

Introduction

The Bradesco Integrity Program focuses on curbing inappropriate conduct by our administrators, employees, interns, apprentices and collaborators both in Brazil and abroad and is made up of a set of policies, standards and procedures aimed at prevention, monitoring, detection and response in relation to harmful acts provided for in Law No. 12.846/2013 Anti-Corruption and applicable international legislation.

This program is structured to permeate all areas of the Bradesco Organization. In the case of overseas units, adaptations can be made to this Integrity Program to comply with specific local legislation, but maintaining, at a minimum, the conduct already required in Brazil.

The main operational activities and all of the Organization's business practices were considered in the preparation of the Program and are structured into strategic pillars of action, which are:

Corruption Risk Prevention: preparation and communication of clear and objective policies and standards, in addition to permanent promotion of a culture of integrity through training, workshops, lectures, videos, among other actions for all administrators, employees, interns, apprentices and collaborators.

Monitoring and Detection of Inappropriate Conduct: monitoring of risks and controls related to anti-corruption and the rapid identification of conduct that does not adhere to the Code of Ethical Conduct of the Bradesco Organization through compliance reports, adherence tests of controls, indicators, audits internal and external and management of reporting channels.

Response from Senior Management: diligence in the complaints received, in the notes made by internal and external audit, and by professionals in internal controls, Compliance, regulatory and supervisory bodies. Application of disciplinary measures and reporting to the Integrity and Ethical Conduct Committee, the Audit Committee, the Members of the Board of Directors, and the Regulators and Supervisors, always aiming at the continuous improvement of the Integrity Program.

1. Senior Management Commitment

1.1. Board of Directors

The Board of Directors of the Bradesco Organization supports the Integrity Program so that its effectiveness is met. All Policies and Standards relating to ethics and anti-corruption are ratified at Board meetings and must be followed by all administrators, employees, interns and apprentices of the Bradesco Organization and its controlled companies, in Brazil and abroad when carrying out their work and business, also extending to employees.

The Bradesco Organization's Code of Ethical Conduct and the Policies and Standards of Conduct are available to all Bradesco Organization's administrators, employees, interns and apprentices. Its applicability also extends to employees who are providing services on behalf of one of the Organization's companies or for the Organization, and the documents are available for consultation and reading on the Bradesco Suppliers and Bradesco Investor Relations websites.

1.2. Executive Board

The Executive Board is responsible for establishing and monitoring the actions necessary to achieve the guidelines established by the Board of Directors, promoting high standards of integrity and ethics and the dissemination of a culture that emphasizes and demonstrates to all administrators, employees, interns, apprentices and collaborators the importance of preventing, detecting and remedying deviations, fraud, irregularities and illicit acts carried out, mainly, against public administration, national or foreign.

1.3. Audit Committee

The Committee's duties are contained in the Charter of the Bradesco Organization's Audit Committee.

1.4. Integrity and Ethical Conduct Committee

The Committee's duties are contained in the Charter of the Integrity and Ethical Conduct Committee.

2. Standards of Conduct and Integrity Procedures

2.1. Code of Conduct and Ethics

The Bradesco Organization's principles and values, as well as the Leadership Message, are contained in the Code of Ethical Conduct of the Bradesco Organization.

In addition, there are specific, sector-specific Codes of Ethical Conduct that must be observed and respected by administrators, employees and collaborators who perform such functions in the Bradesco Organization. They are:

- Sectoral Code of Ethical Conduct for Purchasing Professionals;
- Sectoral Code of Ethical Conduct for Auditors and Internal Inspectors of the Bradesco Organization;
- Sectoral Code of Ethical Conduct of Bradseg Participações S.A, its affiliates and subsidiaries; It is,
- Sectoral Code of Ethical Conduct for Financial and Capital Market Professionals at the Bradesco Organization.

2.2. Anti-Corruption Corporate Policy and Standard / Giveaway, Gifts and Hospitality Standard - Public Sector

The Bradesco Organization reaffirms the commitment contained in the Code of Ethical Conduct of the Bradesco Organization, in the guidelines of the Anti-Corruption Corporate Policy and establishes rules and procedures contained in the Anti-Corruption Corporate Standard and Gifts, Giveaway and Hospitality Standard - Public Sector that aim to prevent and combat corruption and bribery, in accordance with the legislation and regulations in force in Brazil and in the countries where it has Business Units.

