

1 Introduction

The Bradesco Organization, comprised of Banco Bradesco S.A. and its Affiliated Companies, in Brazil and Abroad, and its administrators and employees, is committed to the preservation and enhancement of the Bradesco brand, as well as, with the prevention and combating of corruption and illegal competitive acts in all contexts, forms and modes of occurrence.

The Standard of Sponsorship is designed to ensure adequate governance and transparency in all the activities undertaken by Bradesco Organization. The sponsorships are promoted as part of its commitment with society, which should be in line with its principles and values, being conducted with honesty and integrity.

It is the obligation of all administrators, employees, interns, apprentices and collaborators to comply with the rules of the countries in which we are present, and to ensure adherence to the Bradesco Organization's Code of Ethical Conduct, the Bradesco Integrity Program, the Competition Compliance Program Standard, the Anti-Corruption Corporate Policy, the Competition Corporate Policy, the Anti-Corruption Corporate Standard and the Competition Corporate Standard.

2 Definitions

2.1 Sponsorship

Any contribution, monetary or not, for an event organized by third parties with promotional purposes, having as the main objective to add value to the brand and business of the Bradesco Organization or its products, services and segments, strengthening its identity.

For this reason, it demands to be planned, developed, articulated and thus strengthened within precepts established in the strategic plan of marketing and communication, which involves the evaluation of the marketing context and the needs of the Organization.

There are two types of sponsorship: **institutional**, strategic for brand visibility; and **business sponsorships**, with commercial interest in the segments and areas of products and services.

2.2 Public Agent

It is everyone who, even if temporarily or without remuneration, exercises by election, appointment, assignment, contract or any other form of investiture or bond, a mandate, position, employment or function in direct, indirect or foundational administration of any of the Powers (Executive, Legislative and Judiciary) of the Government, of States, of the Federal District, Municipalities or of an incorporated company to public assets.

2.3 Active Corruption

"To offer or promise undue advantage to a public official so that he/she practices, omits or delays an official act." (Art. 333 of the Brazilian Penal Code).

2.4 Passive Corruption

It occurs when a public agent requests an undue advantage to do or fail to do something that is under their responsibility. (Adaptation of Art. 317 of the Brazilian Penal Code).

2.5 Conflict of Interest

The conflict of interest occurs when there is the possibility of direct or indirect confrontation between the personal interests of administrators, employees of the Organization and/or service providers, which might compromise or unduly influence the performance of their attributions and responsibilities. The interest is characterized by any advantage, material or not, for themselves or for others (relatives, friends, etc.) with whom they have or intend to have personal, commercial or political relations.

Administrators, employees and/or collaborators are forbidden to deliberate in the presence of any conflict of interest, and they are responsible for notifying their impediment and their consequent non-participation in the decision to their peers and immediate superiors.

3 Technical Restrictions

Any technical restrictions will enable, at the discretion of the Managing Units, the refusal of the sponsorship (with or without tax incentives), identified by the Unit(s) involved in the process, such as:

corruption, bribery, anticompetitive behavior, socio-environmental risk, credit risk, negative media that compromises the image of the Organization, among others.

Cases that involve negative media of a serious nature or information that harms the Organization's reputation, identified by the 4165/Marketing Area, the technical areas and other departments and segments, need to be considered by the Marketing Board, the Executive Board and the Risk Governance area of the Organization.

3.1 Sponsorships Not Allowed

All sponsorships must follow the guidelines of this Standard, the Anti-Corruption Corporate Standard and the Competitive Corporate Standard.

Cases of suspected inappropriate conduct must be reported to 4820/Compliance, Conduct and Ethics Department and/or through formal reports on the Institutional, Bradesco IR and Corporate Portal websites or by telephone at 0800 776 4820, by administrators, employees, interns, apprentices, collaborators, customers and other interested parties, hereinafter referred to only as "Whistleblowers", as established in the Standard for Reception, Treatment and Investigation of Complaints.

