



# **Banrisul's Anti-Corruption Policy**



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### **1. PURPOSE**

The purpose of this Anti-Corruption Policy is to establish prevention and control rules to mitigate the risk of the Company's employees, suppliers and partners being involved in corruption acts, pursuant to the legal provisions in force.

### **2. RELATED REGULATION**

This Policy is mainly based on the following regulations:

I – Law 13,303, of June 30, 2016

II – Law 12,846, of August 1<sup>st</sup>, 2013

III – Rio Grande do Sul State Law 15,228, of September 25, 2018

The rules listed above are not exhaustive, serving merely as examples, that is, as a normative reference to this policy or any other anti-corruption regulations and/or news amendments to laws and regulations described herein.

### **3. SCOPE**

This Policy shall take effect as of its publication, being applied to all members of management, employees, interns, business partners, suppliers and service providers of Grupo Banrisul. These persons will hereinafter be referred to as the "Persons Subject to this Policy".

As of its publication, this Policy shall also apply to the Company and all its Subsidiaries, a conglomerate which will hereinafter be referred to as "Grupo Banrisul" within the scope of this document, consisting of the following companies: Banco do Estado do Rio Grande do Sul S.A., Banrisul Soluções em Pagamentos S.A. – Instituição de Pagamento, Banrisul S.A. Administradora de Consórcios, Banrisul S.A. Corretora de Valores Mobiliários e Câmbio, Banrisul Armazéns Gerais S.A., Banrisul Seguridade Participações S.A., and Banrisul Corretora de Seguros S.A.

### **4. DEFINITIONS**

#### **Corruption**

For the purposes of this Policy, corruption consists of any act through which an undue advantage is offered to or gained for public agents to facilitate or accelerate corporate procedures, or to defraud competition.

Corruption also consists of the following:

- to hinder investigation or supervision conducted by public bodies, entities or agents, or interfere in their operations, including within the scope of regulators and oversight bodies of the Brazilian financial system; and
- to commit any act against the Government in an attempt to damage public property in Brazil or abroad, against the principles of Public Administration, or against the international commitments taken on by Brazil.

Articles 317 and 333 of the Brazilian Penal Code divide corruption into two categories:

- Passive corruption: to ask for oneself or for others, directly or indirectly – even if out of the position or before assuming said position, but by reason of it – undue advantage, or accept a promise of such advantage.
- Active corruption: to offer or promise undue advantage to public servants so as to lead them to commit, omit, or delay an ex-officio act.

### **Harmful Acts Committed Against the Government**

In a summarized and exemplary manner, the legislation classifies the following as harmful acts:

- a) to promise, offer, receive, or give, directly or indirectly, undue advantage to public or private agents, or even to third parties related to them;
- b) to finance, fund, sponsor or in any other way support one in harmful acts, as provided for in the law;
- c) to thwart, defraud, prevent or try to prevent competitive bidding, or to unlawfully divert bidders from the bidding process;
- d) to manipulate or defraud the economic and financial balance of contracts entered into with the government; and
- e) to jeopardize or hamper any supervision or investigation process conducted by public bodies, entities or public agents at any level of operation.

### **5. PROHIBITIONS**

It is prohibited to:

- a) suggest, offer, promise, or grant, directly or indirectly, if requested or not, undue advantages of any nature (financial or not) to people and public, private and third sector companies in Brazil or abroad, as well as persons, companies and organizations from other countries, including at a transnational level, in exchange for acts, or omission of acts, inherent in their duties, operations or activities for Grupo Banrisul, or to seek personal benefits or benefits for third parties.
- b) suggest, request, demand, accept or receive from persons and public, private and third sector companies in Brazil or abroad, as well as persons, companies or organizations from other countries, directly or indirectly, undue advantages of any nature (financial or not), in exchange for acts, or omission of acts, inherent in their duties, operations or activities for Grupo Banrisul, or to seek personal benefits or benefits for third parties.

### **6. GUIDELINES AND RULES**

As a primary guideline of this policy, Grupo Banrisul and the persons subject to this policy are prohibited from committing or allowing any corruption and fraudulent act (without prejudice to the other prohibitions, i.e., those of a legal or normative nature, those contained herein, and those set out in the previous item).

### **BANRISUL'S COMMITMENTS**

#### **With Clients and Users**

Grupo Banrisul's actions are generally based on the satisfaction and protection of its clients and users. To that end, the Institution seeks diligent and transparent relationships with said stakeholders, as it interacts with such an extensive group of people under regular market practices, principles of good faith and compliance with the laws and regulations governing the relationship between the Institution and its clients.

**Politically Exposed Persons**

Grupo Banrisul adopts measures to identify Politically Exposed Persons (PEPs) and monitor transactions with such persons by using a regulatory framework that guides Anti-Money Laundering (AML) activities.

**With Suppliers and Service Providers**

Grupo Banrisul will include in its contracts for the provision of services and supply of goods an explicit clause stating that commercial negotiations shall be made under common market conditions and practices and the principles of good faith, without any personal advantages, bribery, concussion, and donation, among others. Even contracts in which said clause has not been formally included, Banrisul will seek to meet the requirements set down in this Policy.

**Corporate Transactions**

Mergers, acquisition of companies, joint ventures, corporate restructurings or shareholders' agreements conducted by Banrisul, or in which Banrisul or its subsidiaries have equity interests shall be subject to due diligence reviews that are adequate to the complexity of each case, in order to identify any act or omission that might harm the government in Brazil or abroad.