Among the guidelines presented in the Anti-Corruption Corporate Policy, the following stand out:

- Registration of agendas (in-person or video conferences/virtual/online meetings) related to interactions with Public Officials and PEPs;
- Meetings conducted through video conferencing/virtual/online meetings must be carried out exclusively using corporate equipment;
- Conduct due diligence when hiring suppliers of goods and services, as well as in the granting of donations and sponsorships;
- Analysis of anti-corruption clauses;
- Provision of whistleblower channels and protection of good-faith whistleblowers;
- Conducting regular training and communications;
- Enforcement of disciplinary measures and prompt interruption of irregularities or infractions; and,

- Due diligence in merger, acquisition, divestiture, and partnership processes.

Among the guidelines presented in the Giveaway, Gifts and Hospitality Standard - Public Sector, the following stand out:

- Limitation or prohibition of granting or receiving gifts, giveaway, and hospitalities to/from Public Agents and People Politically Exposed (PEP).
- Recording expenses incurred with Public Agents and Politically Exposed Persons through reimbursement of small expenses and corporate cards.
- Recording the granting or receiving of gifts and hospitalities to/from Public Agents and Politically Exposed Persons; and,
- Guidelines relevant to the participation of Public Agents and PEP in events sponsored by the Bradesco Organization, such as seminars, congresses, in Brazil or abroad.

2.3. Additional Policy, Standards and Procedures

In addition to the Code of Ethical Conduct of the Bradesco Organization, we highlight the specific Policies and Standards for the topics of Anti-Corruption, Competition, Handling Complaints, Donations and Sponsorships, Regulations of the Executive Committee for Acquisitions and Associations of the Bradesco Organization, Charter of the Interdepartmental Commission for Assessment of Strategic Operations of the Bradesco Organization, Charter of the Executive Committee for Management of Accounting Practices, among others, which direct the correct treatment of conduct and business evaluation.

3. Standards of Conduct and Integrity Policies for Employees

All employees, suppliers of goods and services, correspondents in the country and business partners must accept the inclusion of the anti-corruption clause in their respective contract and be in compliance with the values and principles of integrity and ethics of the Bradesco Organization, in addition, they must know and comply with the Code of Ethical Conduct when providing services at the Bradesco Organization and/or on its behalf.

4. Periodic Trainings

The Bradesco Organization believes that its greatest resources are its people and invests in in-person, telepresential, online and virtual communications and training for all topics, mainly in relation to ethical, anti-corruption and competitive conduct. In addition to training its administrators, employees, interns and apprentices, it also carries out communications, workshops and lectures with its collaborators (suppliers of goods and services, correspondents in the country and business partners), notably with those who have the responsibility of interacting with Public Agents and/or PEP, to ensure alignment with the values and principles of ethical conduct and transparency. Training and communications are carried out based on the mapped risks, aiming to permanently acculturate the fight and prevent corruption.

5. Periodic Risk Analysis

Risks related to corruption are periodically monitored and controlled through compliance reports, internal control adherence tests, scheduled internal and external audits, and management of the reporting channel. The Bradesco Organization classifies its processes, products and services in relation to risks related to corruption and bribery, as well as defining appropriate steps to mitigate such risks.

6. Accounting Records

All accounting records of the Bradesco Organization fairly and accurately reflect the operations involving the business and/or disposition of the Organization's assets, observing the regulations and

accounting practices applied. The effectiveness of these procedures is assessed by an adherence test applied by the Integrated Risk Control Department (DCIR), the Compliance, Conduct and Ethics Department (DCCE), the General Audit and Inspectorate (AIGL), Independent Audit and the Bradesco Seguros Group (GBS) by the Internal Controls and Compliance Areas.

All expenses are accurately accounted for, including appropriate supporting documentation, and are entered into the appropriate records and classifications when paid or reimbursed.

