

# ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Publicly-Held Company

NIRE 35300010230

## CORPORATE POLICY ON INTEGRITY, ETHICS AND CONDUCT (GLOBAL)

### 1. OBJECTIVE

Establish complementary guidelines to the Itaú Unibanco Code of Ethics and Conduct, related to the Itaú Unibanco Integrity and Ethics Program, as well as establish rules of conduct in relationships with *stakeholders* and in situations related to conflicts of interest. In addition, the document mentions the prevention of illicit acts, rules for the distribution and negotiation of securities and socio-environmental responsibility.

### 2. TARGET AUDIENCE

It applies, in Brazil and abroad, to all Itaú Unibanco Holding SA managers and employees, also including any interaction that the Conglomerate maintains with clients, partners, suppliers and other stakeholders.

### 3. INTRODUCTION

Society demands from large companies transparency and commitment to the objectives and commitments made. Small slips can almost instantly ruin a good reputation and a brand built over decades.

Aware of this and of Itaú Unibanco's corporate responsibility towards society, we conduct our business, processes and relationships in the direction of establishing lasting bonds and generating shared value with our *stakeholders*. We are committed to high business conduct standards, valuing sustainable relationships and complying with laws, standards and regulations in every location we operate or establish business relationships.

Through the confidence acquired and the quality of our products and services, we guarantee the continuity of business and client satisfaction, understanding client's perception and meeting the requirements expected by them when providing a service.

These traits of our identity are reflected, above all, in the organizational culture, in the guidelines and practices of the Code of Ethics and Conduct and corporate governance. These values, principles and guidelines are key assumptions of our Integrity and Ethics Program.

### 4. GUIDELINES

#### 4.1 Integrity and Ethics Program

Itaú Unibanco's Integrity and Ethics Program comprises a set of integrity and ethics processes, policies and procedures, in addition to the Code of Ethics and Conduct. In addition, awareness and training actions are carried out.

Senior management supports the Program through resources and the promotion of an ethical and law-abiding culture.

Our Integrity and Ethics Program, based on good national and international market practices, is monitored by specific risk assessments and indicators.

Details of the pillars and actions of the Integrity and Ethics Program are described in a internal specific procedure.

#### 4.2 Channels for Ethical deviations, Doubts and Unlawful Acts

All employees, administrators, customers, partners, suppliers and any other person may inquire or report, without the need for identification, questions, suspicions or violations of the Itaú Unibanco Code of Ethics and Conduct. They may also report evidence of illicit acts of any nature, related to the activities of the Conglomerate, with confidential treatment and protection of the whistleblower's identity being ensured in all claims.

The communication channels must timely, independently, impartially and confidentially investigate the communications received and keep a record of the identified situations, investigations and decisions adopted.

#### 4.2.1 Reporting Channels

Channel	Topics	Contacts
Ethics Consulting	<p>Questions:</p> <ul style="list-style-type: none"> <li>• Itaú Unibanco Code of Ethics and Conduct</li> <li>• Corporate Integrity, Ethics and Conduct Policy</li> <li>• <u>Corporate Corruption Prevention Policy.</u></li> <li>• Conflicts of Interest</li> <li>• Ethical dilemmas.</li> </ul>	<p>External</p> <p>E-mail: <a href="mailto:comitedeintegridadeetica@itau-unibanco.com.br">comitedeintegridadeetica@itau-unibanco.com.br</a></p>
Ombudsman	<p><b>Events – suspicions, reports and complaints, etc. about:</b></p> <ul style="list-style-type: none"> <li>• Interpersonal conflicts and conflicts of interest in the work environment</li> </ul>	<ul style="list-style-type: none"> <li>• External e-mails: <a href="mailto:ombudsman@ombudsman.itau-unibanco.com.br">ombudsman@ombudsman.itau-unibanco.com.br</a> or</li> <li>• Personal contact</li> </ul>
Reporting Channel	<p><b>Questions, red flags and reports about:</b></p> <ul style="list-style-type: none"> <li>• Fraud in electronic channels.</li> <li>• Documentary fraud in its various forms.</li> <li>• Corruption and bribery acts.</li> <li>• Theft and robbery of units and extensions, customers, administrators and employees</li> <li>• Burglary in general.</li> <li>• Extortion through kidnapping.</li> <li>• Physical, personal, property and information security incidents.</li> <li>• Misbehavior of administrators and employees</li> </ul>	<p><b>External:</b></p> <ul style="list-style-type: none"> <li>- Corporate website: <a href="https://www.itau.com.br/atendimento-itau/para-voce/denuncia/">https://www.itau.com.br/atendimento-itau/para-voce/denuncia/</a></li> <li>- Phone: 0800-723-0010 - working days - from 8:30 am to 7:00 pm;</li> <li>- E-mail: <a href="mailto:inspetoria@itau-unibanco.com.br">inspetoria@itau-unibanco.com.br</a> e <a href="mailto:fornecedores_relatos@itau-unibanco.com.br">fornecedores_relatos@itau-unibanco.com.br</a></li> </ul>

