



# Code of Ethics

2024 – 2025

Ethics and Internal  
Ombudsperson's Office





# SUMMARY

Ethics and integrity  
are the base of trust.

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## WORDS OF THE COMMITTEES OF ETHICS.

### PRINCIPLES OF THE CODE OF ETHICS

“In a world of fast and deep transformations, it is worth to root our convictions on what is sustainable in the history: our upstanding and ethical behavior.”

Allyson Menarren Santiago Lobato

### RESPECT TO THE INDIVIDUAL

“Because being ethical is to notice in your acts, transparency and seriousness to your fellow being, in addition to peace and tranquility in your heart.”

Celso Miranda Nunes Junior

### PURPOSE AND VALUES

“When we experience the ethics in our day-by-day, at all organizational levels and with all stakeholders, we generate a climate that provides the development and the collaborative environment.”

Nadia Brugnara Soares

### PRINCIPLES OF THE CODE OF ETHICS

“Being ethical is to act with honesty, being responsible for your actions, guaranteeing transparency and having respect to anyone with no distinction.”

Ann Grace Heuer Holanda

### PRINCIPLES OF THE CODE OF ETHICS

“The Code of Ethics is a light to guide your history at BB.”

Josenilda Helena Laurindo Barbalho



# Message from the President

The Code of Ethics has existed since 2000. Over the years, it has undergone many changes. For a moment we can think... have ethics changed? Are we more or less ethical today as a result of changes?

What we must be very clear about is that ethical principles do not change and that BB is a company that operates based on principles that are valuable to society.

The content, approach and appearance of our document have undergone major transformations and these are very important to make the document clear, accessible and representative. But, in addition to these changes, we need to monitor the context in which we are located. We need to talk about the facts and events that transform the world and society. We must talk about business and processes, but we need to talk about conduct, behaviors and relationships.

BB's Code of Ethics represents this... a set of ethical principles applied to the most diverse themes that permeate our society, with everything that is expected from a group of people who desire and have the purpose of transforming the lives of our people for the better. customers, society and ourselves.

We talk about people, artificial intelligence, protection, honesty, seeking respect for diversity and we need to have constant and true attitudes that demonstrate our commitment and responsibility.

We are all connected and responsible for the future of our organization. If we are aligned, seeking respectful and long-term relationships, our capacity for transformation will be intensified every day.

The new version of BB's Code of Ethics is available to you. Know your content, apply it and disseminate it.

Ethics and Integrity are the foundations of trust!



**Tarciana Medeiros**



## Purpose

To be close and relevant in people's lives at all times.

## Values

**Proximity:** We are present, proactive, and empathetic to enchant people.

**Innovation:** We innovate to simplify the solutions and facilitate people's lives.

**Integrity:** We act based on respect, trust, ethics, and transparency.

**Efficiency:** We optimize the resources available to create value to our relationship publics.

**Commitment to the society:** We consider the collective interest in making our decisions.

**Diversity:** We promote the diversity, equity, and inclusion to build relationships and sustainable results.



# Purpose and Values



**Target  
public**

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## The code of ethics is applied to:

### Senior management

Board Members, President, Vice-Presidents, and Officers, including of controlled companies.

### Employees

Allocated in Brazil and abroad.

### Collaborators

Trainees, apprentices, directors, and employees of contracted companies.

### Others

Those acting or providing services on behalf of Banco do Brasil or to Banco do Brasil.



# PRINCIPLES OF THE CODE OF ETHICS

**Each of us has the challenge of transforming ethical principles into an essential part of our responsibilities.**

They are principles that dictate the direction we shall take, Especially when we live ethical dilemmas and need to make decisions according to the Bank's expectancies, even if they have not been provided in specific standards.





# PRINCIPLES OF THE CODE OF ETHICS

## Honesty

The Bank expects that its employees' conduct has honesty as standard. We shall only do what is correct, we shall act in good faith, with integrity and sincerity in the subjects that affect the Bank's duties and interests.



# PRINCIPLES OF THE CODE OF ETHICS

## Responsibility

Each member of the Bank is responsible for his/her actions and decisions. We shall, regardless the position we hold, be responsible for the creation of a transparent, respectful, and safe environment, so that the businesses are ethical and sustainable. It is our responsibility to take care so that irregular acts do not take place at the Bank.



# PRINCIPLES OF THE CODE OF ETHICS

## Transparency

The Bank takes care of the transparency of its actions. The information shall be complete, accurate, and clear. The trust of our partners are connected to the free access the Bank gives to the information of its reports, rendering of accounts, and decision making. The secrecy and confidentiality of the information permeate and are required in our actions at the Bank. However, actions intentionally taken in secret are not ethical.



# PRINCIPLES OF THE CODE OF ETHICS

## Respect

Banco do Brasil does not tolerate disrespect to the dignity, equality, diversity, and privacy of people. We respect the different cultures and understandings of the world and consider the observance to what is legal as essential. We repudiate any criminal acts and conducts, even if practiced outside the work environment.



## What do such principles mean in practice?

Respect is a duty, it is good, and everybody likes it.

Do what is correct.

You are responsible for the consequences of your attitudes.

Take care of the Bank! What affects the company, affects you. Inside and outside it, you carry with yourself the institution's image and reputation.

If you need to hide your action, it is not ethical.

It is not sufficient to be ethical, it is also required to seem ethical.

When in doubt about how to act, stop, and look for help.



# What are the gains and benefits of keeping an ethical posture?

The ethical posture of each one decisively cooperates to the development of a healthy organizational culture.

The work environment becomes safe, and people feel engaged.

With the ethical posture of its employees, the company gains respect in its business and approval of the community.



# 1. Respect to the individual

- 1.1 We respect the diversity of the people that form the work environment, and that keeps a relationship with Banco do Brasil.
- 1.2 We encourage the culture of respect and repudiate violence, inside and outside the work.
- 1.3 We shall take care of the establishment of a decent and healthy work environment, grounding the relationships on respect and cordiality, regardless the position performed in the organization.
- 1.4 We shall ground our relationships on the respect to the differences, being them physical, racial, cultural, religious, of sexual orientation, social, linguistic-regional, age, of ideas, origin, capacity, appearance, class, marital status, or identity of gender.
- 1.5 We recognize that the diversity and multiplicity of experiences, perspectives, and abilities enrich the teams.
- 1.6 We promote the equity and inclusion of people.
- 1.7 We promote an inclusive environment that recognizes the differences, actively aiming the participation and contribution of everyone, regardless their origin or individual characteristics.
- 1.8 We commit to create and keep a safe and inclusive environment, where the psychological safety is a priority and essential, whether in the interaction with clients, users, employees, collaborators, or any other public we have a relationship with.
- 1.9 We shall respect the social and cultural standards of the community where we act, presenting us and behaving in a proper manner aligned with the position performed.
- 1.10 We shall prevent embarrassments and losses to the image of the Bank and of its employees.
- 1.11 We do not authorize that it starts or that it is disclose, in any medium – internal or external – criticisms offensive to the honor or slanders that expose the image of BB or of any of our areas or employees.

