



Internal Audit Charter

Summary

CHAPTER I	– PRELIMINARY PROVISIONS	3
CHAPTER II	– PURPOSE	3
CHAPTER III	– ORGANIZATION	3
CHAPTER IV	– OBJECTIVE AND PERFORMANCE	4
CHAPTER V	– AUTHORITY AND AUTONOMY	5
CHAPTER VI	– INDEPENDENCY AND OBJECTIVITY	6
CHAPTER VII	– MANAGEMENT AND QUALITY IMPROVEMENT	7
CHAPTER VIII	– RESPONSIBILITIES OF THE INTERNAL AUDIT UNIT	7
CHAPTER IX	– RESPONSIBILITIES OF THE CHIEF AUDITOR	8
CHAPTER X	– INTERNAL AUDIT PROFESSIONALS’ RESPONSIBILITIES	9
CHAPTER XI	– SCOPE OF WORKS	10
CHAPTER XII	– FINAL PROVISIONS	11

CHAPTER I – PRELIMINARY PROVISIONS

Art. 1. This charter is a guide of the main aspects of the Internal Audit Unit function in Banco do Brasil (Bank). It is written compliant with the applicable legislation, regulation, and in adherence to the mandatory elements of the International Professional Practices Framework (IPPF), settled by the Institute of Internal Auditors (IIA).

Art. 2. The Internal Audit Unit is part of the Internal Control System of the Federal Executive Authority in Brazil, and its activities are duly regulated by the National Monetary Council (CMN), and also, by the Federal Internal Control Secretariat (SFC).

CHAPTER II – DEFINITION, PURPOSE, AND MISSION

Art. 3. Internal Audit helps the Bank to achieve its objectives by applying a systematic and disciplined approach to evaluating and improving the effectiveness of governance, risk management and controls.

Art. 4. The purpose of the Internal Audit Unit is: *To contribute to sustainability and care for the organizational values of Banco do Brasil.*

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

CHAPTER III – ORGANIZATION AND REPORT STRUCTURE

Art. 6. The Internal Audit Unit is set up as provided by the Bank's structure and responds directly to the Board of Directors (CA), which, compliant with its supervisory role, settles to the Unit all its responsibilities.

Art. 7. The nomination, designation, dismissal or waive of the Internal Audit Chief Executive (Chief Auditor) must be approved by both CA and by the The Comptroller General of the Union (CGU) and must also be submitted to the Banco Central do Brasil (Bacen).

1st Paragraph. The one in charge for the Internal Audit Unit must be chosen among all Bank's duty employees and must work in a three-year term, extendable for an equal period. After the extendable term, CA can, upon reasoned decision, extend it for more 365 days.

2nd Paragraph. The formal assessment of the Chief Auditor performance is carried out annually by the CA.

Art. 8. The Internal Audit Unit interacts and communicates with the governance units of the Bank - the Board of Directors (CA), the Fiscal Council (CF), and the

Advisory Committees to the CA - including the executive sessions and the meetings of those Boards.

Art. 9. The Internal Audit participates, without the right to vote, in the meetings of the Executive Board (CD) and the strategic committees of the Organization.

Art. 10. The organizational structure of the Internal Audit is composed in such a way as to cover the various organizational levels, through the Audit Management (GA) in the country and abroad, which carry out assessments of the main risks associated with the corporate processes of the Bank and of the Related Entities of Banco do Brasil (ELBB).

Art. 11. The Internal Audit Unit provides an Admission, Mobility and Professional Promotion's Program (Pimap) meant to attract, retain, and allocate professionals with a suitable profile for the Unit's requirements, and also a Professional Training Program (Procap) aiming at training and developing professionals capable of upholding the high standard performance expected by the Unit and ensuring the best technical quality to its staff.

CHAPTER IV – OBJECTIV AND PERFORMANCE

Art. 12. The Internal Audit Unit performs assessment and consultancy work in corporative processes and provides advisory services, independently and objectively, helping to improve the corporative governance, the risk and control management, and the achievement of the Organization's objectives.

Art. 13. The Internal Audit Unit considers the nature and complexity of the organizational environment in which it takes part, with risk-based assessment, to prioritize the objects of greatest relevance to the achievement of the conglomerate's objectives.

Art. 14. The Internal Audit, a specific and specialized unit for carrying out internal audit activities, is part of the Bank's Internal Controls System, in which it acts as a third line, interacting with the other lines, while preserving its autonomy and independence.

