



Report on the Brazilian Corporate Governance

Attachment D to CVM Resolution No. 80/22

REPORT ON THE BRAZILIAN CORPORATE GOVERNANCE CODE

Attachment D to CVM Resolution No. 80/22

Base date: July 31, 2025

CHAPTER 1 – SHAREHOLDERS

Item 1.1.1: The Company's share capital should be composed of common shares only.

Response: Not adopted.

Explanation: We are a holding company incorporated in the end of 1974, in accordance with Brazilian Corporate Law ruling at that time (Decree Law No. 2,627/40) and our share capital is represented by common and preferred shares, at the approximate proportion of 1/3 and 2/3, respectively.

Our controlling group holds approximately 63.66% of common shares and 17.89% of preferred shares, according to items 6.1/2 and 6.5 of our Reference Form disclosed on May 30, 2025¹ ("Reference Form").

In accordance with our Bylaws, preferred shares are entitled to priority in the receipt of a minimum annual dividend and the right to tag along, in the event of a sale of our control, at a price equal to eighty percent (80%) of the price paid for each common share held by the controlling group, even though with no voting right (except in specific cases provided for by law).

The controlling shareholders understand that this structure serves our corporate purposes and contributes to value creation for us and our shareholders, with no discussions underway regarding any changes to the company's capital structure.

Furthermore, we strive to increasingly create more value for our shareholders by implementing actions to strengthen our corporate governance. Accordingly, in 2024, we were chosen for the 21st year to make up the Dow Jones Sustainability World Index (DJSI) and for the 18th year, the Business Sustainability Index (ISE) of B3 S.A. Brasil, Bolsa, Balcão (Brazilian Stock Exchange and OTC) ("B3"), in addition to recently created indexes, such as the IGPTW (for the 2nd year) and IDiversa (for the 1st year). We also make up the Special Corporate Governance Stock Index (IGC) and the Special Tag Along Stock Index (ITAG), both of B3. These indices nominate companies of recognized corporate sustainability, in accordance with their corresponding criteria, including best corporate governance practices.

Additionally, in mid-2020, the Corporate Governance Council was set up and its members take part in internal discussions on topics such as the improvement of our corporate governance system, including best practices, and monitor market trends and benchmarks and new regulations. These

¹ Base date: May 29, 2025.

activities provide insights for our Governance and Personnel Committee (set up in May 2021) and contribute to spreading governance high standards and good practices to the portfolio companies

For further information, please see the Bylaws available on the website of the CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 1.2.1: Shareholders' agreements should not bind the exercise of voting rights of any member of management or supervisory and control bodies.

Response: Partially adopted.

Explanation: As described in item 1.13 of the Reference Form, the Shareholders' Agreement of Companhia ESA ("Shareholders' Agreement") provides for the exercise of our shareholding control, the exercise of voting rights by the signatories to that agreement, as well as the exercise of our voting rights in our investees.

This Shareholders' Agreement sets forth that subscribers are responsible for discussing matters of our interest, in compliance with the procedures defined therein, with respect to decisions our strategic issues and our investees. Regarding the composition of the Board of Directors of these companies, the controlling group nominates representatives who are instructed to vote alike at meetings, as well as Officers, in conformity with item 4.6 of this Shareholders' Agreement. On our Board of Directors, four out of eight members are bound to said agreement.

The prior discussion of certain strategic matters by the subscribers to the Shareholders' Agreement is deemed a legitimate mechanism to align controlling shareholders, aimed at making coherent and consistent decisions in connection with us and our subsidiaries, if they understand it is required, always in the benefit of the continuity of business and long-term value creation.

In addition, it is worth noting the considerable number of independent members in our Board of Directors, which currently represents 50% of the total number of effective members.

It is worth mentioning, however, that the binding to the Shareholders' Agreement should not be perceived as an impediment for management members to carry out their responsibilities and fiduciary duties, as these activities are not incompatible. Law No. 6,404, of December 15, 1976, as amended ("Law No. 6,404/76") provides for the duty of loyalty in its Article 154, stating that our interests are a priority, even if the management member has been elected by the controlling shareholder (and the latter must not use the Shareholders' Agreement to avoid the responsibility for exercising the voting right and for any abuse of control, in accordance with Articles 115 and 117 of said Law).

Regarding the supervisory and control bodies, there is no binding upon the exercise of the voting right. Our Supervisory Board has been established without interruption since 1995 and has operated permanently since 2018. The Supervisory Board is currently composed of five effective members, three of whom are elected by controlling shareholders, one by preferred shareholders and one by minority shareholders, in addition to their respective alternates.

For further information, please see the Shareholders' Agreement of Companhia ESA available on the website of the CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 1.3.1: The board of officers should use the shareholders' meeting to communicate how the company's business is being conducted, for which reason management should publish a manual aimed at facilitating and encouraging attendance to general shareholders' meetings.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 1.3.2: Minutes of these meetings should ensure the full understanding of the discussions held at the meetings, even if recorded in summary form, and identify the votes cast by shareholders.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 1.4.1: The board of directors should carry out a critical analysis of the advantages and disadvantages of anti-takeover mechanism and its characteristics, especially triggers and price parameters, if applicable, providing any related explanation.

Response: Not applicable.

Explanation: No justification is required when responding "Not applicable" to this item.

Item 1.4.2: Provisions that prevent the removal of the measure from the bylaws, the so-called "entrenched clauses", should not be used.

Response: Not applicable.

Explanation: No justification is required when responding "Not applicable" to this item.

Item 1.4.3: If the bylaws determine that a tender offer should be carried out, whenever a shareholder or group of shareholders directly or indirectly achieves significant interest in the voting capital, the rule for determining the offer price should not impose the addition of premiums substantially greater than the economic or market value of shares.

Response: Not applicable.

Explanation: No justification is required when responding "Not applicable" to this item.

Item 1.5.1: The company's bylaws should establish that: (i) transactions with a direct or indirect disposal of shareholding control be followed by a tender offer intended to all shareholders, at the same price and in the same conditions obtained by the selling shareholder; and (ii) management should state an opinion on the terms and conditions of corporate reorganizations, capital increases and other transactions leading to change of control, and also whether these terms and conditions ensure fair and equitable treatment to the company's shareholders.

Response: We do not adopt it.