<p><b>Channel for Questions, Suspicions and Reports on the Prevention of Money Laundering and Combating the Financing of Terrorism</b></p>	<p><b>Questions, red flags and reports about:</b></p> <ul style="list-style-type: none"> <li>• Risk of money laundering or terrorist financing;</li> <li>• Financial incompatibility;</li> <li>• Atypical proposals from clients and non-clients;</li> <li>• Transactions that disguise ownership of the money;</li> <li>• Expressive movement in cash without justification or in fractions;</li> <li>• Suspicion of hidden partners (or dummies);</li> <li>• Lack, omission or inaccuracy of information provided;</li> <li>• Mishandled cash movements (e.g. moldy, marked, damaged);</li> <li>• Suspicious foreign exchange transactions.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Phone:</b> +55 (11) 2757-6753</li> </ul>
<p>Audit Committee</p>	<p>Red flags and claims:</p> <ul style="list-style-type: none"> <li>• Legal or regulatory non-compliance.</li> <li>• Fraud and errors in auditing, accounting and internal controls.</li> </ul>	<p><b>email:</b> AUDIT COMMITTEE box.  <b>External email:</b> comite.auditoria@itau-unibanco.com.br.</p> <p><b>Mailing address:</b> Att. Audit Committee 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 the International Units, the whistleblower may communicate to one or more of: (i) local channels made available in the local Codes of Ethics and Conduct or in Annex 1 - REPORTING CHANNELS INTERNATIONAL UNITS, which contains the channels of manifestation used by each international unit; (ii) matrix channels: Inspection, Audit Committee and Ombudsman for cases according to specific governance.

#### 4.2.2 Whistleblower Protection

- Administrators and Employees

They cannot carry out acts of retaliation against anyone who, in good faith, reports or expresses a complaint, suspicion, doubt or concern regarding possible violations of the guidelines of this Policy;

They must adopt good faith in reports or claims, not communicating facts that are known to be false;

They must provide information or assistance in investigations regarding such possible violations and must preserve the confidentiality of information related to investigations of possible violations of the guidelines of this Policy.

- The reporting channels must accept anonymous manifestations and preserve the anonymity of the whistleblowers.
- Good faith reports are protected. Administrators or employees who attempt or practice retaliation against those who report possible violations of the guidelines of this Policy will be eligible for disciplinary sanctions.

#### **4.3. Relationship with Stakeholders**

The following items express our way of doing business and relating to our *stakeholders*, including customers, suppliers, service providers, partners, shareholders, investors, public sector, press, social media, third sector and even with employees and administrators.

##### **4.3.1 Relationship with customers**

At Itaú Unibanco we are focused on client and user satisfaction at all stages of their relationship with the institution. To that end, we are committed to maintaining high standards of business conduct, monitoring the quality of sales and adhering to laws, standards and regulations, in all jurisdictions in which we operate and establish business relationships. Thus, customers and users make the decision, freely and consciously, for the products and services that are most suited to their interests, needs and objectives. In the case of providing services and relationships with *cross-border* (international) customers by any employee of the Conglomerate, the specific rules applicable to conducting the business must be observed.

##### **4.3.2 Relationship with suppliers, service providers and partners**

We strive to have with our suppliers, service providers and partners the same transparency, lawfulness, quality and trustworthiness we have achieved with our clients.

To this end, the Relationship Code with Suppliers\* guides interactions between our employees and suppliers.

All are subject to a risk analysis process to ensure proper relationship.

(\* although the Relationship Code with Suppliers shall not apply to international units, they should have practical suppliers, service providers and business partners assessments in line with the guidelines applied in the matrix.

##### **4.3.3 Relationship with shareholders and investors**

In order to preserve the specific interests of shareholders and investors, we are committed to disclosing relevant information in a correct and timely manner to our shareholders and investors, regardless of the interest they hold.

The behavior expected from the investor relations professional is defined in the Code of Conduct for Investor Relations available on the Investor Relations website:

<https://www.itaubr.com.br/relacoes-com-investidores/Download.aspx?Arquivo=4ikpB/KzBaOhLHcIJ4T4Wg==&IdCanal=jjCFHS5ladmGCLdvw2zldg==>

##### **4.3.4 Relationship with the public sector**

The relationships and contacts maintained with public officials in Brazil and abroad, regardless of position or hierarchy, require broad transparency and strict accountability from us, with the aim of guaranteeing legality and cooperation in these interactions.