Art. 15. To ensure the achievement of its objective, the Internal Audit develops activities in an integrated and synergistic manner, in the BB Conglomerate, according to its planning, comprising:

- I. Scheduled Audits: assessment works, that aims of improving governance and risks and controls management, with performance supported by the risk-based integrated audit method.
- II. Special Audits: investigation of irregularities, carried out within the scope of the disciplinary control process, and on the assessment of the causes of irregularities, in order to direct actions to improve the Bank's

processes, products, systems and services, in order to inhibit new occurrences.

- III. Consultancy: independent and objective advisory and consulting service to the Bank's strategic committees and units, as well as to its controlled entities.
- IV. External Demands: relationship with the external audit and with the inspection and control bodies, in the form monitoring the work performed by them, within the scope of the Conglomerate.
- V. Other Demands: planning activities, specific studies, and innovation actions, internal quality assessment carried out within the scope of the Quality Management and Improvement Program, and generation of information for the Bank's and ELBB's Senior Management.

Sole paragraph. To carry out its activities, the Internal Audit has instruments and tools for advanced information analysis (AAI), used to provide more effectiveness and greater operational efficiency in the assessments of risk management, controls, and governance of corporate processes.

CHAPTER V – AUTHORITY AND AUTONOMY

Art. 16. In the scope of its functions, The Internal Audit Unit is entitled to access and analyze all kinds of files, documents, methodologies, data basis, information, and electronic transaction systems, as well as to have unrestricted access to work environments, equipment and software used in the Bank.

1st Paragraph. In the scope of its role, the Internal Audit Unit is entitled to evaluate the Conglomerate's core functions, as well as those that are outsourced, considering legislation, regulation, and contracts.

2nd Paragraph. The Internal Audit Unit is entitled to establish the frequency of its activities, to select both subjects and scopes of its engagements, and establish criteria and maximum deadlines for resolving findings, determining activities, applying necessary techniques to fulfill audit objectives and to request, when necessary, the assistance of employees from other areas of the Bank who have technical mastery over the audited object.

Art. 17. The Internal Audit Unit can ask for external expert advisory to subsidize the Unit. when necessary

Art. 18. In order to maintain and ensure Internal Audit's authority, its duties, performance, planning, budget and structure are exclusively approved by CA.

Sole Paragraph. The Internal Audit has the autonomy to make changes to its audit managements, involving staffing (audit managers, audit coordinators auditors and administrative assistants), scope of action, denomination, and

connection to executive managements, as long as the changes do not imply extrapolation of the overall staffing, nor the budget approved by the Board.

Art. 19. The Internal Audit has can make adjustments in the performance of the works foreseen in its planning, such as inclusions and cancellations, provided that rendering accounts of those alterations for both Coaud and CA.

Art. 20. The Audit Management Committee is responsible for deciding on how to use the Audit methodology, in compliance with the Internal Audit policies and strategies, approved by the Board of Directors.

CHAPTER VI – INDEPENDENCY AND OBJECTIVITY

Art. 21. The Internal Audit Unit's hierarchical relationship to CA grants its independency in its activities and aims at ensuring financial, material, human and technological resources availability, and for the training of its professionals required to perform its functions.

Art. 22. The Internal Audit Unit's hierarchical relationship to CA grants its unrestricted access, communication and direct interaction between the Chief Auditor and CA, moreover, in private meetings.

Art. 23. The Internal Audit Unit must refrain from interferences of any nature, in order to grant a performance with the proper independency and objectivity.

Sole Paragraph. Any interferences, in fact or veiled, that represent threats to the autonomy of the Internal Audit and the objectivity of its professionals must be reported by the Chief Auditor to Coaud and CA.

Art. 24. The remuneration of the Internal Audit Unit employees follows the company's policy, and it is not tied to the business area's performance.

Art. 25. The Internal Audit Unit's employees must report to their direct manager any situation that may result in real or potential damage to their independency and objectivity.

Art. 26. The Internal Audit professionals are not allowed to perform activities that could be typified as a participation in the management of either the Bank or its Controlled Company.

Art. 27. In cases where the Chief Auditor assumes, or is expected to assume, roles and/or responsibilities that go beyond Internal Audit, there must be safeguards in place to limit the prejudice to independence or objectivity.

Art. 28. The Chief Auditor, when taking part in advisory committees to the Board of Director - CA (or equivalent bodies) and/or Fiscal Council of Related Entities, must act impartially, avoiding either conflict of interest or any other situation that

may affect his objectivity, in fact or in appearance, or compromise his professional judgment.