Explanation: Regarding item (i), our Bylaws do not provide for the need to carry out a tender offer intended to all shareholders, at the same price and in the same conditions obtained by the selling shareholder, as it is not required by law. Accordingly, Article 254-A of Law No. 6,404/76 provides for the disposal of a publicly-held company to be carried out only in the condition that the buyer commits itself to carry out a tender offer of the voting shares held by the other shareholders of the company, so as to assure the latter a price at least equal to 80% of the value paid per voting share that is part of the controlling group. However, our Bylaws also assure this tag-along right to preferred shareholders, so that B3 has listed the Company at ITAG (Brazil Special Tag-Along Index).

Regarding item (ii), our Bylaws do not provide for the management's opinion on the terms and conditions of corporate reorganizations, capital increases, and other transactions that result in change of control, stating whether they ensure fair and equitable treatment to its shareholders. However, we understand that management will always be able to express an opinion, regardless of the statutory provision. Additionally, it is worth mentioning that Law No. 6,404/76 already sets forth management members' duties and responsibilities in carrying out their duties, among them the duties of diligence, loyalty, and carrying out any functions assigned by law or by the Company's Bylaws to achieve the financial purposes in our interest.

Item 1.6.1: The bylaws should set forth that the board of directors issue an opinion on any tender offer related to shares and securities convertible into or exchangeable for shares issued by the Company, which should include, among other relevant information, the board of directors' opinion on any possible acceptance of the tender offer and the company's economic value.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 1.7.1: The company should prepare and disclose a policy on the appropriation of income to be defined by the board of directors. Among other aspects, this policy should provide for the frequency of payments of dividends and the reference parameter to be used to define the related amount (such as percentages of adjusted profit and free cash flows).

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 1.8.1: The bylaws should clearly and accurately identify, in a specified chapter, the public interest that has justified the creation of the mixed-capital company.

Response: Not applicable.

Explanation: No justification is required when responding “Not applicable” to this item.

Item 1.8.2: The board of directors should monitor the company’s activities and establish policies, mechanisms and internal controls to verify any costs of serving the public interest and any refunds to the Company or other shareholders and investors by the controlling shareholder.

Response: Not applicable.

Explanation: No justification is required when responding “Not applicable” to this item.

CHAPTER 2 – BOARD OF DIRECTORS

Item 2.1.1: Without prejudice to other legal, statutory powers and to other practices set forth in the Code, the Board of Directors should: (i) define business strategies, taking into account the impacts of the Company’s activities on society and the environment, aiming at the continuity of the Company and the creation of long-term value; (ii) periodically assess the Company’s risk exposure and the effectiveness of risk management systems, internal controls, and compliance system, and approve a risk management policy in line with these business strategies; (iii) define the Company’s values and ethical principles and ensure the Company’s transparency in its relationship with all stakeholders; (iv) annually revise the corporate governance system to improve it.

Response: Yes.

Explanation:

Sub item (i): Our Board of Directors is responsible for defining overall business guidelines and deciding on strategic issues, aiming at carrying out certain guidelines, such as: ensuring our continuity, within a long-term and sustainability perspective that incorporates economic, social, environmental and good corporate governance issues when defining business and operations, and ensuring that the strategies and guidelines are effectively implemented by our Board of Officers, but do not interfere with operational issues.

As a result of the commitment to the above mentioned guidelines, the Board of Directors , with the support of the Sustainability Committee, guides implementing of our sustainability strategy approved in 2022, promoting the adoption of practices recognized both in Brazil and internationally, in line with its interests and those of its shareholders, and considering the economic, social and environmental impacts in the short and long term about our employees, suppliers, business partners and other interested parties.

To strengthen this journey, in 2024 we carried out a new materiality process to reflect the expansion of our portfolio, aimed to identify the most material topics that impact our business as a holding

company, and the outcome was approved by our Board of Directors. We are thus getting ready to comply with IFRS S1 and S2 requirements, which take into account the risks and opportunities related to financially material climate and sustainability topics. As from 2025, we will revisit our Sustainability Strategy and corporate Risk Matrix, which will be submitted to the approval of our Board of Directors, to ensure that they reflect the outcome of the Double Materiality model approved at the end of 2024. Further information on the main actions and outcomes achieved in the sustainability agenda can be accessed in our Integrated Report, available on our Investor Relations websites (<https://ri.itausa.com.br/en/about-itausa/integrated-report/>). For some years now we have been included in the portfolios of the Dow Jones Sustainability World Index and the Corporate Sustainability Index (B3), among others. Additionally, we also report through the Carbon Disclosure Project (CDP) our management practices related to climate change.

We seek to positively influence our investees through our representatives on their Boards of Directors and committees, and also in the Thematic Forums, which periodically bring together our specialists and those from different technical departments of the investees to share best practices, experiences and promote knowledge and ongoing innovation, thus creating a great knowledge hub and fostering continuous improvement and value creation in investees. To learn about the topics covered in these forums in 2024, access Itaúsa's Integrated Report 2024, available on the Company Investor Relations website (<https://ri.itausa.com.br/en/about-itausa/integrated-report/>).

Sub item (ii): We have a Risk Management Policy approved by the Board of Directors on May 4, 2017, last updated on October 16, 2023, which provides for the guidelines to be followed in our risk management process (for further information, please see item 5.1 of the Reference Form).

As described in item 5.1 of the Reference Form, the Board of Directors is Itaúsa's top risk management body and responsible for, among others, define the company's risk appetite and tolerance levels based on the principles and guidelines of the Risk Management Policy, and approve, upon the Audit Committee's proposal, the risk map and prioritization, risk response plans when they exceed the Company's risk appetite, as well as their revisions.

Sub item (iii): The first version of our Code of Ethics was approved by the Board of Directors on December 19, 2011. On May 14, 2018, the Board of Directors approved a new version of the Code of Ethics, which was renamed "Itaúsa Code of Conduct", which was again revised and approved by the C.A. on August 8, 2022. This document seeks to address the principles, values and commitments that guide our actions, and our relationship with society and the market; it also reports on the we expect about the conduct of each and every employee and management member in the performance of professional activities and relationships.

Furthermore, Itaúsa's Code of Conduct also values the principle of transparency in a number of scenarios, such as when interacting with public agents, entering into related-party transactions, managing people and engaging suppliers.

Additionally, the Board of Directors approved on November 9, 2020 our Integrity Program (whose last update was approved by the Board of Directors on August 12, 2024), which promotes good corporate ethical practices.

Therefore, it is absolutely clear the Board of Directors' commitment to clearly establishing our values and ethical principles, ensuring transparency in our relationship with our diverse stakeholders.

