



# INVESTOR RELATIONS: CODE OF CONDUCT

**Itaú Unibanco Holding S.A.**

# Investor Relations: Code of Conduct

---

## Purpose

The purpose of this document is to describe the proper conduct of the Investor Relations (“IR”) professional at Itaú Unibanco Holding S.A. (“Itaú Unibanco” or “Company”).

Please note that this Code of Conduct is supplemental to the IR Policy, the Policy for the Disclosure of Material Act or Fact, the Policy for Trading Own Securities and the Code of Ethics of Itaú Unibanco, and these policies must be read by all employees of the IR Department.

The reading of this Code of Conduct in full and **adherence thereto by all professionals in the IR Department** is mandatory.

## Proper conduct of the IR professional

Pursuant to legislation, the Investor Relations Officer (“IRO”) is the Company’s official spokesperson to the market. He or she is responsible for ensuring the proper, timely and equitable disclosure of information and he or she may be penalized for any violations, whether in Brazil or abroad.

All disclosure and market relationship activities developed by the IR staff are therefore the responsibility of the IRO and consequently are reflected in the Company’s reputation.

It is incumbent on all professionals in the IR Department to behave in a manner that is consistent with the Company’s interests in the capital markets.

The main guidelines for the proper conduct of an IR professional are presented below.

### 1. Alignment with management’s discourse

The Company always adopts an official position in relation to the requirements of market agents and to accountability and voluntarily disclosed information, thus ensuring the transparency provided for in our Corporate Governance Policy.

In this context, the IR professional must:

- Adopt the same discourse as management, reporting frequently to their superior for guidance and updates.
- Refuse to respond to questions on matters on which they have no knowledge of the Company’s official position, immediately seeking guidance should such questions arise again.
- Not disclose information to the market, except when duly authorized to do so.

### 2. Responsibility in the relationship with the market

In the relationship with capital market agents, the IR professional is the representative of the Company and the management and should adopt an appropriate posture in any situation where there is contact with analysts, investors, rating agencies and other stakeholders.

The IR professional must:

- Ensure the accuracy, transparency, equitability and timeliness in the disclosure of information.
- Maintain a healthy relationship with the representatives of the various market agents, always prioritizing the Company's interests.
- Maintain the utmost care with information involving forecasts of results, requesting from their superior a clear and explicit position on this type of communication.
- Avoid comments on the Company or companies in the same industry on social media sites, including in their own/personal profiles.
- Not comment on market news or rumors about the Company.
- Not give interviews to the media on the Company or on matters relating to the capital markets, except when duly authorized by the IRO.
- Follow instructions from Itaú Unibanco's Corporate Communication Department when giving interviews on behalf of the Company when authorized by the IRO.
- Know how to identify and refuse to answer trick questions designed to obtain privileged information or place the professional in embarrassing situations.

### **3. Responsibility in handling non-public information**

In their day-to-day activities, the IR professional is exposed to confidential information on the Company that, irrespective of the manner in which it is received (by email, telephone, internet, etc.), belongs solely to the Company.

The IR professional must:

- Restrict the access to confidential information to the smallest number of people possible.
- Assume that all information that is not disclosed by the Company is confidential.
- Not share the Company's confidential information.
- Not address confidential information in public places (elevators, restaurants, cafés, and airplanes, among others).
- Ensure that the access by third parties with confidentiality agreements is restricted only to the basic information necessary for the performance of their activities.
- Should any non-public information be revealed, immediately notify the IRO for its disclosure to the market in general.
- Dispose of materials with confidential content that will no longer be used in a secure manner.
- Keep the materials that are indispensable for their work in a restricted and secure manner.

### **4. Responsibility in the trading of assets issued by companies of the Itaú and Itaúsa conglomerates**

The IR professionals must comply with the provisions in the Policy for the Trading of Own Securities for trading assets issued by any company of the Itaú Unibanco and Itaúsa conglomerates, and the **trading of assets is NOT permitted in the following situations:**

- When the IRO so determines.
- From the time when they become aware of a material fact until its disclosure.
- In the period of 15 days prior to and on the day following the disclosure of the Company's quarterly and annual information.
- If preliminary or anticipated financial information is disclosed by the company, the trading ban will also come into effect the day after the announcement.
- As from the Company's decision to increase capital, distribute dividends, pay a bonus in shares or their derivatives or approve stock splits, until the publication of the respective notices or announcements.
- In a period of less than 180 days following the most recent sale or acquisition of these assets.

The following types of trading are forbidden:

- The lending of shares or any other security issued by the Company, or indexed to it.
- Operations of any nature with put or call options on shares issued by the Company and its controlled companies.

To trade any asset issued by the companies of the above mentioned conglomerates, the IR professional must exclusively use Itaú Corretora.

Please note that this text does not substitute the Policy for the Trading of Own Securities, and compliance with its rules is mandatory. Should there be any questions, the IR professional may contact their supervisor or the Company's Compliance Department.

The Policy is available on the Investor Relations website in the following path: Itaú Unibanco > Corporate Governance > Regulations and Policies > Policies.

### **Final Considerations**

When aspects arise that are not covered by this document, the IR professional should not hesitate to consult with their superior or specialist departments such as those of Compliance and Legal. It is incumbent upon the individual to care for their own professional reputation to the extent where it should prevail over the guidance from their manager should the professional deem such guidance to be contrary to the Company's ethical standards.