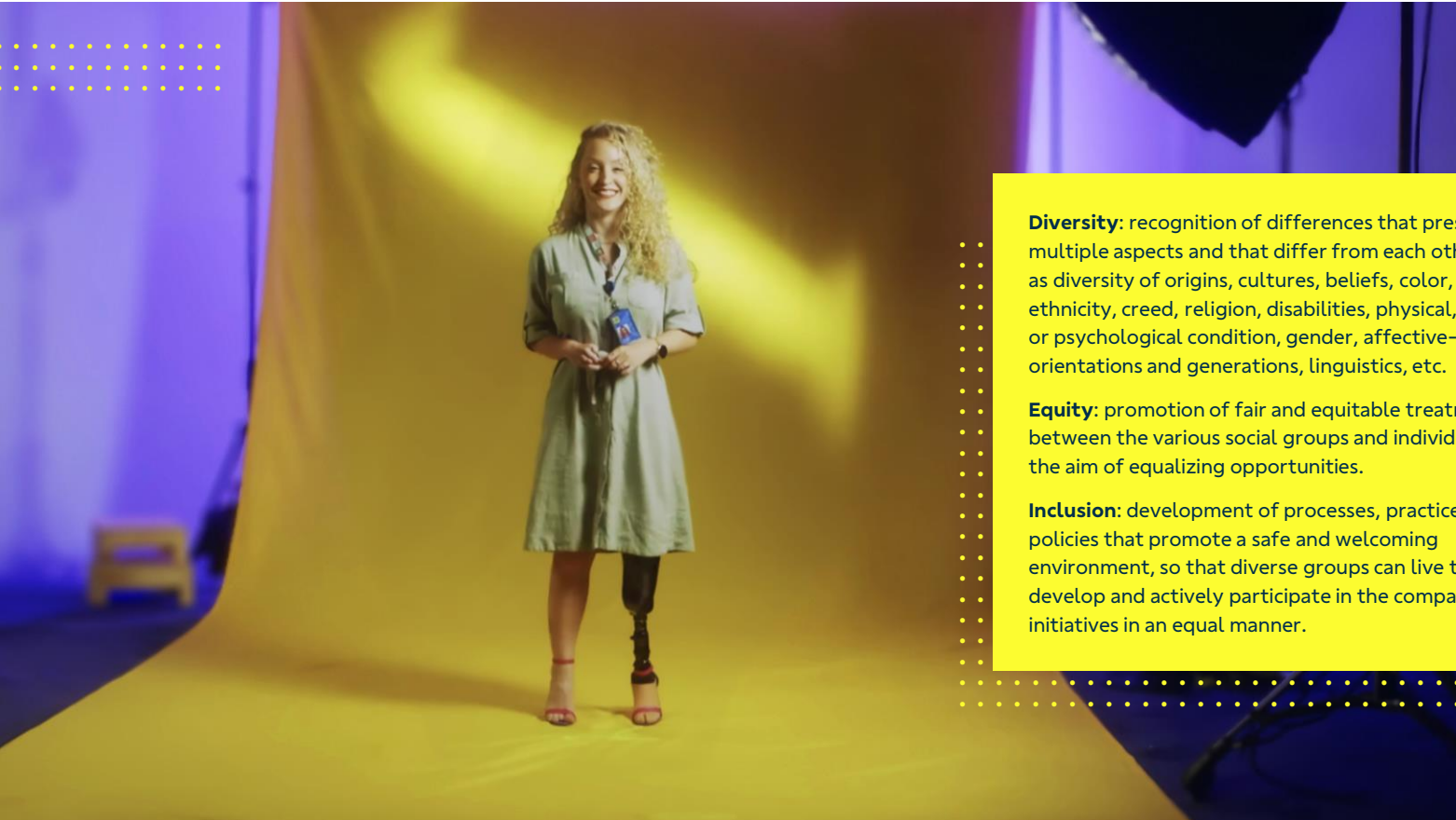
Gifts, Presents, Hospitality and Favors

As a result of its function as a government-controlled company, a member of the Indirect Federal Government, the Bank follows rules for receiving gifts and hospitalities similar to those established by the Public Ethics Commission of the Brazilian Government. These rules are the same that must reference the conduct of the areas and employees in offering gifts and promotional actions to public agents.