**Receipt of Gifts**

The persons subject to this policy may not accept gifts, except those with no significant value, or arising from awards, campaigns or marketing actions, which must comply with their regulations.

**Sponsorships**

Sponsorships provided by Banrisul shall comply with the Bank's Sponsorship Policy.

**Donations to Political Candidates and Parties**

Grupo Banrisul's companies are prohibited from making donations to political candidates and parties.

**Senior Management Commitment**

The Senior Management teams of the companies belonging to Grupo Banrisul uphold the Anti-Corruption Policy and have committed themselves to the implementation and continuous improvement of corruption fighting and prevention actions, while fostering an integrity environment.

**Employee Commitment**

All employees shall carry out ethical and honest actions and conduct their professional activities in accordance with the guidelines of Banrisul's Code of Ethical Conduct, especially (but not solely) aimed at:

- avoiding situations that represent a current or potential conflict between their personal interests and the interests of Banrisul;
- making the proper use of the Company's resources, intellectual property, time and facilities;
- not sponsoring events or activities that may violate rules and laws in force, or represent conflicts of interest;
- not using the Company's equipment, vehicles and facilities for personal benefit without prior authorization and with due reimbursement;

- not allowing the granting of sponsorships to public bodies to directly or indirectly facilitate contracts with the government;
- not using Banrisul's name or resources to finance campaigns for political parties or candidates;
- not speaking on behalf of the Company, disclosing data, news and information related to Banrisul or any of its group companies, without being duly authorized;
- avoiding the use of their employment status to obtain benefits in their personal or professional relationships, or to benefit third parties;
- not establishing ties of any nature with organizations or clients with conduct that is not aligned with ethically, socially and environmentally responsible standards; and
- not transmitting or transferring to third parties any information, documents, financial reports, accounting records, strategies, customer records and/or programs containing confidential data that is of exclusive interest to Banrisul.

### **Reporting of Suspicious Situations**

Pursuant to Banrisul's Code of Ethical Conduct, everyone must report suspicious situations involving fraud, corruption or events deserving special attention from Banrisul, with the confidentiality of the information provided ensured.

Internal and external reporting channels are disclosed on the corporate intranet and the website of Banrisul, [www.banrisul.com.br](http://www.banrisul.com.br), entitled "Whistleblower Channel".

### **Training and Education in Corruption Prevention**

Banrisul's Senior Management is committed to Corruption Prevention by continuously supporting the improvement of measures to prevent and combat corruption, demonstrated by fostering an organizational culture based on ethical values, standards of conduct, transparency and integrity, highlighting its relevance for all levels of the organization.

Senior Management supports actions aligned with the guidelines established by anti-corruption regulations, encouraging participation in joint actions aimed at preventing and combating corruption. In this sense, Banrisul provides all employees with a mandatory distance learning course on Corruption Prevention.

## **7. CONSEQUENCE AND RESPONSIBILITY MANAGEMENT**

### **Responsibilities**

All the persons subject to this Policy are responsible for fostering a culture of ethics and for establishing a permanent environment for the control and prevention of corruption, in which it is possible to monitor and identify operations of clients, nonclients, individuals and legal entities, and actions or suspicions of corruption through due diligence procedures, as well as for enforcing internal mechanisms and procedures of integrity and auditing, in addition to encouraging that irregularities are reported to effectively enforce this Policy and the Code of Ethical Conduct of Banrisul.

### **Legal Sanctions**

Law 12,846, that is, the Anti-Corruption Law provides for stiff penalties for the Company and its employees and/or representatives, including criminal liability for involved individuals, and disciplinary actions administered by the company, including the termination of the employment and the service contract.

The Anti-Corruption Law also provides for the imposition of corporate fines that may range from 0.1% (zero point one percent) to 20% (twenty percent) of the company's gross revenue reported for the fiscal year prior to the filing of the administrative proceeding, or if the gross revenue criteria cannot be used, the fine may range from R\$6 thousand to R\$60 million.

### **Internal Consequences**

In case of noncompliance with this Policy and related regulations, measures shall be taken according to the violator's level of relationship with the Bank:

- if the violator is an Employee, the penalties provided for in the Penalties item of the Staff Regulations shall be adopted, as appropriate for addressing the noncompliance;
- if the violator is an Executive Officer or Member of the Board of Directors, the noncompliance shall be reported by the Controls, Compliance and Inspection Unit to the Board of Directors;
- if the violator is an Intern or Third Party, the penalties provided in the service agreement shall be adopted.

If managers, other employees and/or other related persons become aware of a violation that has occurred and does not report the fact to the Personnel Management Unit or the Whistleblower Channel, they will also be considered liable.

Regardless of the level of relationship with Banrisul and the penalty adopted, anyone who fails to comply with the provisions of corporate policies may be held civilly or criminally liable for proven violations.

### **Third Parties**

In the case of business partners, suppliers, and service providers of Grupo Banrisul, i.e. individuals not covered by its Personnel Regulation, Banrisul may, always in compliance with Brazilian and international laws and regulations, report suspicious acts and facts to the competent authorities.

## **8. MISCELLANEOUS**

This Policy shall be yearly reviewed by the Board of Directors. Reviews on an extraordinary basis will also be allowed at any time.

## **9. MANAGER IN CHARGE**

Controls, Compliance and Inspection Unit.