Sub item (iv): On May 14, 2018, the Board of Directors approved its Corporate Governance Policy (whose last update was approved by it on May 15, 2023), consolidating the Corporate Governance principles and practices adopted by us.

As set forth in this Corporate Governance Policy, it is the responsibility of the Board of Directors to express an opinion on the annual review of our corporate governance system. To this end, the Board of Directors is supported by the Governance and Personnel Committee, set up in May 2021.

In 2024, the corporate governance rules and structure process was assessed and revised along the year by the Board of Directors, through the approval and improvement of policies, and the approval of the Report on the Brazilian Corporate Governance Code.

For further information, please see Itaúsa's Risk Management Policy, Corporate Governance Policy and Code of Conduct, available on the websites of the CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 2.2.1: The bylaws should establish that: (i) the board of directors be composed of a majority of external members, where at least one third should be independent; (ii) the board of directors annually assess and disclose the independent members of the board of directors and indicate and justify any circumstances that might compromise their independence.

Response: Partially adopted.

Explanation: With respect to item (i), our Bylaws provide for that the Board of Directors must be composed of at least one-third of independent members. Currently, half of the effective directors are independent.

Although not expressly included in our Bylaws, the Board of Directors is currently composed mostly of external members, in accordance with item 7.3 of the Reference Form.

We have Nomination Policy for the Members of the Board of Directors and the Supervisory Board, approved by the Board of Directors on May 14, 2018, and last revised on October 16, 2023, setting the principles, rules and procedures for appointing members of these collegiate bodies. For further information on this policy, please see item 2.2.2 of this Report.

With respect to item (ii), in accordance with Article 6.5, item V, of our Bylaws, the Board of Directors is responsible for evaluating and disclosing, on an annual basis, the independent and external members. Additionally, for independent members, it is responsible for reporting and justifying any circumstances that might compromise their independence.

Our Bylaws and Nomination Policy for the Members of the Board of Directors and the Supervisory Board are available on the website of the CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 2.2.2: The board of directors should approve a nomination policy establishing: (i) the process for nominating board members, including indicating the participation of other company's bodies in the nomination process; and (ii) that the Board of Directors should be composed based on the time

availability of its members to exercise their duties and on the different expertise, experiences, behaviors, cultural aspects, age groups and genders.

Response: Yes.

Explanation: On May 14, 2018, our Board of Directors approved the Nomination Policy for the Members of the Board of Directors and the Supervisory Board (“Nomination Policy”), which was last updated on October 16, 2023, which provides for the nomination procedures for members of the Board of Directors and the Supervisory Board the responsibilities of other corporate bodies in this process.

The Nomination Policy sets forth that nominees for the Board of Directors must be highly qualified professionals with reputed experience (technical, professional, academic), have time available for exercising the duties and be aligned with our values and culture, in addition to the ethical and behavioral aspects set forth in Itaúsa’s Code of Conduct. The nomination process should also take into consideration, among others, criteria such as: unblemished reputation and, whenever possible, people with different characteristics and profiles, aimed at complementary skills and diversity, allow us to benefit from multiple rationale and a decision-making process of the greatest quality and security.

This policy also sets forth that the Governance and Personnel Committee is responsible for checking in advance whether the nomination of members to our Board of Directors is in compliance with said regulation, as well as for analyzing the independent or external status of the candidates nominated as such to the Board of Directors, forwarding its assessment to the latter.

The nomination process for the members of the Board of Directors is described both in the Nomination Policy and in item 7.1 of the Reference Form.

The Nomination Policy is available on the website of the CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 2.3.1: The CEO should not also hold the position of chairman of the board of directors at the same time.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 2.4.1: The Company should implement an annual performance evaluation process for the board of directors and its committees, as joint committees, and for the chairman of the Board of Directors and Board members, individually considered, and the governance department, if any.

Response: Partially adopted.

Explanation: As informed in item 7.1(b) of our Reference Form, in 2022 we started the first cycle of joint evaluation of the Board of Directors and Committees, carried out for the second time in the

following year. In 2024, we carried out the third cycle, including the individual evaluation of the Board members and governance department.

Our evaluation process comprises three stages: (i) the initial preparation stage, in which our Board members and governance department respond to a self-evaluation questionnaire, (ii) the second stage of diagnosis with individual interviews, also including members of the committees and the Board of Officers, in which the questions are related to the following dimensions and skills: interpersonal style, experience, orientation for results and strategic orientation, independence and integrity, and collaboration and influence, and (iii) the final stage composed of the individual feedbacks for each Board member and the final presentation of the outcomes to the Board of Directors.

The criteria adopted were: (a) assessment of the processes, (b) dynamics, and (c) composition of the Board and its committees. In the “assessment of the processes” item, the management of our board and our committees, their issues and our committees themselves, among other things, were analyzed. In the “dynamics” item, the decision-making process and the quality of discussions, among other things, were analyzed. In the “composition” item, the skills and experiences, among other things, were analyzed.

Additionally, as mentioned in item 8.1 of the Reference Form, the objectives of our compensation practices adopted are: to attract, reward, retain and encourage management members in the running of its business, management members, in exchange for achieving sustainable results, always aligned with the interests of shareholders. The definition of our compensation practices considers values aligned with those practiced by the market, our strategy and the proper management of our risks over time. For this purpose and for setting individual compensation, annually we participates in a compensation survey, conducted by a globally renowned human resources consulting firm, to conduct a study on compensation of boards and management, bringing benchmark of compensation practices adopted by, preferably, Brazilian publicly traded companies that are compatible in size with our, which supports the recommendation to set the individual compensation to be adopted. Additionally, in conformity with the best corporate governance practices and Nomination Policy for the Members of the Board of Directors and the Supervisory Board, the proposal for reelection of a member of our Board of Directors must takes into account their good performance during the period, their experience, attendance and effective participation at meetings during the current mandate. It is worth mentioning that, in accordance with our Internal Charter of the Board of Directors, it is the duty of every Board member to attend, in person or remotely, at least 75% of Board meetings held during the term of office, not computing the meetings where absence was justified.

Our Internal Charter of the Board of Directors is available on the websites of the CVM and our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 2.5.1: The board of directors should approve and keep updated a CEO succession plan, the preparation of which should be coordinated by the chairman of the Board of Directors.

Response: We do not adopt it.

Explanation: We have no formal CEO succession plan. However, discussions and decisions at the Company are shared and count on the engagement not only of our CEO but also of the other members of our Board of Officers and our Board of Directors, who also participate in Itaúsa's committees and councils, which contributes to the continuity of our management, in the event of any need of succession.

