

## ANTI-CORRUPTION POLICY

### 1. PURPOSE

The purpose of this Anti-Corruption Policy ("Policy") is to ensure best practices in relationships between Itaúsa S.A. ("Itaúsa" or "Company") and third parties, whether they may be private entities or Public Officials, in line with Anti-Corruption Laws and Itaúsa Code of Conduct.

By implementing and complying with the Policy, which is one of the components of Itaúsa's Integrity Program, the Company seeks to strengthen its commitment to developing relationships with high standards of integrity, ethics, and transparency, and preventing and fighting corruption in all its forms.

### 2. TARGET AUDIENCE

This Policy applies to every Itaúsa's management members, members of the Advisory Board and Supervisory Council, members of the committees and councils, employees and service providers in all of their interactions, on behalf of the Company, with Third Parties.

### 3. GLOSSARY

- **Public Official:** anyone who performs, even if temporarily or without compensation, by election, appointment, designation, hiring, or any manner of nomination or connection, a mandate, position, office, or function in government bodies, companies that are part of the public direct or indirect administration, including regulatory agencies and the legislative, executive or judicial branches of any country.
- **Unlawful acts:** acts and omissions in breach of the law, such as money laundering, terrorism financing, corruption and fraud.
- **Corruption:** any and all action that directly or indirectly implies a suggestion, offer, promise, solicitation, demand, acceptance, giving (active form) or receiving (passive form) undue benefits, whether or not of a financial nature, such as: bribes, kickbacks, influence peddling and favors; in exchange for the execution or non-execution of acts inherent to their duties or the expediting of business, operations or activities, or with a purpose to secure benefits for themselves or third parties.

- **Anti-Corruption Laws:** Includes Law No. 12,846/13, as regulated by Federal Decree No. 11,129/22 and, where applicable, Law No. 8,429/92 (Administrative Misconduct Act) and Law No. 8,666/93 (Biddings Act).
- **Private Entities:** any entities with which Itaúsa interacts that cannot be regarded as a Public Official, including suppliers.
- **Integrity Program:** set of principles, rules, procedures and mechanisms for preventing, detecting and correcting corruption practices and fraud, irregularities, unlawful acts and ethical noncompliance and other misconduct, breach or disrespect of rights, values and principles that impact trust, reliability and institutional reputation.
- **Third parties:** any and all third parties with which Itaúsa has or may have any form of relationship in Brazil or abroad.

#### 4. **PRINCIPLES APPLICABLE TO RELATIONSHIPS WITH PUBLIC OFFICIALS AND PRIVATE ENTITIES**

Itaúsa is committed to interacting with Public Officials and Private entities in an ethical, moral, fair, professional, transparent way, in full compliance with applicable legislation and regulation, including, but not limited to, Anti-Corruption Laws.

The relationship and interaction with any Public Officials and Private Entities should be based on the best market practices, respecting the rules that govern the public administration, the applicable legislation and regulation, as well as the guiding principles set forth in Itaúsa Code of Conduct.

#### 5. **SENIOR MANAGEMENT COMMITMENT**

The Board of Directors defines the guidelines on conduct and values of the organization that must be followed by all management members, members of the Advisory Board and Supervisory Council, members of the committees and councils, employees, service providers and partners, in any relationships, to prevent and fight Corruption or other Unlawful Acts.

#### 6. **HIRING**

##### 6.1. **Suppliers and Service Providers**

Itaúsa should adopt the following procedures in hiring suppliers and service providers:

- Reputation analysis to check trustworthiness;
- Inclusion of contractual clauses (i) on anti-corruption, as well as for termination in the event of suspected Corruption acts, and (ii) that hold Itaúsa harmless, in relation to its counterparty, from breaches of law, including Anti-Corruption Laws, and that provide for the liability for acts against Brazilian or foreign public administration; and

- Assessing, registering, approving, hiring and monitoring suppliers and service providers.

