



Grandes **marcas**, grande **história**, grande **futuro**.

CNPJ 61.532.644/0001-15

A Publicly-Held Company

ITAÚSA'S INTEGRITY PROGRAM

MESSAGE FROM THE MANAGEMENT

Itaúsa has always been committed to ethics and integrity that support its organizational culture, which are translated not only in words, but also in attitudes corroborating the assumption of "leading by example".

We have always been proactively engaged in preventing any unethical behavior, corruption and fraud, as well as developing activities aimed at promoting integrity, both in connection with Itaúsa and its investees, as we understand that everyone is responsible for the effectiveness of mechanisms to prevent such misbehavior.

Investors' increasing concerns about building up a more righteous and fairer society require that companies perform to make a difference ethically wise and play the social role we have. Accordingly, Itaúsa has become a signatory to the Corporate Pact for Integrity and Against Corruption, in addition to the United Nations Global Compact, supporting the purpose of promoting a fairer and more transparent corporate environment.

Aimed at favoring business sustainability and since we feel responsible for multiplying our values with our stockholders and employees, this Integrity Program presents the principles and tools that address our concerns about and responsibility for ethics and transparency.

Itaúsa's Integrity Program Guidelines

Through this Integrity Program, Itaúsa ("Company") seeks to strengthen its commitment to maintaining and developing high standards of integrity, ethics and transparency, working to prevent and mitigate Integrity risks associated with the breach of these principles guiding the Company's activities.

These Integrity Program guidelines must support the conduct of the Company's management members, members of the Advisory Board and Supervisory Council, members of committees and commissions, employees, suppliers, service providers and other stakeholders of the Company, and guide Itaúsa's business.

Itaúsa's Integrity Program was prepared in accordance with Brazilian legislation, particularly anti-corruption measures provided for in Law No. 12,846/2013 and Decree No. 11,129/2022.

1. Senior Management's Commitment and Support

Itaúsa's Senior Management affirms their commitment to ensuring the effectiveness and ongoing improvement of Itaúsa's Integrity Program, by adopting and fostering any actions required for their compliance, such as the maintenance of an ethical attitude that sets the example for all employees and third parties to follow, and the provision of resources to create indispensable frameworks to their management, including material, financial and human resources required, in addition to actively participating, reviewing and approving internal policies related to the Integrity Program.

To ensure their ongoing commitment, Itaúsa's Senior Management members actively attend integrity and ethics training and qualification and encourage the attendance of all employees.

As a holding company, Itaúsa's strategy and business model focus on operating in its investees through the presence of representatives at their committees and commissions, thus contributing to improve Corporate Governance. In addition, Itaúsa influences the risk management at the Board of Directors level, by disseminating its principles and focusing on creating value to stockholders, business ethics and human capital appreciation.

For the purpose of this Integrity Program, Itaúsa's Senior Management comprises the Board of Directors and the Board of Officers.

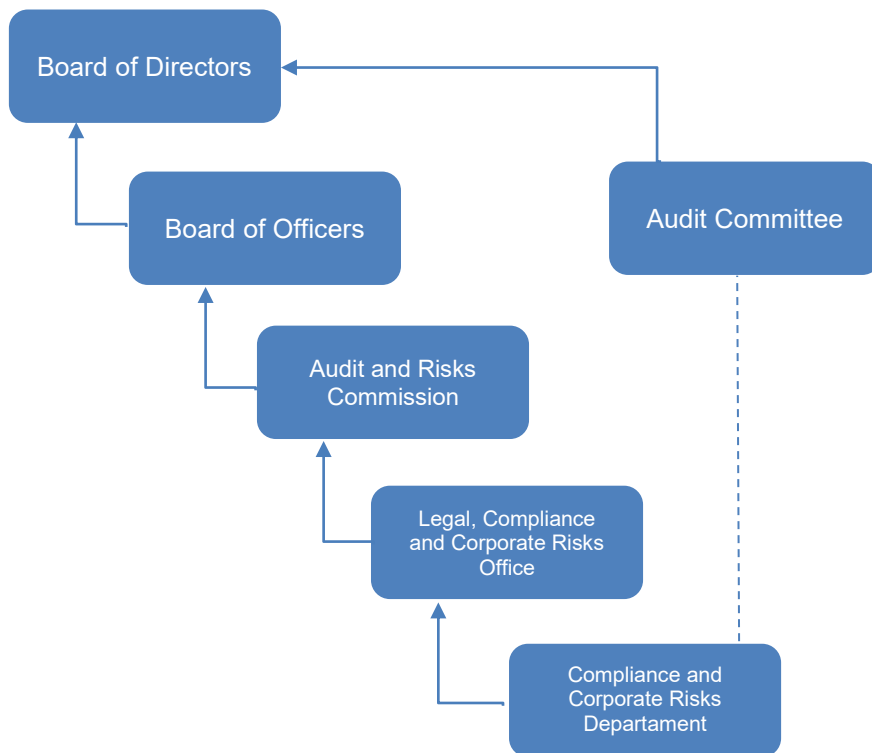
1.1. Hierarchical level and department responsible for managing the Integrity Program

