

# ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Open Company

NIRE 35300010230

## INTEGRITY AND ETHICS CORPORATE POLICY

### 1 OBJECTIVE

To establish guidelines additional to the Itaú Unibanco's Code of Ethics related to:

- a) Integrity and Ethics Corporate Program.
- b) Conflicts of interests situations (i.e. use of Institution's information, registers and know how, external activities/corporate interest, relatedness and close relationships, offering and receiving courtesies, etc.) and ethical dilemmas.

NOTE: Guidelines to prevent money laundering, terrorism financing and frauds are addressed in the Corporate Policy of Prevention and Fight Against Illegal Acts Information Security guidelines are addressed in the Information Security Corporate Policy.

### 2 TARGET AUDIENCE

This Policy applies, in Brazil and abroad, to all Directors and managers, employees and controlling shareholders of Itaú Unibanco Conglomerate and to any interaction of the Conglomerate with clients, partners, suppliers and other relationship stakeholders.

### 3 INTEGRITY AND ETHICS CORPORATE PROGRAM

Set of guidelines and processes to ensure the compliance with the Code of Ethics, principles and values of the Itaú Unibanco Conglomerate.

The Integrity and Ethics Corporate Program is composed of the following:

#### 3.1 Top Management Commitment

The Board of Directors, through the Code of Ethics of Itaú Unibanco, defines the guidelines, the most adequate and coherent attitudes considering the values of the organization, such as professional attitude, management of conflicts of interests, relationship with stakeholders and corporate and social responsibility.

The integrity and ethics committees define the guidelines and practices of the Program; monitor its compliance and other actions necessary to management of the Program.

#### 3.2 Policies and Procedures

Includes the issuance and update of the ethic and integrity guidelines of the Conglomerate in order to comply with the Code of Ethics, applicable legislation and national and international good market practices.

Policies and procedures of the Program are mentioned in this policy and listed in item 10– Related Documents. Additionally, conflicts of interests situations identified below are addressed in item 9.

- Use of information, registers and know-how of the Conglomerate;
- Interest in businesses and external activities;
- Political activities (candidacy to public positions);
- Relatedness and close relationships within the conglomerate;
- Relationship with clients, suppliers, business partners and employees;
- Courtesies – offering and receiving;
- Lunches and dinners;
- Tickets/invitations - offering and receiving;
- Contributions (donations and sponsorships): offering and receiving;
- Personal investments.

#### 3.3 Training and Communication

The training and communication actions of the Program help management and employees to:

- deepen their knowledge of Integrity and Ethics guidelines, as well as their application to business and people and process management;
- be qualified to identify, prevent and resolve ethical dilemmas, conflicts of interests, interpersonal conflicts and misconduct inherent to their daily activities;
- know about whistleblowing and doubt solving channels.

Training and communication practices include:

- **Integrity and Ethics Training Program:** composed of remote and live training actions. It is the responsibility of the Regulatory Relations and Compliance Superintendence and the Corporate Security Awareness Management in a coordination with Itaú Unibanco Business School.
- **Institutional Communication Plan:** It involves awareness-raising campaigns, notices on specific issues related to ethics, and dissemination of policies and guidelines. It is carried out by the Superintendence of Regulators and Compliance Relations and the Corporate Security Awareness Management in partnership with the Superintendence of Brand, Media, Content and Image.

The Regulatory Relations and Compliance Superintendence must coordinate annually the preparation of a Training Program and an Institutional Communication Plan and approve them in the Superior Commission of Ethics and Sustainability. A report on the effective application of the Program and the Plan must also be prepared annually.

### 3.4 Integrity and Ethics Program Monitoring

The continuous monitoring of program effectiveness and possible adjustment needs is coordinated by the Executive Department of Operational Risk and Compliance (DEROC) with direct action by several areas of the organization (as per the activities provided in the policies in item 9) and with periodic reporting by the DERO to the Audit Committees and Board dealing with matters related to Integrity and Ethics, as defined in the policy. This monitoring includes process testing by Internal Controls and Compliance, monitoring of indicators, information of channels of doubts and complaints and treatment of new regulations that impact the program.

Through the results of the monitoring, the adjustment and improvement needs of the Integrity and Ethics Program are identified.

The DERO shall submit to the Audit Committee and to the Integrity and Ethics Board, as applicable: (i) before the beginning of the calendar year, an annual monitoring plan for the subsequent year; and (ii) during the first quarter of the year an annual report on the effective implementation of the plan, the relevant situations identified in the previous year and the adequacy needs identified in the Integrity and Ethics Program identified.

Internal Audit must perform an independent annual assessment of the Integrity and Ethics Program and of the reports mentioned in the previous paragraph.

The assessment of the compliance with the Program and possible improvement opportunities can also be performed by an third-party audit, certification or accreditation firm.

#### 3.4.1 Monitoring and Management of Conflicts of Interests

A conflict of interests exists when personal or group interests clash with or overlaps with interests of the Itaú Unibanco Conglomerate or its stakeholders. The item 9 of this policy details the main guidance on conflicts of interests.

### 3.5 Channels to Report Ethical Misconducts and Doubts

#### 3.5.1 Procedures to report complaints and doubts

- Managers and employees must immediately communicate suspicions or violations of the Itaú Unibanco's Code of Ethics and this policy.
- Reporting channels described in item 3.5.2 must be open to all reports in order to allow managers, employees and third parties to seek those channels with complete freedom.
- Reporting channels must timely, independently, confidentially and objectively investigate communications received and to maintain a record of all situations identified, of the results of the investigations and of the decisions adopted.
- Notices concerning the complaint must be accompanied by as much information as possible, as:
  - objective and unbiased description of the fact;
  - where and when violation occurred or is occurring;
  - who are the people and organizations involved;
  - documents which help to assess the case and forwarding of actions, etc.