The Code of Ethics contains the rules for giving and receiving gifts and favors, while the rules for participation in events, seminars and other trips sponsored by third parties are available in the internal normative instructions.



Guidelines



Diversity: recognition of differences that present multiple aspects and that differ from each other, such as diversity of origins, cultures, beliefs, color, race, ethnicity, creed, religion, disabilities, physical, mental or psychological condition, gender, affective-sexual orientations and generations, linguistics, etc.

Equity: promotion of fair and equitable treatment between the various social groups and individuals, with the aim of equalizing opportunities.

Inclusion: development of processes, practices and policies that promote a safe and welcoming environment, so that diverse groups can live together, develop and actively participate in the company's initiatives in an equal manner.

Diversity, Equity and Inclusion – DE&I

Respecting differences is a fundamental principle for the development of an inclusive and diverse organizational culture.

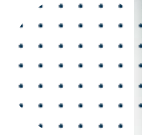
Banco do Brasil respects, encourages and values diversity and equity in relationships, as well as repudiates conduct that may characterize harassment and discrimination of any nature.

Diversity is one of BB's 12 Long-Term Commitments to Sustainability, directing the Bank's actions, in alignment with society's demands and the UN Global Sustainable Development Goals.

Diversity, equity and inclusion are essential principles for a company like Banco do Brasil, which values what is relevant to people. The Compliance Program contributes to ensuring that these principles are complied with, that actions are promoted with all BB's stakeholders and that opportunities are distributed fairly and equitably, without any type of discrimination.

We reaffirm our commitment to respect the dignity of every human being. Our diversity, equity and inclusion goals are in search of more representation of our society and to foster actions and initiatives on the subject among our internal and external audiences.

Guidelines



Training and Communication (Compliance Culture)

Training programs and communication actions are fundamental to promote a culture of compliance, ethics and integrity. For this reason, as part of the Program and an inducer of cultural transformation and strengthening, training and communication actions focused on content are structured to deepen knowledge about compliance, ethics and integrity, as well as their applicability in business, process management and relationships with various audiences.

Training of Senior Management

One of the practices that is observed for Senior Management to reinforce and demonstrate its commitment to *compliance*, ethics and integrity management is the participation of its members in training related to the topics.

When we talk about Senior Management, we are talking about managers and others in charge of governance, namely: the Board of Administration, the Executive Board, the Fiscal Council, the Risk and Capital Committee and the Audit Committee.

Training of Suppliers and Third Parties

Banco do Brasil offers several courses in the "Courses open to the community" tab of the UniBB Portal, as learning options for the external public, socializing the knowledge produced by the Bank.

The Bank maintains, on the BB Portal, on the "Supplier Relations" page, among others: guidance to service providers, clarifications on how to become a supplier of BB, specific supplier relationship policy, sustainable purchasing and disposal standards, BB's Code of Ethics, institutional programs and information on ethics and integrity, with the objective of encouraging companies to adopt procedures/best practices.

In the "Instructions and Duties" section of the "Supplier Relations" page, the conduct of BB employees in dealing with suppliers is explained, to explain the dynamics of the relationship with the Bank in view of the application of the Relationship Policy and Code of Ethics.



Guidelines



Due Diligence and Procedures to Prevent Fraud and Illicit

Due Diligence – adopted from the English expression, refers, according to the Federal Internal Affairs Office, to the "process of checks prior to the hiring of third parties and measures aimed at the supervision of these contractors, especially in situations of high integrity risk profile".

The Bank may relate to different types of third parties: suppliers, service providers, bank correspondents, business partners, sponsors and any others acting for the Bank and/or on behalf of the Bank. Prior to the relationship, specific risk-based procedures are carried out to certify the suitability and good image of the third party and to be aware of the risks that may impact the strategic objectives.

Guidelines



Internal Controls

These are processes and practices by which Banco do Brasil seeks to ensure that all planned and approved actions are properly executed, aiming at safeguarding assets, adequate risk mitigation management, the accuracy and reliability of management information and financial records, the promotion of operational efficiency and adherence to the organization's policies.