CHAPTER VII – MANAGEMENT AND QUALITY IMPROVEMENT

Art. 29. The Internal Audit upholds a Quality Improvement and Management Program (PGMQ), which includes continuous and periodic assessment of internal audit work, oriented to meet the expectations of the Board of Directors and Coaud, as well as the professional responsibilities inherent to the auditors, in accordance with national and international internal audit standards.

Art. 30. The quality assessments, with the aim of identifying the improvement opportunities, are composed of:

- I. supervision process and continuous monitoring of the evaluation and consulting engagements.
- II. periodic internal compliance assessment with the definition of internal audit, with the code of ethics and with IIA rules.
- III. external evaluation that will occur at least once every five years.

Art. 31. The Audit Chief Executive with a member of the Audit Management Committee are responsible for approving the Quality Management and Improvement Program and its revisions that must be presented to the Coaud for knowledge.

CHAPTER VIII – RESPONSIBILITIES OF THE INTERNAL AUDIT UNIT

Art. 32. The Internal Audit Unit, in compliance with the policies and guidelines of the Conglomerate and the attributions settled by CA, is responsible for the:

- I. evaluation of both internal control adequacy, and the effectiveness of risk and governance process management, that includes the search for identifying potential fraud risks and timely forwarding the information to the competent bodies.
- II. assurance and consultancy work, including to support the structuring and functioning of the first and second lines;
- III. issuance of opinions and performance of programmed audit works in legal and regulatory documents applied to the Conglomerate;
- IV. advisory assistance to the CA and Fiscal Council of the Bank and of the Related Entities; the Audit Committee (Coaud); the Risks and Capital Committee (Coris); the People, Compensation and Eligibility Committee (Corem); the Technology and Innovation Committee (Cotei); the Corporate Sustainability Committee (Cosem); the CD, strategic committees, strategic units and Related Entities;

- V. formulation, proposition and implementation of the policies and strategies related to the Internal Audit Unit performance;
- VI. preparation of the Internal Audit Annual Plan (PAINT) and Internal Audit Annual Activity Report (RAINT);
- VII. issuance of opinion about the creation and the staffing resource of the Internal Audit Unit, as well as the nomination of the chief, in controlled entities in Brazil and abroad, and also about hiring either internal or external audit services, in Brazil and abroad;
- VIII. provision of information to fiscal and control bodies about the performance of the Internal Audit Unit;
- IX. monitoring of the recommendations issued by the Internal Audit and by the Inspection and Control Entities.
- X. following up of:
 - a) both supervisory and control works and external audit company activities, when it is performing a supervision in the bank or in the course of an audit work in the Conglomerate; and also information to the Bank areas in response to audit and supervision demands;
 - b) internal audit works contracted with specialized companies, in Brazil and abroad.
- XI. insurance of:
 - a) the compliance with policies and guidelines established by the Internal Audit Unit;
 - b) carrying out its performance, according to applied laws and regulations, banking demands and supervision, internal policies and procedures, and rightful expectations of the society.

CHAPTER IX – RESPONSIBILITIES OF THE CHIEF AUDITOR

Art. 33. The Chief Auditor is responsible for:

- I. submitting for the approval of CA, with the prior opinion of Coaud, the following items:
 - a) annually, the Paint, the budget provisions and the Raint.
 - b) the main amendments to the Paint and to the budget provisions.
- II. ensuring that:
 - a) the management of Internal Audit activities be driven efficiently, aiming at accomplishing all proposed objectives and adding value to the Organization.
 - b) the principles of integrity, independency, objectivity, confidentiality and competency be applied.

- c) the Internal Audit has professionals with knowledge and skills essential to the performance of its function.
 - d) relevant questions, informed to the Internal Audit Unit, be considered in its works and reports to both Coaud and CA.
 - e) the execution of the activities and audit works foreseen in the Paint, including the establishment of objectives and scope, the assignment of suitable resources and proper supervision, documents of scheduled works and test results, and also, communication of work reports with applicable conclusions and recommendations.
 - f) the adherence of its activities to both policies and procedures meant to guide the Internal Audit Unit.
- III. communicating both Coaud and CA, about:
- a) the impact of potential limitations in the resource required to the achievement of those activities scheduled in the Paint.
 - b) the accomplishment of the Paint.
 - c) the alterations upheld in the Paint, in the meeting just after those adjustments are made.
 - d) the purpose, authority, and responsibility of internal audit activities, at least, once a year.
 - e) the result of the Management and Quality Improvement Program (PGMQ), at least, once a year.
 - f) any damage to his independence or objectivity, in fact or in appearance, arising from his participation as a member of advisory committees either to the Board of Director (or equivalent bodies) and/or Fiscal Council of Related Entities.
- IV. reporting to CD, Coaud, Coris and CA all cases of non-implementation of the audit's recommendation, considering that managers of processes assessed are not allowed to assume risks without the authorization of CA.
- V. endorsing to CA, at least, once a year, the administrative and functional independency of the Internal Audit Unit.