#### 3.5.2 Reporting Channels

Channel	Subjects	Contacts
Ethics Consultancy	Doubts about: - Integrity and Ethics Corporate Policy; - Conflicts of interests;	comitedeintegridadeetica@correio.ita.com.br

	<ul style="list-style-type: none"> <li>- Itaú Unibanco's Code of Ethics;</li> <li>- Anti-corruption Corporate Policy ;</li> <li>- Ethical dilemmas.</li> </ul>	
Inspectorate Superintendence	<p>Doubts, suspicions, accusations about:</p> <ul style="list-style-type: none"> <li>- Employees misbehavior;</li> <li>- Fraud in electronic channels;</li> <li>- Any kind types of document fraud;</li> <li>- Corruption and bribery;</li> <li>- Theft and steal within premises to clients and employees;</li> <li>- Break-ins in general;</li> <li>- Blackmail through kidnapping;</li> <li>- Information, physical, personal and property safety incidents.</li> </ul>	<p>Customer Service: 0800 723 0010.</p> <p>External e-mail: <a href="mailto:inspetoria@itau-unibanco.com.br">inspetoria@itau-unibanco.com.br</a>.</p> <p>Itaú's website: "<a href="https://www.itau.com.br/atendimento-itau/para-voce/#">https://www.itau.com.br/atendimento-itau/para-voce/#</a>".</p> <p>Itaú's Website of Suppliers: "<a href="https://www.itau.com.br/fornecedores/">https://www.itau.com.br/fornecedores/</a>".</p> <p>Email: <a href="mailto:fornecedores_relatos@itau-unibanco.com.br">fornecedores_relatos@itau-unibanco.com.br</a>.</p> <p>Mail Address: A/C Inspetoria -Av. Dr. Hugo Beolchi, 900 - piso -1 Torre Eudoro Villela - São Paulo/SP - CEP 04310-030.</p>
Audit Committee	<p>Suspicious and accusations about:</p> <ul style="list-style-type: none"> <li>- Legal or regulatory non-compliance;</li> <li>- Frauds and errors in audit, accounting and internal controls activities.</li> </ul>	<p>External e-mail: <a href="mailto:comite.auditoria@itau-unibanco.com.br">comite.auditoria@itau-unibanco.com.br</a>.</p> <p>Mail Address: A/C Comitê de Auditoria Itaú Unibanco Holding S.A. - Praça Alfredo Egydio de Souza Aranha, 100 - Torre Olavo Setúbal, Piso PM, São Paulo - SP - CEP: 04344-902.</p>

NOTE: In international units, the whistleblower may communicate through one or more of the following channels: (i) local Compliance Officer; (ii) one of the channels above in the parent company or (iii) other channels available at the unit.

### 3.5.3 Whistleblowers protection

- a) Managers and employees may not retaliate, take revenge or persecute those who, in good faith:
  - report complaints, accusations, suspicions, doubts or concerns regarding ethical misconducts and other misbehaviors;
  - provide information or assist to in the investigations of such ethical misconducts and other misbehaviors.
- b) Managers and employees must preserve the confidentiality of information they have access to, related to the verification of ethical misconducts and other misbehaviors.
- c) Anonymous reports will always be accepted by whistleblowing channels and must be treated in the same way as reports with identification of the whistleblower.
- d) Disciplinary sanctions will be applied to managers or employees who attempt to or retaliate against someone who, in good faith, communicates ethical misconducts and other misbehaviors.
- e) Disciplinary sanctions will be applied to managers or employees who are proven to use bad faith when communicating ethical misconducts and other misbehaviors.

## 4 RESPONSIBILITIES

### 4.1 Board of Directors

Approves the Conglomerate's integrity and ethics guidelines and their respective modifications.

### 4.2 Audit Committee

It follows the Integrity and Ethics Program through reports from the Internal Audit, Internal Controls and Compliance, Corporate Security Department and Ombudsman Superintendence, as well as through other mechanisms available to it.

### 4.3 Integrity and Ethics Committees

The main responsibilities of the Superior Commission of Ethics and Sustainability and of the Integrity and Ethics Committees are described in internal policy Internal Controls and Compliance Officer

### 4.4 Executive Department of Operational Risk and Compliance (DEROC)

Regulatory Relations and Compliance Superintendence (SRRC) is responsible for managing the Integrity and Ethics Program, whose main roles are:

- a) Coordinating Integrity and Ethics Committees and their regulations and monitoring the compliance with resolutions.
- b) To prepare and provide integrity and ethics training and raising-awareness campaigns, jointly with DSC, according to established parameters, and make them available to managers and employees in Brazil. To coordinate, together with the Superintendence of Compliance and Risks of the External Units and the Superintendence of Brand, Media, Content and Image, the provision of training and awareness campaigns for the international units.
- c) Clarifying doubts related to this Policy and its application.

- d) Providing guidance to managers and employees with respect to doubts about ethical dilemmas, conflicts of interests, misconducts and other practices that might conflict with approved corporate policies.
- e) Monitoring and reporting about compliance with the guidelines of the Integrity and Ethics Program's to the Integrity and Ethics Committees.
- f) Providing the annual reports set forth in this policy for consideration by the Board of Directors and the Audit Committee.
- g) Timely reporting potentially significant situations related to this Policy to the Audit Committee and the applicable Integrity and Ethics Committees.

