

Report about the Brazilian Code of Corporate Governance – Publicly Traded Companies

Annex D to CVM Resolution no. 80 of March 29th, 2022

2025

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1

SHAREHOLDERS

1.1. EQUITY STAKE

1.1.1: "the share capital of the Company shall be composed only by common shares."

Principle: "Every share must give the right to one vote."

Answer: *Not Applicable*

Justification

The Company chose to have a corporate structure with established control and with the differentiation between kinds of shares, in order to facilitate, through greater flexibility in the capital structure, the Company's capitalization.

The corporate structure is composed as shown below, in which the shareholdings were calculated based on the total capital, including shares in treasury:

SHAREHOLDERS	ON	%	PN	%	TOTAL	%
CONTROLLERS	3.811.582.439	71,5078	121.067.106	2,2792	3.932.649.545	36,9535
OTHER SHAREHOLDERS	1.518.722.242	28,4922	5.190.798.441	97,7208	6.709.520.683	63,0465
TOTAL	5,330,304,681	100.00	5,311,865,547	100.00	10,642,170,228	100.00

Base Date December, 2023

The Bylaws of the Company ensure to all shareholders, in each fiscal year, as the minimum mandatory dividend, 30% of the net income, adjusted by the decrease or increase of the values specified in sections I, II and III of the caput of Article 202 of Law No. 6.404/76.

The Company's shares may be divided into kinds, namely:

- The Common Shares (ON) have the right to vote in all resolutions of the shareholders' meetings. In addition, the Bylaws of the Company grant to its shareholders, not members of the controlling block, the receipt of 100% of the value paid per common share of ownership of the controlling shareholders, in the case of inclusion of the public offer due to the eventual change of control of the Company (tag along), going beyond the legal requirement, which is 80%.

- The Preferred Shares (PN) do not have the right to vote, with the exception of cases provided for by law, which are:

- At the election of members to the Board of Directors and the Fiscal Council, most of the preferred shareholders without right voting which represent, at least, 10% of the share capital, have the prerogative to elect one member and his alternate at the shareholders' meeting, if applicable, in a separate voting, in accordance with Articles 141 and 161 of Law No. 6.404/76;

Although preferred shares do not have voting rights, they confer on their holders, in accordance with the Bylaws, the following rights and advantages: inclusion in a public offering arising from any sale of control of the Company, ensuring to their holders the receipt of the price equal to 80% of the value paid per share for the common share as part of the controlling block; priority in the refund of the share capital in the case of liquidation; and dividends 10% higher than those attributed to common shares. We highlight that the Company respects the legal provision that the number of preferred shares cannot exceed 50% of the total shares issued.

- The way control is exercised

The control is exercised together, directly, by Cidade de Deus – Cia. Comercial de Participações S.A. (“Cidade de Deus”) (approximately 45% of the voting capital), Fundação Bradesco (Bradesco Foundation) (approximately 17% of the voting capital) and NCF Participações S.A. (“NCF”) (approximately 8% of the voting capital) and, indirectly, by Nova Cidade de Deus Participações S.A. (“Nova Cidade de Deus”), BBD Participações S.A. (“BBD”), in addition to Bradesco Foundation itself. It is important to stress that the largest individual shareholder has only 0.45% of the voting capital of Banco Bradesco, on the base date of December 2023.

Although there is no Shareholders' Agreement or shareholder with a shareholding that exceeds 50%, it is necessary to observe the presence of several companies of the same economic group as the shareholders of the Company and of several companies of that same group as shareholders of the Company's shareholders. Therefore, it is possible to identify the way in which the control is exercised in practice. To facilitate this analysis, we observed below the shareholding composition of each one of the controllers of the Company, on the base date of December 2023.

- Shareholders of Bradesco's Controllers:

1) Cidade de Deus – Companhia Comercial de Participações S.A. (“Cidade de Deus”)

Holding company, which manages, buys and sells securities and other assets on its own. The share capital is composed of common, book-entry, nominative shares, without par value.

Shareholder	% Voting Capital
Nova Cidade de Deus	47,93
Fundação Bradesco	35,44
Família Aguiar	16,63
Total	100

2) NCF Participações S.A. (“NCF”)

Holding company, whose purpose is to make investments in equity securities.

Shareholder	% Voting Capital
Cidade de Deus	74,72
Fundação Bradesco	25,13
Nova Cidade de Deus	0,15
Total	100

3) Nova Cidade de Deus Participações S.A. (“Nova Cidade de Deus”)

Holding company, which holds investments in other companies, especially those who, directly or indirectly, hold the Bradesco’s capital with a right to vote. The share capital of Nova Cidade de Deus is divided into common class A shares, common class B shares and preferred shares. Ownership of common class B shares shall be limited to:

- members of our Board of Executive Officers;
- members of our Board of Directors who have been Officers of Banco Bradesco or its subsidiaries; and
- a commercial or civil society whose shares or quotas, with the right to vote, belonging in their majority to the people listed above.

The ownership of common class A shares of Nova Cidade de Deus is exclusively for people who have the right to hold common class B shares, as well as the civil associations and foundations of private law, whose administration is borne by these people or leaders named by it. Only holders of common class A and B shares of Nova Cidade de Deus are entitled to vote.

Shareholder	% Voting Capital
BBD	53,70
Fundação Bradesco	46,30
Total	100

4) Fundação Bradesco

Fundação Bradesco has no shareholders. It is an entity declared of Public Federal, State and Municipal Utility, established by appropriation of Banco Bradesco, of which the assets are personified. It has a “Managing Board”, a supreme deliberative body composed of members of the Management of Banco Bradesco and of Cidade de Deus, in the terms of its Bylaws. Its main purpose is to promote social inclusion, through education, and act as a multiplier of pedagogical-educational best practices with the socioeconomically disadvantaged Brazilian population.

5) BBD Participações S.A. (“BBD”)

Holding company, formed to hold participations in our capital and in the capital of our direct and indirect shareholders. In 1999, BBD acquired from various shareholders an indirect stake of 5.37% of our voting capital. The only people who can hold shares of BBD are members of the Board of Directors and Statutory Board of Executive Officers of Bradesco, as well as qualified staff of Bradesco, of Bradespar or of our subsidiaries and national non-profit legal entities or national companies controlled by them, which have as managers exclusively employees and/or managers of the Organization. However, only the Directors and Statutory Officers may own shares with a right to vote. Most of the members of our Board of Directors and Statutory Board have shares in the BBD. Currently, it has more than 390 shareholders, mainly Managers of Bradesco and of its subsidiaries, with the largest holding approximately 5,58% of the voting capital. Upon leaving the Bradesco Organization, by statutory provision they are obliged to sell their positions.

The structure above can be visualized in item 6 of the Reference Form (Control and economic group) available on the Investor Relations Website (Bradesco IR), in the Market Information – Reports and Spreadsheets – CVM.

- Mechanisms that mitigate the asymmetry of political and economic rights

The Company understands that the asymmetry of political rights (for example, the right to a guaranteed vote in all situations to the holders of common shares) and economic rights (since the holders of common shares will receive 100% of the value paid per share of ownership of the controllers, in the case of inclusion of public offer due to the eventual disposal of control of the Company, while the holders of preferred shares will receive 80%, among others) is mitigated with both the payment to holders of preferred shares, of dividends 10% higher than those paid to holders of common shares, as well as the priority in the reimbursement of the share capital in case of liquidation of the Company. In addition, the holders of preferred shares have the right to vote in special situations, provided for in law, as previously mentioned.

1.2 SHAREHOLDERS' AGREEMENT

1.2.1: "the shareholders' agreements shall not bind the exercise of the right to vote of any manager or member of the supervisory and control bodies."

Principle: "All the shareholders' agreements must not transfer to the signatory shareholders the decisions in matters regarding the competence of the Board of Directors, the Board of Executive Officers or of the Fiscal Council."

Answer: *Not Applicable*

Justification

Not Applicable.

1.3. GENERAL MEETING

1.3.1: “the Board of Executive Officers must use the meeting to communicate the running of the Company’s business, for which the Management should publish a manual to facilitate and encourage the participation in general meetings.”

Principle: “The Management should seek the engagement of shareholders, favoring the presence at the General Meeting and the correct understanding of the matters to be discussed, as well as facilitate the nomination and election of candidates to the Board of Directors and Fiscal Council.”