Their purpose is to contribute to the achievement of the strategic objectives and the continuity of the company, since they seek to ensure a satisfactory level of security for all the institution's processes, from the mitigation of mapped risks and providing data that demonstrate operational efficiency and effectiveness, confidence in accounting and financial records and compliance with applicable laws and regulations.

Accounting Records

Banco do Brasil prepares its financial statements in accordance with the Corporation Law and observing the standards and instructions of the National Monetary Council (NMC), the Central Bank of Brazil (Bacen) and the Securities and Exchange Commission of Brazil (CVM), when applicable, to adequately represent the results of operations, cash flows and financial position of the Company.

The accounting process is inserted in the Bank's Corporate Governance structure through financial reports to the Board of Administration, Board of Directors, Audit Committee, Fiscal Council, Internal and External Audits, Dicoi, among others.

Banco do Brasil has an Internal Control System appropriate to its size and complexity, meeting regulatory requirements and in line with best governance practices.



Guidelines



Reporting Channel

Banco do Brasil's Reporting Channel is the communication channel through which employees, collaborators, customers, users, partners or suppliers can report situations with indications of illegality, of any nature, related to the Institution's activities, pursuant to CMN Resolution 4.859/2020.

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

The protection of the whistleblower in good faith, identified or anonymous, against any type of retaliation that may arise from their report is guaranteed.

The breach of confidentiality of the complaint data, as well as the information of the whistleblower in good faith, will be subject to disciplinary treatment.

•••
••• The email of the reporting channel is:
••• dicoi.canaldenuncias@bb.com.br
•••
••• They can be registered on the BB Portal:
••• <https://fazai.bb.com.br/canaldenunciabb>
•••

Guidelines



Internal Investigations and Consequence Management

The Disciplinary Control is the process that governs the regulations in relation to employees and former employees with participation in irregularity. Thus, when violations of the regulations are identified, either through complaints or as a result of monitoring actions, the Bank identifies the circumstances and consequences of the irregularity committed, which may result in the application of an administrative measure or disciplinary sanction to the person involved.

Failure to comply with the guidelines of the Code of Ethics may result in sanctions according to the severity of the occurrence, its circumstances and the level of participation of each person involved.

Conduct occurs independently and confidentially, and the investigation must be carried out in a professional and unbiased manner, using appropriate investigation mechanisms.



Guidelines



Internal Investigations and Consequence Management

Violations of the Code of Ethics

Employees or former employees who commit irregularities, also including harmful acts against the public administration in the form of article 5 of Law 12.846/2013, may have their conduct evaluated through Disciplinary Control.

Administrative Accountability Process - PAR

To investigate the practice of a harmful act qualifying as corruption, capitulated in article 5 of Law 12.846/2013, by a legal entity against the Bank, the Administrative Accountability Proceeding - PAR. The authority responsible for deciding on the establishment, trial and filing of the PAR is the Executive Committee for the Prevention of Financial and Foreign Exchange Illicit - CEPI.

Regulation of Law 13.303/2016 and the Bidding Regulations of Banco do Brasil

For contracts governed by Law 13.303/2016, the determination of responsibilities of contracted suppliers is also conducted within the scope of a process, with the fundamental difference that the new legal diploma and the Bidding Regulations of Banco do Brasil no longer establish the sanctions of "impediment to bid and contract with the Federal Government, disqualification from SICAF" and "declaration of unfitness to bid with the Federal Government, while the reasons for the punishment persist or

until rehabilitation is promoted".

Under Law 13.303/2016, the contract may be terminated in the following cases:

- Administratively, at any time, by a unilateral act, duly formalized;
- Amicably, formalized in written and reasoned authorization; and
- Legally, in the terms of the law.

Guidelines

Program Monitoring

Dicoi, as the 2nd line of defense (2nd LD), acts in the continuous monitoring of the Compliance Program and in the verification of the work carried out by the 1st line of defense (1st LD), carrying out periodic evaluations in the processes that make up the Compliance Program, and may, from such monitoring, issue Technical Control Recommendations – RTC for the treatment of identified deficiencies or non-conformities.

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





Questions about the Compliance Program



If further clarification is needed, or if you have suggestions.

Questions from the internal and external public regarding the application of BB's Compliance Program or other topics related to the Program should be sent to the mailbox dicoi.gepro@bb.com.br.