#### **4.5 Corporate Security Office**

- a) Maintaining specific channels to receive and verify accusations related to possible violations of this Policy and the Code of Ethics' guidelines (misconducts).
- b) Preparing and making available integrity and ethics corporate trainings and awareness-raising campaigns to managers and employees, according to parameters set forth by the Internal Controls and Compliance Office.
- c) Opportunely reporting possibly important situations related to this Policy to the Audit Committee and applicable Integrity and Ethics Committees.

#### **4.6 Ombudsman Superintendence**

- a) Receiving and addressing interpersonal conflicts and conflicts of interest reports, within the workplace, from managers and employees
- b) Reporting, at least half-yearly, information about the channel to the Integrity and Ethics Committees and to the Audit Committee.
- c) Timely reporting potentially significant situations related to this Policy to the Audit Committee and the applicable Integrity and Ethics Committees.

#### **4.7 Attraction, Selection and School Superintendence**

Facilitate Integrity and Ethics trainings within the Conglomerate.

#### **4.8 Brand, Media, Content and Image Superintendence**

Facilitate corporate integrity and ethics communication within the Conglomerate.

#### **4.9 Managers and Employees**

- a) Knowing and following the Code of Ethics and this Policy's guidelines.
- b) Disseminating its principles and guidelines and stimulating expected attitudes and behaviors.
- c) Participating in available integrity and ethics trainings.
- d) To sign the Corporate Integrity Policy Term, attesting its knowledge and agreement with its content.

#### **4.10 Employees**

- a) Knowing and following the Code of Ethics and this Policy's guidelines.
- b) Participating in available integrity and ethics trainings.
- c) To adhere to the Corporate Integrity Policy Term, certifying its knowledge and agreement with its content.

### **5 DISCIPLINARY SANCTIONS**

Managers and employees who violate the terms of this Policy are subject to disciplinary sanctions included in internal rules of the companies of the Itaú Unibanco Conglomerate.

### **6 DOUBTS AND EXCEPTIONS**

Doubts and exception evaluations regarding the themes of this Policy or possible non-contemplated matters should be sent to the Ethics Consultancy at the Superintendence of Regulators and Compliance Supervisor through the "COMITE DE INTEGRIDADE E ETICA" [Ethics and Integrity Committee] (Brazil) or the local Compliance Officer available in the international units. In case of need, the Ethics Consulting or the local Compliance Officer may refer the case for deliberation in an integrity and ethics board.

### **7 SIGNATURE TO THE TERM OF CORPORATE INTEGRITY POLICIES**

All managers and employees of Itaú Unibanco Conglomerate must annually sign electronically (or through any means available in the company where they work) "Term of Awareness and Compliance with Corporate Integrity Policies" of Itaú

Unibanco . In International Units, the term will be signed in compliance with the local legislation. The signature may be electronic or physical, depending on the resources of each unit.

## **8**    **SECTORIAL GUIDELINES**

Those guidelines which are more restrictive than those included in this policy may be set forth in internal rules of the companies or areas of the Conglomerate . In the event of conflict between guidelines in this this policy and local legislation of companies abroad, the most rigorous standard must prevail, to the extent that does not violate the local legislation.

## **9**    **CONFLICT OF INTERESTS**

A conflict appears whenever personal interests of managers or employees potentially conflict with those of, the Conglomerate or its stakeholders. Such situations may risk the integrity and reputation of Itaú Unibanco Conglomerate. As a result, they must be effectively and transparently managed and also promptly communicated to management and the applicable communication channels. Additionally, individuals affected must abstain from participation in decisions that involves them leaving the room when such decisions are being taken. The main attitudes which help to avoid conflicts are listed below.

### **9.1**    **USE OF INFORMATION, REGISTERS AND KNOW-HOW OF THE CONGLOMERATE**

Information, registers of individuals and companies (employees, clients, suppliers, etc.) and know-how (knowledge, technologies, methods, models, systems, policies, etc.) which are internally used are the property of the Conglomerate. Managers and employees must:

- a) use the information, registers and know-how of the Conglomerate according to the legislation and internal rules on information security.
- b) protect the information, registers and know-how of the Conglomerate and prevent they are misused and leaks.
- c) obtain authorization, via e-mail, of the Superintendent (or higher level) and the officer ( Head office) of the area which owns the information before using it ( including any type internal and confidential of databases) in external activities and publications (hard copy, electronic or internet), such as:
  1. lectures, debates, seminars, courses, conferences, interviews, etc.;
  2. academic papers, dissertations, articles, thesis, books and booklets, etc.;
  3. newspapers, magazines, social networks, sites, blogs, chats, etc.;
  4. To provide bank information to third parties.
  5. benchmarking\* with market companies.

Key notes:

- i) Information classified as Confidential may only be used in external activities and publications after formal authorization by the information owner (officer – or equivalent). If the information is classified as Restricted, it may only be used after formal authorization by general officer (General Officer) or vice-president.
- ii) Even if the activity or publication is performed on behalf of or under the interest of the Conglomerate, an authorization for use must be obtained.
- iii) The same rules must be applied if third parties request the use of information of the Conglomerate.
- iv) Additionally , regarding items c) 1 and c) 3 above, guidelines of Corporate Policy must be followed in Brazil with international units complying with local guidelines.
- v) Managers and employees are not allowed to use information, registers and know-how of the Conglomerate for private purposes or transfer them to third parties without previous authorization, even after the termination of employment by the Conglomerate.

(\*)Managers and employees must request authorization to the superintendent or higher level before holding benchmarking meetings.