Our Governance and Personnel Committee is responsible for advising the Board of Directors on matters involving the succession of managers, in addition to other responsibilities provided for in the internal charter of the referred committee.

Item 2.6.1: The company should have a program to integrate the new members of the board of directors, prepared in advance, so that these members are introduced to the key people of the Company and its facilities, and this program should address key topics for understanding the company's business.

Response: Yes.

Explanation: We have an Onboarding Program for New Board Members, with the purpose of helping new directors to become more quickly familiarized with the principles, values, culture, people, governance and business model and our investees. This program comprises certain stages, among them we highlight their introduction to our key people and of the main investees, field visits to the portfolio's administrative and industrial facilities, when applicable, in addition to talks to Itaúsa's and main investees' executives, with presentation of business, current situation and challenges, strategies and ownership and organizational structures, as well as results of operations and main financial indicators of these companies.

Item 2.7.1: The compensation of the members of the board of directors should be proportional to their duties, responsibilities and time demands. Compensation should not be based on meeting attendance, and any variable compensation of the board members should not be bound to short-term results.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 2.8.1: The board of directors should have an internal charter regulating its responsibilities, duties and rules of operation, including: (i) the duties of the chairman of the board of directors; (ii) rules for replacing the chairman of the board of directors in the event of absence or vacancy; (iii) measures to be adopted in the event of conflicts of interest; and (iv) definition of a deadline with enough time in advance to receive materials for discussion at meetings, in appropriate detail.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 2.9.1: The board of directors should establish an annual calendar with the dates of ordinary meetings, which should not be fewer than six or over twelve, in addition to calling extraordinary meetings, whenever necessary. This calendar should set forth an annual thematic agenda with relevant issues and dates for discussion.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 2.9.2: The meetings of the board of directors should provide for regular exclusive sessions for external Board members, without the presence of the executives and other guests, to align the external board members and discuss topics that could cause embarrassment.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 2.9.3: The minutes of the board of directors’ meetings should be clearly drafted and include the decisions made, the names of attendees, and any dissenting votes and abstentions.

Response: Yes.

Explanation: In compliance with the best corporate governance practices, our Internal Charter of the Board of Directors provides for that the minutes of the Board of Directors’ meetings should be clearly drafted and include the decisions made, the names of attendees, and any dissenting votes and abstentions, if applicable.

CHAPTER 3 – BOARD OF OFFICERS

Item 3.1.1: Without prejudice to its legal and statutory powers and to other practices set forth in this Code, the board of officers should: (i) carry out the risk management policy and, whenever necessary, propose to the board of directors any necessary revision of such policy, in view of changes to the risks to which the company is exposed; and (ii) implement and maintain effective mechanisms, processes and programs to monitor and disclose the financial and operating performance and the impacts of the company’s activities on society and the environment.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 3.1.2: The board of officers should have a dedicated charter establishing its structure, operation and roles and responsibilities.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 3.2.1: No board of officers or managerial positions should be reserved for direct appointment by shareholders.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 3.3.1: The CEO should be evaluated, on an annual basis, in a formal process conducted by the board of directors, based on their achieving the financial and non-financial performance goals established by the board of directors for the company.

Response: We do not adopt it.

Explanation: We do not have formal performance evaluation mechanism for the CEO to be carried out by the Board of Directors. However, in compliance with the best corporate governance practices, the annual process to lead back members to their posts takes into consideration their good performance during the period, the experience, regular attendance to and effective participation and contribution at the meetings during the prior term of office, in accordance with item 7.1 (b) of the Reference Form.

Additionally, our investees have an evaluation process for their CEOs.

Item 3.3.2: The results of the evaluation of other board of officers members, including the CEO’s proposals of goals to be agreed and whether the executives should continue, be promoted or dismissed from their respective positions, should be submitted to, reviewed, discussed and approved at meetings of the board of directors.

Response: We do not adopt it.

Explanation: We do not have formal performance evaluation mechanism for Officers to be carried out by the Board of Directors. However, we have a formal mechanism for assessing the performance of our Managing Officers based on goals and evaluation of competencies, which are evaluated annually by the Personnel and Ethics Council and whose results are analyzed and approved by the Governance and Personnel Committee. Furthermore, in compliance with the best corporate governance practices, the annual process to lead back members to their posts takes into consideration their good performance during the period, the experience, regular attendance to and effective participation and contribution at meetings during the prior term of office, in accordance with item 7.1 (b) of the Reference Form.

Item 3.4.1: The compensation of the board of officers should be defined through a compensation policy approved by the Board of Directors based on a formal transparent procedure that takes into account the costs and risks involved.

Response: Partially adopted.

Explanation: We do not have compensation policy for the Board of Officers formally approved by the Board of Directors. However, the compensation practices adopted related to compensation of Board of Officers members are described in item 8.1 of the Reference Form.

It is worth mentioning that the goals of the compensation practice adopted by us, as follows: attracting, rewarding, retaining and encouraging management members while conducting business, in consideration for the achievement of sustainable results, always in line with the interests of shareholders. When defining our compensation practices, amounts in line with those practiced by the market, our strategy and our adequate management of risks over time are taken into account.

Item 3.4.2: The compensation of the board of officers should be bound to results, with medium- and long-term goals clearly and objectively related to the creation of long-term economic value for the company.

Response: Partially adopted.

Explanation: Sub-item “c” of item 8.1 of the Reference Form describes the main performance indicators that are taken into consideration when determining each element of the management’s compensation. The annual variable compensation of Officers can be directly impacted by performance indicators. The main indicators considered are linked to (i) the financial results of investees, ROIC for the companies from the non-financial sectors and ROE for companies from the financial sector, in addition to the performance of our businesses and our investees; and in relation to the Managing Officers, the implementation sustainability strategy, in accordance to the scope approved by senior management. The annual variable compensation of officers may not exceed the total annual fixed compensation or a tenth of the earnings, whichever is the lowest.

Accordingly, considering that the overall compensation for officers is impacted by our results, including risks assumed, we believe that this compensation practice aligns the interests of management members with our short-, medium- and long-term interests.

Item 3.4.3: The incentive structure should be in line with the risk limits established by the board of directors and bar a single person from controlling the decision-making process and its respective supervision. No one should resolve on their own compensation.

Response: Yes.

Explanation: The Personnel and Ethics Council, the Governance and Personnel Committee, the Board of Directors and the General Shareholders’ Meeting take part in the compensation decision-making process.

