

# Specific Policy for Relationships with Customers and Users of Products and Services

**Responsible areas:** Internal Controls and *Compliance* Department (Dicoi).

**Regulation:** CMN Resolution 4,949, of September 30, 2021.

**Review frequency:** At least every three years or, exceptionally, at any time.

## Introduction and Concepts

This policy sets forth guidelines for Banco do Brasil's relationship with customers and users, establishing principles for conducting its behavior. Banco do Brasil's Related Entities (ELBB) are expected to develop their own guidance, considering the specific needs and the legal and regulatory aspects to which they are subject.

This policy establishes Banco do Brasil's guidelines for its relationship with customers and users of products and services and for conducting its activities in compliance with principles of ethics, responsibility, transparency and diligence, fostering the convergence of interests and the consolidation of credibility, security and competence for the company. The criteria, requirements, standards, and procedures resulting from this Policy are defined in internal normative instructions (IN).

This document complies with Banco do Brasil's Code of Ethics.

This policy applies to all customers and users of products and services, with special attention to vulnerable customers. This policy recognizes that each market segment has different needs, interests and objectives. Therefore, it seeks to offer products and services that are appropriate for each group, since its conception and without conditioning the supply of one product or service on the supply of another.

For all areas that carry out activities related to relationship with customers and users of products and services, the implementation of the Policy must provide for:

- For Banco do Brasil employees, a training program and internal dissemination of its provisions;
- If service providers, the contractual provision for training their employees;
- All Bank Units must establish management mechanisms to ensure the full implementation of this Policy.

For the purposes of this Policy, the following concepts are considered:

- **Service Channels:** <https://www.bb.com.br/site/pravoce/atendimento/>
  - **In-Person Service:** Physical service at all branches, even with the availability of other channels, except in situations provided for by law.
  - **Digital Channels:** Service channels, such as internet banking and apps, with full functionality and security.
  - **Whistleblower Channel:** Communication channel through which employees, collaborators, customers, users, partners and suppliers can report, without needing to identify themselves, situations with indications of illegality of any nature, ensuring integrity and transparency within the institution and thus contributing to a more ethical and fair corporate environment.
  - **External Ombudsman:** Banco do Brasil's external Ombudsman is responsible for responding to requests that have not been previously

resolved through regular customer service channels. It also deals with issues forwarded by consumer protection agencies, such as Bacen and CVM, and mediates conflicts between the institution and its customers. For specific demands, such as those of the hearing or speech impaired, there is a specialized service with accessibility for customers.

- **Customer Service (SAC):** Free telephone service throughout the country, and for customers abroad with collect calls, available 24 hours a day, 7 days a week, for information, questions, complaints and cancellations. The SAC is also available online, including self-service for individuals, and interacts with consumers on platforms such as Consumidor.gov, Reclame Aqui and social networks.
- **Customers and Users:** Individuals or legal entities that acquire, contract or use financial products and services from Banco do Brasil.
- **Vulnerable Customers :** Consumers who, due to their personal characteristics or circumstances, whether temporary, sporadic or permanent, may demonstrate a lower capacity for understanding, analysis and decision-making or representing their own interests and are more likely to suffer harm than traditional consumers. This condition may be, among other possibilities, age, some disability, low education, low digital maturity, a moment of over-indebtedness, or even the combination of more than one characteristic and to different degrees.
- **Collaborators:** Administrators, employees, contractors and service providers.
- **Customer Knowledge and Suitability:** In-depth knowledge of each customer and user's profile, from the design of products and services, to offer solutions suited to their needs, risk profile, vulnerability and financial capacity.
- **Monitoring, Evaluation and Continuous Improvement**
  - **Evaluation:** Carrying out periodic assessments of the effectiveness of the policy, control mechanisms and compliance with regulations, with the participation of the three lines of defense.
  - **Continuous Improvement:** Implementation of action plans to correct deficiencies, improve processes and ensure continuous improvement in customer relationships, based on feedback and analyses carried out.
  - **Monitoring:** Continuous monitoring of policy performance through metrics and indicators, such as satisfaction surveys, complaints, product and service performance indicators, and other relevant information.
- **Offer of Products and Services**
  - **Target Audience Adaptation:** Development and improvement of products and services suited to the needs and profile of each customer segment, with special attention to vulnerable customers, considering their needs from the design phase.
  - **Clear and Transparent Communication:** Use of clear and objective language in the dissemination and advertising of products and services, through the channel of the customer's choice, informing about characteristics, risks, target audience, costs and benefits.
  - **Financial Education:** Process that promotes improvements in the understanding of financial products and services, with the potential to transform realities, drive informed decision-making, stimulate sustainability in conducting business and increase people's well-being and financial health.