### **9.2**    **INTEREST IN BUSINESSES**

#### **9.2.1**    **Officers**

The officers must communicate to the Nomination and Corporate Governance Committee the equity interests they hold in other organizations for analysis and eventual manifestation of potential conflicts of interest.

#### **9.2.2**    **Employees and Managers (except Officers)**

- a) Employees and other managers are not allowed to hold interest in companies or ventures which operate in the same business of the Institution or whose activities conflict with the roles developed by the person at Itaú Unibanco.
- b) Employees and other managers are allowed to hold interest in companies or ventures which operate in businesses different that those of the Institution, as long as:

- There is no conflict of interest between the activities carried out in the institution and those carried out in these companies and enterprises;
- working hours set forth in the labour agreement are not impacted;
- There is no internal advertising of this activity among employees or even with clients, suppliers or commercial partners;
- They do not use equipment, machines, systems, office supplies, etc. of the institution for the benefit of the external activity or enterprise;
- rules of item 1 above are complied with;
- the direct manager is informed.

### 9.2.3 Corporate Registration in Company

In Brazil, participations in companies in which there is doubt about potential conflict of interests with their own activities in the bank, should be informed, at any time, to the Ethics Consultancy by means of the e-mail key "COMITE DE INTEGRIDADE E ETICA" [Ethics and Integrity Committee].

## 10 EXTERNAL ACTIVITIES

### 10.1 Management

a) Board members must communicate to the Appointment and Corporate Governance Committee about external activities they perform in other organizations to assess and take a position about potential conflict of interests.

### 10.2 Employees and other Management (except Officers)

- a) They may not engage in activities in companies or ventures that conflict with their own activities in the institution;
- b) They should consult the Ethics Consultancy:
- b1) To carry out activities in companies or ventures that conflict with the operation areas of the institution, even though they do not conflict with the activities themselves;
  - b2) To exercise activities in companies of clients, suppliers and business partners of the institution;
  - b3) To participate in boards of companies, professional activities in the media, advertising companies, business associations and class entities. Activities that involve the media, advertising companies, interviews in general should be reported to the Corporate Communication Area to obtain an opinion.
- c) They may carry out external activities in companies and ventures with operating areas other than those of the institution, and that do not conflict with their own activities, as educational institutions, voluntary sector companies, provided that:
- There is no conflict of interest between the activities carried out in the institution and those carried out in these companies and enterprises;
  - working hours set forth in the labour agreement are not impacted;
  - There is no internal advertising of this activity among employees or even with clients, suppliers or commercial partners;
  - Do not use equipment, machines, systems, office supplies, etc. of the institution for the benefit of the external activity or enterprise;
  - rules of item 1 above are complied with;
  - the direct manager is informed.
- d) Employees and other managers may perform activities in non-profit institutions (public or community interests): religious, Voluntary Sector, political parties, groups, clubs, condominiums, neighborhood associations, etc., as long as:
- working hours set forth in the labour agreement are not impacted;
  - there is no conflict of interests between activities performed in the Institution and those performed in such institutions;
  - rules of item 1 above are complied with.
- e) They should consult the Ethics Consultancy and inform the director or higher hierarchical level before carrying out professional activities in the public offices, in positions of the bankruptcy or appointment.
- f) They must also request prior authorization from a director or senior hierarchical level to hold lectures or presentations on behalf of the conglomerate, even in events of representation entities as, for instance, Febraban and Anbima.
- g) When performing activities on behalf of the Conglomerate or in financial services industry organizations, managers (or employees) must: (a) resign from receiving the compensation to perform such activity, using the document template for such purpose (see attachment M-4); or (b) collect the compensation and report to the Personnel Area (Compensation) so that such amount is deducted from total cash compensation received from the Conglomerate.

### **10.3 External Activities Registration**

In Brazil, external activities in which there is doubt about potential conflict of interests with their own activities in the bank, must be informed, at any time, to the Ethics Consultancy by means of the email "COMITE DE INTEGRIDADE E ETICA" [Ethics and Integrity Committee].

## **11 POLITICAL ACTIVITIES (CANDIDACY TO PUBLIC POSITION)**

### **11.1 Brazil**

a) Managers and employees who are running for or were elected to public offices must request unpaid leave:

- During the campaign;
- During the term of office.

b) Managers and employees running for public office must comply with internal institutional rules and the company's specific rules and they are not allowed to receive any type of contribution or support to their candidacy.

For other information within Brazil, refer to Policy of Employees Running for Elective Public Offices.

### **11.2 International Units**

Local rules about public office election must be complied with.

## **12 FAMILY AND CLOSE RELATIONSHIP WITHIN THE CONGLOMERATE**

Employees may indicate, maintain, become related or have close relationships without a conglomerate, as long as it does not result in a conflict of interest. However:

- In case of appointments for hiring or transfer, they must inform this condition to the person responsible for hiring;
- In case you are aware of hiring or moving, which may generate a conflict of interest, you must notify your direct manager;
- Situations of kinship or proximity relationship in the same board should be informed to the director regardless of whether there is a conflict of interest or not.

Employees may not authorize the hiring of close relatives and close relationship.

The family and close relationships are not allowed when there is a hierarchical relationship between those involved.

Other situations of relationship (whether family or close) involving a hierarchical relationship, should be evaluated by the manager and by the Ethics Consultancy.

In the agencies network, no kinship or proximity relationships are allowed in the same agency or in similar physical locations (e.g. platforms, hubs, centers).

The situations below, if they involve relations of kinship and proximity, although there is no hierarchical relationship between the involved ones, should be evaluated by the management and by the Ethics Consulting with the objective of identifying possible conflict of interests:

- Additional activities (e.g. done and checked, process approvals and payments, etc.);
- performance, worthiness and promotion assessments;
- situations that might affect the healthy environment within the workplace.