7. Internal Controls

DCIR is responsible for supporting managers in identifying, evaluating and responding to risk, ensuring the existence, execution and effectiveness of controls, as well as recommending, when necessary, corrective action or action plan in order to ensure acceptable levels of risk in the Organization's processes. Exceptionally, in the case of GBS, this responsibility will be carried out by the Internal Controls Area.

8. Procedures to Prevent Fraud and Illicit Acts in the Scope of Interaction with the Public Sector

All Premises must comply with the Code of Ethical Conduct of the Bradesco Organization, the Anti-Corruption Corporate Policy and the Anti-Corruption Corporate Standard, the Giveaway, Gifts and Hospitality Standard - Public Sector, the Governance Policy for Relationships with Public and Private Institutions, the Bidding Standard Public and Building Infrastructure, Assessments, Leases, Sale of Movable/Real Estate Assets, Construction Supplies, Office Supplies, Mobility and Logistics, in particular, those that maintain interaction with the Public Sector.

The risks are inventoried by the DCIR, with adherence tests applied to prevent or mitigate any mapped risks. The effectiveness of key controls is assessed by the DCCE together with managers. Exceptionally, in the case of GBS, this responsibility will be carried out by its Internal Controls Area.

Contracts with the public sector (direct and indirect administration, parastatals and multilateral organizations) are won through bidding processes carried out in accordance with the relevant legislation, for a period of 60 months. The Bradesco Public Power Department (DBPP), as an advisor, coordinates matters relevant to the Executive Committee of Banco Bradesco S.A. for the evaluation and definition of tenders with public institutions and commercial proposals with private institutions.

Necessarily, the representative (Administrator and/or Employee) of the Bradesco Organization must demonstrate transparency in face-to-face and/or videoconference relationships and in virtual/online meetings held between Public Agent and PEP, filling out the electronic meeting record form.

9. Responsible Internal Body

The DCCE is responsible for maintaining the Bradesco Integrity Program.

To guarantee independence of action, the DCCE is structured by trained professionals, clear and robust processes and an exclusive Departmental Board that reports directly to the Executive Board.

In possible cases of non-compliance, whether consummated or not, with regard to the Integrity Program, the DCCE acts directly and independently with those responsible with a view to immediate interruption and/or correction, reporting, in a timely manner, to higher authorities up to the Board of Directors.

When carrying out the work, the DCCE may request support from other control areas, including: AIGL, DCIR, Legal Department (DEJUR), Corporate Security, among others.

10. Reporting Channels

Protection is guaranteed for good faith whistleblowers who report any violation of this Norm or suspicions of acts that may be related, directly or indirectly, to the completed or attempted practice of corruption or bribery.

The report can be made anonymously or through identification, with identity confidentiality being guaranteed. The complaint can be consulted using the protocol number provided at the time of registration.

Online electronic form, available at:

- Corporate Portal/O Bradesco/Complaints and Manifestations Channel;
- Bradesco website Investor Relations/Corporate Governance/Corporate Reporting Channel;
- 0800 776 4820 (Monday to Friday, 8am to 6pm, except on national holidays).

The Corporate Reporting Channel, published on the Corporate Portal and on the Bradesco Investor Relations website, is intended for recording complaints and manifestations by employees and other interested parties in situations of:

- a) violations of the provisions of this Standard; It is,
- b) suspicion of acts that may be related, directly or indirectly, to the practice of corruption or bribery, whether consummated or not.

In accordance with the applicable legislation in the locations where the Organization maintains its activities, failure to comply with the guidelines of the Anti-Corruption Corporate Policy and the rules and procedures described in this Standard may subject offenders to civil, criminal and administrative liability, as the case may be.

Regarding Bradseg Participações S.A., its affiliates and subsidiaries, complaints must be made through the respective channels:

- etica@bradescoseguros.com.br;
- prevencaoafraude@bradescoseguros.com.br;
- Hotline Fraud: 0800 701 2788; or
- www.bradescoseguros.com.br/clientes/atendimento/denuncie-a-fraude

The guidelines are contained in the Rules for Receiving, Handling and Investigating Complaints.

