

Intern al Audit Regula tion

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CHAPTER I - PRELIMINARY PROVISIONS

Section 1. This Regulation sets the guidelines on the main aspects concerning Banco do Brasil S.A. (Bank) Internal Audit Unit operations.

This Regulation was drafted according to the applicable legislation and regulation and is aligned with the International Professional Practices Framework (IPPF) requirements set by The Institute of Internal Auditors (The IIA).

Section 2. The Internal Audit comprises the Internal Control System of the Federal Executive Branch. The Brazilian Monetary Council (CMN) and the Federal Office of Internal Control govern all Internal Audit activities.

CHAPTER II - DEFINITION, PURPOSE AND MISSION

Section 3. The Internal Audit assists the Bank in achieving its goals through a disciplined and systematic approach to assess and improve the efficiency of the governance, risk management and control processes.

Section 4. The purpose of the Internal Audit is to contribute to promoting sustainability and protecting Banco do Brasil's organizational values.

Section 5. According to The Institute of Internal Auditors (The IIA), the Internal Audit's mission is to enhance and protect the organizational value by providing risk-based and objective assessments, advice and insight.

CHAPTER III - REPORTING ORGANIZATION AND FRAMEWORK

Section 6. The Bank's By-laws provide the organization of the Internal Audit Unit, which shall directly report to the Board of Directors (CA). The CA sets the duties and oversees the Unit's operations.

Section 7. The CA and the Office of the Controller General (CGU) shall approve the appointment, assignment, removal or dismissal of an Executive Head of Internal Audit (General Audit).

Any such appointment, assignment, removal or dismissal shall then be reported to the Central Bank of Brazil (Bacen).

Paragraph 1. The Internal Audit holder shall be chosen among the Bank's active employees and their term of office shall last for three years, renewable for an equal period. After the original and renewed terms of office end, the CA may extend it for 365 days more upon a grounded decision.

Paragraph 2. The CA will annually assess the performance of the Internal Audit holder.

Section 8. The Internal Audit Unit shall communicate to and interact with the Bank's governance bodies — Board of Directors (CA), Fiscal Board (CF) and advisory committees to the CA — during executive sessions and meetings those boards hold.

Section 9. Despite not having any right to vote, the Internal Audit Unit shall attend the meetings of the Steering Committee (CD) and other strategic committees of the Organization.

Section 10. The Internal Audit Unit's framework covers several organizational levels, interconnected by Audit Management (GA) Units in Brazil and abroad. The GA Units assess the main risks related to the corporate processes undertaken by the Bank and Entities Associated with Banco do Brasil (ELBB).

Section 11. The Internal Audit Unit has its career path programs, Pimap (Program of Professional Admission, Development and Promotion), to attract, retain and assign all professionals with profiles fitting the Unit's needs, and the Professional Development Program (Procap), to prepare the professionals so they can maintain the high level of performance expected from them by the Unit and ensure the continuous technical improvement of the staff.

CHAPTER IV - PURPOSE AND OPERATIONS

Section 12. The Internal Audit Unit operates independently and objectively in its assessments and advisory works to contribute to improving corporate governance and risk and control management and the Organization's capacity to achieve its goals.

Section 13. The Internal Audit Unit's operations consider the nature and complexity of its organizational environment. All assessments are risk-based to prioritize the most pertaining aspects concerning the Conglomerate's goals.

Section 14. The Internal Audit is a separate unit specialized in internal audit activities and is part of the Bank's Internal Control System. The unit operates independently to protect the Bank's values but also interacts with other internal control bodies.

Section 15. To achieve its purpose, the Internal Audit Unit conducts activities in an integrated and synergic manner inside the BB Conglomerate. These are some of the activities performed by the Internal Audit Unit:

- I. Scheduled Audits: assessment works to improve governance and risk and control management, supported by a risk-based integrated approach;
- II. Special Audits: assessment of irregularities conducted during a disciplinary control process so that the Unit can provide the measures to improve the Bank's processes, products, systems and services and prevent any such events in the future;
- III. Consultancy: independent and objective advisory provided to the Bank's boards, strategic committees and strategic units as well as associated entities;
- IV. External Demands: work along with external audit and inspection and control entities in audit and inspection activities and monitor their work for the Conglomerate;
- V. Other Demands: planning and methodology and project activities, innovation actions, internal quality assessment within the scope of the Quality Management and Improvement Program and provision of information to the Senior Management of the Bank and ELBBs.

Sole Paragraph. To perform its activities, the Internal Audit Unit has advanced information analysis (AAI) tools and devices to improve operational efficiency in assessing corporate processes' risk, control and governance management.

CHAPTER V - AUTHORITY AND AUTONOMY

Section 16. During its inquiry and analysis activities, the Internal Audit Unit will have free access to all files, documentation, methods, database, information systems and electronic transactions as well as to the Bank's premises, equipment and software.

Paragraph 1. The Internal Audit Unit will have the authority to assess the operations of the Conglomerate and those of any third parties, always complying with the legal, regulatory and contractual provisions.

