

## **1. Presentation**

### **1.1 Purpose**

The Sectorial Code of Ethical Conduct of Purchasing Professional has the main objective of serving as guidance to employees in the exercise of their duties, in order to guarantee the fairness and integrity in the acquisition processes and in the relationship with the suppliers of products and services

### **1.2 Scope**

Compliance with the guidelines established in this Code of Conduct is extensive and applicable to all employees of Bradesco Organization who:

- a) perform any activity related to the acquisition of products and services, on a timely basis or as part of the assignment of their position, such as: authorized direct purchases, small non-recurring amount and/or emergency purchases, involving or not involving contacts with suppliers; and
- b) have access to any step or document of the processes carried out by the 4080 – 0 / Purchasing

Suppliers in their relationship with Bradesco Organization, where applicable, are expected to conduct in accordance with this Code.

## **2. Ethical Values and Principles**

All Bradesco Organization employees must follow the ethical standards for which they are encouraged and held accountable, governed by the values and principles contained in the Bradesco Organization's Code of Ethical Conduct.

However, some principles must have their peculiarities reinforced in this Code. Are they:

### **2.1 Integrity**

#### **2.1.1 Conflict of Interest**

The conflict of interests, in the acquisition process, occurs mainly in situations in which the Procurement Professional's performance, in the relationship with suppliers, puts the pursuit of own benefits or those of third parties ahead of the Organization's interests

Examples of conflicts of interest:

- a) financial interests that may influence the Procurement Professional's decisions regarding the conduct of business with suppliers;
- b) inappropriate use of confidential information
- c) use of items owned by Bradesco Organization for matters of personal interest or interest of third parties, except when authorized; and

d) claim, based on their position, discounts on purchases of goods or services, for personal use or consumption.

### **i. Gifts**

The acceptance of gifts offered by suppliers may compromise the Procurement Professional's judgment and impartiality, as well as the exemption, fairness and transparency of purchasing procedures.

Gifts offered by supplier companies, as well as by any of their employees, that may represent an improper relationship or financial or reputation damage to the Organization shall not be accepted.

Advertising institutional gifts containing a logo may be accepted, such as pens, key chains, diaries, card holders, etc.

### **ii. Social Events**

Due to the commercial contacts between the Procurement Professional and the suppliers, invitations to social events may arise. Repeated invitations can characterize a conflict of interest, and it is up to the professional involved to evaluate each situation, refusing them if he perceives that they may represent an improper relationship.

### **iii. Return of Samples**

Samples of third-party owned products must be returned immediately upon completion of the procurement process.

## **2.2 Information Security**

All documents in the acquisition process, such as technical and/or commercial proposals, quotation maps, supplier records, contracts, must be treated confidentially and their custody must comply with the requirements for the topic.

Prices, specifications, supply conditions, name of participating companies, etc. must not be disclosed to competitors or third parties.

## **2.3 Social and Environmental Responsibility**

The Procurement Professional must always observe the Bradesco Organization's Corporate Sustainability Policy in their actions and negotiations, being their duty:

a) to continuously promote the questioning of suppliers and requesters about the characteristics of products or services and the analysis of the impact on social and environmental aspects, always focusing and concentrating efforts on the acquisition of sustainable products and services and on the possibility of reducing consumption;

- b) to be an awareness agent for the engagement of suppliers in the culture of Social and Environmental Responsibility of Bradesco Organization; and
- c) promote the awareness of managers and requesters about the importance of the process of evaluation and continuous monitoring of the socio-environmental aspects of suppliers, through the sustainable supplier Bradesco's program – (FSBRA), which provides for socio-environmental and consultative audits of suppliers.

### **3. Conduct Rules**

The Procurement Professional must:

- a) contribute in every way to improve the Organization's results;
- b) treat suppliers with impartiality and professionalism, rejecting any attempt or even appearance of favoritism;
- c) guide the negotiations by objective criteria that take into account quality, price, total cost of ownership, term and socio-environmental aspects;
- d) maintain confidentiality on internal procedures or on any information obtained as a result of the exercise of the function; and
- e) ensure that the suppliers participating in the competitions or contracted parties protect the confidentiality of the information, maintaining absolute secrecy on any data, materials, documents, technical and commercial specifications of the purpose of the acquisition that they may have knowledge of or access to.