Answer: *Applicable*

Justification

Not Applicable.

1.3.2: “the minutes should allow the full understanding of the discussions during the meeting, even if they appear in the form of a summary of facts occurred and should include the identification of the votes cast by the shareholders.”

Answer: *Applicable*

Justification

Not Applicable.

1.4. DEFENSE MEASURES

1.4.1: “the Board of Directors shall make a critical analysis of the advantages and disadvantages of the measure of defense and of its characteristics and, above all, the triggers set off and price parameters, if applicable, explaining them.”

Principle: “Defensive measures, if they are adopted by the Company, shall have as their objective to prevent opportunistic acquisitions of significant portions of the Company’s capital in adverse market times, preserving the liquidity or maximizing the value of shares for the benefit of all shareholders.”

Answer: *Not Applicable*

Justification

Not Applicable.

1.4.2: “clauses that impede the removal of the measure of the bylaws, the so-called ‘eternity clauses’ should not be used.”

Answer: *Not Applicable*

Justification

Not Applicable.

1.4.3: “if the bylaws determines that a takeover bid (TOB) should be made whenever a shareholder or group of shareholders reaches, directly or indirectly, a relevant stake in the voting capital, the rule for determining the price of the offer should not impose a surplus substantially above the economic value or of the stock market.”

Answer: *Not Applicable*

Justification

Not Applicable.

1.5. CHANGE OF CONTROL

1.5.1: “the bylaws of the Company must establish that: (i) transactions that configure the disposal, directly or indirectly, of the equity control should be accompanied by a takeover bid (TOB) addressed to all shareholders, at the same price and same conditions obtained by the selling shareholder; (ii) the managers must express an opinion on the terms and conditions of corporate restructuring, capital increases and other transactions that give rise to a change of control, and establish whether they ensure fair and equitable treatment to the shareholders of the Company.”

Principle: “Irrespective of the legal form and the terms and conditions negotiated for the transaction that gives rise to a change of control, all shareholders of the Company object of the transaction shall be treated in a fair and equitable manner.”

Answer: *Applicable*

Justification

Not Applicable.

1.6 MANIFESTATION OF THE MANAGEMENT ON TOBS

1.6.1: “the bylaws should provide that the members of the Board of Directors give their opinion regarding any TOB having as object shares or securities that can be converted or exchanged for shares of the Company, which shall contain, among other relevant information, the opinion of the Management about the possible acceptance of the TOB and of the economic value of the Company.”

Principle: *“The Board of Directors shall guide the shareholders regarding the TOBs directed to them.”*

Answer: *Applicable*

Justification

Not Applicable.

1.7. POLICY FOR ALLOCATION OF EARNINGS

1.7.1: “the Company shall prepare and disseminate the results destination policy defined by the Board of Directors. Among other aspects, such a policy should provide for the periodicity of payments of dividends and the reference parameter to be used for the definition of the respective amount (percentage of adjusted net income and free cash flow, among others).”

Principle: “The policy of allocation of earnings of the Company must comply with the economic and financial characteristics of the business – cash generation and the need for investments – and be acknowledged by all stakeholders, shareholders and investors.”

Answer: *Applicable*

Justification

Not Applicable.

1.8. JOINT CAPITAL COMPANIES

1.8.1: “the bylaws must identify clearly and precisely the public interest that justified the creation of the joint capital company, in a specific chapter.”

Principle: *“The orientation of the activities of the Company by the controlling shareholder that meets the public interest that justified the creation of the joint capital company, must be reconciled with the interests of other shareholders and investors in securities of the Company.”*

Answer: *Not Applicable*

Justification

Not Applicable.

1.8.2: “the Board of Directors shall monitor the Company’s activities and establish policies, mechanisms and internal controls for calculation of possible costs of complying with the public interest and possible compensation of the Company or of the other shareholders and investors by the controlling shareholder.”

Answer: *Not Applicable*

Justification

Not Applicable.

2

BOARD OF DIRECTORS

2.1. DUTIES

2.1.1: “the Board of Directors shall, without prejudice to other legal and statutory responsibilities, and other practices provided for in the Code: (i) define the business strategies, considering the impacts of the Company’s activities in society and in the environment, aiming at the Company’s continuity and creation of value in the long-term; (ii) periodically evaluate the company’s exposure to risks and the effectiveness of the systems of risk management, internal controls and the integrity/compliance system and approve a risk management policy compatible with the business strategies; (iii) define the values and ethical principles of the company and ensure the maintenance of transparency of the issuer regarding all the stakeholders; (iv) review the system of corporate governance annually, aiming to enhance it.”

Principle: “The Board of Directors shall exercise their powers considering the long-term interests of the Company, the impacts arising from their activities in society and in the environment and the fiduciary duties of its members, acting as guardian of the principles, values, social object and governance system of the Company.”

Answer: *Applicable*

Justification

The Company adopts all of the practices described in items (i) (ii), (iii) and (iv).

Item (i): According to the Bylaws, the Board of Directors is responsible for (i) ensuring that the corporate business is conducted with integrity, in order to preserve the good name of the Society; (ii) constantly seeking to align the Company's strategic planning with the ESG (Environmental, Social and Governance) aspects; and (iii) to establish the Company's strategy, with the objective of protecting and maximizing the shareholder return on investment within best corporate governance practices. It can be said, therefore, that it is incumbent upon the Body to foster the generation of value, considering the impacts of the Organization's activities on society and the environment, strengthening the sustainability of the business and generating value in the long term.

Complementarily, it is worth highlighting item i of Article 2 of the Internal Charter of the Board of Directors, which attributes to the Board the power to establish the general orientation of the Company's business, including deciding on the constitution and operation of Operating Portfolios, defining policies and limits to be observed by Management, which provides for the duty and responsibility of the Board of Directors to preserve administrative continuity, aiming at the Company's stability, prosperity and security.

Item (ii): The Organization adopts a solid and integrated governance structure, composed of formal decision-making and support bodies that act in a coordinated manner at all levels, with the aim of ensuring the effectiveness, integrity, and consistency of the process of defining, implementing, monitoring, and reviewing risk appetite.

In this context, the Risk Committee plays a strategic role in the governance of the risk management structure, being responsible for assessing risk appetite and exposure levels, reviewing mitigation strategies, and supervising the Chief Risk Officer (CRO), ensuring that risk practices are aligned with institutional guidelines. The Committee also proposes improvements to the risk framework and advises the Board of Directors in the performance of its duties, reinforcing the evolution of the risk culture and compatibility with the complexity of the business.

At the executive level, the Integrated Risk Management and Capital Allocation Committee (COGIRAC) supports the CEO in overseeing critical issues such as risk management, capital and liquidity, information security, cyber risks, compliance, money laundering and terrorist financing prevention, customer relationship conduct, financial citizenship, external auditing, and crisis management. COGIRAC is supported by technical committees and specialized areas that work on proposing methodologies, monitoring, and controlling risks.

Among these areas, the following stand out: Corporate Risk Management, Financial Risk Management, Compliance and Non-Financial Risk Management, Corporate Security, and Independent Model Assessment, which operate in an integrated and synergistic manner.

As for Compliance, aiming at the search for the best practices of Governance and Corporate Conduct within the highest ethical standards and principles, Compliance and Non-Financial Risk Management Department has as its mission ensuring that the Organization is aligned with its principles, legal, non-legal, internal and external regulations, contributing to the sustainability and ethics of its business. This department is also responsible for the management and annual review of Bradesco Integrity Program, composed of a set of policies, standards and procedures, promotion of culture, whistle blowing channel aimed at prevention, monitoring, detection and response in relation to the harmful acts provided for in the Anti-Corruption Law No. 12,846/13 and in international legislations.

Actions related to the Integrity Program are presented quarterly to the Integrity and Ethical Conduct Committee, whose purpose is to report to Senior Management on the progress, inconsistencies, and evolution of the Program.

It is up to the Board of Directors to determine the institutional guidelines on the subject and to support the Integrity Program so that its effectiveness is met.

Item (iii): Established in 2003, the Code of Ethical Conduct is the main guideline for administrators, employees, interns, apprentices, and collaborators of the Bradesco Organization. This document reaffirms our values and principles as fundamental pillars in decision-making, supported by integrity, ethics, trust, quality service, and transparent relationships.