Paragraph 2. The Internal Audit Unit can set its schedule of activities, select any topics and scope of work, set the criteria and deadlines to provide solutions, decide what actions to perform, apply the measures required to achieve the audit goals, and, whenever necessary, request the assistance of employees from other areas of the Bank with technical knowledge about the audited topic.

Section 17. The Internal Audit Unit can request assistance from external experts not working for the Bank whenever necessary.

Section 18. To maintain and ensure the Internal Audit Unit's autonomy, the CA shall be the only authority to approve the Unit's duties, activities, annual planning, budget and framework.

Sole Paragraph. The Internal Audit Unit has the autonomy to change its audit management units, including assignment of employees (audit coordinators, auditors and administrative assistants), scope of work, appointment and working with executive managers. However, these changes shall not result in excessive assignments and expenses over the budget approved by the CA.

Section 19. The Internal Audit Unit has the autonomy to make changes to the works already planned, such as inclusions and cancellations, but shall always report those changes to the Coaud and the CA.

Section 20. The Audit Management Committee shall resolve the auditing methods, ensuring they comply with the Internal Audit Unit's policies and operational strategies approved by the Board of Directors.

CHAPTER VI - INDEPENDENCE AND OBJECTIVITY

Section 21. The hierarchical relationship between the Internal Audit Unit and the CA ensures the Unit's independence and the availability of funds, material and technological resources, and staff. Such independence also guarantees the qualification of the Unit's professionals to

perform their duties.

Section 22. The Internal Audit Unit's hierarchical relationship ensures the General Auditor's unrestricted access, communication and direct interaction with the CA, including during special meetings.

Section 23. To ensure the Internal Audit Unit's independence and objectivity in its activities, no intervention or interference on the Internal Audit Unit shall occur.

Sole Paragraph. The General Auditor shall report any actual or attempted intervention or interference threatening the autonomy of the Internal Audit Unit and the objective work of its professionals to the Coaud and the CA.

Section 24. The Internal Audit Unit professionals shall be compensated as provided by the Organization's policy, regardless of the performance of the business areas.

Section 25. The Internal Audit Unit professionals shall report any event that could actually or potentially impair the Unit's independence and objectivity to their superiors.

Section 26. The Internal Audit Unit professionals shall not perform any activity that could represent taking part in the management of the Bank and any associated entities.

CHAPTER VII - QUALITY MANAGEMENT AND IMPROVEMENT

Section 27. The Internal Audit Unit has a Quality Management and Improvement Program (PGMQ) for continuous and periodical internal audit works, ensuring the expectations of the CA and the Coaud are met.

The PGMQ also assesses the professional responsibilities of the auditors according to the Brazilian and international internal audit rules.

Section 28. The quality assessments to identify improvement opportunities involve:

I. continuous supervision and monitoring of assessment and consulting works;

II. internal assessment of internal audit activities from time to time, checking if they are conducted and aligned with the code of ethics and the IIA rules;

III. external assessment at least once every five years.

Section 29. The General Auditor and a member of the Audit Management Committee shall approve the PGMQ as well as any reviews submitted.

CHAPTER VIII - INTERNAL AUDIT RESPONSIBILITIES

Section 30. Always according to the Conglomerate's policies and guidelines and duties set by the CA, the Internal Audit Unit shall:

I. assess the adequacy of the system of internal controls and the effectiveness of the risk and governance process management;

identify potential risks of fraud and timely report the competent authorities about it;

II. assess and provide advice, including preparing and ensuring the operations of other areas concerned with the protection of the Organization;

III. draft opinions and perform audits provided by the legislation and regulations applicable to the Conglomerate;

IV. advise the CAs and CFs of the Bank and associated entities, the Coaud (Audit Committee), the Risk and Capital Committee (Coris); the Staff, Compensation and Eligibility Committee (Corem), the Technology and Innovation Committee (Cotei), the Corporate Sustainability Committee (Cosem), the CD, the strategic committees and units and associated entities;

V. prepare, propose and implement operational policies and strategies;

VI. prepare an Annual Plan for Internal Audit (Paint) and an Annual Report of Internal Audit Activities (Raint);

VII. draft opinion about the assignments of internal audit as well as the appointment of the unit's holder for associated entities in Brazil and abroad as well as about contracting internal or external audit services in Brazil and abroad;

VIII. provide information to inspection and control entities about the Internal Audit Unit's activities;

IX. monitor the recommendations from the Internal Audit Unit and inspection and control entities;

X. monitor:

a) the inspection and control works as well as any others performed by an external audit company whenever they concern the Conglomerate's banking or supervision activities; and the provision of information from the Bank's areas whenever required for audit and supervision purposes;

b) internal audit works contracted with specialized companies in Brazil and abroad.

XI. ensure:

- a) the compliance with the policies and guidelines set for Internal Audit purposes;
- b) that the Unit's activities are performed according to the applicable laws and regulations, the bank supervision requirements, the internal policies and procedures and the legitimate expectations of society.

CHAPTER IX - GENERAL AUDITOR RESPONSIBILITIES

Section 31. The General Auditor is responsible for:

- I. submitting the following for the CA approval along with an opinion from the Coaud:
- a) every year, the Paint, the budget and the Raint;
- b) material changes to the Paint and the budget.