#### **3.1 In communication**

In all channels used, communication must occur in a clear and objective way, and the Procurement Professional must:

- a) not to disclose, under any pretext, personal information to suppliers, such as address, home and cell phones and email;
- b) communicate with suppliers using corporate tools (cellphone and/or e-mail);
- c) when answering requests for information about purchasing activities, provide them only when the subject is within their direct competence; if this is not the case, refer the interlocutor to the most appropriate source of information;
- d) not provide restricted or confidential information, justifying to the interlocutor about their obligation of confidentiality;
- e) in case of doubt about the interlocutor, his intention or about the information requested, demand that the request be made in writing and immediately inform his hierarchical superior; and
- f) in written communications, observe the correspondence models defined by the Organization.

### **3.2 Relationship among Procurement Professionals**

Maintaining a healthy environment and mutual trust strengthens the ethical behavior and development of the Procurement Professional. In this way, respect, empathy and solidarity are expected behaviors.

In a situation of conflict between people, one should try to solve the problem in a conciliatory way, not using their hierarchical position.

## **4. Code Management**

### **4.1 Integrity and Ethical Conduct Committee**

The Integrity and Ethical Conduct Committee, composed of members appointed by the Board of Directors of Banco Bradesco S.A. and the Ethical Conduct Committee are the bodies responsible for proposing actions regarding the dissemination and compliance with the Bradesco Organization's Codes of Ethical, Corporate and Sectoral Conduct, in order to ensure their effectiveness.

### **4.2 Procedures in the event of doubts, conflicting situations or actions contrary to the principles of this Sectoral Code of Ethical Conduct**

This Sectoral Code of Ethical Conduct legitimizes the policies and standards established by the Organization.

Improper actions by one or more people can have chain effects on the entire group or community, and in extreme cases, the Organization's own image can be affected. Thus, it is imperative that situations and businesses with suspicious appearance or practices of improper conduct are reported, such as:

- a) bribery or attempted bribery;
- b) leakage of information that could compromise the integrity of the process and the impartial choice of supplier or product; and
- c) violation of supplier selection rules or purchasing processes.

Considering that a code of ethical conduct hardly covers all situations encountered in practice, in case of doubts and/or ethical dilemmas about the content of this document or when situations or suspected violations of the Codes of Ethical Conduct arise, the communication must be made in a timely manner, in a complete way through its leadership immediately or through the Corporate Reporting Channel.

### **4.3 Violations of this Sectoral Code of Ethical Conduct**

Complaints and statements by employees or third parties who are aware of violations of this Sectoral Code of Ethical Conduct, as well as any information about possible non-compliance with legal and regulatory provisions applicable to the Bank and controlled companies, can be made on the Corporate Reporting Channel, available at:

**Electronic Form:** Corporate Portal website > Bradesco > Channel of Denunciations and Manifestations Bradesco RI Website > Corporate Governance > Corporate Reporting Channel > electronic form.

**Telephonic service:** 0800 776 4820 (Service from Monday to Friday, from 08h to 18h, except on weekends and national holidays)

**Manifestation Boxes:** Boxes located in the buildings of Cidade de Deus and Next. The Channel ensures that the whistleblower visualizes the progress of his report, through the protocol number generated at the time of registration.

To formalize the Complaints, the complainant, identified or not, must provide the maximum of information it has on the subject, if possible, accompanied by evidence or other elements that may help in the investigation of the reported facts.

We guarantee the right to anonymous reporting, ensuring that no type of retaliation is tolerated due to complaints made in good faith.

We declare that this is a true copy of the Bradesco Organization's Sectoral Code of Ethical Conduct for Purchasing Professionals, approved in RECA No. 1.366, of 10/30/2008, whose last revision, with amendments, took place in RECA No. 3.389, dated 18/5/2023.

Banco Bradesco S.A.

Cassiano Ricardo Scarpelli  
Vice President