

## 1. Introduction

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, to the prevention and combating of corruption and to the competitive illicit acts in all contexts, forms and modes of occurrence.

The Standard of Donations was designed to ensure adequate governance and transparency in all the activities undertaken by the Organization. The donations 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 and employees to comply with the rules of the Countries in which we are present and ensure adherence to the Code of Ethical Conduct of the Bradesco Organization, Bradesco's Integrity Program, Anti-Corruption Corporate Policy, Business Competition Policy, Corporate Anti-Corruption Standard and Corporate Competitive Standard.

## 2. Coverage

It applies to Banco Bradesco S.A. and its Affiliated Companies in Brazil and Abroad.

## 3. Definitions

### 3.1. Donation

It consists of the contract by which the donor undertakes to transfer financial resources to the equity of another, the grantee. It is a contract by unilateral rule, since only the donor assumes an obligation; free, because the grantee increases their wealth without any burden; and consensual, because it is necessary that the grantee accept the amount donated.

### 3.2. Public Agent

This 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 in any Branches (Executive, Legislative and Judiciary) of the Government, States, the Federal District, Municipalities or in an incorporated company to public assets.

### 3.3. Active Corruption

"To offer or promise undue advantage to a public official so that they practice, omit or delay an official act" (Article 333 of the Brazilian Penal Code).

### 3.4. 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).

### 3.5. 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. Interest is characterized by any and every advantage, material or not, in their own favor or in the favor of third parties (relatives, friends etc.) with whom they have, had or intend to have personal, commercial or political relations.

Managers, employees and/or collaborators cannot deliberate on the presence of any conflict of interest, whereby they should make them aware of any impediment and consequent nonparticipation in the decision to their peers and immediate superiors.

### **3.6. Technical Restrictions**

Any technical restrictions will enable, at the discretion of the General Secretariat, the refusal of the Donation (with or without tax incentives), identified by the Unit(s) involved in the process, such as: corruption, bribery, anticompetitive conducts, social and environmental risk, credit risk, negative media that compromises the image of the Organization, among others.

## **4. Donations Not Allowed**

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

Cases of suspected misconduct should be reported to the DCCE – Department of Compliance, Conduct and Ethics and/or to the Corporate Reporting Channel, by means of the electronic form, available in the Corporate Website; Bradesco RI website or by means of 0800 776 4820, (Monday to Friday, from 8:00 a.m. to 6:00 p.m., except holidays) of Bradesco Organization.

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

- those that may generate reputation risk for the Bradesco Organization;
- those in which there is a conflict of interest between the Bradesco Organization or its administrators and the beneficiary Individual or Legal Entity, and their administrators;
- those 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;
- those made in exchange for favors that are contrary to the morale and the good market practices, as well as those that do not comply with the Code of Ethical Conduct of the Bradesco Organization and the integrity and Competitive Programs; and
- Donations offered or promised to Public Agents, or people related to them, who have power to directly or indirectly benefit the Bradesco Organization.

The guidelines are in the Complaint Acceptance, Handling, and Investigation Standard.

### **4.1. Political Donations**

It is forbidden for companies of the Bradesco Organization to make any kind of contribution to parties and candidates in electoral campaigns.

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.

Although donations are allowed by Individuals, it is recommended to all who exercise statutory duties in the Bradesco Organization, to refrain from making personal donations to electoral campaigns, extending an equal recommendation to those who are included in their circle of economic dependence.

#### 4.2. 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 and child labor;
- Unofficial or speculative gambling;
- Disrespect to the Statute of the Child and Adolescent;
- Disrespect to individuality, diversity of people, capacity for judgment of vulnerable groups and society in general;
- Corruption, bribery, anticompetitive conducts, money laundering 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.

#### 5. Incentive Law

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

The **Individuals and Legal Entities** that contribute with donations to these programs may benefit from tax deductions on the Income Tax return, as below:

**PRONAS / PRONON** – imposed by Law No. 12,715/2012, the National Program of Support for Oncologic Care (PRONON) and the National Program of Support for the Health Care of People with Disability (PRONAS/PCD) were implemented by the Ministry of Health to encourage actions and services developed by entities, associations and private, non-profit foundations in the field of oncology and of people with disability.

**ECA – Statute of the Child and Adolescent** – concerning the rights of the child and adolescent, provided for in Article 260 of the Statute of the Child and Adolescent (ECA), of Federal Law No. 8,069/90.

**ELDERLY STATUTE** – From this statute, Law No. 12,213, of January 20, 2010, was sanctioned, instituting the National Fund for the Elderly, which seeks to ensure the rights provided for in the Elderly Statute by means of programs and specific actions.

Projects related to the Culture Incentive Law ("Rouanet"), Audiovisual and Sport/Parasport, should be forwarded to the Marketing Department, in accordance with Standard No. 05.1407 – Sponsorship Management.

#### 6. Responsibilities

The social grants and donations that involve the incentive laws of the Statute of the Child and Adolescent – ECA, Elderly Statute, PRONAS and PRONON are under the management of the General Secretariat.

### **6.1. Management Departments**

It is the responsibility of the General Secretariat to ensure the due diligence of the demand by means of a robust screening process, according to item 8.2, identification of potential conflicts of interest, compliance with the requirements of the tax incentive law, when applicable, and comply with the requirements set out in this Standard, especially with regard to the cases in item 4 "Donations not allowed".

### **6.2. General Secretariat**

Responsible for the management and meeting the demands and deliberation of social donations, not based on the laws of incentive, the Non-profit Entity or Organization of Civil Society of Public Interest (OSCIP), in addition to the management and meeting the demands and deliberation of the donations based on incentive laws related to PRONON, PRONAS, ECA and the Elderly Statute.

