



## **CORPORATE POLICY ON HUMAN RIGHTS**

### **1. Objective**

Set out the Human Rights guidelines and principles of the Saфра Conglomerate (hereinafter referred to as "SAFRA").

### **2. Guidelines**

The guidelines and basic principles underlying SAFRA's internal, business and related-party relationships are based on the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the Convention on the Rights of the Child and its protocols, the Older Persons Act, the Fundamental Principles established in the Constitution of the Federative Republic of Brazil, and the UN Sustainable Development Goals, as well as all of their related documents and Conventions.

SAFRA, as signatory of the Global Compact, has principles underlying its relationships and activities, which are the protection of human rights, dignity of work, and a healthy and sustainable environment and anti-corruption. Among these activities are the following:

- Promote and stimulate the respect and protection of the dignity of the human person and internationally-accepted human rights, rights of the child, adolescent and older persons;
- Assure that it does not participate in the breach of such rights;
- Avoid that SAFRA's business activities exert negative impacts on human rights;
- Promote the protection and respect of the labour rights;
- Respect and assure an environment designed to control and comply with laws, regulations and self-regulations applicable to its internal relations, activities and businesses;
- Guarantee the respect for gender equality, the right to privacy and individuality, promoting equal work and promotion opportunities, prohibiting the practice of discriminatory acts, professional growth restrictions, and harassment acts in the workplace environment, and in all of its activities and businesses;
- Assure the equality and integration of many ethnic groups/races, country or social origin, belief, religions, disabilities, ages, civil status, sexual orientations, ancestry and political opinions, besides promoting an inclusive, safe and respectful workplace environment, where all employees feel that they can fulfil and show their potential, because SAFRA understands that different perspectives and realities bring knowledge and experiences that add great value to the final result of the Organization and each individual.
- Provide incentive to a workplace environment where its employees value mutual respect, adopt a management aligned with the principles of occupational health and safety established in the applicable legislation, creating opportunities for personal and professional development to everyone, and aiming at the continuous improvement in performance and organizational climate.
- Promote and encourage good relationship between its employees and between them and the Human Resources area;
- Provide guidance and care to the health of its employees and their relatives;
- Provide its employees with study incentive and opportunities for their own and professional development, through courses in the internal education and development digital platform;
- Support freedom of association and effective recognition of the right to collective bargaining;
- Contribute to the elimination of all forms of forced or compulsory labour;
- Collaborate to the effective abolition of all and any child labour that is in breach of the cases allowed in the Brazilian legislation in effect;
- Contribute to the elimination of discrimination in respect of employment and occupation;
- Zeal for privacy and protection of the personal data of the natural person (employees, customers and former customers), bringing transparency and clarity in the relationships that SAFRA has with the owners of personal data.



## **2.1. SAFRA, environment and anti-corruption**

SAFRA supports a preventive approach to the environmental challenges, always based on studies and development of initiatives on promotion designed to promote greater social responsibility of its employees towards the society and in their activities and business relations.

The Conglomerate provides incentives to the development and dissemination of environmentally-friendly technologies.

Likewise, it combats corruption in all forms, including extortion and bribery.

In this sense, in all operations of SAFRA, aiming to avoid or minimize any risks to its businesses, the Compliance, Anti-Money Laundering and Social and Environmental Risk areas perform analyses by making several evaluations of each of their respective fields at the beginning of the relationship, at the time credit is granted and during the regular monitoring of the risk exposures taken.

## **2.2. Guidelines on defence sector**

SAFRA, according to its values and principles based on the respect for human rights and in the interest of employees, customers, non-customers and the society at large, follows the guideline of not maintaining any kind of business and/or finance relationship with organizations (or its subsidiaries, whichever their activities) that manufacture, trade or distribute the following:

- Chemical or biological weapons;
- Nuclear weapons; and
- Ammunition containing uranium.

## **2.3. SAFRA's Commitments**

SAFRA repudiates any act that breaches the rights of its employees and has made efforts to continuously improve its mechanisms for controlling risks and breaches of its guidelines and principles.

The Institution undertakes, in the event any infringement of human rights is found, occurred as a result of its activities or business, to timely minimize and repair the observed impacts.

This policy is aligned with the Conglomerate's Code of Conduct.

## **2.4. Whistleblowing/Reporting channel**

SAFRA encourages its employees, customers, business partners and suppliers to report any kind of act that is in breach of its Policy on Human Rights.

For this purpose, the Institution provides channels to report any act that breaches the guidelines set out in this document, which may lead to disciplinary sanctions.

The reports may be either anonymous or identified, being assured the confidentiality, independence, impartiality and non-retaliation to those that file them in good-faith.

The reporting channels are as follows:

Website:

<https://www.safra.com.br/atendimento/canal-de-denuncias.htm?componente=#Formulario>

E-mail: [denuncia@safra.com.br](mailto:denuncia@safra.com.br)

Mail addressed to Banco Safra's headquarters, to the attention of Compliance at the following address: Av. Paulista, 2150, 14ª andar, São Paulo – SP – CEP 01310-300.



### **3. Approval Plan**

The Institution's Social and Environmental Risk area is responsible for reviewing and updating the document, as well as for releasing it after the evaluation and approval from the respective Committee and Board in charge.

The Governance Committee is the area responsible for evaluating and approving the guidelines on this Policy's theme.

The Corporate Policy on Human Rights is applicable to the entire Safra's Conglomerate and is annually updated.

SAFRA reserves the right to amend this document, according to the amendments related to this Policy, principles, guidelines or legal rules, whenever required.

All amendments will be subject to evaluation and approval from the Committee in charge and the Board of Directors

### **4. External regulation**

All and any regulation and national and international agreements governing human rights, particularly the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

**Validity:** 2022

**Revision:** December 2022