We may be who we are and do good.

## Illustrative example – Disrespect in the work environment:



- A mate, in the work environment, routinely makes inconvenient jokes upon the mates.

Although they have talked about it, he does not cease such type of behavior, generating a sensation of discomfort and embarrassment in the others.

Banco do Brasil does not tolerate acts of disrespect or discrimination. If it occurs, look for you manager and competent sectors to manifest your discomfort.





## 2. Good relationship practices

2.1 We make trust, honesty, and ethics a priority in our commercial practices, and in the relationship with all publics of interaction, acting in a transparent, impartial, and fair manner.

2.2. We commit ourselves to the good climate of work, grounding our conducts on respect and tolerance

2.3 We keep the respectful and professional communication with our mates, managers, subordinates, internal and external clients.

2.4 We do not authorize the issuance or reproduction of comments that may hinder the harmonious coexistence in the work environment.

2.5 We develop our activities and assignments with responsibility, autonomy, timeliness, and commitment.

2.6 We follow up and conduct, with timeliness and commitment, the demands sent through official tools of internal communication of the Bank.

2.7 We develop our daily work observing the safety guidelines.

**“The remote work is, at the same time, a privilege and a challenge, since the success in this modality of work requires to adequate the routines of the employee and of the people that live together.”**

Céssia Freitas de Figueiredo  
Employee

**Onsite, Remote, or Contingencial  
Work Environment**



## 2. Good relationship practices

2.8 We consider the occupation safety and health as institutional pillars.

2.9 We comply with the occupational safety and health standards.

2.10 We forbid to work intoxicated and/or under the effect of illegal drugs.

2.11 We contribute, in our daily activities, for the maintenance of the secular and non-partisan character of the Company.

2.12 We repudiate conducts that may characterize harassment of any nature.

2.13 We repudiate conducts that may characterize discrimination or its inducement; duress, persecution, or embarrassment; disrespect to the functional assignments; public disqualification, harm, or threat.

2.14 We direct that employees keep an economic-financial situation compatible with the evidenced occupation and income.

2.15 We supervise and adopt measures inhibiting irregularities.





## 2. Good relationship practices

**May every inadequate conduct that generates misunderstanding be considered moral harassment?**

It is understood as moral harassment every abusive conduct, such as gestures, words, and attitudes that repeat in a systematic manner, affecting the dignity or psychical or physical integrity of the worker. Source: Prevention to Moral Harassment Booklet – Stop and Observe – For a more positive Work Environment – TST’s Social Communication Office.

Moral harassment is a form of violence that harms the dignity or psychical or physical integrity of another person through abusive conduct, regardless intention, through the degradation of the social-professional relationships and of the work environment, being able to be characterize by the requirement of compliance with unnecessary or exorbitant tasks, discrimination, humiliation, embarrassment, isolation, social exclusion, defamation, or humiliating and embarrassing situations liable to cause suffering, physical or psychological damage.

The harassment is configured when the inadequate attitudes are repeated during a period of time, that is, in a repetitive and extended manner.



## 2.

## Good relationship practices

**The sexual harassment at work is characterized, as a rule, by the conduct that violates someone's sexual freedom.**



## 2. Good relationship practices

### **What are the characteristics of sexual harassment?**

Sexual harassment: conduct of sexual connotation practiced against someone's will, in a verbal, non-verbal, or physical manner, manifested by words, gestures, physical contacts, or other ways, with the effect of disturbing or embarrassing the person, affecting his/her dignity, or to create an intimidating, hostile, degrading, humiliating, or destabilizing environment to him/her.

Regardless the position held or the existence of subordination between the involved ones, the undesired approaches of sexual nature are treated with severity and responsibility.

## 2. Good relationship practices

Differently of the moral harassment, so that the sexual harassment is configured, there is no need that the harassing conduct that perpetuates over the time. Thus, the sexual harassment may take place through the simple harassment of the victim or the continuous practice of harassing acts. #noisno

### Illustrative example – Sexual Harassment:



- A employee offers a ride to a mate after the working hours. In the route, he makes insinuations of sexual nature and ends up intimidating the victim with threats of losses in the work.

The sexual harassment may be characterized for practices in the work place or outside it, provided that the approach outside has relationship with the work, as it was evidenced in the example. Physical contact is not required. Oral and written expressions, gestures, or images sent via e-mails, social networks, etc., may also configure a situation of harassment.



## 2. Good relationship practices

### Leaders

2.16 We require that our leaders respect, disclose, and apply the precepts of the Code of Ethics and of the Policy of Relationship with Clients and Users, promoting the induction of their led ones for such same purpose.

2.17 We recommend that our leaders promote the development and inspire their teams valuing victories and achievements, stimulating the engagement and aiming to form successors to current and future challenges.

2.18 We determine that our leaders build a sound relationship with the clients, providing solutions proper to them.

2.19 We require that our leaders act with vision and purpose, presenting BB's strategy of an assertive perspective to obtain the support and commitment of the led ones.

2.20 We require that our leaders are ethical, reference of proper posture, and promoters of the team work, of the sharing of knowledge and experiences, autonomy, innovation, inclusion, and cultural transformation.

2.21 We determine that the communication of our leaders is aligned to the Bank's strategy, looking for the balance between people, processes, and results, showing care with clients, employees, society, and shareholders.

2.22 We induce our leaders to have courage to dare and develop adaptability, resilience, and wisdom before challenging circumstances, continuously making the management of the risks.

2.23 We recommend that our leaders have empathy, emotional control, respect to the individuality of the led ones, promoting the respectful, assertive dialog based on the Non-Violent Communication.

2.24 We direct that our leaders look for knowledge about more efficient and effective processes, advancing and adopting innovating initiatives in the development of digital solutions to obtain consistent results.



## 2. Good relationship practices

### Led People

2.25 We require that our led people respect the Code of Ethics and the Policy of Relationship with Clients and Users.

2.26 We direct that our led people have respect, tolerance, emotional control, and maturity, putting in practice the Non-Violent Communication and active listening.

2.27 We guide that our led people are protagonists of their career and promote their self-development, showing initiative and commitment, in addition to the capacity of adaptation to changes of scenario.

2.28 We direct that our led people are partners of the management, focusing on the good relationship practices and in the conduct of the processes.

2.29 We direct that our led people develop the strategic thinking, the digital skill, the reading of scenario, the creativity and innovation.