This Code seeks to guarantee the integrity of the actions, to ensure and strengthen the reputation and image of the Organization, always focused on the continuity of the business and commitment to sustainability. As such, the Organization invests in the acculturation of good practices of conduct by undertaking actions, such as training, lectures, periodic disclosures on the topic. By means of the Principle of Transparency, the Code is based on commitment of the Organization in providing to all stakeholders a clear, objective and timely information, in order to contribute to the creation and maintenance of an image of reliability.

The Organization manages its economic activities in line with social demands and the conscious use of environmental resources. We work to meet current needs without compromising the opportunities of future generations. Through precise guidelines, effective governance, engagement, and management of environmental, social, and governance (ESG) aspects, we reinforce our commitment to sustainable development.

The pursuit of continuous and sustainable evolution is based on high standards of conduct and integrity, which guide our strategy toward more integrated, customer-centric operations that benefit society as a whole. Our corporate governance follows best market practices, with guidelines and structures focused on managing economic, social, and environmental impacts. We have a specific structure in place to ensure integrity, ethics, and compliance with the Code of Ethical Conduct, acting to prevent, mitigate, and respond to possible violations.

The Integrity and Ethical Conduct Committee, which reports to the Board of Directors, is responsible for proposing actions to disseminate and ensure compliance with the Codes of Ethical Conduct — corporate and sectoral — and anti-corruption and competition rules, ensuring their effectiveness. In addition to the Organization's Code of Ethical Conduct, there are specific codes for certain professional categories, which must also be respected by all those who perform these functions. The Board of Directors is responsible for approving all Codes.

The Code is managed by Compliance and Non-Financial Risk Management and involves various activities related to the dissemination of the Code, acculturation, training, clarification of doubts, and the proper processing of reports of violations received by the Corporate Reporting Channel. The Code of Ethical Conduct is available on the following websites: Bradesco IR (Corporate Governance – Compliance and Ethics – Codes of Ethics) and Bradesco Integrity (<https://banco.bradesco/integridade/pt-br/index.shtm>)

Item (iv): Another assignment of the Board is to review annually the Bank's governance system, as stated in its Rules of Procedure (item ii of Paragraph 2 of Art. 2), the procedure of which occurs normally before the summoning to the Annual Shareholder's Meeting or timely, either by the Board's approval of the constitution, review or evaluation of committees to which they report, whether by conducting administrative changes, establishment of subsidiaries, corporate reorganizations and/or institution/review of internal codes, policies and regulations or proposals for statutory changes.

2.2 MEMBERSHIP OF THE BOARD OF DIRECTORS

2.2.1: “the bylaws must establish that: (i) the Board of Directors is composed in its majority by external members, having at least one-third of independent members; (ii) the Board of Directors shall assess and disclose the independent directors annually, as well as indicating and justifying any circumstances that might compromise their independence.”

Principle: *“The Board of Directors should have members of a diversified profile, appropriate number of independent directors, and a size that allows the creation of committees, the actual debate of ideas and technical, exempt and substantiated decision-making.”*

Answer: *Partially Applicable*

Justification

Item (i) Although the Company complies all the recommended requirements, there was not statutory provision that Bradesco's Board of Directors is composed of a majority of external members or that at least 1/3 of its composition is composed of independent members. On the other hand, the Internal Regulation of the Board of Directors establishes a minimum of 20% of independent members in the body.

Currently, all Board members are external, with four of them being independent members, representing 36% of the total. This information is available in the document Declaration of Independent Action of Members, disclosed on Bradesco IR (Corporate Governance – Boards – Board of Directors).

Item (ii) Although not provided for in the Bylaws, the Company discloses, annually, after the Annual Shareholders' Meeting, the approved composition of the Board of Directors, including the independent members that are part, in addition to permanently disclosing on Bradesco IR (Corporate Governance - Boards – Board of Directors – Board of Directors' Composition and Profile) information on its directors, independent ad external. In addition, the Board of Directors, in accordance with the ethical principle of transparency, is committed to indicate and justify any circumstances that may compromise such independence.

2.2.2: "the Board of Directors shall adopt a policy on nomination that establishes: (i) the process for the nomination of the members for the Board of Directors, also indicating participation of other bodies of the Company in that process; and (ii) that the Board of Directors shall be composed in view of the availability of time of its members for the exercise of their responsibilities and the diversity of knowledge, experiences, attitudes, cultural aspects, age group and gender."

Answer: *Applicable*

Justification

The process of appointing directors in Bradesco Organization, which comprises both members of the Board of Directors and the Board of Executive Officers, at its various hierarchical levels, is based on the guidelines established by the Policy on Nomination and Succession of Bradesco Organization's Administrators, publicly available on Bradesco IR Organization (Corporate Governance – Bylaws, Policies, Standards and Compensation Agreement).

The aforementioned Policy states that both the availability of time and aspects of diversity, such as gender, ethnicity, color, age, marital status, sexual orientation, religious choice, physical condition or socioeconomic class, in addition to diversity of experience and technical and behavioral competences, are respected in the process of appointing candidates for possible vacancies in the Board of Directors and the Board of Executive Officers. This whole process of appointing uses criteria of meritocracy, in addition to the aspects already mentioned. In this way, even any Executive Officer has the possibility of being elected to compose the Board of Directors.

As the adviser to the Board conducting this process, there is the Nomination and Succession Committee of the Bradesco Organization, a body subordinated to the Board of Directors, which acts on behalf of all the Institutions members of the Organization. Among other tasks, the Committee is responsible for identifying, evaluating and proposing to the Board candidates to occupy a seat on the Board of Directors, on the Board of Executive Officers and positions for Qualified Employees (Executive Superintendents and Regional Managers), considering, when indicated, criteria of meritocracy and competence, identification with the organizational culture of career and full respect to aspects of diversity, such as gender, race and ethnicity. In addition, the Committee reviews, annually, both the Policy on Nomination and Succession of Bradesco Organization's Administrators and the internal rules related to the subject.

2.3 CHAIRMAN OF THE BOARD

2.3.1: “the Chief Executive Officer should not accumulate the position of Chairman of the Board of Directors.”

Principle: *“The Chairman of the Board shall coordinate the activities of the Board of Directors seeking the efficiency and good performance of the Body and of each one of its members, serving as a link between the Board of Directors and the CEO.”*

Answer: *Applicable*

Justification

Not Applicable.

2.4 EVALUATION OF THE BOARD AND ITS MEMBERS

2.4.1: “The Company should implement an annual performance appraisal process of the Board of Directors and of its committees, as collegiate bodies, of the Chairman of the Board of Directors, of the Board Members, considered individually, and of the governance department, if it is in place.”

Principle: *“The Board of Directors should establish mechanisms for periodic evaluation of performance that contribute to its effectiveness and for the improvement of the governance of the Company.”*

Answer: *Applicable*

Justification

Board of Directors

Since 2006, the annual evaluation of the Board of Directors, both as a Collegiate Body and its members, is carried out individually. From 2021, this evaluation began to be conducted by an independent company, using questionnaires and individual interviews with Managers and members of Committees subordinated to the Board of Directors.

The methodology considers several factors including experience, diversity of skills, leadership styles and communication among the board members, structuring, agenda, number of meetings, time dedicated to the topics dealt with in the meetings, flow of information and tools used, quality of discussions, form of decision-making, effectiveness of the committees subordinated to the Body and benchmark with national and international companies from various sectors.

The company hired to provide the consultancy periodically publishes the results of the Board’s evaluation as a Collegiate Body, focused on issues such as succession, strategy, dynamics, and governance, among others. Based on the results, the board members receive reports on the strengths of the Body, the points for improvement and the actions to be implemented.

In the individual evaluation, each of the directors only receive their final evaluation, attributed by the other members in a strictly confidential manner, ensuring the effectiveness of the survey.

Committees and Governance Department

Bradesco's Committees which report to the Board of Directors are evaluated on the basis of the fulfillment of their tasks, which are established in the respective Charters. During the year, there were some assessments of controls at entity level, which were used to monitor and detect relevant deviations or relevant errors and materials in the processes. In these assessments, the internal controls help to ensure that the guidelines are being executed.