The Personnel and Ethics Council analyzes the compensation strategy and issues

recommendations of compensation best practices to the Governance and Personnel Committee on individual compensation of the members of the Board of Directors (fixed and benefits of any nature), members of the Advisory Committees (fixed) and members of the Board of Officers (fixed, variable and benefits of any nature).

The Governance and Personnel Committee assesses the practice for compensation of management members (Board of Directors and its Advisory Committees, Advisory Board and Board of Officers) e recommends to the Board of Directors the overall compensation of management members.

Meanwhile, the Board of Directors assesses and approves the recommendation of the overall compensation of management members (Board of Directors and its Advisory Committees, Advisory Board and Board of Officers) and of the individual compensation of the members of the Supervisory Council and submits their proposal to the General Shareholders' Meeting.

Finally, the General Shareholders' Meeting establishes the annual overall compensation of the members of the Board of Directors (including their attendance in its Advisory Committees), Board of Officers and Advisory Board, and establishes the monthly individual compensation of the members of the Supervisory Council.

To set individual compensation, we participate annually in a compensation survey, conducted by a globally renowned human resources consulting firm, to conduct studies on the boards and officers' compensation, bringing benchmark results of compensation practices adopted by preferably Brazilian publicly traded companies that are compatible in size with our, and this supports the recommendation of the individual compensation to be adopted.

CHAPTER 4 – SUPERVISORY AND CONTROL BODIES

Item 4.1.1: Among other duties, the statutory audit committee should: (i) assist the board of directors in the monitoring and control of the quality of financial statements, internal controls, and risk management and compliance; (ii) be made up mostly by independent members coordinated by an independent member; (iii) have at least one of its independent members with proven experience in the accounting-corporate, internal controls, financial and auditing areas, in the aggregate, and (iv) have its own budget to engage advisors on accounting, legal and other topics, when the opinion of an external expert is required.

Response: Yes.

Explanation:

Our Audit Committee was established by the Board of Directors on August 15, 2022 and transformed into a statutory body by resolution of the shareholders at the General Meeting held on April 28, 2023. The committee's internal charter establishes that the majority of the committee must be made up of independent members and coordinated by an independent member. In addition, the charter provides that at least one of the independent members must have proven experience in the accounting-corporate, internal controls, financial and auditing areas, cumulatively.

It is incumbent upon the Audit Committee to advise the Board of Directors by ensuring: (i) the quality and completeness of the financial statements; (ii) the compliance with legal and regulatory requirements; (iii) the performance, independence and quality of the work of the independent audit firm; (iv) the performance, independence and quality of the work of the internal audit function; and (v) the quality and effectiveness of the internal control and risk management systems.

Finally, said committee may hire the services of external consultants, ensuring the integrity and confidentiality of the work, according to its own budget approved by the Board of Directors.

For more information, see the Internal Regulations of the Company's Audit Committee available on website of CVM and our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 4.2.1: The supervisory board should have a dedicated charter describing its structure, operation, work program, roles and responsibilities, without hindering the performance of its individual members.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 4.2.2: The minutes of the supervisory board’s meetings should follow the same disclosure rules applicable to the Board of Directors’ minutes.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 4.3.1: The company should establish a policy to engage non-audit services from its independent auditors, approved by the board of directors, to bar the engagement of non-audit services that might compromise the auditors’ independence. The company must not engage independent auditors who have provided internal audit services for the company for the last three years.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 4.3.2: The independent audit team should report to the board of directors, through the audit committee, if any. The audit committee should monitor the effectiveness of the independent auditors’ work, as well as its independence. It should also assess and discuss the independent auditor’s annual work plan and submit it for appreciation of the board of directors.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 4.4.1: The company should have an internal audit function reporting directly to the board of directors.

Response: Yes.

Explanation: Our internal audit, carried out by an outsourced firm (Big Four), reports to the Board of Directors and checks the adequacy of the processes and procedures for identifying and managing risks on an independent and periodic basis, and contributes to improving the internal control environment.

Additionally, the Internal Audit is responsible for helping Management to identify any potential control weaknesses that may affect us, taking into account business, management, and information technology aspects. After the approval of the Internal Audit annual plan by the Board of Directors (after recommendation by the Audit Committee), the controls involved in the selected processes are assessed. The Internal Audit carries out effectiveness tests, identifying control weaknesses, and action plans are developed to mitigate them.

It will be incumbent on the Board of Directors, after recommendation by the Audit Committee, to approve the Internal Audit’s annual plan, analyze the results of internal audit reports for risks above risk appetite, monitor the implementation of any recommended corrections, appoint and remove the person in charge of the Internal Audit and ensure the external audit firm is qualified and independent.

For further information on the Internal Audit work, please see items 5.1 and 5.3 of the Reference Form.

Item 4.4.2: If this activity is outsourced, the internal audit services must not be provided by the same firm that audits the financial statements of the company. The company must not engage internal audit services from any independent auditors who have provided independent audit services for the company for the last three years.

Response: Yes.

Explanation: No justification is required when responding “Yes” to this item.

Item 4.5.1: The company should adopt a risk management policy, approved by the board of directors, that includes a definition of the risks for which a protection is sought, the instruments used accordingly, the organizational structure for risk management, the assessment of the adequacy of the operational structure and internal controls when checking its effectiveness, and also define guidelines for acceptable limits for the Company’s exposure to these risks.

Response: Yes.

Explanation: On May 4, 2017, our Board of Directors approved Risk Management Policy (“Risk Management Policy”) and, on October 16, 2023, approved the latest version of this Policy, which establishes the guidelines to be followed in our risk management process.

This Risk Management Policy sets forth that the risks to which we are exposed should be reviewed at least annually, documented and formalized on a structured way so these are known and adequately addressed. The general risk analysis process should take place every two years. These risks should be classified based on their nature and origin, as follows: (a) strategic, (b) financial, (c) operational, (d) regulatory, and (e) technological.

Regarding the risk management process and the hedge instruments used by us, the Risk Management Policy provides for the involvement of the following organizational structures: (i) Board of Directors, (ii) Audit Committee, (iii) Board of Officers (iv) Business Departments; and (v) Compliance and Corporate Risk Department. Furthermore, this Policy sets forth that it is up to the Board of Directors to define our risk appetite and tolerance level, based on the principles and guidelines of the policy, and to approve, at the proposal of the Audit Committee, the map and prioritization of risks, risk response plans, when above our risk appetite, as well as their revisions. In addition, the Internal Audit is responsible for presenting to the Board of Directors the results of assessments of risk management system and the effectiveness of internal controls.