At Itaú Unibanco, we have rules for relationships and contracting with public officials and companies that are part of the direct and indirect public administration. These standards include Government Relations activities, tender procedures, the signing of administrative contracts and compliance with regulators.

The expected conduct for the relationship with members of the Public Sector is defined in the Government and Institutional Relations Policy.

##### **4.3.5 Relationship with the press, media and third sector**

Relationship with the press and the third sector, such as in the processes of donations and sponsorships, are important aspects in our relationship with society. For this reason, they are based on the guidelines of the Code of Ethics and Conduct and specific internal procedures.

##### **4.3.6 Relationship with employees and managers**

All interaction between employees and managers must always be guided by respect for Human Rights and the promotion of social diversity, combating any form of discrimination, harassment, prejudice and unworthy working conditions.

These precepts are defined in the Itaú Unibanco Code of Ethics and Conduct, in the Human Rights Commitment and specific internal procedures, such as: Ombudsman procedure, Guide for Combating Moral Harassment and Diversity and Inclusion Policy.

#### **5. PREVENTION OF UNLAWFUL ACTS**

It is unacceptable to practice or tolerate business and operations that may contribute to the performance of unlawful or criminal acts. To comply with this prohibition, Itaú Unibanco has specific procedures for preventing, detecting and combating and Corruption. Such procedures are part of a governance structure guided by national and international best practices, aiming at transparency, compliance with standards and regulations and cooperation with police and judicial authorities.

## **6. DISCLOSURE AND TRADING OF SECURITIES AND PERSONAL INVESTMENTS**

Employees and managers personal investments must be oriented towards the long term, maintaining the members solvency and credibility, in order to avoid any reputational risk for Itaú Unibanco.

We have internal policies and specific procedures on conduct in securities negotiation and on segregation of activities between departments in order to guarantee the confidentiality of non-public information on securities and to ensure fairness and smooth functioning of the markets.

The information held by managers and employees as a result of their professional activities at Itaú Unibanco Conglomerate must be kept confidential and cannot be used as a basis for making decisions about their personal investments, avoiding Insider Trading and other unfair practices.

Transactions with Securities of Publicly-Held Companies Related to Itaú Unibanco Holding SA or referenced therein must comply with the standards set forth in Trading Policy for Securities Issued by Itaú Unibanco Holding SA.

The acknowledgment agreement signed by the employee will identify the respective set of rules that must be followed to guide their personal investments. The International Units must observe local rules regarding personal investments and the employees of these units must seek to be aware of the rules with the local Compliance department.

Doubts about personal investments: - Securities of the conglomerate; - Assets of other companies.

## **7. SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY**

Our objective goes beyond financial results, seeking to generate shared value, which is why we conduct our actions. We want to be partners in developing people, society and the countries where we operate. In this context, we recognize our responsibility to play a transforming role, our commitment to sustainable development is at the core of our activity and is reflected in our sustainability strategy, which guides the integration of social, environmental and climate aspects into our businesses, and the way we generate value for society through our Positive Impact Commitments (sustainability strategy with public goals on the institution's website), which permeate the entire organization and guide our decision-making in our businesses, activities and processes.

We promote financial education, the integration of social-environmental issues into business and activities, and we value transparency in our practices, building sustainable relationships.

For more information on this subject, access the Social, Environmental and Climate Responsibility Policy.

## **8. CONFLICT OF INTEREST**

Whenever the personal interests of a manager or employee are not in line with those of the Institution or its stakeholders, a conflict appears. These situations can jeopardize our reputation.

Any type of conflict, in addition to being promptly communicated to management and the competent channels, must be managed in an effective and transparent manner. People involved in possible conflicts of interest should refrain from decisions that involve them, leaving the forum when such decisions are dealt with.

## **9. DISCIPLINARY SANCTIONS**

Managers and employees who violate the terms of this Policy are subject to the disciplinary sanctions provided for in an internal policy.

At International Units, disciplinary sanctions will be applied in accordance with applicable policies and legislation.

## **10. SPECIFIC GUIDELINES**

More restrictive guidelines than those in this Policy may be established in internal rules of the companies or departments of the Conglomerate. In case of conflict between the guidelines of this Policy and the local laws of the representations abroad, the most stringent standard will prevail, as long as it does not violate local law.

For departments where it is necessary to have a Conduct manual with specific guidelines for the business, it must be consulted in the department itself (e.g. department's intranet or internal documents). However, it is important to point out that specific internal documents do not eliminate the application of the guidelines established in the documents above and in the procedures subordinated to this policy.