### **12.1 Registration of Family or Close Relationship**

In Brazil, family and close relationships must be recorded by employees and managers.

## **13 RELATIONS WITH CLIENTS, SUPPLIERS, BUSINESS PARTNERS AND EMPLOYEES**

Managers and employees must:

- a) Keep the confidentiality of information, registers, operations, contracted services of clients, suppliers, business partners and employees of the Conglomerate.
- b) To refrain from conducting private business - on behalf of relatives, or on behalf of organizations or enterprises in which they are executives or partners - with individuals, professionals, companies and managers of enterprises, which are clients, suppliers or trading partners of the conglomerate, or even use the position for such purpose, in a way that creates a conflict of interest. Questions should be directed to the Ethics Consultancy.
- c) Refrain from performing private businesses – on behalf of relatives or organizations or ventures in which they are executives or partners - with companies, professionals and managers who are clients, suppliers or business partners of the Conglomerate, or even using the position for such purpose, thus creating conflicts of interests. Doubts must be submitted to Ethics Consultancy.

Managers and employees are not allowed to:

- a) Hire suppliers, service providers or business partners who are related to managers or employees (relatedness, interest in companies, etc.), thus creating conflicts of interests.
- b) Enter into agreements or commitments with clients, suppliers or business partners involving reciprocity and exchange of favors or own and third party personal advantages.
- c) Enter into or manage negotiations or be responsible for managing relationship with clients, suppliers or business partners working in companies which:
  - c.1) they have a interest on; or
  - c.2) are managed (business officer or manager) by the spouse (domestic partner) of the managers or employees, by relatives or by individuals on a close relationship.
- d) Transact with related parties without considering the rules of Corporate Policy of Related Parties Transactions.
- e) Improperly facilitate business on behalf of clients, suppliers or business partners of the conglomerate.
- f) Request a job position for spouses (domestic partner), for relatives or for individuals on a close relationship people to clients, suppliers or business partners with which they maintain direct contact when performing their duties at the Institution.
- g) Request courtesies or contributions to clients, suppliers and business partners.
- h) To manage the bank accounts (checking, savings, investment, etc.), and other products and services of the conglomerate, belonging to itself (individual or legal entity), relatives or close people.
- i) To provide services for the institution as if they were third parties.
- j) Employees are not allowed to manage bank accounts (checking, savings, investment, etc.) and other products and services of the Conglomerate belonging to themselves (individual or corporate), their relatives or individuals on a close relationship.

It is necessary to avoid particular commercial relations between employees or between employees and managers that have a hierarchical relationship between them in order to avoid conflicts of interest or undesirable situations that may affect the climate in the work environment.

### 13.1 Registration of Suppliers' Relationship

In Brazil, relationships with suppliers or business partners that may result in a conflict of interests with their own activities in the bank should be informed to the Ethics Consultancy by means of the email key "COMITE DE INTEGRIDADE E ETICA" [Ethics and Integrity Committee].

## 14 COURTESIES, INVITATIONS AND HOSPITALITY

### 14.1 Courtesies – Offer

- a) **Prohibition:** managers and employees are prohibited from offering, direct or indirectly, to private agents or public officials in Brazil or any other country, courtesies of any type in order to influence decisions, facilitate business that would not have been performed or obtain any undue advantage (whether financial or not) for themselves, third parties or the Conglomerate.
- b) **Cash courtesies:** managers and employees shall not offer to third parties, in Brazil or any other country, cash courtesies, favors or anything equivalent of any amount (gift cards or pre-paid cards), regardless of the beneficiary of the offer.
- c) **Tax courtesies:** it will be allowed to offer, to private or public agents, from Brazil or any other country, physical courtesies (e.g. gifts, books, calendars and other items of small value, acquired under the terms of the General Purchasing Policy (or policy applicable to the unit), provided, cumulatively:
  - c1. It is possible to verify that this is a customary practice, intended for a wide audience or a certain category of persons, in which the beneficiary of the courtesy is;
  - c2. It is bound to institutional or relationship actions;
  - c3. The value of the courtesy, individually, is limited to R\$ 400,00 for private agents; R\$ 100,00 for public agents in Brazil; and US\$100.00 in the international units or, still, that does not have commercial value;
  - c4. The approval of the manager of the offering area with a minimum position of superintendent.
- d) **Exception:** if the courtesy object is not acquired through the Purchasing Department or the value individually exceeds the limits established above, the offer must be submitted to the evaluation of the Ethics Consultancy and approval of the director or senior hierarchical level of the offering area.
- e) **Purchasing and Assets Equity Board:** managers and employees of this board may not offer courtesy.