Regarding the guidelines for setting limits acceptable for our risk exposure, the Risk Management Policy sets forth that any risks identified should be addressed based on their criticality.

The Audit Committee or the Board of Directors, as the case may be, determines how to respond to risks, and defines the instruments for our protection, balancing the effects of risk response with any cost/benefit arising from legal, regulatory or any other requirements that prove relevant to us. It is up to the Board of Directors to define our risk appetite and tolerance level.

For further information, please see Risk Management Policy, available on the websites of the CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>), and item 5 of the Reference Form.

Item 4.5.2: The board of directors should ensure that the board of officers have mechanisms and internal controls to get to know, assess and control risks, so as to keep these risks at levels consistent with limits set, including a compliance program aimed at complying with the laws, regulations, and external and internal rules.

Response: Yes.

Explanation: It is up to the Board of Directors is responsible for: (i) defining the level of our risk appetite and tolerance based on the principles and guidelines set forth in the Risk Management Policy; (ii) approving the Risk Management Policy and its future revisions; and (iii) approving, based on a proposal of the Audit Committee, the mapping and prioritization of risks, risk response plans, when above our risk appetite, as well as its revisions. In addition, Internal Audit is responsible for presenting the results of risk management system assessments to the Board of Directors and internal controls effectiveness.

Taken as a whole, these activities ensure that the Board of Officers have mechanisms and internal controls to get to know, assess and respond adequately to risks, so as to keep them at levels consistent with the limits set and in compliance with applicable laws and regulations.

Our Board of Officers is supported by the Audit and Risk Council in connection with the performance of its risk control and management activities.

Accordingly, the Board of Officers is aware of the risks involving the by way of risk consolidation reports submitted periodically by the Audit and Risk Council.

In addition to the aforementioned reports, the Audit and Risk Council submits to the Board of Officers its assessment on the effectiveness of the Company's policies, risk management and internal control systems.

Taking into account the hard work carried out by the Audit and Risk Council in our risk management process, the Board of Officers has significant support and mechanisms to get to know, assess, and control our risks to which we are exposed.

Additionally, the Board of Directors approved on November 9, 2020 our Integrity Program (whose last update was approved in the Board of Directors of August 12, 2024), which promotes good corporate ethical practices, and on May 11, 2020 it approved the Compliance and Integrity Policy, (whose latest update was approved by the Board of Directors on August 14, 2023), which establishes guidelines on compliance with laws and internal and external regulations.

This policy sets forth, for example, that all our departments should have an unbiased approach to all Compliance related activities and promote a culture of ethics and compliance to all employees, third parties and stakeholders.

The Company's Integrity Program and Compliance and Integrity Policy are available on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 4.5.3: The board of officers should assess at least once a year the effectiveness of the risk management and internal control policies and systems, as well as the compliance program, and report this assessment to the board of directors.

Response: Yes.

Explanation: Our Board of Officers has the support of the Audit and Risk Council in connection with the performance of its risk control and management activities.

Among other duties, the Audit and Risk Council assesses from time to time the effectiveness of the policies, risk management and internal control systems, and forwards this assessment to be appreciated by the Board of Officers.

The Board of Officers, in turn, analyzes the assessment prepared by the council and expresses an opinion thereon. The Board of Officers forwards the assessment for appreciation by the Audit Committee, which then reports it to the Board of Directors.

On March 17, 2025, the specialized company in charge of our internal audit presented to the Board of Directors the annual work plan for 2025. Additionally, on that same occasion, the Compliance annual plan and the outcome of the annual monitoring of the Integrity Program 2024, with the main indicators of the Program and the Whistleblowing Channel, were presented to the Board of Directors.

CHAPTER 5 – ETHICS AND CONFLICTS OF INTEREST

Item 5.1.1: The company should have an independent and self-governing conduct committee, reporting directly to the board of directors, and responsible for implementing, disclosing, training, reviewing and updating the code of conduct and whistleblowing channel, as well as for carrying out inquiries and proposing corrective measures in connection with any violations of the code of conduct.

Response: Yes.

Explanation: To strengthen the commitment to ethics and transparency with our stakeholders, our governance framework comprises advisory bodies, such as the Governance and Personnel Committee (Composed of Board of Directors members and coordinated by an independent member of the Board of Directors).

The Governance and Personnel Committee, which reports directly to the Board of Directors, has among its duties expressing an opinion on the review and updating of Itaúsa's Code of Conduct, as well as monitoring any material misconduct incidents inside our company.

We have the Personnel and Ethics Council, a Board of Officers advisory body composed of officers and executive HR manager, which among other duties and as a way of operationally supplementing the aforementioned duties of the Governance and Personnel Committee, according to the strategy set out by this committee, is responsible for: (i) providing training in general; (ii) investigating any violations reported to Itaúsa's Whistleblowing Channel or received by any other medium, including possible violations of Itaúsa's Code of Conduct, and it may consult the committee, whenever required and depending on the severity of alleged violations; and (iii) proposing corrective actions, as the case may be, except for cases involving members of the council itself, the Board of Officers, the committees or the Board of Directors, Advisory Board and the Supervisory Board, which will be analyzed by the Audit Committee and reported to the Board of Directors. The Personnel and Ethics Council will analyze the work carried out by the Whistleblowing Channel and corresponding indicators, as well as relevant incidents of misconduct (if applicable) and applications of disciplinary measures, when applicable. In addition, the indicators of the Itaúsa Whistleblowing Channel are reported to the Audit Committee.

The council itself defines, in the end of each financial year, a calendar with meeting dates for the next year. The council currently meets at least every two months, and the topics discussed at meetings are defined by the members themselves and follow the agenda of initiatives for the year in the area of Personnel & Culture.

We have internal policies setting rules for receiving, handling, verifying and investigating irregularity reports, disciplinary measures, violations of Itaúsa's Code of Conduct and other internal policies, as

well as to the legislation applicable to Itaúsa, received by means of the channels that are made available.

Additionally, we have engaged an outsourced specialized company to help analyze and investigate reports.

Ultimately, it is worth mentioning that the most updated version of Itaúsa's Code of Conduct was approved by the Board of Directors on August 8, 2022, and any amendment to this document should go under the analysis of and approval from the latter.