The sponsorships are prohibited, not being limited, to the following cases:

- Sponsorships that may generate reputation risk for the Bradesco Organization;
- Cases where there is a conflict of interest between the Organization or its administrators and the beneficiary Individual or Legal Entity, and their administrators;
- Sponsorships with or without tax incentives which have as beneficiary, directly or indirectly, an administrator or officer of the Bradesco Organization, or relatives up to the 3rd degree;
- In exchange for favors or that appear to be made as compensation for any type of service provided or that are contrary to the morale or good practices in the market;
- Sponsorships offered or promised to Public Agents, or people related to them, who have power to directly or indirectly benefit the Bradesco Organization;

Cases that present a grade 5 score in the risk analysis related to the bidder should not be sequenced.

The guidelines are contained in the Standard for Reception, Treatment and Investigation of Complaints.

3.2 Political Sponsorships

It is forbidden to carry out any kind of contribution to parties and candidates in electoral campaigns by companies of the Bradesco Organization.

Contribution means, besides financial donation, any other form of assistance, such as: donation or loan of assets, assignment of physical or advertising space, sponsorship of events in which candidates can be presented to the public, assignment of manual labor, distribution of leaflets and "campaign propaganda", sending electronic messages and posters, among others.

It is recommended to all who exercise statutory duties in the Bradesco Organization, to refrain from sponsoring election campaigns, extending an equal recommendation to those who are included in their circle of economic dependence.

3.3 Restrictive Aspects in General

The Bradesco Organization does not support and does not sponsor projects and actions that involve:

- Cruelty to animals;
- Violence, drugs and sexual exploitation;
- Party-political issues;
- Slave labor, analogous to slavery and child labor;
- Unofficial or speculative gambling;
- Disrespect for the Statutes of Children, Adolescents and the Elderly;
- Disrespect to individuality, diversity of people, capacity for judgment of vulnerable groups and society in general;
- Corruption, bribery, anticompetitive behavior, money laundering, terrorist financing and other crimes;

- Damages to society and/or to the environment; and
- Controversial topics, such as transgenic, in vitro fertilization, abortion, cloning, euthanasia and stem cell research, among others.

4 Incentive Law

The Federal Government, by means of the tax waiver of the Income Tax return, stimulates the development of social, educational, health, culture and sport programs and projects.

The **individuals** and **legal entities** that contribute with sponsorship to these programs may benefit from tax deductions on the Income Tax return, as below:

Culture Incentive Law (Law No. 8.313 of December 23, 1991 and Law No. 9.874 of November 23, 1999): institutes a public policy for the development of culture.

Audiovisual Law (Law No. 8.685, of July 20, 1993): creates mechanisms to promote audiovisual activity and other measures. Specific audiovisual, cinematographic, exhibition, distribution and technical infrastructure projects presented by Brazilian companies with national capital may be accredited by the Ministries of Finance and Culture to benefit from tax incentives.

Sports/Parasports Incentive Law (Law No. 11.438, of December 29, 2006): provides for incentives and benefits to promote sports activities and other measures.

Projects that are involved with the laws of PRONAS/PRONON - National Health Care Support Program/National Oncology Care Support Program, ECA - Statute of Children and Adolescents and the Statute of the Elderly, should be directed to **4260/General Secretariat**.

5 Responsibilities

Sponsorships and **incentivized projects** (Culture, Audiovisual and Sports/Parasports Incentive Laws) and **non-incentivized** projects are managed by **4165/Marketing**.

5.1 Marketing

Responsible for the management, meeting the demands and deliberation of sponsorships and all the demands of incentive laws related to Culture, Sport/Parasport and Audiovisual.

It must ensure due diligence of demands, through a robust screening process, as per item 7.2, identifying possible conflicts of interest, ensuring compliance with the requirements of tax incentive laws, when applicable, and complying with the requirements set out in this Standard, especially regarding the hypotheses in item 3.1 - "Non-permitted Sponsorships".

It is also responsible for consolidating and, in compliance with current tax legislation, keeping the entire dossier for twenty (20) years, containing the documents in digital format, the analyses carried out by the technical areas and the respective approvals or not, as well as reserving a scanned copy for the 4100/General Accounting Office and, for sponsorships with tax incentives, also for the 4060/Tax Audit Office, if requested.

Responsible for forwarding the report on margins, quarterly or whenever there is a significant change in the values of the margins, as to the limits available to the incentivizing companies that constitute the Bradesco Organization.