CHAPTER X – THE INTERNAL AUDIT PROFESSIONALS' RESPONSIBILITIES

Art. 34. The Internal Audit employees are subject to the Code of Ethics of Banco do Brasil, settled for all employees. They are also subject to the Internal Audit Professional Behavior Guidelines and, perform their activities in compliance to the Code of Ethics of the *The Institute of Internal Auditors (The IIA)*.

Art. 35. The Internal Audit employees must undertake their duties with a high level of excellence, objectivity, and professionalism, by performing independent evaluations, that is, avoiding being influenced by either their own or third party's interests, when building their opinions.

Art. 36. The Internal Audit employees must continuously improve their knowledge and skills.

Art. 37. The Internal Audit employees are not entitled to: implement controls, establish procedures, install systems, prepare registers, and assume responsibilities assigned to the administration of the audited area, or take part of any activity that may influence their analysis.

Art. 38. The Internal Audit employees must refrain from evaluating specific operations in which they have either worked or taken administrative responsibilities or decision making, at any time, as well as evaluating activities that they have worked with by the last 24 months before carrying out their audit work.

Art. 39. The Internal Audit employees must respect the confidentiality of any information or facts they have access to due to the carrying out of their duties, preventing to either divulge them or use them in their own or third party's benefit.

Art. 40. The Internal Audit employees must carry out their activities impartially, avoiding either conflict of interests or any other situation that may affect their objectivity, in fact or veiled, that could compromise their professional analysis.

Art. 41. The Internal Audit employees must respect control and security requirements defined by the register, access and storage of all documents and information related to works of evaluation and advisory, taking into consideration all guidelines and regulations settled by the Bank, along with their respective legal and regulatory aspects.

Art. 42. The Internal Audit employees' performance evaluation must not be tied to the results of the areas subject to their audit works.

CHAPTER XI – THE SCOPE OF WORKS

Art. 43. The Internal Audit prepares the planning of its work, which includes the Bank's corporate processes assessment, including relevant risks and strategic objectives, by performing audit works of a three-year cycle.

Art. 44. The scope of the Internal Audit work considers the Conglomerate's corporate processes, including outsourced ones, and covers, among other aspects:

- I. the effectiveness and efficiency of corporative governance practices and risk management, of control intern processes and systems, considering present and potential risks;

- II. the credibility, effectiveness, sufficiency and integrity of administrative processes and information systems;
- III. the observance to legal framework and regulations, recommendations given by fiscal and control entities and behavioral internal codes applied to all the members of the Organization;
- IV. the protection to both assets and activities related to the Organization's financial function;
- V. the adequacy of the transactions with related parts, in the form of applied legislation and regulations, aiming at preserving interests of both the Bank and its shareholders; e
- VI. the activities, systems and processes recommended or settled by Bacen, the The Attorney General's Office (AGU), the Federal Court of Accounts (TCU) and other supervisory and control bodies related to the Conglomerate's area, when carrying out its supervising duties.

Art. 45. The internal audit works results are discussed and presented monthly to the areas in the charge of each subject, and then issued to Coaud, Coris, CA and CF. Monthly, the Chief Auditor presents the Internal Audit Executive Summary at the Board of Directors meeting and, later, at the CD meeting.

Sole Paragraph. The internal audit works results are available for external audit entities and control and supervisory bodies, when provided on applied legislation and regulations; and even available to third parties, solely due to legal determination.

CHAPTER XII – FINAL PROVISIONS

Art. 46. The Internal Audit must review this Charter annually. Any changes will be proposed by the Chief Auditor to the Board of Directors, for deliberation, with the opinion of the Coaud.

Art. 47. Any doubt or omission that should arise in the interpretation of this Regulation will be solved by the Administration Committee of the Internal Audit Unit.

Brasília (DF) July 12, 2023