### **My manager ordered me to do something contrary to the code of ethics. What do I do?**

Talk to your manager, and check if there was no communication problem. If you notice something contrary to the Code of Ethics, look for help at the Ombudsperson's Office or in another channel of the Bank.

**You may not be collusive with acts that breach the Code of Ethics.**





## 2. Good relationship practices

# Partners and Clients

2.30 We direct partnerships with agents that assure values, such as: integrity, ethics, good reputation, and respect to the diversity, to the community, and to the environment.

2.31 We require that the social-environmental impacts are measured and considered in the achievement of partnerships, agreements, protocols of intentions and technical-financial cooperation with external private or public entities.

2.32 We offer products and services, as well as we provide service with honesty, diligence, and ethics.

2.33 We direct that the contacts and business with the clients are made with respect, reputation, and professionalism, and that the products and services are offered according to the applicable legislation, observing the guidelines of compliance, suitability, and policy of relationship with the clients and users of Banco do Brasil.

2.34 We direct that entities connected to Banco do Brasil ground their strategic and business directions on ethical principles and rules of the corporation.

2.35 We forbid the use of subterfuges to achieve goals, such as, for example, the non-sustainable businesses, and circumvents the corporation's systems and rules.

2.36 We respect the freedom of union association, and aim to conciliate the company's interests with interests of employees and of our representative entities, having the negotiation as a permanent practice.





## 2. Good relationship practices

### Suppliers

2.37 We shall conduct processes of bid, contracting, and formalization of agreements and partnerships with honesty, ethics, integrity, and impartiality.

2.38 We shall adopt actions and procedures to prevent frauds and illegal acts in the bidding processes, in the performance, and follow-up of administrative contracts, or in interaction with the public sector.

2.39 We direct that criteria of selection, contracting, and assessment shall be determined in an impartial and transparent manner, allowing plurality and competition between suppliers.

2.40 We shall require of suppliers: compliance with the labor, social security, and fiscal legislation; compliance with the legislation and of the regulations related to the corruption prevention and fighting; actuation grounded on the integrity, ethics, good reputation, and respect to the diversity, to the community, and to the environment; non-use of child or slave work; adoption of good practices of environmental preservation; non-adoption of corruption acts against governments and the Brazilian or foreign public administration.

2.41 We direct the suppliers to follow the guidelines of this Code of Ethics.

2.42 We respect the limits of the management of the companies and collaborators contracted by BB, observing abilities and rules for follow-up, inspection, and direction of such public.

**If you notice any irregularity or inconsistency by suppliers, you shall inform the fact to your superior and to the unit in charge of the contract administration via the e-mail [cesup.fornecedores@bb.com.br](mailto:cesup.fornecedores@bb.com.br) or, if you prefer, register the demand with the Internal Ombudsperson's Office.**



## 2. Good relationship practices

# Shareholders, investors, and creditors

2.43 We are transparent and agile in the provision of information, observing rules of secrecy and confidentiality.

2.44 We prepare financial statements in compliance with the law, principles, and accounting standards to properly present the result of the operations, the cash flows, and the equity and financial position of the Company.

# Competitors

2.45 We define that the ethics, the integrity, and the civility shall be guiding principles of our relationships with the competition. Exchange of information may only take place in a legal, transparent, and reliable manner, preserving the principles of the bank secrecy, and the interests of the Company.

2.46 We do not approve the rendering of opinion about the competition or the depreciation of their products and services.

2.47 We forbid inadequate practices in the offer of products and services, including the imposition in the processing of businesses.



## 2. Good relationship practices

### Governments

2.48 We are partners of the public sector in the implementation of public policies and projects, and government programs towards the social and economic development of Brazil and of the countries we act in, focused on sustainability.

2.49 We articulate the convergence of interests and needs of the Public Sector with the Private Sector and social-economic segments of the societies we have a relationship with.

2.50 We shall act in the relationships with the public authority in compliance with international guidelines regarding the prevention and fighting to the tax evasion, corruption, money laundering, and financing of terrorism.

2.51 We forbid the financing of political parties or candidates to public offices in Brazil and in the countries we act on the behalf of the Bank, or of its representatives.

2.52 We repudiate acts of corruption practiced against the Public Sector and the Brazilian or foreign public administration, such as, for example: guarantee, promise, offer, or give, directly or indirectly, any undue advantage to public agent or third party related thereto; finance, fund, sponsor, or in any other manner endow practice of illegal act; induce to perform or fail to perform action breaching the legal obligations; obtain, keep, or direct businesses in an undue manner; practice tax evasion, foreign currency flight, and other fiscal crimes; affect or influence act or decision; use broker – individual or legal entity – to hide or dissimulate interest or identity of beneficiaries of practiced acts; prevent, disturb, or manipulate the competitive character of the public purchases and bid processes; make it difficult or interfere in the investigation or inspection activity.

2.53 We shall establish, regardless individual ideological conviction, a courteous relationship with the Brazilian Public Sector and with the public authority of the countries we act in.

2.54 We forbid to give, offer, promise, or authorize that anything of value is given to an employee of the Brazilian or foreign government, directly or through and intermediary, in order to influence action to obtain an undue advantage.