The interaction between the Committees and the Board of Directors is intense in Bradesco. The number of committee sessions, as well as meetings with the Board and with different areas, denotes the good relationship between these bodies and the Board, as well as the Senior Management's support for the development of the activities. Moreover, the composition of the Board of Directors and Board of Executive Officers members within the Committees further facilitates the relationship between the bodies, as well as their functioning.

2.5 SUCCESSION PLANNING

2.5.1: “The Board of Directors shall approve and maintain updated a succession plan of the CEO, which preparation should be coordinated by the Chairman of the Board of Directors.”

Principle: *“The Board of Directors should ensure the continuity of the management of the Company, avoiding that the succession of its main leaders ends up affecting the performance of the Company and causing the destruction of its value.”*

Answer: *Applicable*

Justification

The Management Succession Plan, which encompasses the members appointed to compose the Board of Directors and also the Board of Executive Officers, is embodied in the application of the Guidelines of the Policy on Nomination and Succession, approved on 3.27.2017 and updated annually and periodically. Its applicability is monitored by the Nomination and Succession Committee, with final approval of the entire process by the Board of Directors. Both the Policy and Rules of Procedure of the mentioned Committee are disclosed in the Corporate Governance item of Bradesco IR.

2.6 INTEGRATION OF NEW DIRECTORS

2.6.1: “the Company must have a program for the integration of new members to the Board of Directors, previously structured, so that those members are introduced to the key people of the Company and to its premises and which addresses topics essential to the understanding of the Company’s business.”

Principle: “To carry out their duties, the member of the Board of Directors should understand the Company’s business.”

Answer: *Applicable*

Justification

When a new member joins Bradesco’s Board of Directors, they receive a kit from the Company containing all the relevant documents for holding their role on the Board, including the Bylaws, the Internal Charter and the Board of Directors’ Meetings Manual. In addition, the Governance Secretariat, an area that advises all Board members, facilitating the interface with other executives and businesses of the Company, makes a welcome presentation, introducing the governance structure, the meeting schedule and the initial arrangements.

In addition, the Integration Manual for new board members, has already been approved by the Board of Directors, summarizes in a single document all the information mentioned above, to establishing a schedule for the director's first day at the Company, which includes, among other activities, the presentation of the teams and the support areas.

2.7 COMPENSATION OF THE MEMBERS OF THE BOARD OF DIRECTORS

2.7.1: “the compensation of the members of the Board of Directors shall be commensurate with their duties, responsibilities and time demands. There shall be no compensation based on participation in meetings, and the variable compensation of directors, if any, must not be tied to short-term results.”

Principle: *“The remuneration of the members of the Board of Directors must be aligned with the strategic objectives of the Company focused on their sustainability and the creation of value in the long-term.”*

Answer: *Applicable*

Justification

Not Applicable.

2.8 CHARTER OF THE BOARD OF DIRECTORS

2.8.1: “the Board of Directors shall have a charter which establishes their responsibilities, duties and operating rules, including: (i) the duties of the Chairman of the Board of Directors; (ii) the rules for replacing the Chairman of the Board in his/her absence or vacancy; (iii) the measures to be adopted in situations of conflict of interest; and (iv) the definition of the appropriate deadline for the receipt of the materials for discussion in the meetings, with the proper depth.”

Principle: *“The actions of the Board of Directors should be guided by a document containing rules that standardize its structure and form of working.”*

Answer: *Applicable*

Justification

Not Applicable.

2.9 MEETINGS OF THE BOARD OF DIRECTORS

2.9.1: “the Board of Directors shall establish an annual calendar with the dates of the annual meetings, which should be no less than six and no more than twelve, in addition to convening special meetings, whenever necessary. This calendar shall provide for an annual thematic agenda with relevant topics and dates of discussion.”

Principle: “The Board of Directors should adopt a set of actions that propitiates the effectiveness of its meetings, facilitates the performance of the external directors and gives transparency to its work.”

Answer: *Applicable*

Justification

Not Applicable.

2.9.2: “the Board meetings shall provide regular sessions exclusive to external directors, without the presence of the executives and other guests, for the alignment of the external directors and discussion of themes that may create embarrassment.”

Answer: *Applicable*

Justification

Not Applicable.

2.9.3: “the minutes of the Board meetings should be drafted with clarity, recording the decisions taken, the attending persons, the dissenting votes and the abstentions in the votes cast.”

Answer: *Applicable*

Justification

In accordance with Third Paragraph of Article 9 of the Internal Charter of the Board of Directors, for each meeting of the Body, minutes must be drawn up, which content must be clear and objective, recording all decisions taken. The attending directors, those absent and all the guests of the meeting are duly informed thereof, in addition to the direction of the votes of the members of the Body.

3

**BOARD OF
EXECUTIVE
OFFICERS**

3.1 DUTIES

3.1.1: “the Board of Executive Officers shall, without prejudice to other legal and statutory responsibilities and other practices provided for in the Code: (i) perform the risk management policy and, where necessary, propose to the Board any needs for review of this policy, due to changes in the risks to which the Company is exposed; (ii) implement and maintain mechanisms, processes and effective programs for the monitoring and disclosure of the financial and operational performance and the impacts of the Company’s activities on society and on the environment.”

Principle: “The Board of Executive Officers shall manage the Company’s business, observing the limits of risk and guidelines approved by the Board of Directors.”

Answer: *Applicable*

Justification

Not Applicable.

3.1.2: “the Board of Executive Officers must have a Charter that establishes its structure, its operation and its roles and responsibilities.”

Answer: *Applicable*

Justification

Not Applicable.

3.2 APPOINTMENT OF THE OFFICERS

3.2.1: “There should be no reservation of positions on the Board of Executive Officers or managerial positions for direct nomination by shareholders.”

Principle: “The nomination process and filling in of positions on the Board of Executive Officers and managerial positions should aim to form a group aligned to the ethical principles and values of the Company considering the diversity, including gender, aspiring to fill it with people with complementary skills and empowered to face the challenges of the company.”

Answer: *Applicable*

Justification

Not Applicable.

3.3 EVALUATION OF THE CEO AND THE BOARD OF EXECUTIVE OFFICERS

3.3.1: “the CEO should be evaluated, annually, by a formal process conducted by the Board of Directors, based on the verification of the achievement of the goals of financial and non-financial performance established by the Board of Directors for the Company.”

Principle: “The CEO and the Board of Executive Officers should be evaluated based on performance targets, financial and non-financial (including environmental, social and governance), aligned with the values and ethical principles of the Company.”

Answer: *Applicable*

Justification

The evaluation of the CEO is carried out by external consultancy, as with the Board of Directors. The Chief Executive Officer, Vice-President Officers and Executive Officers evaluate their directors.

The formal evaluation process of the CEO and other Officers takes place annually, with a partial payment in the first half of the year. The Compensation Committee, composed of members of the Board of Directors, is responsible for analyzing the results of the performance evaluations, in order to propose, for resolution by the Board of Directors, the payment of variable remuneration, which will observe the criteria of goals and performance indicators to be established.

3.3.2: “The results of the evaluation of the other officers, including the propositions of the CEO regarding the targets to be agreed on and to the permanence, promotion or dismissal of executives in their respective positions, must be presented, analyzed, discussed, and approved in the Board of Directors meeting.”

Answer: *Applicable*

Justification

The individual performance of the Management, as well as that of their corresponding areas, is accompanied by their respective superiors regarding the process of formal evaluation, establishing that both the availability of time and aspects of diversity, such as gender, race, ethnicity and age group, as well as diversity of experience and technical and behavioral competencies, are respected in the process of nomination of possible candidates for vacancies on the Board of Directors. This process occurs by meritocracy. Thus, any Executive Officer, apart from the aspects mentioned above, has the possibility of being elected to compose the Board of Directors.

In addition, for the formal evaluation process, specific indicators are defined for the evaluation of the areas and for individual evaluation, according to the functions of the Management, considering the business-oriented areas, control areas and other support areas.

The Department of Human Resources of Bradesco, in the position of Advisory Dependency, follows the entire process described above, submits to the Compensation Committee the evaluation form of each Officer, with their name and decision on possible eligibility. The Compensation Committee, in turn, submits the results to the Board of Directors.

3.4 COMPENSATION OF THE BOARD OF EXECUTIVE OFFICERS

3.4.1: “the compensation of the Board of Executive Officers must be established by means of a compensation policy approved by the Board of Directors by means of a formal and transparent procedure that considers the costs and risks involved.”