## **6.2. Employees and Nomination of Members for the Board of Directors, Advisory Board, Committees, Board of Officers and Supervisory Council**

The Company carries out an integrity analysis in the hiring of new employees, aiming at ensuring they are aligned with Itaúsa's ethical values and integrity principles.

Additionally, a reputation analysis is carried out of the candidates to Itaúsa's Board of Directors, Advisory Board, Board of Officers, Supervisory Council and committees.

Appointing and hiring former Public Officials are only permitted when they have already fulfilled the grace period, as set forth in Article 6, item II, of Law on Conflict of Interest for Public Officials (Law No. 12,813/13).

## **7. MERGER AND ACQUISITION OPERATIONS**

Itaúsa should adopt the following procedures in merger and acquisition operations:

- Inclusion of clauses into agreements that hold Itaúsa harmless, in relation to its counterparty, from breaches of law, including Anti-Corruption Laws, and that provide for the liability for acts against Brazilian or foreign public administration; and
- Carrying out of due diligence aimed at identifying indications of Corruption.

## **8. ACCOUNTING AND FINANCIAL CONTROLS**

The Company shall keep books, records and accounts that accurately reflect its transactions and assets, as well as an effective internal accounting control system, prohibiting practices such as the use of fake financial documents, inaccurate accounting entries, accounting fraud and tricks to help conceal any illegal payments. Additionally, its accounting records shall be audited by independent auditors on an annual basis.

## **9. RULES GOVERNING RELATIONSHIPS WITH PUBLIC OFFICIALS AND PRIVATE ENTITIES**

The following general rules must be followed in any type of relationship with Public Officials and Private Entities, including with their advisors, whether directly or by means of third parties that Itaúsa may hire or that represent the Company.

- Itaúsa must not allow, after becoming aware of such a conduct, any Public Official or Private Entity to receive, offer or request bribes, kickbacks, expediting payments, or any other unlawful payments from Itaúsa or Third Parties. Those who become aware of an event that raises suspicions regarding any of the foregoing conducts must report such an event to the People and Ethics Commission or to the whistleblowing channel for investigation and

determination of the applicable measures, including termination of the relationship with the Private Entity or Public Official, and reporting to the relevant bodies. In the event of omission the penalties provided for in this Policy will be applied.

- All **Private Entities with which the Company maintains any kind of relationship** should be **diligently** selected, and **they must comply with the applicable legislation and regulation, including Anti-Corruption Laws**.
- Government relations activities must be carried out at arm's length and independently, with no bearing from political or partisan ideologies, and must be exclusively intended to uphold the Company's legitimate interests.
- Management members and employees shall comply with the rules on family or emotional links with Public Officials provided for in Itaúsa's internal policies, including the requirement to report to the Company.
- As concerns the submission of technical opinions, clarifications, suggestions and information to Public Officials, the entire content must be complete, current, precise and truthful.
- Rules and procedures regarding the offering and acceptance of gifts and gratuities must be complied with.
- The Company's donation and sponsorship recipients must be duly regularized and proven to be legitimate and reputable.
- In in-person meetings with Public Officials, which must be previously scheduled whenever possible, and on an institutional basis, Itaúsa must be represented by at least two (2) employees or management members, and one (1) of them may be replaced by an external lawyer or consultant representative of any association of which the Company is part or of industry unions, federations or confederations. Exceptionally, Itaúsa may be represented by one (1) employee or management member, including in not scheduled interactions, when time is too short to schedule a meeting, or urgencies. Possible situations that may conflict with the guidelines of this Policy must be reported to the Compliance and Corporate Risk Department.
- Communications and reports on interactions with Public Officials must be available for possible audits, to enable identifying the matters addressed.
- In the event of execution of administrative agreements by the Company, management members, employees and third-parties acting on behalf of Itaúsa shall comply with the provisions in the applicable legislation, withdrawing themselves from any unlawful acts, ensuring that these agreements are executed in accordance with their subject matter and specifications and with no deviation from the purpose. Additionally, they shall ensure the authenticity and validity of all the documentation related to the administrative agreements.