## 3. Need to observe what is legal

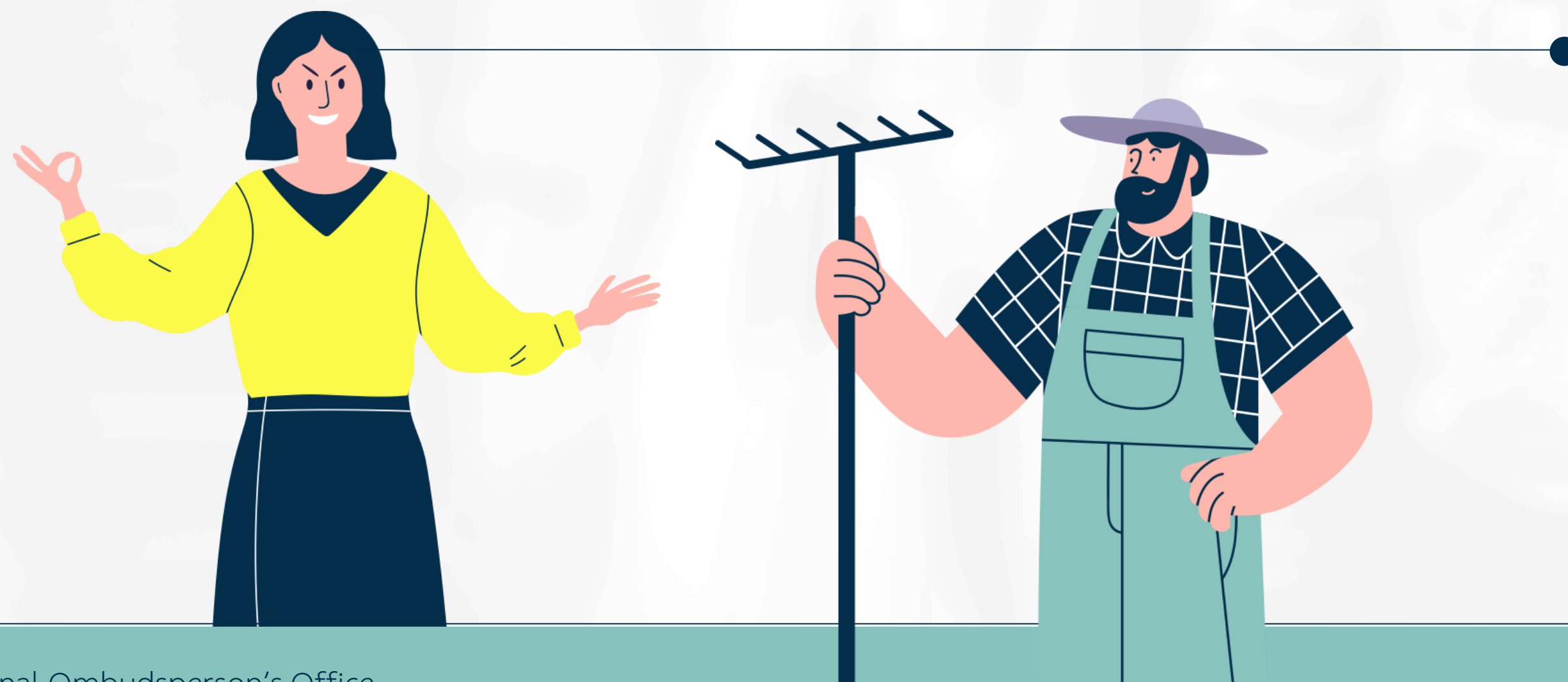
3.1 We ground our actuation on the principles of legality, impersonality, morality, publicity, and efficiency.

3.2 We repudiate any illegal conduct that raise rejection or revere social disapproval, even if practiced outside the work environment, such as, for example, fraud, bribery, extortion, corruption, nepotism, kickback, usury, money laundering, foreign currency flight, and financing of terrorism, reduction of someone to condition analogue to slave, pedophilia, grooming, criminal solicitation of a child, crimes against sexual freedom, robbery, theft, or embezzlement, racial injury or racism, domestic violence, and discrimination.

### Illustrative example – Corruption:

An employee that worked with family agriculturalists and small farmers visited a client's technical service, who asked her to direct the demands for rural projects to his company.

The company then passed to indicate the client's company and, in exchange of the "favor", she received deposits in her checking account from the technical service company. BB's position: One shall never direct businesses, nor receive value/present/gift/hospitality from a third party as payment of "commission" for the services provided by the Bank.





## 3. Need to observe what is legal

# Compliance

3.3 We ratify the need of all employees and the members of the senior management to have knowledge about the Bank's Policies, the legislation, and the regulation in effect inherent to its activities.

3.4 We shall act in compliance with the internal standards, the laws, and standards of the Brazilian legal system, and the legal system of the countries we act in.

*"The school of ethics that more instructed me, since the early grades until the practice of the management of the cultures, business, and people is called Banco do Brasil."*

Luis Felipe Soares Pires  
Employee

### Is everything that is not written in the standard allowed?

The standards of the Bank are good guides of our actions. However, if you are upon a situation where it is not found in the standards, a clear explanation of how you shall act, ask for help to your manager and through the service channels. If a certain situation is not provided in the standards, it does not mean it is allowed.



## 3. Need to observe what is legal



### Attention

3.5 We forbid the business relationship with people and organizations involved in illegal activities.

3.6 We do not authorize the practice of act that may give rise to civil or labor action or that causes loss to the Bank.

3.7 We forbid the formalization of decisions related to operations with no prior and formal authorization of the client.

3.8 We forbid the commercialization and consumption of illegal drugs in the work environment.

3.9 We shall meet the requests of external bodies of regulation and inspection, and of external and internal audits within the terms set forth.

3.10 We shall assure legitimate, complete, objective, current, and clear information in public disclosures, reports, and documents made available to the regulatory bodies of countries we act in.

3.11 We direct the employees and the members of the senior management to annually perform qualification about ethics disclosing the precepts contained in this Code and in the Track of the Ethics and about the Policies associated to the risk management, especially the Risk of Conduct.

3.12 We direct that the employees, trainees, and apprentices to read the BB's Code of Ethics, and register awareness at every reading campaign.



## 3. Need to observe what is legal

### Senior management

3.13 We direct the Senior Management to observe legal standards that are applicable thereto in the exercise of the function, including those of public law.

3.14 We direct the Statutory Staff to follow, in addition to this Code of Ethics, the Code of Conducts of the Federal Senior Management, which provides, among others subjects: interest conflict; secrecy and communication of relevant information obtained due to the function held; statutory quarantine.

An officer of the Bank received a proposal to immediately undertake the position of CEO of a fintech of digital payments.

#### BB's Position

In such case, the officer shall comply with the quarantine that consists of the period of interdiction of six months, from the exoneration date.

**Who shall decide about the compliance with the quarantine or not?**

**How should one proceed?**

"It is liability of the Public Commission of Ethics – CEP to assess each situation.

The Statutory employee shall previously consult with CEP about the activities and services he/she intends to perform or provide during the quarantine period."

Source: Code of Ethics of the Federal Senior Management





# 4. Interest Conflict

## ILLUSTRATIVE EXAMPLE OF INTEREST CONFLICT

4.1 We understand that there is conflict when an employee has private interests that influence on the performance of his/her duties and responsibilities at the Bank.

4.2 We understand that the correct way of avoiding the interest conflict is looking for the impartiality. Acting in an impartial manner means, sometimes, to declare yourself as prevented from performing certain activities.

4.3 We shall exercise our activity in an exempt manner, exempting ourselves from using the condition of employee to obtain advantages to us or to third parties. It is each one's duty to avoid the occurrence of interest conflict.

4.4 We shall inform, in an immediate manner, cases of interest conflict or assumption of its existence to the hierarchical superior or to the Internal Ombudsperson's Office.

4.5 We shall support and participate in risk strategies of BB and of its managers aiming to prevent and mitigate the occurrence of interest conflict.



An employee of the Bank monitors the auctions of real estate properties made by the Bank and indicates the purchase of such real estate properties to his/her clients, receiving a "commission" for the indication, acting as a "real estate broker".