Principle: “The compensation of the members of the Board of Executive Officers must be aligned with the strategic objectives of the company with a focus on their sustainability and the creation of value in the long-term.”

Answer: *Applicable*

Justification

On February 6, 2012, the Board of Directors approved the Remuneration Policy of the Directors of the Bradesco Organization, which guarantees the practice of remuneration to all Administrators, ensuring that it complies with the legislation, rules and regulations that control the matters, and based on the Administrators responsibilities, according to the different positions and functions they hold. The aforementioned Policy is compatible with the risk management policy, because it was formulated so as not to encourage behavior that increases exposure to risks above the levels considered prudent in the short, medium and long-term strategies adopted by the institution.

The Compensation Policy is available on Bradesco IR (Corporate Governance – Bylaws, Policies, Standards and Compensation Agreement) and other information on the practice of remuneration are available on item 8.1 of the Company Reference Form, also available on Bradesco IR (Market Information – Reports and Spreadsheets – CVM), as well as on the CVM website.

3.4.2: “Compensation of the Board of Executive Officers must be tied to results, with goals of medium and long-term related clearly and objectively to the generation of economic value for the Company in the long-term.”

Answer: *Applicable*

Justification

By achieving the Organization's goals and the risks of the measured business, considering the possible discretionary elements, and the results of individual performance evaluations, the Directors meeting those expectations will be eligible for Variable Remuneration, according to the Corporate Standard on Remuneration of Bradesco Organization's Directors. Thus, the Remuneration Committee shall submit a proposal to the Board of Directors for payment or non-payment of Variable Remuneration to the Directors. The Board of Directors, in turn, will consider in making its decision, aspects linked to the generation of economic value for the Company in the long term, such as economic conjuncture, internal and external factors and organizational culture, among others.

Even with the establishment of goals and objectives for all areas, individually, for remuneration purposes, the overall performance of the Organization prevails, without distinction of area, whether it is considered to be of support or of business, technical or of relationship. This overall performance takes into account the result of the performance indicators defined below:

- ROAE – (Return On Adjusted Equity);
- Overall Customer Satisfaction Index;
- Basel Index – Tier I;
- OER – Operational Efficiency Ratio;
- Social and Environmental Dimension of the Market Indexes; and
- Coverage Ratio.

The individual performance of the Directors, as well as their corresponding areas, is accompanied by their respective superiors in a formal evaluation process, as already mentioned in item 3.3.2 of this Report.

3.4.3: “the structure of incentives must be aligned to the risk limits defined by the Board of Directors and prohibit the same person from controlling the decision-making process and its respective supervision. Nobody should decide on their own compensation.”

Answer: *Applicable*

Justification

The overall amount of the remuneration is proposed to the Board of Directors by the Compensation Committee, which, according to the best corporate governance practices, consists, in its majority, of Board members. The Board, in turn, decides annually on the submission to the Annual General Meeting of a proposal for approval of the overall amount. Once approved, the Board of Directors approves the fixed remuneration of the administrators, and the Compensation Committee proposes the variable remuneration, based on: (i) the individual evaluation of the administrators, an essential prerogative for their permanence in the Company; and (ii) the Organization's overall performance.

Even if the Compensation Committee is composed, in its majority, of Board members, the existing corporate process prevents the director from deliberating on their own remuneration. This process is also based on the guidelines established in the Remuneration Policy of the Bradesco Organization Directors, which establishes that the compensation practice is related to objectives that seek to enhance the Organization, encouraging upright and ethical behaviors and not encouraging behaviors that raise the exposure to risk above the levels considered prudent in the short, medium and long-term strategies adopted, in addition to the lack of conflict of interest in establishing compensation, so that the decisions taken are the best possible, seeking to create value for its shareholders and investors.

In order to encourage the alignment of interests in the medium term, the total variable remuneration is paid net of legal deductions, by crediting the Administrator's current account. Concomitant, 50% of the net value of the paid variable remuneration will be allocated to the acquisition, by the Administrator, of PNB shares of BBD Participações and/or preferred shares of Bradesco, which will remain blocked becoming available in 3 (three) equal, annual and successive installments, depending on the result of the Organization, the first installment being due one year after the date of acquisition of the shares.

4

AUDIT AND CONTROL BODIES

4.1 AUDIT COMMITTEE

4.1.1: “The statutory audit committee shall: (i) have among its responsibilities to advise the Board of Directors on the monitoring and control of the quality of financial statements, on internal controls, on risk management and compliance; (ii) be formed in its majority by independent members and coordinated by an independent director; (iii) have at least one of its independent members with proven experience in the area of corporate accounting, internal controls, financial and audit, cumulatively; and (iv) have its own budget for the hiring of consultants for accounting issues, legal issues or other topics, when the opinion of an external expert is necessary.”

Principle: “The company must have a statutory, independent and qualified audit committee.”

Answer: *Partially Applicable*

Justification

Bradesco Organization has a Statutory Audit Committee since 2004, whose objective is to recommend and advise the Board of Directors in its duties related to the monitoring of the accounting practices adopted in the preparation of the Financial Statements of the Company and its Subsidiaries, and in the indication and evaluation of the effectiveness of the Independent Audit, as well as to the monitoring of the Internal Audit.

Among its duties, the Audit Committee is responsible for interacting with the Risk Committee to exchange information related to the structure of governance of risks and for the effective handling of risks to which the institution is exposed. It is also responsible for the evaluation of effectiveness of the Company’s Internal Control System and independent and internal auditors. The other duties of the Audit Committee can be found in its Internal Charter, available on the Investor Relations website (Corporate Governance – Committees – Audit), as well as in the Committee’s Half-Yearly and Annual Reports, pursuant the Resolution of the National Monetary Council (CMN) No. 4,910, of May 27, 2021.

Currently, the body is composed of four members:

- Mr. Paulo Ricardo Satyro Bianchini (Coordinator);
- Mr. Amaro Luiz de Oliveira Gomes (Member – Financial Expert);
- Mr. Antonio José da Barbara (Member); and
- Mr. Samuel Monteiro dos Santos Junior (Member) - External Member.

In addition, as indicated in the First and Second Paragraphs of Article 4o of the Committee Charter, within the scope of its duties, the Body can hire specialized professional services.

4.2 FISCAL COUNCIL

4.2.1: “the Fiscal Council must have its own internal regulations which describe its structure, its operation, work program, its roles and responsibilities, without creating discomfort to the individual actions of its members.”

Principle: “The Fiscal Council, if installed, should be endowed with the resources and the support of Management needed so that its members can perform their individual duties of independent supervision effectively.”

Answer: *Applicable*

Justification

Not Applicable.

4.2.2: “the minutes of the meetings of the Fiscal Council must observe the same rules of disclosure as the minutes of the Board of Directors.”

Answer: *Applicable*

Justification

Not Applicable.

4.3 INDEPENDENT AUDITORS

4.3.1: “the Company shall establish a policy for hiring extra-audit services from its independent auditors, approved by the Board of Directors, which prohibits the recruitment of extra-audit services that may compromise the independence of the auditors. The Company should not hire an independent auditor who has provided internal audit services for the Company for less than three years.”

Principle: “The independent auditors shall report to the Board of Directors. This should ensure the independence of the independent auditors in their work.”

Answer: *Applicable*

Justification

Not Applicable.

4.3.2: “the independent audit team should report to the Board of Directors, through the audit committee, if any. The audit committee shall monitor the effectiveness of the work of the independent auditors, as well as their independence. It should also assess and discuss the annual work plan of the independent auditor and forward it for consideration by the Board of Directors.”

Answer: *Applicable*

Justification

Not Applicable.

4.4 INTERNAL AUDIT

4.4.1: “the Company shall have an area of internal audit directly linked to the Board of Directors.”

Principle: “The Company must structure its internal audit in a manner compatible with the size, complexity, and risks of its business, and the Board of Directors must ensure the professional qualification and independence of the professionals of the internal audit team in relation to the Board of Executive Officers.”

Answer: *Applicable*

Justification

The Internal Audit of the Company, also nominated Global Internal Audit Department, is directly subordinated to the Board of Directors of Bradesco Organization.