Itaúsa's Code of Conduct is available on the websites of CVM and our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 5.1.2: Prepared by the board of officers, supported by the conduct committee and approved by the board of directors, the code of conduct should: (i) govern the internal and external relations of the company, by expressing the commitment expected from the company, its board members, officers, shareholders, employees, suppliers and stakeholders to the adoption of proper conduct standards; (ii) manage conflicts of interest and provide for the abstention of the member of the board of directors, the audit committee or the conduct committee, if any, who, as the case may be, is conflicted; (iii) clearly define the scope and reach of actions intended to identify any situations believed to have occurred with the use of inside information (e.g.: using inside information for business purposes or gaining the upper hand when trading securities); (iv) establish that ethical principles be the basis for negotiating contracts, agreements, proposals to amend bylaws, as well as policies guiding the entire company, and establish a maximum value for assets or services from third parties that management members and employees may accept on a gratuitous or favored basis.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 5.1.3: The whistleblowing channel should be independent, self-contained and unbiased, operating working guidelines defined by the board of officers and approved by the board of directors. It should operate in an independent and unbiased way and preserve the anonymity of its users, in addition to timely investigate and take the measures required accordingly. This service may be carried out by a third party of reputed capacity.

Response: Yes.

Explanation: We have on Itaúsa's Whistleblowing Channel, through which employees, management members and third parties related to us may submit reports, including those related to investees, and request guidance on how to act in certain situations, clarify doubts, submit criticisms, complaints, and report misconducts, violations and conflicts of interest, always in a secure, professional, unbiased and confidential way, without fears of retaliation or reprisals. Reports may be submitted in an identified form, anonymously or confidentially.

Itaúsa's Whistleblowing Channel is an independent and unbiased tool, widely disclosed on intranet and available on our website (<https://www.itausa.com.br/en/canal-de-denuncias/>), and operated by

an internationally renowned service provider, which ensures confidentiality of the information and reports received.

Any employees, management members, members of the Supervisory Board and Advisory Board and third parties may contact Itaúsa's Whistleblowing Channel by phone, email or the internet.

After a report is registered at Itaúsa's Whistleblowing Channel, a file number and a password are generated. With this data, the person who submitted the report may follow it up at the channel itself on the internet or by phone.

We have engaged an outsourced company specialized in analyzing and verifying reports, with the Personnel and Ethics Council being responsible for proposing, as the case may be, that the report be investigated and possible corrective measures applied, except in cases involving members of the committee itself, the Board of Officers, committees or the Board of Directors, Advisory Board and Supervisory Board, which will be analyzed Audit Committee and reported to the Company's Board of Directors.

We have internal policies setting rules for receiving, handling, verifying and investigating irregularity reports, disciplinary measures, violations of Itaúsa's Code of Conduct and other internal policies, as well as to the legislation applicable to Itaúsa, received by means of the channels we make available.

The Personnel and Ethics Council will analyze the work carried out by Itaúsa's Whistleblowing Channel and corresponding indicators, as well as any incidents of misconduct, depending on the subject-matter involved.

For further information on Itaúsa's Whistleblowing Channel, please see item 5.3 of the Reference Form.

Item 5.2.1: The company's governance rules should watch over the clear segregation and definition of functions, roles and responsibilities associated with the mandates of all governance agents. The levels of authority for decision making of each level should also be defined to minimize possible sources of conflicts of interests.

Response: Yes.

Explanation: Our Corporate Governance Policy consolidates the governance principles and practices adopted by us, referred to in the Bylaws and Internal Charters. Our corporate governance framework comprises the General Shareholders' Meeting and the following joint bodies: Board of Directors, Advisory Board, Board of Officers, Supervisory Board, as well as the Audit Committee, the Strategy and New Business Committee, Governance and Personnel Committee, Sustainability Committee, and Related-Parties Committee, directly reporting to the Board of Directors, and the Board of Officers advisory councils (Finance Council, Investments Council, Personnel and Ethics Council, Audit and Risk Council, Sustainability Council, Capital Markets Council, and Corporate Governance Council).

Our Bylaws establish authority levels for certain operations that must be observed by the Board of Officers.

Furthermore, we have an internal policy aimed at consolidating the rules on duties and corresponding applicable limits of authority levels.

The formalization of the above-mentioned governance rules ensures the clear segregation and definition of functions, roles and responsibilities, and levels of authority for the decision making of each level, thus minimizing possible sources of conflicts of interests.

For further information on our corporate governance framework, please see item 7 of the Reference Form and Corporate Governance Policy, available on the website of CVM and on our Investor Relation website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 5.2.2: The company's governance rules should be made public and determine that any person who is not independent regarding the issue under discussion or resolution in the company's management or supervisory bodies should state, on a timely basis, their conflict of interest or interest in particular. If they fail to do so, these rules should provide for that another knowing person may bring such conflict to light and that, as soon as this conflict of interest regarding a specific topic is identified, the involved person keeps away, even physically, from such discussions and resolutions. These rules should set forth that this temporary absence be registered in the minutes.

Response: Yes.

Explanation: Our governance rules are included in different documents of the Company available to the public and consolidated in our Corporate Governance Policy.

This policy sets forth that in the event any conflict of interest or particular interest of any person is identified in connection with the subject-matter under discussion or resolution at our management or supervisory bodies, this conflicted person should state their conflict of interest or particular interest on a timely basis. If they fail to do so, another knowing person may bring it to light.

As soon as this conflict of interest or interest in particular is identified, the involved person should keep away from discussions and resolutions, and leave the meeting, on a temporary basis, until the topic is sorted out.

Moreover, we have a Transactions with Related-Parties Policy, aimed at ensuring that we are not harmed due to conflicting interests upon entering into certain transactions.

Ultimately, it is worth mentioning that our Internal Charters of the Board of Directors, Advisory Board, Supervisory Board, Board of Officers and committees also set forth that any member conflicted in a certain resolution should state their conflicting or particular interest in such subject-matter and abstain from voting.

The policies and internal charters mentioned above, are available on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 5.2.3: The company should have mechanisms to manage conflicts of interest in the voting submitted to the general meeting, so as to receive and deal with alleged conflicts of interest, and to annul votes cast in such conflicting situations, even if subsequently to the voting.

Response: Yes.

Explanation: In accordance with paragraphs 1, 2 and 4 of Article 115 of Law No. 6,404/76, shareholders cannot vote at meetings intended to resolve on the appraisal report of assets that contributed to the capital, approve their accounts as management members or any other resolution that could benefit them, under penalty of: (i) the resolution being cancelled; (ii) being held accountable for any damage caused; and (iii) having to transfer any advantages received to the Company.