11. Protection for Good Faith Whistleblowers

Protection is guaranteed to whistleblowers in good faith¹ who speak out about any violation of the provisions of this Standard or about suspected acts that may be related, directly or indirectly, to a completed practice or a mere attempt at corruption or bribery.

Protection for the whistleblower will be provided through the unconditional guarantee of confidentiality regarding the information related to the report and the whistleblower's right to remain anonymous.

(1) "Good faith means that the report was not intentionally made with false information or evidence."

12. Disciplinary Measures

Any administrator, employee, intern and apprentice found in violation of the Laws, Code of Ethical Conduct of the Bradesco Organization, Anti-Corruption Corporate Standard and other internal rules will be subject to the application of consequences/disciplinary measures contained in the Consequences Standard of the Bradesco Organization, in accordance with applicable laws and Organization policies/standards.

Employees, suppliers of goods and services, correspondents in the country and business partners, providing services and/or acting on behalf of the Bradesco Organization, found in violation of the Integrity Program, Code of Ethical Conduct of the Bradesco Organization, Anti-Corruption Corporate Policy, Anti-Corruption Corporate Standard and Giveaway, Gifts and Hospitality Standard - Public Sector, as well as, in violation of other internal rules/standards, will be subject to the termination of the contractual relationship, as well as any other remedial and legal measures available to the Bradesco Organization under the terms of the law applicable.

The guidelines are contained in the Bradesco Organization's Consequences Standard.

13. Prompt Interruption of Irregularities or Violations

To ensure the prevention and/or interruption of irregularities or infractions, when contracting, establishing partnerships, donations, sponsorships and other processes considered to be of greater risk, the Bradesco Organization uses standard clauses in its draft contracts, such as:

- the responsibility of employees, suppliers of goods and services, correspondents in the country and business partners and other intermediary agents to refrain from committing illegal acts;
- the need to maintain practices aimed at preventing and combating corruption;
- the possibility of suspending or interrupting the service;
- the possibility of contract termination; and,
- the possibility of applying penalties and fines.

If violations of the rules are identified through reports, compliance reports, adherence tests, internal/external audits, or as a result of monitoring actions, Bradesco Organization investigates and ensures the prompt interruption of irregularities/infractions, as well as promptly remedies the damages caused, including applying appropriate disciplinary measures.

14. Diligence

Any unit, administrator, or employee of Bradesco Organization seeking to establish a business relationship between Bradesco Organization and employees, suppliers of goods and services, local correspondents, and business partners must, before entering into the contract, carefully observe and comply with the due diligence procedures set forth in the respective internal regulation.

In general, the due diligence review should determine, among other things:

- a) if the individual proposing to provide services to Bradesco Organization in exchange for payment is a "Public Agent" or a "PEP";
- b) whether the legal entity employs or is a company in which a "Public Agent" or a "PEP" holds ownership interest or sits on the board of directors;
- c) whether the services that the individual or legal entity is proposing to provide are necessary to promote a commercial initiative, contract, or renewal of an existing contract;

- d) if the individual or legal entity has the expertise, experience, and other qualifications to legitimately perform the necessary services;
- e) whether the individual or legal entity demonstrates a likelihood of engaging in practices that may expose Bradesco to any liability;
- f) evaluating the company's experience, size, production capacity, and location;
- g) and to assess the reputation of the employee, suppliers of goods and services, correspondents in the country, and business partners with other clients;
- h) check if the company has restrictions, such as being listed in the "CEIS - National Registry of Ineligible and Suspended Companies," "CNEP - National Registry of Punished Companies," "CEPIM - Registry of Nonprofit Entities Prevented," and "Leniency Agreements," among other internal and external research sources;
- i) check various media sources to see if there is a history of committing crimes against public and private administration, including anticompetitive practices;
- j) evaluate if the deadline and price are consistent with those practiced in the market;
- k) check if the collaborator, suppliers of goods and services, correspondents in the country, and business partners comply with the internal rules of the Organization for hiring and outsourcing of services;
- l) check their primary line of business, whether their registration (CNPJ) is active, and if there are any registration issues; and,
- m) check whether the establishment/company complies with Bradesco's policies and norms, as well as the applicable laws and regulations for hiring correspondents and business partners. Also, verify if the necessary licenses/authorizations are in place from regulatory agencies for their operations.