The department is responsible for evaluating Bradesco Organization processes in order to contribute to risk mitigation and the effectiveness of Internal Controls, in accordance with Internal and External Policies, Standards, and Regulations. It operates autonomously and independently with statutory and non-statutory committees, in accordance with the Organization's governance and the standards of The Institute of Internal Auditors (IIA) and national and international best practices.

It covers Audit services (assessments in the context of business, products, services, information technology, routines, and/or business), Investigations (facts or situations arising from demands, occurrences, complaints that may generate relevant risks for the Organization, customers, and third parties), and Consulting (advice and related services). AIGL's activities extend to the Bradesco Organization and, when applicable, to third parties and suppliers.

4.4.2: “in the case of outsourcing of this activity, the internal audit services should not be performed by the same Company that provides the services for financial statements auditing. The Company should not hire, for the internal audit, anyone that has provided independent audit services to the company within three years.”

Answer: *Not Applicable*

Justification

Not Applicable.

4.5 RISK MANAGEMENT, INTERNAL CONTROL AND INTEGRITY/COMPLIANCE

4.5.1: “the Company must adopt the risk management policy, approved by the Board of Directors, which includes the definition of the risks to which it seeks protection, the instruments used for this purpose, the organizational structure for risk management, the assessment of the operational structure adequacy and internal control in the verification of their effectiveness, in addition to defining guidelines for the establishment of acceptable limits for the Company’s exposure to those risks.”

Principle: “The company needs to have a proper risk management process, maintaining internal control and integrity/compliance programs that are proportional to the size, risk and complexity of its activities.”

Answer: *Applicable*

Justification

Based on an integrated understanding of the strategic plan, the types and levels of risk exposure that the Organization is willing to assume in pursuit of its corporate objectives are defined. This process includes the identification of relevant risks, based on its own materiality criteria and the minimum requirements established by the Brazilian Central Bank (BCB) regulations.

These risks are formalized in the Risk Appetite Statement (RAS), a document that establishes acceptable exposure limits and guides the actions of the various lines of defense. The RAS is reviewed annually, or whenever necessary, by the Board of Directors, and is continuously monitored by senior management forums, business areas, and control functions, reinforcing the Organization's risk culture.

The risk management framework is supported by policies, standards, and procedures approved by senior management, which establish guidelines for identifying, assessing, responding to, monitoring, and reporting risks. This framework ensures that the internal control structure is compatible with the nature, complexity, and scale of the Organization's operations, products, services, and systems.

The effectiveness of the risk management structure is continuously assessed by the Internal Controls area, which verifies the adherence of processes to internal standards, regulatory requirements, and best market practices. This ensures that the controls implemented are effective in mitigating risks, promoting compliance, operational robustness, and protection of the Institution's assets. In a dynamic and highly regulated financial environment, the internal controls function is strategic for strengthening corporate governance, sustaining stakeholder confidence, and ensuring business resilience and sustainability.

More information can be viewed in the Risk Management Report – Pillar 3, available in website Bradesco IR (Market Information – Reports and Spreadsheets – Risk Management).

4.5.2. "it is incumbent upon the Board of Directors to ensure that the Board of Executive Officers has mechanisms and internal control to understand, assess and control the risks, in order to keep them at levels consistent with the limits laid down, including the integrity/compliance program aiming at compliance with laws, rules and regulations, both external and internal."

Answer: *Applicable*

Justification

The Board of Directors oversees the existence and effectiveness of the internal mechanisms and controls adopted by the Executive Board, based on a robust risk management and compliance framework.

The Organization adopts specific indicators for each dimension of risk appetite, aligned with its strategy and capital structure, enabling continuous monitoring of exposure and timely action in the event of deviations. These indicators are part of the Risk Appetite Statement (RAS), which is reviewed annually by the Board and monitored by executive forums and control areas.

The management structure is formalized by policies, standards, and procedures that define the risks to be managed, the instruments used, acceptable exposure limits, and criteria for evaluating the effectiveness of internal controls.

The Internal Controls area conducts ongoing assessments of the effectiveness of the controls implemented, ensuring compliance with internal and regulatory standards and best market practices. The compliance program reinforces this framework by promoting compliance with laws, regulations, and internal guidelines.

More information is available in the Risk Management Report – Pillar 3, on the Organization's Investor Relations website.

Since 2017, the Bradesco Organization has also had an Integrity Program comprised of a set of policies, rules and procedures, promotion of the culture, reporting channel aimed at prevention, monitoring, detection and response in relation to detrimental acts set forth in the Anti-Corruption, Law No. 12,846/13 and in international legislation. These instruments establish the basic guidelines for action expressed by Senior Management in line with the institution's standards of integrity and ethical values based on the Code of Ethical Conduct, and cover all of the Bradesco Organization's activities.

Additional information regarding the Bradesco Integrity Program can be obtained from Bradesco IR (Corporate Governance – Compliance and Ethics – Integrity Program) or on the Bradesco Integrity website (<https://banco.bradesco/integridade>).

4.5.3: "the Board of Executive Officers must assess, at least annually, the effectiveness of the policies and systems of risk management and internal control, as well as the integrity/compliance program, and be accountable to the Board of Directors on this assessment."

Answer: *Applicable*

Justification

At least once a year, the Board of Directors assesses the effectiveness of policies, risk management systems, internal controls, and the compliance program to ensure their adherence to institutional strategy, regulatory requirements, and best market practices.

The review process includes an analysis of the current policy and, when necessary, its updating. Proposed changes are submitted for technical and strategic review by the Risk Committee and the Executive Committee for Integrated Risk Management and Capital Allocation (COGIRAC) and are subsequently deliberated by the Board of Directors.

In addition, key information on activities, assessments, and diagnostics related to the effectiveness of the Internal Control System is consolidated in an annual report, submitted to the responsible executives, and presented to governance forums, including the Audit Committee, COGIRAC, and the Board of Directors. This flow ensures broad visibility, collegial supervision, and alignment with corporate governance principles, promoting continuous improvement of the Organization's risk and control structure.

Integrity Program

The Bradesco Integrity Program is evaluated on an annual basis through interviews; the application of integrity questionnaires; and evaluation of national and international legislation to which the bank is subject. In addition, ongoing monitoring of the Integrity Program allows Bradesco Organization to verify the effectiveness of the program, identify any new risks that have arisen and respond in a timely manner through corrections and improvements. Monitoring is done by collecting and analyzing information from various sources, such as:

- a) regular reports on the routines of the Integrity Program or on related investigations;
- b) trends seen in the complaints of clients, employees, service suppliers, correspondents in the country and business partners;
- c) information obtained through the reporting channel;
- d) reports from government regulatory or supervisory authorities;
- e) internal audit reports;
- f) compliance reports; and
- g) results of the adherence test.

In addition to assessing existing information, the Bradesco Organization evaluates whether the Administrators and Employees are aware of the Organization's values and policies through a Diagnosis of the Risk Culture, which includes whether they follow the stipulated procedures and whether the training has produced practical results. If there is any non-compliance with the rules identified or if there are deficiencies seen that are making it difficult to reach the expected results, the Bradesco Organization takes measures to remedy the problems found.

The actions related to the Integrity Program are presented quarterly in the Integrity and Ethical Conduct Committee, whose objective is to report the progress, inconsistencies and progress of the Program to Senior Management. The result of the Compliance diligences and diagnoses, as well as tracking the action plans declared by the managers to diagnose deficiencies, are periodically presented to the Risk Management Committee and to COGIRAC.

Compliance Program

The compliance structure has robust governance appropriate to Bradesco's size and complexity, and monitoring takes place at different levels up to the level of the Board of Directors. The main activities of the compliance function, in line with the expectations of Senior Management and the provisions of CMN Resolution 4,595/17, are consolidated at least annually in a Report and submitted to the Executives in Charge. The Corporate Compliance Policy and the Compliance Program of the Bradesco Organization are reviewed on an annual basis, and/or from time to time whenever necessary.

5

ETHICS AND CONFLICT OF INTERESTS

5.1 CODE OF CONDUCT AND REPORTING CHANNEL

5.1.1. "the Company shall have a conduct committee, which is independent and autonomous and linked directly to the Board of Directors, responsible for the implementation, dissemination, training, review and update of the code of conduct and of the whistle blowing channel, as well as for the investigations and filing of corrective measures relating to breaches of the code of conduct."