### BB's Position

We may not use internal information to make personal businesses with third parties, such as clients, suppliers, service providers, business partners, correspondents, etc.



## 4. Interest Conflict

4.6 We warn that the actions exemplified below configure interest conflict:

- Deliberate about subjects of interest conflicting with the Bank's interest.
- Execute administrative contract or execute a contract in name of the Bank, except for the contracting of bank operations, provided that observing the limits provided under the terms of the legislation, applicable regulations, as well as in the Specific Policies of Transactions with Related Parties (TPR), and Credit Policies of the Bank, with a person that has a family relationship up to the third degree with: a) BB's director; b) BB's employee which assignments involve actuation in the area in charge of the bid or contracting; c) authority of public entity which BB is bound to.
- Keep under direct hierarchical subordination spouse, partner, or relative in straight or collateral line, by blood or affinity, up to the 3<sup>rd</sup> degree.
- Conduct affairs or business with public agent with decision power in the scope of the governmental bodies and entities with which he/she has family relationship, in straight or collateral line, by blood or affinity, up to the 3<sup>rd</sup> degree.
- Allow that internal activities extrapolate the restricted environment, affecting interests of the Bank.
- Use the condition of employee to obtain pecuniary loan from client, supplier, or service provider.
- Use privileged information about relevant act or fact even if not disclosed in the market and that he/she has had access due to position or function.
- Use internal information to make personal businesses with third parties, such as clients, suppliers, service providers, business partners, correspondents, etc.
- Use the name of Banco do Brasil in the exercise of his/her political rights.
- Conduct career at the Bank appealing to third parties' intermediation.
- Use his/her position and power to appoint, contract, or favor one or more relatives in detriment of people and companies with more adequate profile and skills, configuring practice of nepotism, including upon mutual appointments or assignments.
- Perform external activities that may constitute loss or competition to the Bank.



## 4. Interest Conflict

### ILLUSTRATIVE EXAMPLE I ●

The event promotion company, which has as partner the spouse of BB's officer shows interest in closing contract with the Bank for the promotion of the institutional events.

#### BB's Position

Such situation configures interest conflict, because it is forbidden to execute administrative contract with relative up to the third degree of BB's director.





## 4. Interest Conflict

### ILLUSTRATIVE EXAMPLE II

The event promotion company, which has as partner the husband of BB's officer, intends to request a financing with the Bank, to renew the fleet of cars of the company.

#### BB's Position

The execution of a contract of operations with a relative of BB's director does not configure interest conflict, provided that observing the limits provided under the terms of the legislation, applicable regulations, as well as in the Specific Policies of Transactions with Related Parties (TPR) and Credit Policies of the Bank.





## 4. Interest Conflict

4.7 We forbid the performance of Transactions with Related Parties (TPR) in conditions different of the market's.

- Due to activities developed at BB, an employee obtains information of a certain company listed with stock exchange. Aware of the valuation of its bonds, he acquires a high quantity, in order to make profit with the operation.

### BB's Position

Employees shall abstain from making business from information obtained due to the activities developed at the Bank not disclosed to the market yet, in addition to keep them under secrecy until it is of public knowledge.

### Does only the senior management have access to privileged information? NO.

Privileged information involves knowledge and data that all of us have in the Bank as a result of the activities we perform – in a higher or lower degree.

It is strategic information that may generate some impact on the business and internal processes. For example:

- Direct someone to expect to make an investment for knowing that the Bank will release a new product in the market (not disclosed yet);
- Not to observe the statutory quarantine and/or period of non-compete and pass to act in a company with an activity competing with the Bank, using information he/she had at BB;
- Use accesses in corporate environments – physical or virtual – to obtain information to private use;
- Share with third parties information, not public yet, of clients, which he/she obtained due to the provision of consultancy;
- Disclose secret information regarding studies on eventual strategic partnership or shareholding operation of interests of the Bank to third parties.

## 4. Interest Conflict

### ILLUSTRATIVE EXAMPLE – Interference on TAO

Employee has an exemplary history at the Bank, satisfactory performance, and considered able to undertake new functions at the company. However, in the competitions in TAO he/she is not among the classified ones. May such employee contact the other enrolled ones, and request they remove their competitions so that he/she improves his/her classification?

#### BB's Position

No! The employee shall research the parameters of the opportunities where he/she is enrolled and use efforts in the improvement of his/her score, for example, taking the UniWB courses and indicated certifications. Making contact with a mate better classified is non-ethical, undermines the process, and may be analyzed under the disciplinary aspect.





## 4. Interest Conflict

Employee wants to open a financial consultancy company.

### BB's Position

In such case, it is configured Interest Conflict, because the activity of financial consultancy competes with the bank activity.



## Attention

Cases of interest conflict involving the members of the Executive Board (President, Vice-Presidents, and Officers) shall be sent to the analysis of the Committee of Public Ethics of the Presidency of the Republic.

Consultation of other employees about parallel labor activity shall be made through the Electronic System of Interest Conflict Prevention – Sei at CGU's portal.

# 5. Decision Making

Every time you want to make a decision, ask the following questions, to assess if it is proper:

1

Is your decision in compliance with the Bank's Code of Ethics, with the effective legislation and with the internal rules?





## 5. Decision Making

Every time you want to make a decision, ask the following questions, to assess if it is proper:

2

Does your decision meet the Bank's interests?



## 5. Decision Making

Every time you want to make a decision, ask the following questions, to assess if it is proper:

3

May this decision be justified to your mates and superiors?



## 5. Decision Making

Every time you want to make a decision, ask the following questions, to assess if it is proper:

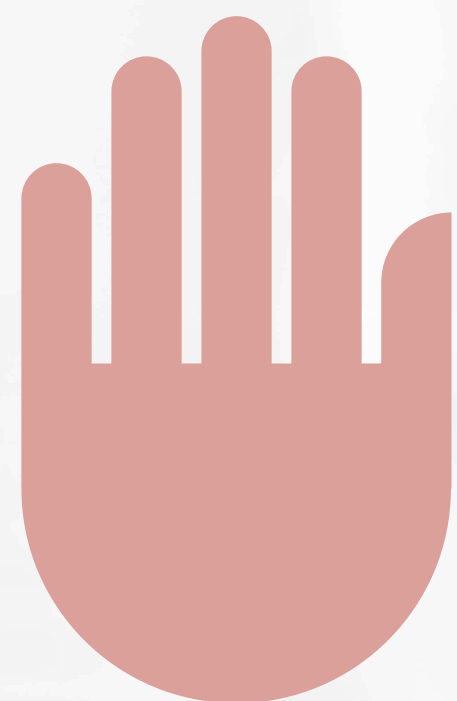
4

Except for situations where there is need of secrecy and confidentiality, is your decision able to be public?