The guidelines are outlined in the corporate policies "Anticorruption Corporate Standard" and "Know Your Supplier and Outsourced Service Provider".

15. Mergers, Acquisitions, Divestitures, and Partnerships Processes

In the merger, acquisition, divestiture, and partnership processes of Bradesco Organization, due diligence procedures are carried out. The responsibility for this procedure lies with the proponent/manager of the proposal, aiming to identify liabilities or activities that may pose risks arising from acts of corruption, money laundering/diversion, and/or other illicit acts. Additionally, specific contractual clauses to safeguard the Organization are included in the business deal.

16. Continuous Monitoring of the Integrity Program

Continuous monitoring of the Integrity Program allows the Bradesco Organization to verify the effectiveness of the program, identify any new risks that may arise and respond in a timely manner through corrections and improvements. Monitoring is done by collecting and analyzing information from various sources, such as:

- regular reports on Integrity Program routines or related investigations;
- trends observed in complaints from customers, employees, suppliers of goods and services, correspondents in the country and business partners;
- information obtained through reporting channels;

- reports from government regulatory or oversight agencies;
- internal audit reports;
- compliance reports;
- adhesion test result.

In addition to analyzing existing information, the Bradesco Organization evaluates, through the Risk Culture Diagnosis, whether its administrators and employees are aware of the values and policies established by the Organization, and whether the stipulated procedures and training carried out bring the expected results, being placed in practice. If non-compliance with rules/procedures is identified, or the existence of failures that are making it difficult to achieve the expected results, the Bradesco Organization will adopt measures to remedy the identified problems.

17. Donations and Sponsorships

17.1. Donations to Candidates and Political Parties

Donations from legal entities to candidates or political parties are prohibited by law, therefore Bradesco Organization and its jointly or individually controlled companies are expressly prohibited from making any political donations, in accordance with the provisions of Law No. 9.504/1997 - Electoral Law and of Law No. 9.096/1995 - Political Parties Law.

Contribution should be understood as, in addition to a financial donation, any other form of assistance, such as: donation or loan of goods, provision of physical or advertising space, sponsorship of events in which candidates can be presented to the public, provision of work, distribution of leaflets and "saints", sending electronic messages and displaying posters, among others.

Although donations by Individuals are permitted, it is recommended that everyone who performs statutory functions at the Bradesco Organization refrain from making personal donations to electoral campaigns, with the same recommendation being extended to those within their circle of economic dependence.

17.2. Donations

All donations and contributions must follow the guidelines of the Bradesco Organization's Corporate Donations Policy and Donations and Sponsorships Standard.

Donations of fixed assets must follow the guidelines of Building Infrastructure, Assessments, Leases, Sale of Movable/Real Estate Assets, Construction Supplies, Office Supplies, Mobility and Logistics and the roadmap for Donating Assets from the Organization's Fixed Assets.

Any form of donation and/or contribution in exchange for favors and/or that appears to be made as compensation for some type of service provided, to any type of person, whether natural or legal and/or even a public agent or PEP, is prohibited.

17.3. Sponsorships

All sponsorships must follow the guidelines of the Bradesco Organization's Corporate Donations Policy and Donations and Sponsorships Standard.

The Bradesco Organization develops and sponsors projects that are related to the brand's essential values: quality, safety, society and respect for the environment.

All contributions in the form of sponsorship, in addition to being aligned with the Bradesco Organization's values, must be transparent and have formalized contracts between the Bradesco Organization and the institutions that will be sponsored.

It is expressly prohibited to carry out sponsorships that indicate the intention of hiding the existence of corruption, influence peddling or money laundering.

Or, even, when the Institution receiving the sponsorship becomes involved in illicit acts and this is reflected in the image of the sponsor.

We declare that this is a faithful copy of the Bradesco Integrity Program, approved in RECA number 2,714, of 5/29/2017, the last revision of which, with changes, was recorded in the minutes of RECA number 3.395, of 8/10/2023.

BRADESCO

Moacir Nachbar Junior
Executive Vice President