The management of the Integrity Program is carried out by the Compliance and Corporate Risks Department, which reports to the Audit and Risks Commission and the Audit Committee, advisory bodies of the Board of Officers and Board of Directors, respectively.

The Compliance and Corporate Risks Department, reporting to the Legal, Compliance and Corporate Risks Office, is responsible for managing, coordinating, monitoring and updating this Integrity Program, in addition to managing corporate and compliance risks and internal controls. In the case of conflicts of interest involving the Company's Board of Officers, the Compliance and Corporate Risks Department will report the case directly to the Audit Committee, composed of independent members, who will recommend any necessary measures to the Board of Directors.

At least twice a year, the Compliance and Corporate Risks Department reports integrity indicators and topics to the Audit and Risks Commission, the Audit Committee and the Board of Directors.

Organization chart:



** In conflicts of interest involving the Company's Board of Officers, the Compliance and Corporate Risks Department will report the case directly to the Audit Committee, composed of independent members, who will recommend any necessary measures to the Board of Directors.*

2. Integrity compliance tools

Itaúsa's Integrity Program ensures the compliance with both legislation and internal policies, which set out standards of performance and ethical conduct expected from Senior Management and all employees, and, when applicable, other stakeholders.

In this regard, Itaúsa's Integrity Program framework is composed of a set of policies, tools and actions aimed at minimizing unethical and illegal behaviors, including:

2.1. Itaúsa's Code of Conduct

Itaúsa's Code of Conduct applies to all Company's management members, members of the Advisory Board and Supervisory Council, members of committees and commissions, employees, suppliers and other stakeholders, aiming at informing the values and conduct expected from everyone while carrying out their professional activities and relationships at Itaúsa.

This document sets out ethical values and principles that must be followed, including the commitment to fighting and not tolerating any form of wrongful or criminal act, such as corruption, influence peddling, favoritism, fraud and money laundering. In addition to ethical values and principles, Itaúsa's Code of Conduct addresses several guidelines and expected or forbidden behaviors, guiding Itaúsa's management members and employees in no uncertain

terms through the definition of strategies, policies and practices of the Company and its investees. Among these guidelines, the highlights are:

- adopting Corporate Governance practices that mitigate conflicts of interest;
- engaging in conduct and ethical attitudes in the workplace based on respect and dignity, zero tolerance for discrimination or conduct of any type of harassment or conduct that breaches both law or internal policies;
- complying with laws and internal policies;
- carrying out negotiation and procurement processes with third parties in a fair, ethical and impartial way;
- interacting with Private Entities and Public Officials based on the best market practices, in compliance with applicable legislation and regulations and the principles of Itaúsa's Code of Conduct;
- ensuring the safety and secrecy of confidential and privileged information;
- adopting policies and practices aimed at preventing, fighting and eradicating all forms of undignified labor: child, forced or compulsory labor;
- Itaúsa's Whistleblowing Channel; and
- corrective measures in the case of possible breaches of Itaúsa's Code of Conduct.

Management members, members of the Advisory Board and Supervisory Council, and members of committees and commissions adhere to Itaúsa's Code of Conduct upon their investiture and employees do so upon joining the Company. Annually, every employee renews their commitment by signing a new declaration of compliance with Itaúsa's Code of Conduct. In addition to adhering to Itaúsa's Code of Conduct, all management members, members of the Advisory Board and Supervisory Council, members of committees and commissions, and employees must periodically bring to light any potential or actual conflicts of interest.