## 14.2 Courtesies - Receiving

- a) Prohibition: managers and employees are prohibited from receiving, directly or indirectly, from private agents or public officials, courtesies of any type in order to influence decisions, facilitate business or provide any undue advantage (whether financial or not) to the offering party.
- b) **Cash courtesy:** managers and employees cannot accept from third parties any kind of money (any value), favors or equivalent of any value (e.g., gift or prepaid cards, voucher), regardless of the offerer.
- c) **Physical courtesies:** it will be allowed to receive courtesy institutional or relationship materials (e.g. gifts, books, calendars and other items of small value), provided that the value of the courtesy, per person, does not exceed R\$400.00 in Brazil and US\$100.00 in international units.
  - c.1) Institutional courtesies should not be accepted in large quantities for several employees, even if the individual value does not exceed the amount stipulated in item c. Possible situations that occur should be submitted to the evaluation of the Ethics Consultancy;
  - c.2) The receipt of courtesy materials, which individual value exceeds the values of item c) must be refused;
  - c.3) in situations in which the return of such courtesy may generate an unpleasant situation, may be seen as insulting or when is not possible to return it, the manager or employee shall thank and notify the offering party about the decision to donate the courtesy to a philanthropic organization supported by the institution. In this case, the manager or employee shall send an e-mail to "INTEGRITY AND ETHICS COMMITTEE", consulting about guidance on the return, or even donation following a specific form.
  - c.4) the return of the courtesy must be accompanied by a letter. Donations shall be made signing a Term of Acceptance of Donation;
- d) **Purchasing and Assets Equity Board:** managers and employees of this board may not receive courtesies.
- e) **External awards:** the reception situations of courtesies linked to the participation of Itaú Unibanco in external awards not promoted by the conglomerate should be sent to the evaluation of the Ethics Consulting.

## 14.3 Lunches and Dinner

It will be allowed the participation in lunches and dinners, with private and/or public agents, with the purpose of maintaining institutional, commercial and prospecting relationships. In the event that the employee or administrator of the bank or the counterparty offers to pay:

- a) offering and receiving is compatible with the position and role of the party inviting/being invited in the Conglomerate.
- b) the value is reasonable.
- c) The employee must communicate to the immediate superior with a minimum superintendent position when involving public agents.
- d) Caution should be taken with expenses and with the choice of location (noting if it is appropriate for the public involved). The consumption of alcoholic beverages in meals is acceptable, provided that the reasons and the relationship of the participants, as defined in internal policy or other standards applicable to the unit.

These payments should not be made with unreasonable frequency and must follow the internal rules of payment (see Policy of Displacement, Food and Lodging Policy of Travel Accounts, Administrative Reimbursements and Card Corporate and, where applicable, also the relationship rules with public power described in the Policy for Relations with Public Officials and Contracting with Public Administrations and Companies.

## 14.4 Tickets/Invitations– Offering and Receiving

### 14.4.1 Offering

- a) **Tickets/Invitations related to events sponsored by the conglomerate:** it is allowed to offer, to persons from the private sector, Brazil or any other country, tickets/invitations linked to events sponsored by the conglomerate (e.g. invitations to congresses, lectures, forums, cultural or sporting events, etc.), provided that, cumulatively:
  - a.1) is possible to ensure that this is a usual practice, directed to a broad audience or specific category of persons, in which the beneficiary is included
  - a.2) is performed a reputational assessment of the guest following the criteria and rules defined in the Sponsorship Policy.

It will not be allowed to provide tickets/invitations to events sponsored by Itaú Unibanco Conglomerate to public officials, even if they are clients of the Itaú Unibanco Conglomerate, except for institutional events of the Itaú Unibanco Conglomerate, where tickets are not sold, for example, the opening of new units.

- b) **Courtesies related to events promoted by Conglomerate:** the offering to individual in the public or private sector, in Brazil or any other country, of courtesies related to events promoted by the Conglomerate (for instance, seminars, invitations to conferences, visits, technical meetings, forums, etc.), is allowed, provided that:
  - b.1) the invitation is directed to the highest authority of the public body or entity;
  - b.2) it is possible to ensure that is usual practice, directed to a broad audience or specific category of persons, in which the beneficiary is included.

Note: other information about events, see the Event Policy.

- c) **Non-institutional Events:** the offer of tickets/invitations for sporting or cultural events, without being linked to institutional, marketing or technical events, to customers, suppliers or business partners (including companions or not) must be evaluated by the Ethics Consultancy of e-mail "COMITE DE INTEGRIDADE E ETICA" [COMMITTEE OF INTEGRITY AND ETHICS]) and deliberation by the Integrity and Ethics Committee of the Executive Area or external unit. This assessment must be preceded by DSC's reputation review.
- d) **Hospitalities:** in the offer of ticket invitations will be allowed to offer hospitality (e.g. travel expenses, transportation, lodging, meals, among others), provided that in conditions similar to those practiced by the conglomerate for its own administrators and employees and provided there is director's approval or higher hierarchical level.
- e) Offerings shall not be made with unreasonable frequency or to the same guest, which may be construed as a impropriety or misconduct.
- f) The offer must not be provided with an unreasonable frequency for the same guest in a way that may generate some suspicion of undue advantage.
- g) The offer may be made in the event that the offeror is not aware of relevant negotiations in progress, in the interest of the conglomerate with the guest, whose decision depends on its influence.