It should be used for the correct interpretation and application of tax rules for tax incentives in cultural, artistic, audiovisual, sports and parasports projects, in addition to issuing opinions on tax deductibility and benefits, and analysis of the Organization's companies to which the incentives and sponsorships should be allocated.

Responsible for issuing a technical opinion, of the bidder and the proposal, with a main focus on regulatory, anti-bribery, anti-corruption and anticompetitive conduct analysis.

Responsible for issuing the technical analysis, with main focus on socio-environmental risk, contemplating especially work analogous to slave labor, child labor, sexual exploitation and trafficking of animals.

Support managers in the identification, assessment and response to risk, ensuring that the control is executed correctly, regularly and effectively, as well as recommending, where necessary, corrective action or the action plan to ensure acceptable levels of risks in the processes of the Organization.

Responsible for demonstrating the responsibility that the beneficiary and other parties involved, such as the fundraiser and promoter, have with the Bradesco Organization, as well as the existing impediments and restrictions.

5.6 General Accounting

Responsible for payments of sponsorships approved by means of requests made via the SAP System, respecting the roles and tasks described in this Standard, the authorization limits established and their respective accounting accounts.

5.7 Sustainability

Responsible for issuing a technical opinion on the proposal, when applicable, assessing compliance with socio-environmental investment criteria and alignment with strategic sustainability pillars.

5.8 Public Authority

Responsible for issuing a technical opinion on the proposal when it comes to a request involving Public Agencies.

5.9 Other Departments and Segments

The segments (Large Corporate, Corporate, Corporate One, Global Private Bank, Prime and Retail) and the Audit and General Inspectorate, Corporate Security and Legal Departments may be called upon by the Management Facilities, occasionally, when it is understood that there is a need to evaluate the demands in detail.

6 Authorization Limits and Deliberations

The Administrative Directors, as set out in the Bylaws and its Charter, will give the Executive Board autonomy to deliberate on the amount of annual disbursements.

- a) **Sponsorship without fiscal incentive:** will be approved according to the criteria set out in the Corporate Authorization Limits Standard;
- b) **Sponsorship with fiscal incentive:** the amount disbursed under these headings will be approved in accordance with the criteria and limits for incentivized projects, as per the table below, established by the Presidency of the Executive Board, and endorsed in meetings of the Executive Marketing Committee.

Title	Values
Officer + Superintendent or Executive Officer	Up to R\$ 850,000.00
Executive Officer + Officer	Up to R\$ 6,000,000.00
Officer -President + Executive Officer	R\$ 6,000,000.00 upward

The Management Units have the responsibility to ensure that the processes deliberated have complied with the flow of this Standard, with the due process of screening and technical opinion. They must have all the information they deem necessary for the deliberation, asking for more information, if necessary, thus ensuring that all approved cases have proper governance and diligence, comply with the requirements set out in this Standard and are in line with the principles and values of the Bradesco Organization.

c) **Business sponsorships:** will be approved according to the criteria set out in the Corporate Authorization Limits Standard.

7 Governance and Procedures

The Bradesco Organization establishes procedures for making sponsorships, with interdepartmental flow involving technical analysis, ensuring the due diligence of each proposal. Regardless of the proponent, all submitted requests will follow the flow established in this Standard, with exceptions demanded in the face of a state of public calamity and the fight against pandemics, subject to the approval of the Executive Board.

7.1 Source of the Demand

The demand will be proposed by means of a form and sent to the relevant management area, as set out in item 5, of this Standard.

Forms:

Requests for **sponsorships** and **projects based on the Culture, Audiovisual, Sports and Parasports incentive laws**, as well as **non-incentivized** ones, must be submitted using the following forms, to 4165/Marketing:

4165-007E - Request for Non-Incentivized Sponsorships;

4165-008E - Request for Incentivized Sponsorships.

Requests for **business sponsorships** must be sent at least **sixty (60) business days** prior to the date of the event, through the area interested in the project, including the documents below:

- Official letter or e-mail from the bidder formalizing the request for sponsorship with the main information of the project;
- If there is a history of previous sponsorships, submit evidence of sponsorship and brand exposure;
- Approval of funds according to authority;
- Knowledge of the 4165/Marketing Senior Manager responsible for the business area served.