Noncompliance with the guidelines of Itaúsa's Code of Conduct is subject to disciplinary sanctions, which will be assessed and determined on a case-by-case basis by the Personnel and Ethics Commission, except in cases involving the members of the commission itself, the Board of Officers, the Board of Directors, the Advisory Board, the Supervisory Council, and the committees and commissions of the Company, which will be analyzed by the Company's Board of Directors.

For Itaúsa's suppliers and/or stakeholders, any illegal conduct or conduct that breaches Itaúsa's Code of Conduct will characterize a breach of contract, subject to contract termination.

2.2. Anti-Corruption Policy

The Company's Anti-Corruption Policy ("Anti-Corruption Policy"), in line with Law No. 12,846/2013, as regulated by Decree No. 11,129/2022, aims at ensuring good practices in

Itaúsa's relationship with third parties, either Private Entities or Public Officials. Accordingly, the Company seeks to strengthen its commitment to engaging in relationships with high integrity, ethics and transparency standards and preventing and fighting all forms of corruption.

This policy sets out general rules that must be followed by Itaúsa's management members, members of the Advisory Board and Supervisory Council, members of committees and commissions, employees and service providers engaging in any type of relationship with Public Officials and Private Entities, including their advisors, whether directly or by means of third parties to be hired by Itaúsa or that represent it.

In this regard, the policy sets out the following rules, among others:

- after becoming aware of any such conduct, Itaúsa must not allow any Public Official or Private Entity to receive, offer or request bribes, kickbacks, or grease or other illegal payments from either Itaúsa or third parties;
- interfering with or hindering the supervision or investigation by any public, supervisory or regulatory bodies is barred; and
- accepting, offering, promising, delivering, whether directly or through third parties, any undue economic benefits or advantages of any kind to Public Officials and Private Entities to expedite and/or obtain business is barred.

The Anti-Corruption Policy content must be known and followed by all, and any noncompliance is subject to disciplinary measures, including dismissal, without prejudice to any applicable administrative, civil, criminal sanctions or other proper measures.

All management members, members of the Supervisory Council and Advisory Board, members of committees and commissions, and employees declare their knowledge of and agreement with the Anti-Corruption Policy upon joining the Company and renew this commitment annually. Renewing the commitment is also required whenever the provisions herein are amended.

2.3. Donation and Sponsorship Policy

Donations and Sponsorships must be provided by Itaúsa on a legal, transparent and fair basis and comply with the principles, rules and authority levels provided for in the Donation and Sponsorship Policy, Itaúsa's Code of Conduct and internal policies on donations and sponsorships.

The Compliance and Corporate Risks Department will report to the Audit Committee on a half-yearly basis the indicators related to the Donations and Sponsorships Policy, including, but not limited to, any cases of noncompliance.

2.4. Assessing and Monitoring Business Partners

Getting to know its business partners was a practice incorporated to protect Itaúsa concerning its reputational risk, particularly in connection with strategic partnerships and supplier engagement.

To ensure integrity, transparency, fairness and reliability in its relationships with third parties, Itaúsa's supplier and service provider engagement process adopts controls and procedures for assessing, registering, approving and monitoring business partners.

Itaúsa has also an internal policy to formalize the practice of getting to know its business partners (Know Your Supplier) and regulate how due diligence is carried out (background check) to ensure that the Company obtain proper knowledge about the reputation and financial position of suppliers and service providers that may adversely impact the Company.

Itaúsa's engaging any supplier or service provider is based on impersonal criteria, without favoritism or preference and with due segregation of duties.

Regardless of the engagement amount, approved suppliers and service providers must be submitted to a reputation analysis if they are from sectors with higher risk of being involved in corruption and money laundering practices.

The Compliance and Risks Department periodically monitors its base of active suppliers to update the reputational risk.

2.5. Integrity and anti-corruption clauses in contracts and commitments of third parties to Itaúsa's Code of Conduct

Contracts with suppliers and service providers are reviewed and validated by Itaúsa's Legal, Compliance and Corporate Risks Office. Whenever possible, clauses are included requiring compliance with anti-corruption rules and rules barring wrongful acts against the public administration, as provided for by Law No. 12,846/13, as well as clauses that keep the Company safe from possible violations, including the possibility of unilateral termination of the contract.

2.6. Due Diligence of New Business

When investing in a new business, Itaúsa seeks to create long-term value to stockholders and society, in line with its strategic goals.

Accordingly, it sets quantitative and qualitative parameters factored in when assessing opportunities, such as potential partners' experience and reputation in their respective industries.