## **10. PROHIBITED CONDUCT**

- It is not allowed to interfere with or hinder the supervision or investigation by any public, supervisory or regulatory bodies;
- It is not allowed to accept, offer, promise, deliver, whether directly or through Third Parties, any undue economic benefits or advantages of any kind to Public Officials and Private Entities as a means to expedite and/or obtain business, omit actions or obtain benefits, even indirectly, for Itaúsa, such as securing authorizations, licenses, permits or declarations;
- It is not allowed to carry out or contribute to actions that may be deemed harmful to the public administration;
- Offering to or receiving from Private Officials, either directly or indirectly, gifts, presents and gratuities of any kind or equivalent is prohibited; and
- It is not allowed to make donations or sponsorships directly to Public Officials, or to relatives of these Public Officials by consanguinity or affinity, in direct or collateral line up to the second degree.

## **11. RISK ASSESSMENT AND MONITORING**

Itaúsa's management members and employees must assess risks associated with this Policy's subject matters, with assistance from the Compliance and Corporate Risk Department, in compliance with the Risk-Management Policy. Risk assessments must take into account aspects related with interactions with the public and private sectors, as well as the nature of the transaction.

## **12. AGREEMENT AND TRAINING**

All management members, members of the Advisory Board and Supervisory Council, members of the committees and councils, and employees must declare their knowledge and agreement with this Policy when joining the Company and renew this commitment every year. Renewing the commitment is also required whenever the provisions herein are amended.

Itaúsa will provide training to management members and employees to teach and raise awareness among them of Anti-Corruption practices.

## **13. RESPONSIBILITIES**

### **13.1 Board of Directors**

- Approving this Policy's guidelines.

### **13.2 Audit Committee**

- Becoming cognizant of the indicators related to this Policy, including, but not limited to, any noncompliance cases.

### **13.3 Audit and Risk Council**

- Becoming cognizant of the indicators related to this Policy, including, but not limited to, any noncompliance cases.
- Pointing out improvements in Itaúsa's internal processes aiming at adopting better compliance practices.

### **13.4 Legal, Compliance and Corporate Risk Office**

- Developing and reviewing, whenever required, standard Anti-Corruption clauses to be included in the agreements.

## **14. QUESTIONS AND WHISTLEBLOWING CHANNEL**

Reports of breach of this Policy, as well as any questions, must be forwarded to Itaúsa's Whistleblowing Channel, including on a strict confidential and anonymous basis if so desired, as follows:

- <http://www.ethicsdeloitte.com.br/itausa/>
- Email: [denunciasitausa@deloitte.com](mailto:denunciasitausa@deloitte.com)
- Phone number: (+5511) 08007219574

The Company provides whistleblowers with protection against reprisals, and any investigation will be timely carried out on a professional, unbiased and confidential way.

Questions concerning the interpretation of rules in this Policy, as well as complaints and suggestions may also be forwarded to the Compliance and Corporate Risk Department by email: [compliance.corporativo@itausa.com.br](mailto:compliance.corporativo@itausa.com.br).

## **15. PENALTIES**

Any noncompliance with this Policy is subject to disciplinary sanctions, including dismissal, without prejudice to administrative, civil, criminal sanctions or other applicable measures.

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

## **16. RELATED DOCUMENTS**

This policy must be read and construed jointly with the following documents:

- Itaúsa Code of Conduct
- Risk Management Policy
- Donation and Sponsorship Policy

- Itaúsa's Integrity Program
  - Anti-Corruption Law – Law No. 12,846/13, as regulated by Federal Decree No. 11,129/22
  - Administrative Misconduct Act – Law No. 8,429/92
  - Biddings Act – Law No. 8,666/93
-