## 5.

# Decision Making



**If you answered NO  
to any of such questions,  
then STOP and look for help.**

### **Does ethics disturb the profit?**

Ethics does not disturb the profit, it brings confidence.

The reliability is one of the greatest assets of the market.

A transparent and ethical company attracts investors and clients.

The ethics creates a sense of belonging in the employees.

Investing in ethics is to invest in the greatest asset of the company:

**the trust in your name**

*“The Bank’s power is us, the employees. The governance, the standards, and internal policies, are the controls that allow that our power is maximized and well directed.”*

Everton Munoz



## 6. Presents, gifts, hospitality, and favors

6.1 The following rules refer to the relationship of Banco do Brasil with third parties, such as client, supplier, service provider, business partner, correspondent, etc.

6.2 We forbid the receipt by the BB's employee of any value in kind as own benefit.

6.3 We forbid the receipt and request of benefit or compensation in return for a provided service in the achievement of our activities in the capacity of BB's employees.

6.4 We do not approve the receipt or the offer of presents or gifts that compromise the perception of professionalism and impartiality of the company regardless the value and that are contrary to effective standards.

6.5 We authorize to accept present or gift assessed in up to R\$ 390.00, which refers to 1% of the compensation cap provided in item XI in the main clause of art. 37 of the Federal Constitution, provided that it shall not characterize manipulation of decision-making processes or obtainment of undue advantages.

6.6 We direct the donation to Fundação Banco do Brasil or to the non-profitable charitable institution presents received, if the refusal or immediate return has not been feasible. The donation shall be informed at the address <https://dipes.intranet.bb.com.br/brindes/index.jsp> or the application "Presentes e Brindes" (Presents and Gifts), available at the store of applications of BB Intranet.

6.7 We direct that, to offer gifts and presents on behalf of BB to a public agent, is shall be observed the limits provided in the Constitution and in the local legislation, as well as in the legislation that addresses transnational bribery and in the rules and policies of the institution, public entity or body thereof that will receive it.

6.8 We authorize to accept hospitality, provided that authorized in the scope of the body, entity, board, or BB unit, according to the legal criteria, and provided that there shall not be compromise of the premises of impartiality and morality.

**If you are still in doubt if you shall or not receive presents, gifts, or courtesies, consult your manager.**



## 6. Presents, gifts, hospitality, and favors

### ILLUSTRATIVE EXAMPLE ●

A client of a branch brought a bottle of wine as a present to his manager. During the service, it was identified that he would like to have benefits previously denied, such as, for example, increase of his credit limit.

#### BB's Position

It shall not be accepted presents or gifts that configure exchange of favors, regardless the value. The Bank does not authorize act that may be understood as bribery, kickback, or undue advantage.





## 7.

# Assets, resources, and image of Banco do Brasil

7.1 We forbid the use of physical, technological resources, assets, and services exclusive to the performance of our assignments, for private purposes.

7.2 We shall limit ourselves to install, use, or allow the use of licensed or authorized computer programs (software).

7.3 We shall preserve the institutional identity, avoiding to use the Company's name, its marks, and symbols without the relevant and justified need or with no authorization, especially in the relationship with external public and in the exposures in social networks.

7.4 We shall observe the restricted skills of the spokesmen to meet demand of information through the media, aligned with the corporate strategy of BB, respecting the Company's view, purpose, and values.

7.5 We forbid the use of facilities, equipment, work materials, and electronic network of communications for polity-party, religious subjects, or subjects of own or third parties' commercial interest.

7.6 We shall take care of the Bb's equity and disseminate such care.

7.7 We shall contribute and continuously take care for the good image of the Bank, inside and outside the work environment.

7.8 We act, inside and outside the Bank, according to the principles of this Code of Ethics, and safeguard our personal conduct, in order to protect and strengthen the reputation and image of the company, exempting ourselves from any type of exposure that may bring risks or losses to the Organization's image.

7.9 BB takes care for coherence and uniformity of the information provided by the people authorized to speak in name of Banco do Brasil to the public in general and with the press. Transparency, simplicity, and agility in the provision of information in name of BB are among the main principles of actuation of BB before the media.

It is spokesmen of BB its directors, managers of CCBB's, and Marketing and Communication Board. They are BB's sources responsible for disseminating the institutional speech, preserve the mark, and build a positive image of the Company, according to internal rules.

## 7. Assets and resources of Banco do Brasil

**An employee used the Bank's logo as photo of his profile in a social network. Frequently, he manifests on current political-party questions.**

**Is it correct?**

The use of the Bank's logo previously requires a discretionary assessment of the managing area of the mark.

Additionally, the binding of the mark to political-party manifestations is forbidden by the Bank.







## 8. Intellectual property and information property

8.1 We preserve the information security and cybernetic security, since the corporate information is an asset and has value for the organization.

8.2 We shall to be aware of the responsibility in the processing of the corporate information throughout its life cycle.

8.3 We shall observe standards of intellectual property of books, texts, images, and other products protected by copyright.

8.4 We shall observe guidelines and policies of information security and cybernetic security of BB, being attentive to the criticality of the information.

8.5 We forbid that employees address secret subjects and subjects of internal use in chat rooms, social networks, and applications with access through Internet not authorized by the Bank.

8.6 We shall protect information property of Banco do Brazil, as well as those used in the exercise of the labor activities, as a way of guaranteeing integrity, confidentiality, and availability. It may not be disclosed, with no prior authorization, studies, methodologies, techniques, materials, or models developed to the Bank.

8.7 We shall refer to the registry and information of products and services of employees and account holders only for need of the service, preserving the registry, bank, corporate, and professional secrecy.

8.8 We shall expect for the secrecy of information of Banco do Brasil, relative to relevant act or fact to which we have privileged access due to the position or function we hold.

## Ethics

8.9 We shall provide reliable and timely clarifications when requested by the Bank, even when we are in an availability situation to another company or assigned to external body.

8.10 We shall assure that accounting records and financial statements are true, complete, accurate, clear, and are in compliance with the legislation, with the principles and with the accounting standards, and internal controls.





## 8. Intellectual property and information property

### Ethical Use of the Data

8.11 We process in a responsible and ethical manner the internal and external data gathered, according to the legislation, throughout the life cycle of the information.

8.12 We shall make management of the information that are entrusted to us and sent through the several corporate channels of internal communication.

8.13 We adopt mechanisms of protection against undue use, frauds, damages, losses, errors, sabotages, and robbery, and cybernetic attacks, throughout the life cycle of the information.

8.14 We shall carry out our activities respecting the clients' privacy and the legislation relative to the subject, including in the use and processing of analytical databases.