After the Company signals interest to assess a certain investment opportunity, it will carry out an internal preliminary analysis of the reputational risk of the target company and its respective group. If the Company chooses to perform a more in-depth analysis of the possible new investment, a Due Diligence process is carried out mainly addressing Compliance issues for any track record of corruption, possible reputational risk exposure and the existence of mitigating

measures (Compliance programs). A Due Diligence process also assesses financial, accounting, technical/operational and legal aspects.

2.7. Mechanisms and Controls for Accounting Records

The Company must keep books, records and accounts that accurately reflect their transactions and assets, as well as keep an efficient internal accounting controls system, barring practices such as the use of fake financial documents, incorrect accounting entries, accounting frauds and tricks that allow the concealment of illegal payments. Additionally, it engages an independent company to carry out annual audits of its accounting records.

2.8. Testing of Compliance with Integrity Law and Policies

The annual assessment plan carried out by the Compliance and Corporate Risks Department includes compliance testing aimed at setting Itaúsa's level of compliance with obligations provided for in current legislation and policies on integrity.

Based on the above mentioned assessment, action plans are developed to address any identified nonconformities, mitigate risks related to fraud, corruption and money laundering, and to enhance the Integrity Program.

3. Notices and Training

To disseminate an ethical culture, an annual plan for training and reporting on material topics within the scope of the Integrity Program is prepared by the Compliance and Corporate Risks and Human Resources departments, to be submitted to and acknowledged by the Audit and Risks Commission, Audit Committee and the Board of Directors.

As an example of dissemination of good practices and an ethical culture, Itaúsa periodically promotes training to qualify management members, members of the Supervisory Council and employees, aimed at:

- spreading awareness raising, content and practical aspects of the guidelines of Itaúsa's Integrity Program, Whistleblowing Channel and other related policies;
- getting a deeper knowledge about integrity and ethical conduct guidelines, as well as about the practical application of these concepts and values to business and process and people management; and
- making people understand their possible contributions to improve Itaúsa's Integrity Program.

The Company annually holds an event featuring talks on ethics and integrity addressing, disclosing and discussing current ethics and integrity-related topics. These actions seek to strengthen Itaúsa's ethical culture and its main features, such as reputation, trust, ethics and anti-corruption practices. Among other topics, it addresses Law No. 12,846/13 (Brazilian anti-corruption law), bringing together guests from investees and expert lecturers, in addition to

members of the Advisory Board and Supervisory Council, members of committees and commissions, and employees of Itaúsa.

Training on ethics and integrity is part of the onboarding process, through which new employees adhere to the commitments, values, principles and behaviors expected from them by Itaúsa.

4. Itaúsa's Whistleblowing Channel

Aimed at improving the governance and integrity process, Itaúsa provides a Whistleblowing Channel to all Company's management members, members of the Advisory Board and Supervisory Council, members of committees and commissions, employees, suppliers and stakeholders. Through this channel, people may report, whether anonymously or not, suspected or actual violations to Itaúsa's Code of Conduct and wrongful acts of any nature, in connection with the activities of the Company and/or its subsidiaries or investees, and the whistleblower is assured confidentiality and protection.

People may also request guidance on how to act in certain situations, have their questions answered, submit criticisms, complaints, and report misconduct and conflicts of interest.

Investigations will be timely conducted in a professional, unbiased and confidential way, ensuring no retaliation or reprisal.

A Company's internal policy sets out rules for receiving, handling, verifying and investigating reports of irregularities, any breaches of Itaúsa's Code of Conduct and other internal policies, as well as violation of the legislation applicable to Itaúsa, received through the channels made available by the Company.

Itaúsa's Whistleblowing Channel is an independent and unbiased tool operated by an outsourced service provider, ensuring confidentiality of the information and reports received, and of the investigation of reports of irregularities.

Employees, management members, members of the Advisory Board and Supervisory Council, members of committees and commissions, and third parties may contact Itaúsa's Whistleblowing Channel by phone, email or Internet, including on an anonymous and confidential way. The following access channels to Itaúsa's Whistleblowing Channel are available, including to have your questions answered:

Phone number: (+ 55 11) 0800 721 9574

Email: denunciasitausea@deloitte.com

Internet: <http://www.ethicsdeloitte.com.br/itausea/>

After a report is registered at Itaúsa's Whistleblowing Channel, a file number and a password are generated. With this data, the person submitting the report may follow it up at the channel itself on the Internet or by phone.