Note: in cases of sponsorship requests involving Public Agencies, Public Companies or Joint Stock Companies, it is necessary to forward the administrative procedure duly initiated and published, and these documents must be evaluated by the Legal Department of the Bradesco Organization.

7.2 Reception and Screening

The form shall be received by 4165/Marketing, according to established competencies and shall be responsible for conducting the screening process, observing at least the following points:

- a) verify that the form is duly completed and that it is accompanied by the information necessary for the analysis as required on the form;
- b) certify that the final and responsible beneficiaries (people with power of representation, such as administrators, officers, etc.), both of the beneficiary and the others involved, such as the funding agent and the sponsor, have been identified;
- c) in the case of sponsorship based on the tax incentive law, ensure that all the specificities and requirements of the incentive law are being met.

In relation to the demands based on the tax incentive laws, the 4060/Tax Audit will analyze the margins of the companies of the Bradesco Organization. After, they will be forwarded to the Managing Units to map out the technical analysis flow.

In all cases of sponsorship, the technical opinion will be given to the entities – Legal Entity and its controllers, by the Departments of Compliance, Conduct and Ethics, Integrated Risk Control, Sustainability and Credit, within their responsibilities, within up to ten (10) business days.

The main objectives of the technical opinion of the areas involved are: to mitigate risks and ensure the image of the Organization; identify impediments and restrictions; prevent money laundering and financing of terrorism; anti-bribery; anti-corruption and anticompetitive conduct; sustainability analysis and socio-environmental risk.

If a process with Related Parties is identified, the 4165/Marketing Sponsorship area will submit the case for deliberation by the Executive Committee for the Evaluation of Transactions with Related Parties (Regulations of the Executive Committee for the Evaluation of Transactions with Related Parties or Potential Conflicts of Interest).

In addition to the above Departments, other Segments and Departments may be involved, as per item 5.9, in this Standard.

The 4100/General Accountancy will make payments for donations and sponsorships, with or without tax incentive, approved through requests made via the SAP System, according to the criteria set forth in this Standard, item 6 - Authorization Limits and Deliberations.

Requests for disbursement of sponsorships, with or without tax incentives, should be made via the SAP System, addressed to 4100/General Accountancy, and should be accompanied by:

Incentive Laws (Culture, Sport, Parasport and Audiovisual):

- Form/Receipt;
- List forwarded to the 4060/Tax Audit with indication of the incentivizing companies with their respective values;
- Official Gazette (Incentive Laws for Culture, Sport and Parasport);
- Term of Adhesion or Supplier Registration Spreadsheet.

Non-Incentivized:

- Receipt;
- Term of Adhesion or Supplier Registration Spreadsheet.

Shopping carts that do not contain the above information **will be returned** to Managers for completion.

Important: the time limit for sending the tax document and level of authorization must follow the Payment Management Standard.

7.6 Monitoring & Control

In all cases of sponsorships, with or without tax incentive, procedures will be carried out to ensure appropriate governance, with technical opinion and final deliberation in the defined levels of authorization.

Management Units will define criteria and mechanisms to ensure the responsibility of the beneficiary for the adequate allocation of resources, periodic accountability and proof of the results initially proposed, according to Decree No. 11.129/22, regulator of Law No. 12.846/13 (Anti-Corruption).

The 4100/General Accountancy shall formalize for the 4060/Tax Audit, by the 2nd working day of the following year, a report with the amounts earmarked and **effectively paid** in the previous year due to the use of the tax benefit.

8 Application of Consequences

Consequences will be applied to actions related to violation of conduct, in breach of the Corporate Policy of Consequences, and Bradesco Organization's Consequences Standard, for example, but not limited to:

Non-tolerated conduct
Failure to comply with the governance of sponsorship procedures, with or without tax incentives, described in this Standard.

8.1 Application of Consequences/Disciplinary Measures

The administration of the unit in which the employee is based will apply disciplinary measures immediately, observing the provisions in item **"Types of Consequences/Disciplinary Measures"**, of the Bradesco Organization's Consequences Standard.

Marketing
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