- **Offer Framing:** Process of ensuring that the offer and recommendation of products and services are appropriate to the customer profile, definition of target audience, with clear information on characteristics, risks and costs, ensuring full understanding and free choice.
- **Prevention of Tied Sales and Abusive Practices:** Process of ensuring that the contracting of products and services is free and conscious, without conditions or abusive practices.
- **Financial Products and Services:** Any good, material or immaterial, or remunerated activity, marketed by Banco do Brasil or by a partner company, whether a related entity or a third party, including all banking, credit, insurance, investment and other financial solutions products and services offered by the Bank.
- **Target audience:** A group of people or companies with similar characteristics, whose needs and desires can be met by the products or services of a specific company. Strategies can be designed to target this group.
- **Relationship with customers and users of products and services: Includes the pre -contracting, contracting and post-contracting phases of products and services.**
- **Cooperative, Balanced and Fair Relationship:** Promote a culture of respect, collaboration, justice and balance in the interests of customers, users and shareholders.
- **Transparency and Security:** Adequacy, security and confidentiality of operations and services, with clear and objective language in contracts and documents, informing deadlines, values, risks and rights.
- **Dignified, Fair and Equitable Treatment:** Offer clear information, timely and barrier-free service, considering the profile and vulnerability of each client, respecting diversity and promoting inclusion.

#### **Statements:**

- I. We strengthen the culture of respect and appreciation for diversity in all its manifestations, promoting an inclusive and safe environment for our customers, users, employees and third parties;
- II. We develop financial products and services that meet the specific needs of each target audience, considering their profile, consumer behavior and degree of vulnerability, thus ensuring the suitability and relevance of the financial solutions provided;
- III. We offer products and services suited to the needs, interests and objectives of customers and users in each market segment, with integrity, innovation, quality, safety and timeliness, without conditioning the supply of a product or service to the supply of another product or service;
- IV. We promote a cooperative and fair relationship model with customers and users;
- V. We offer dignified, courteous and equitable treatment, respecting the interests and rights of the consumer;
- VI. We offer clear, reliable and timely guidance and information, including explaining rights and duties, responsibilities, costs or burdens, penalties and possible risks that exist in the execution of operations and the provision of services to allow

customers to make the best business decisions, considering their profile and consumer behavior;

- VII.** We guarantee the confidentiality, integrity and availability of our customers' and users' data, treating this data in a transparent manner, respecting the rights of the holders and the need for consent for collection and use, except in cases expressly provided for by law;
- VIII.** We ensure in-person service at our facilities, even with the availability of other channels, such as Customer Service (SAC), External Ombudsman, CRBB and Digital Channels, except in cases provided for in specific legislation or regulations.
- IX.** We respect the wishes of customers interested in terminating the contractual relationship relating to products and services or in transferring the relationship to another institution;
- X.** We adopt financial education actions that can help customers manage their resources appropriately and encourage savings, organization and planning of personal and family budgets, and the understanding and conscious use of financial products and services.
- XI.** We encourage communication between customers and users and the Company and consider their opinions in the development and improvement of solutions in products, services and relationships, promoting the convergence of interests and the consolidation of an institutional image of credibility, security and competence;
- XII.** We prioritize dialogue and seek to resolve customer and user demands quickly and accurately, aiming to ensure their satisfaction with our products and services, without having to resort to external bodies;
- XIII.** We pay special attention to the treatment of customers considered vulnerable;
- XIV.** We seek to adequately identify and qualify costumers and users, both at the beginning and when maintaining the relationship with the institution;
- XV.** We guide our relationships with our costumers, including those in the Public Sector, by safeguarding against possible conflicts of interest, acting to prevent and combat corruption and observing the principles of cooperation, transparency, legality and ethics.
- XVI.** We monitor the occurrence of transaction failures, involving undue charges and debits, and take the necessary measures to resolve identified cases, with widespread correction for all customers and not just those who dispute, in a timely and effective manner, in order to avoid or correct inconveniences for customers and users.

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