The findings of the reports received by the Whistleblowing Channel and the application of any disciplinary measures involving employees is the responsibility of the Personnel and Ethics Commission, who will escalate any critical cases to the Board of Directors.

The Compliance and Corporate Risks Department must report the monitoring of Itaúsa's Whistleblowing Channel indicators to the Board of Officers and the Board of Directors.

5. Disciplinary Measures

In the event of employee's noncompliance with the guidelines of Itaúsa's Code of Conduct, this Integrity Program or internal policies, or if reports and charges of irregularities or bad faith are received, educational measures and, when applicable, disciplinary measures provided for in the Company's internal policies will be applied.

The application of educational measures or disciplinary measures provided for in Itaúsa's internal policies will be commensurate with the nature, seriousness of infringement, type of breach and responsibility level of those involved, without prejudice to any sanction provided for in applicable legislation.

For Itaúsa's suppliers and/or stakeholders, illegal conduct or a conduct violating the guidelines of the Company's Integrity Program or internal policies will characterize breach of contract, subject to termination of the corresponding contract.

Internal policies provide for measures to remove management members in case of corruption and fraud acts, and the vacancy rules provided for in the Bylaws must be followed. The Board of Directors is incumbent upon resolving on such removal, with abstention of the Board member involved, if applicable.

6. Periodic Risk Assessment and Ethics, Integrity and Corruption Monitoring

The Compliance and Corporate Risks Department performs formal and periodic assessments of possible internal and external risks on a structured way, taking into account, among other aspects, the impact on the Company's operations, possible risks materialized and the Company's vulnerability to different factors.

The Company's internal controls structure reasonably ensures the mitigation of integrity risks arising from internal and external factors that may adversely affect the achievement of Itaúsa's goals. These risks include fraud, corruption and unethical conduct, as well as lawsuits filed in connection with contracts, ownership interest in investees, relationship with Public Officials or service providers.

Based on the results of these periodic assessments, the Company prepares action plans to mitigate and address any identified risks and other actions to improve the Integrity Program, which are periodically submitted to the Audit and Risks Commission and the Audit Committee.

Regarding guidelines for setting limits acceptable for the Company's risk exposure, the Risk Management Policy sets forth that any risks identified should be addressed based on their

criticality. The Audit and Risks Commission and the Audit Committee should define how to respond to risks and the instruments to hedge the Company, by factoring in the risk appetite level set by the Board of Directors.

Itaúsa adopts the three line model of the International Institute of Auditors (IIA) as the governance framework and the basis for its risk management.

7. Transparency and Social Responsibility

Aware of its role in society and in line with its corporate and social values, Itaúsa has a Sustainability Commission aimed at guiding the committees, foundations and institutes of its subsidiaries, under which it sets the main environmental and social management guidelines and identifies opportunities for improving its social impact.

Information on Itaúsa's activities, identification of its main stockholders, executives and management members' duties and its financial statements are available on its website (www.itausa.com.br).

Additionally, by means of the Integrated Report, Itaúsa annually shares its main practices, results and challenges with its stockholders, society and other stakeholders by adopting an integrated approach.

Glossary

Management member: a member of the Company's Board of Directors and Board of Officers.

Public Officials: anyone who performs, even if temporarily or without compensation, by election, appointment, designation, hiring, or any other form of investiture or relationship, a mandate, position, duty assignment or function in any government body or companies that are part of the public direct or indirect administration, including regulatory bodies, and legislative, executive or judicial branches, in any country.

Compliance: to be in compliance is being in conformity, it is the duty to comply and enforce compliance with internal and external regulations.

Donation: an act of liberality through which an individual or legal entity transfers financial resources, services and/or goods to other individual or legal entity. Donations are free of charge with no expected benefit/consideration to the donor. (Donation and Sponsorship Rule).

Due diligence: an integral part of an M&A project, involving the access to and analysis of information about a given company with the purpose of confirming the data provided to potential buyers or investors.

Private Entities: any party with which Itaúsa interacts that falls out the definition of a Public Official, including suppliers.

Know Your Supplier: a set of tools that ensures the proper knowledge about suppliers.

Sponsorship: the financial contribution to third-party projects or initiatives that offer tax benefits as consideration upon the project approval, according to the specific legislation of a given area (federal, state or municipal).