#### 14.4.2 Receiving

- a) **Technical Events:** the employees or managers of the conglomerate may receive tickets/invitations from private agents or public agents to technical events (e.g. lectures, congresses, forums, company visits, business meetings) to publicize the brand, products, services and ventures, techniques, provided that:
  - a.1) The receipt is compatible with the position and function of the recipient of the courtesy and with the objectives and needs of Itaú Unibanco;
  - a.2) The receipt is not accepted with an unreasonable frequency, so that it may generate some suspicion of undue advantage;
  - a.3) The ticket/invitation received is not intended to influence decisions and does not create a suspicion of undue advantage.
  - a.4) there is approval by the immediate superior;
- b) **Institutional, marketing, cultural and sporting events:** the managers and employees, due to their status as administrator or employee of the conglomerate, may receive from private agents or public agents tickets/invitations linked to institutional, marketing, cultural and sporting events, celebrations or celebrations, provided that:
  - b.1) The ticket/invitation received is not intended to influence decisions;
  - b.2) Receipt does not occur with unreasonable frequency, for the same guest or in disproportionate amounts;
  - b.3) receiving the ticket/invitation is compatible with the position and role of receiver;
  - b.4) an e-mail is sent to "COMITE DE INTEGRIDADE E ETICA" for assessment by Ethics Consultancy .
  - b.5) there is approval by employee with minimum position of officer (*Director*). In the case of invitations to General Officers, Vice-Presidents or President, the approval shall be from the Executive Committee, with information sent by e-mail to "COMITE DE INTEGRIDADE E ETICA".
- c) **Non-institutional events:** tickets/invitations to sporting or cultural events, without being linked to institutional, marketing or technical events, clients, suppliers or business partners (including plus one or not) should not be accepted. Exception cases must be evaluated by the Ethics Consultancy with subsequent submission for deliberation by the Integrity and Ethics Committee of the Executive Area or external unit.
- d) **Hospitalities:** in any situation of receipt of tickets/invitations, expenses with travel, transportation, lodging, meal, etc. should be covered by the conglomerate.
  - d.1) If it is not possible to refuse the offering (for instance, the offering is made out as "package") or if the refusal would generate a unpleasant situation, acceptance shall be conditional to analysis and approval of a officer (*Director*) or higher level, in addition to assessment by and reporting to the Ethics Consultancy to the e-mail "COMITE DE INTEGRIDADE E ETICA".
  - d.2) Acceptance of hospitality by General Officers, Vice-Presidents or President is conditioned to approval by the Executive Committee, with information sent by e-mail to "COMITE DE INTEGRIDADE E ETICA".
- e) It will not be allowed to receive tickets/invitations linked to events sponsored by the conglomerate offered by third parties (e.g. suppliers, business partners and clients).

#### 14.5 Other Prohibitions

Is not admitted any alternative method of offering courtesies that results in circumventing the rules and restrictions above, such as, for instance, offering courtesies to a relative of a party that would not be allowed to receive it, and the recurrent offer or in disproportional amounts.

Is not admitted any alternative method of receiving courtesies that results in circumventing the rules and restrictions above, such as, for instance, offering courtesies to a relative of the manager or employee that would not otherwise be authorized to receive or in disproportion amounts. Potential situations must be reported to the immediate superior informing the Integrity and Ethics Committee.

## 15 EXCHANGE OF GIFTS BETWEEN EMPLOYEES

It is recommended the use of restraint and moderation both in offering and accepting gifts exchanged in the workplace (birthdays, weddings, etc.) in order to avoid exaggerations, suspicions, misunderstandings and defamation.

In addition, voluntary participation in prorating or collecting to fund internal celebrations, presents for colleagues, hidden friend or donations, must be guaranteed and respected, without allowing the amounts disbursed to be disclosed, to maintain a healthy climate of cordiality.

## 16 CONTRIBUTIONS (DONATIONS AND SPONSORSHIPS): OFFERING AND RECEIVING

- a) Contributions made by the Conglomerate, whether in financial resources or not, must respect the provisions in the Sponsorship Policy and in the Donation Policy or in sector policies of each unit and are additionally subject to the approvals defined in these policies.
- b) Contributions shall not be offered or received, or shall not be perceived as having been offered or received, with the purpose of being an exchange of favors, of facilitating business or transactions or any other benefit or undue advantage (financial or otherwise) to the institution or third parties.
- c) Offering and accepting contributions should be made in compliance with the laws and regulations of the countries where the Institution is present and with the internal rules of the companies of the institution.
- d) In order to avoid suspicion of favorable treatment in audits, inspections and negotiations, any type of contributions to inspecting or regulatory agencies are prohibited, as well as to employers and employees unions.
- e) Contributions made to the Conglomerate shall be made to its foundations and social and cultural institutes.

### 16.1 Contributions to Candidates to Public Office and to Political Parties

According to current legislation, it is prohibited in Brazil donations by companies to political parties or to any type of financial committee or to the candidates to public office. The same policy should be applied to International Units. In the event that local law local laws authorize such contributions, all potential donations should be mandatorily approved by the Board of Directors of the unit and ratified, in advance of the contribution, by the Board of Directors of Itaú Unibanco Holding.

### 16.2 Contributions to the Third Sector

- a) The institution's contributions to voluntary sector organizations must follow corporate guidelines.
- b) The Third Sector organizations, their leaders and other partners or beneficiaries of the contributions of the institution shall have good reputation.

### 16.3 Contributions to Management and Employees

Contributions to employees (book publication, exhibitions of works of art, film production and theater plays, participation in sporting events, etc.) shall be approved by the Integrity and Ethics Committees of the companies of the Conglomerate. Requests shall be forwarded by e-mail to "COMITE DE INTEGRIDADE E ETICA".

## 17 PERSONAL INVESTMENTS

Situations that may create a conflict of interest with respect relation to the Itaú Unibanco and/or its clients should be avoided when making personal investments and the provisions of the applicable Personal Investment Policies should be followed.

## 18 DOUBTS AND EXCEPTIONS

The doubts and exceptions evaluations related to the themes of this Policy or to possible non-contemplated matters should be sent to the Ethics Consultancy at the Superintendence of Regulators and Compliance Supervisor through the "COMITE DE INTEGRIDADE E ETICA" [Ethics and Integrity Committee] (Brazil) or to the local Compliance Officer available in the international units. In case of need, the Ethics Consulting or the local Compliance Officer may refer the case for deliberation in a collegiality of integrity and ethics.