Principle: "The company needs to have a code of conduct that promotes its ethical values and principles and reflects the organizational identity and culture, and a reporting channel to handle comments, questions, complaints and claims."

Answer: *Applicable*

Justification

The Integrity and Ethical Conduct Committee, which is made up of members appointed by the Board of Directors and subordinated by it, is the body responsible for proposing measures as to the dissemination and compliance with the Bradesco Organization's Codes of Ethical Conduct, both corporate and sectorial, and the rules of conduct related to the topics of integrity, anti-corruption and competition in a manner to ensure efficacy and effectiveness. The Committee's duties include assessing reports of misconduct, fraud, irregularities and illegal acts committed, as well as infractions and violations of the corporate and sectorial Codes of Ethical Conduct and breaches of anti-corruption and competitive conduct, ensuring that infractions and violations are followed by applicable disciplinary actions, regardless of hierarchical level, notwithstanding any applicable legal penalties.

The Department Compliance and Non-Financial Risk Management, which is tasked with managing the Corporate Complaints Channel, must report the information and results related to the Complaints, whenever necessary, to the Executive Board to which the Compliance and Non-Financial Risk Management is subordinate and to the Integrity and Ethical Conduct Committee, which will be aware of the receipt and conclusion of the investigation, as well as any decision on disciplinary action, when applicable.

The Committee's composition and regulations, with the duties of the Authority, as well as other information related to the Codes of Ethical Conduct and rules of conduct, are publicly available at the Bradesco IR page (Corporate Governance, Compliance and Ethics and Committees tabs).

5.1.2: "the code of conduct, drawn up by the Board of Executive Officers, with the support of the conduct committee, and approved by the Board of Directors, shall: (i) regulate the internal and external relations of the company, expressing the commitment expected of the company, of its directors, officers, shareholders, employees, suppliers and stakeholders with the adoption of appropriate standards of conduct; (ii) manage conflicts of interests and provide for the abstention of the member of the Board of Directors, of the audit committee or of the conduct committee, if any, that, as the case may be, is in conflict; (iii) clearly define the scope and range of actions to ascertain the occurrence of situations involving the use of privileged information (for example, the use of insider information for commercial purposes or for obtaining advantages in the trading of securities); (iv) establish the ethical principles that justify the negotiation of contracts, agreements, proposals for the amendment of the bylaws, as well as the policies that guide the entire company, and establish a maximum value of goods or services of third parties that managers and employees may accept gratuitously or as a beneficiary."

Answer: *Applicable*

Justification

Not Applicable.

5.1.3. "the whistle blowing channel should have independence, autonomy and impartiality, putting in place guidelines of operation defined by the Board of Executive Officers and approved by the Board of Directors. It must be operated independently and impartially, and guarantee the anonymity of its users, in addition to promoting, in a timely manner, the investigations and necessary measures. This service may be exercised by a third party of recognized capacity."

Answer: *Applicable*

Justification

The Corporate Reporting Channel is an internal channel and one of the pillars of the Bradesco Integrity Program and, accordingly, provides the proper means for receiving, recording, investigating and processing all reports. These need to be evaluated with discretion, independence, transparency, integrity and ethics to ensure that complaints are handled properly from the time they are received until their conclusion, in addition to correcting any identified distortions. The Compliance and Non-Financial Risk Management is the corporate manager of the Corporate Reporting Channel and all complaints received in this channel are analyzed beforehand. If they have sufficient information, they are directed to the respective management areas, which are responsible for supporting in investigating the reports.

Every quarter, in the ordinary meetings of the Integrity and Ethical Conduct Committee, the Compliance and Non-Financial Risk Management presents the consolidated report of the audit and inspection assignments regarding ethical rupture, and report on the results obtained by DRH.

The whistleblower is assured the right to formalize his/her complaint by identifying himself/herself, if he/she so wishes. Secrecy and confidentiality of shared information must be preserved, in order to ensure that there are no acts or attempts of retaliation and revenge or persecution to the whistleblower in good faith who chose to identify themselves. The same treatment should also be dispensed to anonymous whistleblowing.

For the formalization of the complaints, the following can be used.

Electronic form:

- ✓ Corporate Portal > Bradesco > Whistleblowing and Manifestation Channels);
- ✓ Institutional Website > Useful Information > Corporate Whistleblowing Channel; and
- ✓ Bradesco's Investor Relations (<https://www.bradesco.com.br/en/>) > Corporate Governance > Corporate Whistleblowing Channels);

Telephone:

- ✓ By the phone 0800 776 4820 (call center from Monday to Friday: from 8am to 6pm, except weekends and public holidays).

Manifestation Boxes:

- ✓ Cidade de Deus: Located within the buildings of Cidade de Deus; or

In the Bradesco Organization, all complaints investigated are carefully examined with independence, transparency, integrity and ethics, aiming to ensure the adequate treatment and correcting any distortions identified.

5.2 CONFLICT OF INTEREST

5.2.1: “the rules of governance of the Company shall ensure the separation and clear definition of duties, roles and responsibilities associated with the offices of all the agents of governance. The seniority for decision in each instance should also be defined, with the purpose of minimizing possible objects of conflict of interests.”

Principle: “The company must establish mechanisms to deal with situations involving a conflict of interest in the company's management or at annual meetings.”

Answer: *Applicable*

Justification

The Company's governance rules are established in the following corporate documents, which determine the roles, functions, duties, responsibilities and approval/decision levels of each of the Company's governance bodies and its members:

- Bylaws;
- Internal Regulation of the Board of Directors, which also determines the abstention of the director in the event of a matter involving a conflict of interest;
- Internal Regulations of the Executive Board;
- Internal Regulations of the Audit Committee;
- The Code of Ethical Conduct stipulates that, in the event of any conflict of interest, the administrator, employee, intern, apprentice or conflicted employee must report this fact to their superior and any peer(s) involved in a timely manner, and remove themselves, including physically, from discussions and decisions related to the specific issue;

- Sectorial Code of Ethical Conduct, which establishes the responsibilities and stance that is to guide how professionals from various areas of the Organization act;
- Regulations of Committees subordinate to the Board of Directors;
- Regulations of the Executive Committees subordinate to the Chief Executive Officer; and
- the Corporate Governance Policy and other Corporate Policies and Standards.

The regulations stated above are available to the public on the Bradesco IR page (Corporate Governance), with the exception of the regulations for the executive committees, which are available on the internal channel of the Corporate Intranet.

5.2.2. "the governance rules of the Company must be made public and determine that the person who is not independent in relation to the matter under discussion or deliberation in the management and supervisory bodies of the Company must demonstrate, in a timely manner, their conflict of interest or particular interest. If they fail to do so, these rules should provide that another person expresses the conflict, if they are aware, and that, as soon as the conflict of interest is identified in relation to a specific theme, the person involved avoids, even physically, the discussions and deliberations. The rules shall provide that this temporary withdrawal is recorded in the minutes."

Answer: *Applicable*

Justification

Among the corporate documents mentioned above, which dictate the governance rules, three clearly express the guidelines to be followed in the event of conflict of interest:

- the Code of Ethical Conduct, in its item IX, in addition to what has already been described above, establishes that in the event of conflict at the time of discussion or deliberation in the administrative or supervisory bodies, the removal of the conflict must be recorded in minutes of the meeting of the respective body. If the conflict does not manifest itself, someone else may do so if they are aware of the conflict.
- Both the Internal Regulations of the Board of Directors and of the Executive Board, under the auspice of their respective bodies, establish that the administrator must intervene in any corporate activity in which there is a conflict of interest with that of the company or with that of any of our companies. In the presence of any conflict of interest, a resolution must be made, being the administrator responsible for notifying them of their impediment and withdrawing, including physically, from the discussions and deliberations in relation to the specific topic, being sure to register the withdrawal in the minutes.

5.2.3. "the Company must have mechanisms to manage conflict of interests in the votes submitted to the shareholders' meeting, to receive and process allegations of conflict of interest, and the cancellation of votes cast in the conflict, even if subsequently to the meeting."

Answer: *Applicable*

Justification

On the Bradesco IR page (Services – Speak to IR), Bradesco has a communication channel on matters related to Annual Meetings (governancacorp@bradesco.com.br) through which shareholders can send (i) both recommendations to be included in the agendas of the Meetings and (ii) any allegations of conflict of interest in the submitted votes.