8.15 BB has a commitment to the ethics and integrity in its actuation and in the management of information under its guard. The ethical posture shall take place in any environment, including through the new forms of interaction, such as the metaverse, and in the data analysis, with the use of the artificial intelligence.

#### ILLUSTRATIVE EXAMPLE – Information property

An employee told in a family's meeting that the Bank is developing a new strategy of attraction of clients. Including, he talked about the methodology to be used to impact the market. Only later he noticed that one of his relatives that was present has friends in a competing bank.

#### **BB's Position**

Each one is responsible for the secrecy and proper use of the Bank's information. Sometimes, the damage may be irreparable to the Institution.



## 8.

# Intellectual property and information property

## Artificial Intelligence - AI



8.16 The solutions, systems, and models of AI implemented by Banco do Brasil shall offer accurate information, be reliable, safe, and robust, and shall consider their social and environmental impacts, and be liable to explanations, preserving the corporate and industrial secrecy.

8.17 The AI systems shall be used to promote the well-being, sustainable development, preserving the privacy of the stakeholders, focusing on the respect to the diversity, inclusion, non-discrimination, or any other condition that may negatively affect this public.



## 9. Engagement with the community and sustainability

**Sustainability is a matter of attitude and commitment to the company.**

9.1 We adopt the social, environmental, and climatic responsibility in the definition of policies, standards, and procedures of corruption prevention and fighting, as well as money laundering, and financing of terrorism.

9.2 We stimulate the entrepreneur actions with partners that proactively approach social, environmental, and climatic impacts.

9.3 We repudiate the degrading work: child, forced, and slave.

9.4 We value bonds set forth with the communities where we act in, and respect their cultural values since we recognize the need of return to the community a portion of the value added to the businesses.

9.5 We support initiatives of sustainable development and participate in undertakings towards the improvement of the population's social conditions.

**Why is the ethical sustainability a responsibility of the Bank?**

The sustainability is grounded on three inseparable aspects: environmental, social, and economic.

This tripod determines that the Bank's businesses cause the lower impact on the environment, and add value to the society.





# 10. Responsible use of digital media

10.1 We understand that the internal communication shall contribute to the strengthening of the relationship between the Company and the employees.

10.2 We are distinguished by the inclusive communication and that creates favorable conditions to the business action and to the performance of the work, focused on the transparency, clarity, and objectivity.

10.3 We shall use in a responsible manner the digital media, and apply good communication practices in line with the principles of integrity, transparency, and respect.

## Protagonism and collaborative debate

10.4 We value manifestations in the digital environment that respect the diversity of ideas and the position of the Company.

10.5 We forbid the binding of Banco do Brasil to comments and posts of offensive information or images and/or that violate the privacy of employees and third parties in digital media and social networks.

10.6 We forbid the issuance or sharing of information of discriminatory or offensive character that exposes the image of the Bank, its employees, and of the Group.

### ILLUSTRATIVE EXAMPLE – Digital Media

A mate made depreciative comments about a sector of the Bank and mates that work there. Even if he has made it in a closed group, his messages may generate personal and professional losses.



### BB's Position

In closed groups, messages are public. They quickly and easily spread. The lack of control and the impossibility of removal of the messages may generate irreparable damages to people and to the institution.



## 10. Responsible use of digital media



“At times of great digital exposure, we have to remember:  
no like worths to give up our ethical principles.”

Maria Rebeca de Oliveira Barros  
Responsible Use of Digital Media

### Can my actions in the private sphere generate consequences to the Bank?

Whenever you, in private life, involves the name of the Bank in illegal and/or no-ethical actions, you generate harmful consequences to the Bank and to yourself. Actions that raise rejection or disapproval, even if not directly bound to BB's name, may be administratively treated – including under the ethical and/or disciplinary aspect.

Before writing in the digital networks, remember that the whole content is public. Think of the impact on your professional life, on your and others' privacy.



# 11. Questions and Reports

**Reports shall be sent to the Internal Ombudsperson's Office and/or the Channel of Reports, even in an anonymous manner.**

**The secrecy of the source and the confidentiality of the information are premises of internal channels.**

As a priority, reports that deal with illegal acts and other irregularities shall be sent to the Channel of Reports. Reports that involve behavior and interpersonal relationship are accepted by BB's Internal Ombudsperson's Office.

11.1 Banco do Brasil expects that everyone is a protagonist in the consolidation of an ethical work environment. So, it is responsibility of each one to report situations of deviation, disrespect, violence, or any other conduct that harms the Code of Ethics of Banco do Brasil.

At BB, it is assured the confidential treatment of the information and the protection of the complainant's data, and data of other people that assist in the clarification of deviations.

11.2 We repudiate any type of retaliation to the author of the reports, or to those contributing in any manner to the clarification of the facts.

Cases of such nature will be assessed under the ethical aspect and may be referred to disciplinary treatment.

The complainant that experiences a situation of duress, persecution, or retaliation shall call the channel of Internal Ombudsperson's Office of BB, reporting the fact occurred.

11.3 We understand that the non-compliance with the guidelines of this code of Ethic represents serious manifestation against the ethics, principles, and values of Banco do Brasil.

Who does not comply with the code of ethics is subject to the ethical and disciplinary penalties, such as, for example, Awareness Document, Business Ethical Alert, Suspension, Removal, Dismissal, among others, and may be responsible in the judicial sphere.



## Is making a complaint to be a "whistleblower"? NO.

Making a complaint is to comply with your ethical duty and represents care with our company.

Fail to report an inadequate behavior is to be collusive with the error.

The report represents respect to the principles and conducts defended by the Bank. Remain in silence may be considered act of honor in certain cultures, but it may never be considered an ethical act. It is interest conflict to defend, protect, or cover people or groups in detriment to the Bank's interests.

**It is important to know the Commitment of Protection to the Complainant and Non-Retaliation of BB, document where it is declared provisions to promote the protection to the complainant in good faith, and measures applicable to those who practice the retaliation.**



# 11. Questions and Reports

**The reports are conducted through autonomous and specialized instances.**

**The BB's Internal Ombudsperson's Office may be contacted through the following channels:**

- E-mail: [ouvidoriainterna@bb.com.br](mailto:ouvidoriainterna@bb.com.br)
- Phone: (61) 3108-7488
- BB Intranet: Application store "Internal Ombudsperson's Office"
- Letter and Onsite Service: SAUN Quadra 5, Bloco B, Torre Central, 4º andar, Asa Norte – Zip Code: 70.040-912 Brasília-DF
- WhatsApp BB Funci – 61 4003-5291

**The external Ombudsperson's Office may be contacted through the following channels:**

- Customer Service: 0800 729 0722
- External Ombudsperson's Office: 0800 729 5678
- Hearing Impaired People: 0800 729 0088

**The Channel of Reports is available at:**

- BB Intranet: Application store "Channel of Reports"





# 11. Questions and Reports

## How is it to make a complaint to the Internal Ombudsperson's Office?

Every report shall be formalized. Upon the registration, attempt to answer the following questions: Who is being reported? What did he/she do? (if possible, identify which item of the Code was not complied with) How did it happen? When did the fact occur? Are there witnesses and proofs? (indicate them).