## 19 RELATED DOCUMENTS

- Itaú Unibanco's Code of Ethics.
- Corporate Policy for Related Parties Transactions.
- Disclosure and Trading Policies
- Personal Investment Sectorial Policies.
- Policy for Employees Intending to occupy Elective Public Positions.
- Sponsorship Policy
- Donations Policy

Policy of Itaú Unibanco Conglomerate's Events

Press Relations

Communication of Errors and Frauds By Members of the Board of Directors, Statutory Committees and Office, Employees and Third-Parties

Anti-Corruption Corporate Policy

Corporate Policy of Prevention and Fight Against Illegal Acts

Information Security Corporate Policy

Roles and Responsibilities on Information Security and intellectual Property

Policy of Integrated Management of Operational Risks, Internal Controls and Compliance

Internal Audit

Disciplinary Standards

Purchase of Materials, Goods and Services

Committees of Itaú Unibanco Holding S.A.

Specific Policies of each International Unit.

## 20 GLOSSARY

**Private Agents:** individual who **does not** hold, even temporarily or without remuneration, any position, title or public duty in bodies, government authorities, whether national or international, or in legal entities controlled, directly or indirectly, by Brazilian or foreign government, as well as public international organizations.

**Public Officials:** individual who hold, even temporarily or without remuneration, any position, title or public duty in bodies, government authorities, whether national or international, or in legal entities controlled, directly or indirectly, by Brazilian or foreign government, as well as public international organizations.

**Integrity and Ethics Committee:** Board, Committee or Commission formally organized in Itaú Unibanco Holding S.A. , in subsidiaries in Brazil and abroad to manage and resolve on matters related to the Integrity and Ethics Program.

**Ethical Dilemma:** situation in which there is the need to make a choice resulting in a conflict between two moral choices.

**Itaú Unibanco Institution or Conglomerate:** for the specific purposes of this Policy, the term include Itaú Unibanco Holding S.A. and all companies directly or indirectly controlled in Brazil and abroad.

**Contributions:** any contribution whether economic, moral, social or political character, provided as a Donation, Sponsorship, social or cultural Investment or philanthropical action.

**Courtesy:** any giveaway or gift received from or offered to someone as token of appreciation following usual practices in business or friendship relationships.

**Donation:** transfer of assets in cash or otherwise, from the Conglomerate to a beneficiary; partial or full financing of costs of courses, training, artistical, sporting or social activities or promotional events with no exchange of consideration. Examples: use of the trademark, invitations.

**Inspection an Regulatory Agencies :** Internal Revenue Service of Brazil (Receita Federal do Brazil), Department of Treasury (state and municipal); Courts of Auditors (federal, state and municipal); Government Attorney's Office (federal, state and local); Federal Public Attorney's Office; Public Defender Service (federal, state and local); Public Prosecutor Office; Ministry of Finance; Ministry of Labor; Brazilian Intelligence Agency, Regulatory Bodies (Central Bank of Brazil, Securities and Exchanges Commission, etc.), etc. and similar bodies in the international units.

**Bodies and Companies which are part of the Direct and Indirect Administration:** includes direct and indirect government administration. The direct administration is composed of entities and agencies of the executive, legislative and judiciary branches, including Public Prosecutor Office, at all levels, whether federal, state or municipal. Includes the individual officers, Ministries and Departments. The indirect administration is composed of entities with its own legal status to carry out government activities having autonomy and acting on a decentralized manner being comprised by Independent Agencies (for instance, INSS), Foundations (for instance FUNAI, IBGE, etc.), Governmental Businesses (for instance, Caixa Econômica Federal, BNDES, National Post Authority Company, etc.) owned exclusively by the government, and Mixed Capital Companies, owned both by government (50% +1) and by private investors (e.g.: Petrobras, Banco do Brasil, etc.). Examples of direct administration:

- Executive Branch: agencies of the direct or indirect administration of the Federal Government, States, Federal District and Municipalities;
- Legislative Branch: Senate; Lower House; Legislative Assemblies and City Councils;
- Judiciary Branch: Federal Supreme Court (STF); Superior Court of Justice (STJ); Superior Labor Court (TST); Superior Electoral Court (TSE), Superior Military Court (STM), etc.;
- equivalent entities in the International Units.

**Relatives:** persons related through or by marriage, following the classification below:

- Ascendants (first degree) - Blood related: (Parents, Grandparents, Great-grandparents, etc.); By marriage: (Stepfathers, Stepmothers, fathers-in-law, mothers-in-law, etc.);
- Descendants (first degree) – Blood related (Children, grandchildren, great-grandchildren, etc.); By marriage (Stepchildren, daughters-in-law, sons-in-law, etc.);
- In-laws (up to the third degree) – Blood related (Brothers and sisters, nephews and nieces, etc.); By marriage (Brothers-in-law, Sisters-in-law), etc.).

**Interest:** interest in a company or external entity.

**Sponsorship:** transfer of assets in cash or otherwise, from the Conglomerate to a beneficiary; partial or full financing of costs of courses, training, artistic, sporting or social activities or of promotional events where is proved that the brand is used.

**Close Relationships:** people in stable relationships or living together, dating and other types of close relationships.  
Example: godfather, stepmother, etc.

**Retaliation:** persecuting, retaliating or taking revenge over managers or employees who reported their doubts, suspicions or findings. Examples: threats, demotion, application of suspension, dismissal, etc.

**Third Sector:** NGOs – Non-Governmental Organizations, OSCIPs – Civil Society Organizations of Public Interest and other nonprofit associations.

**Total Cash:** total annual compensation of the employee or manager.

**Undue Advantage:** property, financial or any other kind of advantage representing a gain to the receiver.

Approved by the board of directors on August 31th of 2017