In the event of any of the above, the cases will be submitted for analysis by the Board of Directors, which will decide whether to annul the votes cast in conflict, even if after the conclave. This is how we attempt to avoid any abuse of voting rights and conflicts of interest within the scope of shareholders' meetings, as established in Article 115 of Law 6,404/76.

5.3 TRANSACTIONS WITH RELATED PARTIES

5.3.1: “the bylaws must define which transactions with related parties must be approved by the Board of Directors, excluding any members with potentially conflicting interests.”

Principle: “The company needs to have governance policies and practices in place aimed at ensuring that any transaction with a related party is always conducted in the best interest of the company, with full independence and absolute transparency.”

Answer: *Applicable*

Justification

The Bylaws, in article 9, letter “t”, establishes that the Board of Directors will decide on transactions with related parties or a set of transactions with related parties, in accordance with the applicable legislation and the criteria set out in internal policies and rules. We also have a Policy for Transactions with Related Parties that was approved by the Board of Directors, reviewed annually and whenever necessary, which fully follows the normative bases related to the matter and is posted on the Bradesco IR page (Corporate Governance - Bylaws, Policies, Rules and Indemnity Agreement). Among the other guidelines, this policy ensures that transactions with related parties are properly formalized and disclosed, making sure that the process are transparent for our shareholders, investors and the overall market. There are also internal rules that regulate the topic with related parties or potential conflicts of interest in the Organization, ensuring that the process is effective and aligning it with the interests of the Organization according to the best Corporate Governance practices.

The Executive Committee Integrated Risk Management and Capital Allocation at Bradesco Organization evaluates the feasibility of these transactions related to potential conflicts of interest, ensuring effectiveness, competitiveness, compliance, transparency and equity in transactions, as well as evaluates the exceptions for donations, sponsorships and hiring with potential conflicts of interest in the Organization.

5.3.2: "the Board of Directors shall approve and implement a policy of transactions with related parties, which includes, among other rules: (i) provision that, prior to the approval of specific transactions or guidelines for contracting transactions, the Board of Directors should request, from the Board of Executive Officers, market alternatives for the transaction with the concerned related parties, adjusted by the risk factors involved; (ii) prohibition of forms of adviser compensation, consultants or intermediaries that generate conflict of interest with the Company, with the managers, with the shareholders or with classes of shareholders; (iii) prohibition on loans in favor of the controller and of the managers; (iv) the hypotheses of transactions with related parties must be based on independent assessment reports, drawn up without the involvement of any party involved in the referred transaction, be it a bank, lawyer, specialized consulting firm, among others, based on realistic assumptions and information endorsed by third parties; (v) that the corporate restructuring involving related parties shall ensure equal treatment for all shareholders."

Answer: *Applicable*

Justification

The Organization fully complies with all the normative bases defined by regulatory agencies, plus we have internal controls and regulations aimed at: (i) ensuring that transactions with related parties are conducted in a transparent manner; (ii) making sure that transactions with related parties comply with legal standards and other internal rules and policies related to the subject; (iii) ensuring that transactions with related parties are properly formalized and disclosed, thereby assuring the transparency of the process for our shareholders, investors and the overall market; and (iv) certifying that actions are aligned with the guidelines of the Bradesco Organization's Code of Ethical Conduct.

As a mandatory procedure, we also maintain a Monthly Certification (internal document) by the managers of the departments and related companies. These certify that transactions between “Related Parties”, when carried out, are in accordance the Standard of Transactions with Related Parties.

5.4 POLICY ON TRADING OF SECURITIES

5.4.1: “the Company shall adopt, by resolution of the Board of Directors, the security’s trading policy it has issued, which, without prejudice to the observance of the rules laid down by the CVM regulations, establishes controls that allow the monitoring of negotiations made, as well as the investigation and punishment of those responsible in the event of non-compliance with the policy.”

Principle: “The trading of shares or other securities issued by the Company itself, by shareholders, managers, members of the Fiscal Council and other statutory bodies, and any people with access to information should be guided by the principles of transparency, equity and ethics.”

Answer: *Applicable*

Justification

The Policy Instrument for Disclosure and Use of Information on a Relevant Act or Fact and on the Trading of Securities Issued by Banco Bradesco S.A. ("Instrument"), approved by the Board of Directors on July 29, 2002 and based on CVM Resolution No. 44, of August 8, 2021, establishes that the persons who sign the Term of Adhesion to the Instrument ("Term of Adhesion") must exclusively use the Bradesco Conglomerate's securities brokerages to trade the securities mentioned in the Instrument, brokerage houses that, in Brazil, have controls to avoid trading during periods of prohibition (blocking of trades). As such, all open positions involving securities need to be transferred to the Bradesco Conglomerate's brokerage houses within a period of sixty (60) days from the date of signature of the Term of Adhesion.

At the same time, the Code of Ethical Conduct of the Bradesco Organization (public document), specifically in its item 8.2. Shareholders and Investors, cover the subject with the conduct that is expected for compliance with the Instrument.

So, in addition to the fact that the use of material information that has not yet been disclosed to the market is considered a criminal practice and subject to imprisonment from one (1) to five (5) years and a fine of up to three times the amount of the unlawful advantage obtained from such crime, the Officer or Employee who makes use of insider information for their own benefit will be subject to penalties defined by the Integrity and Ethical Conduct Committee, reporting to the Board of Directors.

The Policy Instrument can be viewed on the Bradesco IR page (Corporate Governance – Statute, Policies, Rules and Indemnity Agreement).

5.5 POLICY ON CONTRIBUTIONS AND DONATIONS

5.5.1: “in order to ensure greater transparency regarding the use of company resources, a policy must be drawn up on its voluntary contributions, including those related to political activities, to be approved by the Board of Directors and implemented by the Board of Executive Officers, containing clear and objective principles and rules.”

Principle: “The Management shall ensure that managers and other employees understand clearly and objectively, the principles and rules on contributions and donations of securities or assets to philanthropic projects, cultural, social, environmental or political activities.”

Answer: *Applicable*

Justification

The donations made by the Organization, social and encouraged, are governed by the Standard of Donations and Sponsorships and the Corporate Donation Policy. The Standard has been approved by the Board of Executive Officers and published on Bradesco IR. The Policy was approved by the Board of Directors and revised this year, ratifying the guidelines set by the Company.

We can also state the Corporate Anti-Corruption Policy, approved by the Board, which ensures that any kind of contribution to public and/or private entities is in accordance with the ethical principles of the Organization.

All documents stated are available on Bradesco IR (Corporate Governance – Bylaws, Policies, Standards and Compensation Agreement).

5.5.2: “the Policy must provide that the Board of Directors is the body responsible for the approval of all disbursements related to political activities.”

Answer: *Applicable*

Justification

Not Applicable.

5.5.3: “the Policy on voluntary contributions of companies controlled by the State, or that have repeated, and relevant trade relations with the State, must prohibit contributions or donations to political parties or people linked to them, even if permitted by law.”

Answer: *Not Applicable*

Justification

Not Applicable.

- **INVESTOR RELATIONS WEBSITE (BRADESCO IR):** [Homepage - Bradesco RI](#)

✓ **Market Information Section – Reports and Spreadsheets**

[Reports - Bradesco RI](#)

✓ **Corporate Governance Section – Bylaws, Policies, Norms and Compensation Agreement**

[Bylaws - Bradesco RI](#)

✓ **Corporate Governance Section – Compliance and Ethics**

[Codes of Ethical Conduct - Bradesco RI](#)

✓ **Corporate Governance Section – Corporate Reporting Channel**

[Corporate Reporting Channel - Bradesco RI](#)

✓ **Corporate Governance Section – Boards and Board of Directors**

[Fiscal Council - Bradesco RI](#)

✓ **Corporate Governance Section– Committees**

[Remuneration - Bradesco RI](#)

✓ **Corporate Governance Section– Meetings**

[Board of Directors - Bradesco RI](#)

✓ **Service Section - Speak to IR:**

[Contact IR - Bradesco RI](#)

- **OTHER LINKS**

✓ **CVM (Securities and Exchange Commission) – Companies – Periodic and Eventual Information on Companies:**

<https://www.rad.cvm.gov.br/ENET/frmConsultaExternaCVM.aspx?tipoconsulta=CVM&codigoCVM=906>