It is important that the channel is used in a proper manner, with responsibility, ethics, and transparency. The Internal Ombudsperson's Office is a channel offered by the Bank to resolve relevant questions in the administrative scope.

**Reports that are notoriously groundless or that contain false content represent a risk to the Bank and to the people.**

**Therefore, the reports shall be clear, objective, and as more robust as possible.**

11.4 To communicate to the Board of Internal Controls-Dicoi/DF sign of illegal acts or irregularities, through the Channel of Reports of Banco do Brasil, access the BB portal ([www.bb.com.br/canaldedenunciasbb](http://www.bb.com.br/canaldedenunciasbb)).

11.5 We recommend that, in case of question regarding the exercise of labor activity compensated or not, parallel to the Bank, the employee sends consultation through the Electronic System of Prevention of Interest Conflict (Sei), available at the site of the Government Accountability Office - CGU.

11.6 We suggest that, in case of question regarding the application of the Code of Ethics, talk to your manager, or consult the State Committee of Ethics, through registration at the Portal of the Ombudsperson's Office, in the Intranet.

## What are the purpose and importance of the Committee of Ethics?

The Committee of Ethics especially acts in the prevention of ethical problems and invest in education actions; answers to consultations and questions of employees about how to act; aims at minimizing conflicts and acts when there is non-compliance with the Code of Ethics.

The Committee of Ethics is a partner of the employee in his/her day-by-day.



# Closing letter

This Code of Ethics was prepared by the Board of Management of Culture and People with the participation of several mates, validated by all Strategic Units of BB, by the Executive Committee of People and Organizational Culture, Steering Board, and Board of Directors of BB. This collaborative construction portrays that the ethics is made of the culture of Banco do Brasil.

The document shall be revised every three years or, extraordinarily, at any time.

The Board of the Management of Culture and People is the area responsible for the structuring, update, dissemination, and implementation of this Code.



# Closing letter

To facilitate its understanding, simple and clear language was used.

Examples, questions, and answers were built with the purpose of illustrating the application of the ethics in the work day-by-day.

In addition to be an instrument that guides the employees in the decision making, the Code of Ethics presents conducts expected by BB, and those that are expressly forbidden, indicating, in an objective and practical manner, the responsibilities of the collaborators, including of the Senior Management, in order to contribute to the reliability, reputation, and continuity of our Organization.

The assumptions and guidelines contained in the Code of Ethics of Banco do Brasil shall be observed with attention, care, and vision of protagonism, since the responsibility for the application and dissemination is of all of us.

**After all, ethics and integrity are the base of trust.**



# Board of Directors

## Members

**President:** Dario Carnevalli Durigan

**Vice-President:** Anelize Lenzi Ruas de Almeida

**Member:** Elisa Vieira Leonel

**Member:** Kelly Tatiane Martins Quirino

**Member:** Marcelo Gasparino da Silva

**Member:** Paulo Roberto Simão Bijos

**Member:** Robert Juenemann

**Member:** Tarciana Paula Gomes Medeiros

# Steering Board

## Members

**President:** Tarciana Paula Gomes Medeiros

**Vifin:** Marco Geovanne Tobias da Silva

**Vivar:** Carla Nesi

**Vicri:** Felipe Guimaraes Geissler Prince

**Vinet:** Marisa Reghini Ferreira Mattos

**Vigov:** Jose Ricardo Sasseron

**Vicor:** Ana Cristina Rosa Garcia

**Vipat:** Francisco Augusto Lassalvia

**Vipag:** Luiz Gustavo Braz Lage

# Glossary

Gift is an “item of low economic value and distributed in a generalized manner, as courtesy, advertisement, or usual disclose” (CGU, 2022).

**Ethics:** Word of Greek origin. It means custom or habit. It is a part of the philosophy dedicated to answer how we should act.

Hospitality is the “offer of service or expenses with transportation, with meals, accommodation, courses, seminars, congresses, events, fairs, or activities of entertainment, granted by a private agent to public agent in the institutional interest of the body or entity where he/she acts in” (CGU, 2022).

Present is the “good, service, or advantage of any nature received from whom has interest in decision of the public agent or collegiate where he/she participates and does not configure gift or hospitality” (CGU, 2022).

**Moral:** Latin translation of the word ethics, from Greek. Over the time, the specialized literature selected to define as moral the whole public system of rules proper of different social groups.

**Code of Ethics of Banco do Brasil:** Set of principles and rules that guide how we shall act in the work environment. It is a tool of education to Ethics.

**Culture of Ethics:** It is characterized by the daily search of the employees for the development of good habits of ethical behavior, always thinking of the other and of the institution, before acting, collaborating for the development of good practices. It consists of culture for being a common concern, of something that becomes value of everyone.

**Commitment to the Ethics:** Each one has a part of the responsibility for the establishment of the ethics that is only his/hers. Commitment is the individual responsibility that binds us to the need of putting the principles of ethics as an integral part of the personal life and institutional life.

**Education for the Ethics:** It is the formation of the good habits under the guideline of rules and ethical principles, which offers grounds required to the correct selection of our social conduct.

# Glossary

**Prevention of Ethical Problems:** Preventing is the best strategy of development of healthy environments. It is the act of being guardians of our own actions, of taking care of everyone and of the institution.

**Interest Conflict:** The interest conflict arises when a person is involved in a decision-making process where he/she has the power of influencing the final result, assuring gain to him/herself, any family member, or third party with whom he/she is involved, or even that may interfere in the capacity of judgment, with no exemption. There is conflict interest when someone is not independent in relation to the matter under discussion, and may influence, or make motivated decisions for interests other than those of the organizations.

**Statutory quarantine:** It is the period of interdiction, counted of the date of discharge, where the statutory member of the personnel is prevented from making activity incompatible with the position previously exercised.

**Direct Hierarchical Subordination:** It is characterized by the direct binding between the employee and his/her hierarchical superior and is materialized by the subjection of the employee and direct orders, to the performance assessment - GDP - validation of electronic point, order of vacation, authorizations, and several grants, among other situations.

**Risk of Conduct:** Losses resulting of misconduct of the Institution or of inadequate acts in the conduct of its activities by the Senior Management, employees, collaborators, and those that act in name of or provide services to Banco do Brasil.





# Code of Ethics

2024 - 2025

Ethics and integrity  
are the base of trust.