Our Manual of the General Shareholders' Meeting provides for that during the General Meeting, as well as during the meetings of our management and supervisory bodies, shareholders should bring to light any conflicts of interests or interest in particular on any topics under discussion or resolution, in which their independence may be compromised. Any shareholder should also bring to light any conflicting situation they may be aware of in connection with another shareholder and the topic subject to the resolution. When a conflict of interest is brought to light, the conflicted shareholder should abstain from taking part in the resolution of the related matter. If the conflicted shareholder refuses to abstain from the resolutions, the chairman of the General Shareholders' Meeting must order the annulment of the conflicted votes cast, even if they were cast after the General Meeting.

Item 5.3.1: The bylaws should define which related-party transactions should be approved by the board of directors, with the exclusion of any members with potentially conflicting interests.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 5.3.2: The board of directors should approve and implement a transactions with related-parties policy, which includes, among other provisions: (i) that, previous to the approval of specific transactions or guidelines for entering into transactions, the board of directors should request to the board of officers alternatives in the market to the related-party transaction, adjusted by the risk factors involved; (ii) bar any ways of compensation to advisors, consultants or intermediaries giving rise to conflicts of interest with the company, management members, shareholders or classes of shareholders; (iii) bar the granting of any loans to the controlling party and management members; (iv) that any transactions with related-parties should be supported by independent appraisal reports prepared without the participation of any party involved in such operation, whether a bank, lawyer, specialized consulting company, among others, based on realistic assumptions and information supported by third parties; (v) that corporate restructuring involving related-parties ensure equitable treatment for all shareholders.

Response: Yes.

Explanation: On February 19, 2018, Our Board of Directors approved the Transactions with Related-Parties Policy ("Policy"), whose latest update was approved on May 12, 2025, aimed at establishing rules and consolidating procedures to be followed by us in connection with related-party transactions, thus ensuring operations are transparent and carried out on an arms-length basis.

This Policy sets forth that all related-party transactions, under the terms defined therein, should meet the following conditions: (a) be in accordance with market conditions and the provisions established in the Policy and also in conformity with other practices adopted by us and the guidelines in Itaúsa's Code of Conduct; and (b) be entered into in writing, specifying their main characteristics and conditions, such as: overall price, unit price, terms, collateral, conditions for rescission, payment of taxes and fees, licenses required, etc. For this purpose, and in order to support the decision on the transaction with a related-party classified as material under the terms of the Policy, supporting documentation must be provided, including other market quotations, adjusted by the risk factors involved, whenever feasible.

Moreover, aimed at ensuring that the execution of related-party transactions be always undertaken in our best interests and with full independence, this Policy (i) bars the granting of loans to any controlling shareholder or a member of management or of the Supervisory Board of the Company; and (ii) establishes that our must ensure the compensation to advisors, consultants or intermediaries who are considered related-parties, according to this Policy, and that may eventually be hired by us, does not result in a conflict of interest with us, our management members or shareholders.

This Policy also sets forth that if the applicable legislation requires the preparation of an independent appraisal report to support any given related-party transaction, or if such appraisal report is requested by the Board of Directors and/or by the Related-Parties Committee, this appraisal report must be prepared without the participation of any party involved in such operation, whether a bank, lawyer, specialized consulting company, among others, based on realistic assumptions and information supported by third parties. Furthermore, any corporate restructuring involving related-parties should ensure equitable treatment for shareholders.

For further information on the rules involving related-party transactions, please see item 11.1 of the Reference Form. The current Transactions with Related-Parties Policy is available on the website of the CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 5.4.1: As resolved by the board of directors, the company should adopt a policy for trading securities issued by the company, which, without prejudice to the compliance with CVM rules, establishes controls to achieve the monitoring of trades made, as well as the inquiry and sanctions against those responsible for noncompliance with such policy.

Response: Yes.

Explanation: Our Securities Trading Policy, approved by the Board of Directors on July 31, 2002, with latest update approved on March 18, 2024, establishes controls that enable the monitoring of trades made, as well as the duty of bound persons use exclusively Itaú Corretora de Valores S.A. for the trading of securities under this Policy. To this end, the bound persons must transfer to the aforementioned securities broker any open positions involving securities issued by us and our subsidiaries that such bound persons may possess with other securities brokers, within a maximum period of sixty (60) days from the date of adherence to this Policy. We also control the adherence of people linked to this policy, as well as renewing these subscriptions, in accordance with the rules and terms provided for therein, aimed at keeping ongoing monitoring.

The Capital Markets Council, through the corporate affairs and compliance departments, is responsible for monitoring trades made and investigating any cases of violation of this policy, and any noncompliance will subject the offending party to disciplinary sanctions in accordance with the Company's internal rules and the rules set forth in this policy, without prejudice to any applicable administrative, civil or criminal sanctions, as provided for in item 9 of said policy.

The Investor Relations Officer shall report any infringements to the Board of Directors, depending on their severity.

For further information, please see the Policy for Trading Company Securities, available on the website of the CVM and on our Investor Relation website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 5.5.1: In order to ensure greater transparency in the use of the company's resources, a policy should be prepared addressing its voluntary contributions, including those related to political activities, to be approved by the board of directors and followed by the board of officers, including clear and objective principles and rules.

Response: Yes.

Explanation: On February 22, 2021, our Board of Directors approved the Donation and Sponsorship Policy, last updated on August 12, 2024, which sets the guidelines, rules and responsibilities for the provision of donations and sponsorships, so that they can be carried out on a legal, transparent and fair basis, as well as to prevent and fight fraud and unlawful acts in the scope of said actions.

This policy sets forth that, among other rules, we are prohibited from making direct or indirect contributions for election campaigns, candidates to public office and political parties, according to legislation.

Itaúsa's Code of Conduct and the Anti-Corruption Policy also provide for voluntary contributions.

For further information, please see the Anti-Corruption Policy on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>) and the Donations and Sponsorship Policy and Itaúsa's Code of Conduct available on the website of CVM and on our Investor Relations website (<https://ri.itausa.com.br/en/corporate-governance/bylaws-policies-and-codes/>).

Item 5.5.2: This policy should set forth that the board of directors is the body responsible for approving all political activity related expenditures.

Response: Yes.

Explanation: No justification is required when responding "Yes" to this item.

Item 5.5.3: The policy on voluntary contributions of Government-controlled companies or companies with recurring, material business relations with the Government should bar any contributions or donations to political parties or persons bound to the latter, even if permitted by law.

Response: Not applicable.

Explanation: No justification is required when responding “Not applicable” to this item.