It is the responsibility of the General Secretariat to consolidate, and obey the tax legislation in force, maintain custody of the whole dossier for 20 years, containing the original documents, analyses conducted by the Technical Units and the respective approvals of the demands of its management, as well as, reserve a scanned copy for the Department of General Accountancy and donations with tax incentives also for the Tax Audit Department.

### **6.3. Tax Audit Department**

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, and should be engaged in situations regarding the correct interpretation and application of the tax rules for applications of tax incentives in projects: of the Statute of the Child and Adolescent, Elderly Fund, PRONON and PRONAS, besides issuing opinions on deductibility and tax benefits, and analysis of the Organization's companies where the incentives for donations should be allocated.

### **6.4. Department of Compliance, Conduct and Ethics (DCCE)**

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

### **6.5. Integrated Risk Control Department (DCIR)**

Responsible for issuing the opinion of technical analysis of the proposal, with main focus on social and 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.

### **6.6. Credit Department**

It will demonstrate the responsibility that the beneficiary and others involved, such as the funding agent and the sponsor, have with the Bradesco Organization, as well as the existing obstacles and constraints.

### 6.7. General Accounting Department

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

### 6.8. Sustainability Department

Responsible for issuing opinion of the technical analysis of the proposal, when applicable, evaluating the meeting the socio environmental investment criteria and the alignment with the strategic pillars of sustainability.

### 6.9 Public Authority Department

Responsible for issuing commercial opinion of the proposal when the request is related to a Public Body.

### 6.10. Other Departments and Segments

The Segments (Corporate, Prime, Private and Retail) and the Audit and General Inspectorate, Bradesco Public Authority, Corporate Security and Legal Departments may be triggered by Management Units specifically when it is understood that there is a need to evaluate the demand in detail.

## 7. Deliberations

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

- a) **Social Donations:** the amount to be disbursed will be provided in the budget of the General Secretariat. During the year, the disbursement cycle shall be authorized by a committee of at least three members of the Board of Executive Officers.
- b) **Incentivized Donations:** The annual amount to be invested, under the incentive headings, shall primarily comply with the respective available financial margins of the Organization's companies, elaborated by the Tax Audit Department. During the year, the disbursement cycle shall be authorized by a committee of at least three members of the Board of Executive Officers.

The General Secretariat has 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. It must have all the information they deem necessary for the deliberation, ensuring, thus, 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.

## 8. Governance and Procedures

The Bradesco Organization establishes procedures for making donations and 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, except for demands arising from public calamity and those to combat pandemics, which may be submitted, firstly, to the approval of the Board of Executive Officers.

### 8.1. Source of the Demand

The demand will be proposed by means of a form and sent to the General Secretariat, as set out in item 6.

**Forms:**

Social donations or donations based on the draft tax incentive laws for PRONON, PRONAS, ECA and the Elderly Statute should be proposed through the form No. 4260-002 to the General Secretariat.

**8.2. Reception and Screening**

The forms shall be received by the General Secretariat, which 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 has 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.), as well as the other parties involved, such as the funding agent and the sponsor, were identified; and
- c) in the case of donation based on the tax incentive law, ensure that all the specificities and requirements of the incentive law are being met.

**8.3. Margin Management**

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

**8.4. Technical Opinion**

In all cases of donation and sponsorship, the technical opinion will be given to the entities – Legal Entity and its controllers, by the Departments of Compliance, Conduct and Ethics; Corporate Security; Integrated Risk Control; Sustainability; and Credit, within their responsibilities, within seven working days.

The technical opinion of the involved areas has as its main objectives: to mitigate risks and to safeguard the image; to identify impediments and restrictions; to prevent money laundering; to prevent bribery, corruption and anticompetitive conduct; to analyze sustainability and social and environmental risk.

The General Secretariat shall submit to the Executive Committee of Related-Party Transactions for deliberation if a process with a related party is identified.

In addition to the above Departments, other Segments and areas may be involved, as per item 6.10.

**8.5. Making Payments**

The General Accountancy Department will make the payments for donations, with or without tax incentive, approved through requests made via the SAP System, according to the criteria set forth in this Standard, item 7 – Deliberations.

**8.5.1. Disbursement Process**

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

### **Social Donations**

- Receipt; and
- Statement of Receipt of Funds by Donation.

### **Incentive Laws (PRONON, PRONAS, Elderly and ECA)**

- Form / Receipt;
- List forwarded by the Tax Audit with indication of the incentivizing companies with their respective values of disbursement;
- Official Gazette (PRONON and PRONAS); and
- Training Certificate (ECA and Elderly Statute)

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

Important:

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

## **8.6. Monitoring & Control**

In all cases of donations, with or without tax incentive, procedures will be carried out to ensure appropriate governance, with technical opinion and final deliberation of the Board of Executive Officers.

The General Secretariat 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 the Decree No. 11,129/22, which regulates the Law No. 12,846/13 – Anti-Corruption.

The General Accountancy Department shall formalize for the Tax Audit Department, up to the 2nd working day of the following year, a report with the amounts earmarked and effectively paid related to donations in the previous year due to the use of the tax benefit.

## **9. Consequence Enforcement**

Consequences will apply to actions related to the violation of conduct in breach of Corporate Policy of Consequences and Consequence Standard of Bradesco Organizations, such as, but not limited to:

<b>Non Tolerated Conduct</b>
Breaching governance of the donations procedures, with or without tax incentive, described in this Standard.

## **9. Form of Consequence Enforcement/Disciplinary Actions**

The Management of the Department where the employee is allocated shall apply the Disciplinary Actions, immediately, observing the provisions of the item “Consequence Types/Disciplinary Actions”, of the Consequence Standard of Bradesco Organization.

**Banco Bradesco S.A.**

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