

GLOBAL – Environmental, Social and Corporate Governance Policy

Category: ESG

Policy Objective:

This Policy sets the foundations of BTG Pactual's sustainability statement. It defines the sustainability principles and guidelines as well as the Staff Members¹ responsibilities towards sustainability.

This Policy establishes BTG Pactual's fundamental sustainability and socio-environmental risk commitments. The Policy further defines the principles and sustainability guidelines that guide the activities of BTG Pactual and business decision making, determining those responsible for its implementation.

Related Rules:

- COMP001 – GLOBAL – Code of Business Principles & Ethics
- ESG 002 – GLOBAL – Responsible Investment Policy
- COMP 003 – Corporate Governance – Risk Management and Control Framework
- OR 006 – GLOBAL – New Business Initiative New Product Approval and Transaction Requiring Pre-Approval

Who does this Policy apply to?

All the business units of Banco BTG Pactual.

Infringements of this Policy may result in disciplinary action, including dismissal.



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Policy

1 Foundations

The BTG Pactual organization builds on the rooted pillars of the talent, dedication and performance of our employees are the foundations of our continuous growth since 1983. Our approach to sustainability is founded on an understanding of our responsibility towards our partners, our staff members, the society and the environment as a financial services provider. Fully aligned with our Business Principles, BTG Pactual's Environmental, Social and Corporate Governance ("ESG") Policy reflects our long-term ambition and unconditional commitment with responsible and sustainable development. We operate under a consistent focus on the long term implications and results of our actions, prioritizing these long term benefits rather than short term gains, always looking into ESG risks and opportunities. We believe that sound business practices and corporate responsibility are long term drivers that must be applied daily to generate shareholder value through sustainable growth.

2 Core ESG Principles

At BTG Pactual we:

- 1 **Evaluate ESG risks** in accordance with the principles of relevance and proportionality, always considering the applicable legislation and ESG best practices available on the market.
- 2 Manage and **minimize adverse environmental and social impacts** resulting from our operations and activities.
- 3 **Incorporate ESG values in the analysis of products and services**, also looking to innovate and create new sustainable business opportunities.
- 4 **Foster, protect and respect human rights** in respect to business activities and in all stakeholder relationships, including our Staff Members, partners, clients, shareholders, counterparties, authorities and the society.
- 5 Stimulate an **open dialogue with all stakeholders** regarding ESG matters.
- 6 Encourage a **diverse, equal and transparent working environment**.
- 7 **Promote ESG awareness** amongst Staff Members in order to ensure that associated to our business activities and operations risks are properly identified, evaluated, mitigated and/or compensate.
- 8 **Communicate** all relevant information in a clear and transparent manner.

3 Implementation and Governance

This Policy Statement and its principles are embedded in BTG Pactual's solid corporate governance practices and internal control framework, which ensure the adequate implementation of the Policy's provisions.

We are committed to:

- 1 **Align ESG principles to our Code of Business Principles & Ethics** which has established our firm's key values;
- 2 **Incorporate ESG principles to our firm's business plan**, so as to ensure that sustainability and socio-environmental risk best practices are integrated to our management processes and decision making.
- 3 Define the **corporate governance structure** responsible for the ESG integration in business

- 4 Implement specific **ESG control processes** in areas that present associated potential risks.
- 5 Integrate ESG risks to BTG Pactual's Risk Management and Control Framework
- 6 Establish an **ESG subcommittee**, responsible for ensuring that the firm complies with the principles stated throughout Policy and implement them as set forth in this policy. The ESG subcommittee should comprise the structure of the other subcommittees of BTG Pactual.
- 7 **Create awareness** in all Staff Members regarding their responsibility towards this Policy, thereby ensuring that we fully **understand and manage the ESG risks and opportunities** affecting our businesses and operations.
- 8 **Review this Policy** periodically in compliance with the applicable regulations and best practices.

4 Annual Reporting

Feedback and Transparency are an essential part of our ESG commitment. We will periodically Report our progress and achievements regarding the implementation of the principles and objectives outlined throughout this Policy.

5 Waivers/Exceptions

Any exceptions to this Policy must be approved by the ESG subcommittee.