

# ITAÚSA - INVESTIMENTOS ITAÚ S.A.

CNPJ 61.532.644/0001-15

A Publicly-Held Company

NIRE 35300022220

## COMPLIANCE AND INTEGRITY POLICY

(approved at the Board of Directors' Meeting of May 11, 2020)

### 1. PURPOSE

This Compliance and Integrity Policy ("Policy") consolidates the compliance and ethics principles and practices adopted by Itaúsa – Investimentos Itaú S.A. ("Itaúsa" or "Company"), contributing to disclose and strengthen the culture of ethics and transparency.

This Policy sets out guidelines on the Company's compliance with laws and internal and external regulations by spreading the culture and practices of compliance, guiding and raising awareness on the prevention of activities and conduct that may give rise to risks to the Company's image and operation.

As an invaluable corporate governance pillar, compliance strengthens the Company's internal control environment.

### 2. TARGET AUDIENCE

The provisions provided for herein apply to the Company and all management members (members of the Board of Directors and officers), members of the Fiscal Council, members of the Board of Directors' advisory committees, members of the Executive Board's advisory committees and employees.

Itaúsa's subsidiaries must reflect the considerations outlined herein in their respective Compliance and Integrity policies, subject to their unique procedural management features and the level of complexity of operations.

### 3. DEFINITIONS

- 3.1. **Compliance:** derives from the verb "to comply", that is, to act in accordance with a rule, command or request, or an internal order. In other words, to be "in compliance" is to be in conformity with laws and external and internal regulations.
- 3.2. **Integrity Program:** a set of anti-corruption measures adopted by the Company, especially those aimed at preventing, detecting and remediating wrongful acts against Brazilian and foreign public administration provided for in Law No. 12,846/2013.
- 3.3. **Internal Policies:** policies issued by the Company to guide the interaction between the Company's management members, employees and service providers and the values, guidelines and procedures set out by the Company for developing activities and doing business.

### 4. COMPANY'S COMPLIANCE GUIDELINES

These are guidelines and principles to be followed by all Company's departments:

- To spread the principles, guidelines and conduct set out by Itaúsa's Code of Conduct and other Company's policies (policies, rules and procedures);
- To promote a culture of ethics and compliance among all employees, third parties and stakeholders;

- To have an unbiased approach to all compliance-related activities;
- To monitor and identify any regulatory and legal changes and communicate them internally by providing adherence conditions to the departments involved, which are responsible for complying with such legal and regulatory provisions;
- To monitor the adherence to the Internal Policies aimed at the Company's complying with the rules issued by proper regulatory bodies;
- To manage the interface and meet the demands from regulatory authorities, meeting their requests and issuing all reports due;
- To comply with Itaúsa's Integrity Program guidelines;
- To detect compliance and conformity-related improvements and monitor their implementation; and
- To ensure and guide on good compliance and governance practices.

## **5. RESPONSIBILITIES**

### **5.1. Board of Directors**

- To approve the guidelines of the Compliance and Integrity Policy and its revisions to ensure a clear understanding of the roles and responsibilities at all levels of the Company;
- To express an opinion on the revision of compliance management and approve possible suggestions for changes; and
- To support and promote the progress/development of ethics and compliance-related activities and practices.

### **5.2. Executive Group and Managing Directors**

- To lead by example, placing ethics and compliance culture in all practices.

### **5.3. Sustainability and Risks Committee**

- To express an opinion on any suggestions to update this Compliance and Integrity Policy, and recommend possible changes to the Executive Board or Board of Directors; and
- To express an opinion on any suggestions to update the Company's compliance management and recommend possible changes to the Executive Board or Board of Directors.

### **5.4. Legal, Compliance and Corporate Risk Office and Corporate Affairs Department**

- To keep the Compliance and Integrity Policy updated, submitting any adjustment suggestions arising from legal, regulatory or statutory changes to the appreciation of the Sustainability and Risks Committee or other Offices;
- To periodically evaluate the instruments that make up the Company's compliance system, aimed at improving them and recommending possible corrections, changes or improvements to the Sustainability and Risks Committee or other Offices;
- To spread the culture of compliance throughout the Company by providing training as a mechanism to mitigate compliance risks, thus strengthening the culture of compliance;
- To manage the Company's Integrity Program; and
- To adjust the strength and operation of the Company's internal control system.

### **5.5. Administration and Finance Office**

- To ensure the reliability of the Company's financial statements;
- To provide accounting reports with accurate information and transparent accountability.

## **5.6. Employees**

- To read, understand and comply with the guidelines set in this Compliance and Integrity Policy;
  - To attend Itaúsa's mandatory training;
  - To promote the Company's culture of compliance and ethics, ensuring compliance with all obligations associated with the activities of their roles, including identifying, managing and reporting any compliance violations; and
  - To promptly report to the Compliance and Corporate Risk department whenever they identify any changes to rules and regulations in force or compliance risks not foreseen by the control activities.
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