II. ensuring:

- a) the effective management of the Internal Audit Unit's activities to achieve the proposed goals and add value to the Organization;
- b) the application of the principles of integrity, independence, objectivity, confidentiality and qualification;
- c) that the Internal Audit Unit has professionals with the know-how and skills essential to perform their duties;
- d) that any material matters known by the Internal Audit Unit are addressed in the works performed and reported to the Coaud and the CA;
- e) the performance of the activities and works informed in the Paint, including setting the goals and scope, allocating the proper resources and supervision, drafting reports on the work programs and results of tests as well as reporting the results from the works performed along with the applicable conclusions and recommendations;
- f) that the activities follow the policies and procedures established as guidelines for the Internal Audit Unit.
- III. informing the Coaud and the CA:
- a) about how the limited resources available can impact the activities to be performed as

provided by the Paint;

- b) about the performance expected from the activities informed by the Paint;
- c) about any changes made to the Paint in a subsequent meeting;
- d) about the purpose, authority and responsibility for the internal audit activities at least once a year;
- e) the Unit's PGMQ results at least once a year.
- IV. informing the CD, the Coaud, the Coris and the CA about any cases where the audit recommendations were not implemented; keep in mind that the managers of the processes under assessment shall not assume any risks without authorization from the CA;

V. reinforcing the administrative and operational independence of the Internal Audit Unit to the CA at least once a year.

CHAPTER X - RESPONSIBILITIES OF INTERNAL AUDIT PROFESSIONALS

Section 32. The Internal Audit Unit professionals shall comply with the Codes of Ethics of the Bank and The IIA and the Principles and Guidelines of Conduct for Internal Audit Professionals.

Section 33. The Internal Audit Unit professional must show excellence, objectivity and professionalism in their activities, performing independent assessments without being influenced by their interests or the interests of third parties.

Section 34. The Internal Audit Unit professionals shall focus on continuously improving their knowledge and skills.

Section 35. The Internal Audit Unit professionals shall not implement controls, develop procedures, install systems, prepare records, assume administrative duties, or participate in any activity that could impair their judgment.

Section 36. The Internal Audit Unit professionals shall refrain from assessing any operations they took part or performed administrative or decision-making duties as well as any other activities they performed the last 24 months immediately before the audit work.

Section 37. The Internal Audit Unit professionals must maintain the confidentiality of any information or facts they become aware of during their activities and shall not disclose or use it for their benefit or to benefit any third parties.

Section 38. The Internal Audit Unit professionals must be impartial and exempt, avoiding taking part in any situations with a potential conflict of interest or that could impair their objectivity in fact or appearance or jeopardize their professional judgment.

Section 39. The Internal Audit Unit professionals shall comply with the control and security requirements set for registering, accessing and safekeeping every document and information concerning assessment and advisory works, always according to the Bank's guidelines and rules and respective legal and regulatory aspects.

Section 40. The performance of the Internal Audit Unit professionals shall not be assessed as if it depended on the results from the audited areas.

CHAPTER XI - SCOPE OF WORK

Section 41. The Internal Audit Unit plans and schedules works to assess the Bank's corporate processes, material risks and strategic goals.

The audit cycle can last up to three years.

Section 42. The scope of Internal Audit works considers the Conglomerate's corporate processes, including outsourced ones, as well as but not limited to:

- I. the effectiveness and efficiency of corporate governance practices and internal control systems and processes, considering any current and potential risks;
- II. the reliability, effectiveness, sufficiency and integrity of managerial information processes and systems;
- III. compliance with the legislation, the infralegal regulation, the recommendations from inspection and control entities and internal codes of conduct applicable to the Organization's staff;
- IV. the protection of assets and maintenance of activities involving the Organization's financial operations;
- V. the adequacy of transactions made with related parties according to the applicable legislation and regulation, preserving the interests of the Bank and its shareholders;

VI. during their supervisory duties, the activities, systems and processes recommended or established by Bacen, the CGU, the Federal Court of Accounts (TCU) and other inspection and control entities involved with the Conglomerate's operations.

CHAPTER XII - FINAL PROVISIONS

Art. 43. The results from the audit works shall be discussed and submitted every month to the areas in charge of the topics audited and to the Coaud, Coris, CA and CF. The General Auditor shall quarterly submit the Executive Summary of the Internal Audit during a

meeting held by the CA and then at a meeting held by the CD.

Sole Paragraph. The results will be at the disposal of external auditors and inspection and control entities whenever required by the applicable legislation and regulation. Other interested parties may have access to the results from the audit works only upon court decision.

CHAPTER XII - FINAL PROVISIONS

Art. 44. The Internal Audit Unit shall review this Regulation annually. The General Auditor shall propose any changes to this Regulation along with an opinion from the Coaud to the CA for the final decision.

Art. 45. The Internal Audit Unit's CA shall settle omissions and issues raised with the interpretation of this Regulation.

Brasília, Federal District, December 8, 2022.