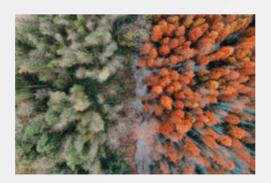




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交行国际化布局 组织架构 企业愿景



**10** 回顾2021



**12** 业绩摘要



# 交通银行巴西子行 2021年报中文版

**16** 经营亮点

业务发展 员工关怀 环境和社会责任



**20** 业务回顾

- 1 公司信贷
- 2 财富管理
- 3 资产管理
- 4 金融市场服务



30

# 经营管理

- 1 资金来源
- 2 风险管理
- 3 公司治理
- 4 人才队伍建设



**44** 释义

46 财务报表及其他



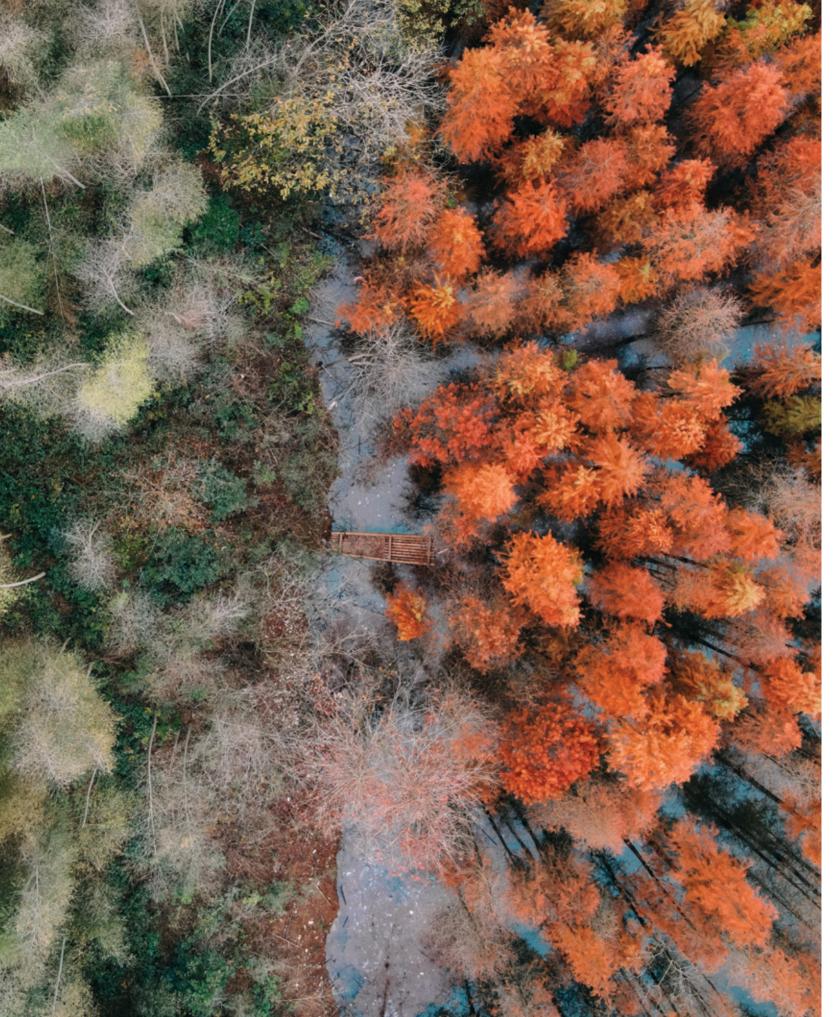
# 公司简介

交通银行巴西子行前身BBM银行始建于1858年,是巴西历史最悠久的银行之一。2015年,交行与BBM银行签署了股权收购协议,并于次年完成交割,BBM银行正式成为交通银行巴西子行。我行总部位于里约,在圣保罗设有办公室,在巴哈马群岛设有分支机构。

巴西交行是一家全牌照银行,业务范围涵盖存贷款、国际结算、贸易融资、外汇兑换、衍生工具买卖、私人银行、债券承销和财务顾问等。

作为一家历史悠久、战略清晰、治理规范、经营稳健、服务优质的 商业银行,巴西交行始终坚持高质量发展目标,秉持绿色发展理念,依托 交银集团国际化优势,不断优化全面风险管理,持续服务社会民生,努力 实现银行、社会、客户和员工的共同价值。

一个能够从挑战中学习,寻找解决方案和 分享知识的团队。



巴西交行作为集团拉美地 区布局的重要金融机构, 充分依托集团综合经营和 国际化布局优势,大力发 挥一体化的协同作战能 力,持续释放发展合力。



始于1908年的交通银行是中国历史最悠久的银行之一,也是中国内地规模第五大的商业银行。目前集团形成了覆盖主要国际金融中心,横跨五大洲的境外经营网络,在全球18个国家和地区设有23家境外分(子)行及代表处,境外经营网点69个。

Cohen

资金部主管

**Caldas** 

资本市场和销售 如主答

# 组织架构

股权关系

**Figueiredo** 

I公司一部主管

**Campos** 

II公司二部主管



全总经理

心常务董事

# 建设巴西一流银行。



为客户提供最好服务。



为股东创造更多价值。



为员工营造幸福家园。



为社会做出更大贡献。



发现天赋并搭建 环境 促进员工 成长



高度重视客户需 求,严谨论证业务 机遇,持续把 握新 业务机遇。



在各业务领域积 极 探索产品创新 机遇



终坚 持共赢与 守信原则。



对公对私,均始



公司内外及外部 , 充分尊重员工 展现 个性, 鼓励 差异化 贡献

# 回顾2021

2021年,受益于疫苗大范围接种及社交限制的逐渐放开,全球经济实现强劲复苏。但伴随经济回归常态化增长,受供应链瓶颈、清洁能源转型等压力影响,全球通胀率持续走高。各主要经济体纷纷调整货币政策,全球经济面临一系列新的挑战。

从巴西看,依托全球经济复苏、商品价格上涨利好巴西出口等综合因素,2021年巴西实现GDP增长4.6%。目前,巴西服务业持续向好、劳动力市场强劲反弹,税收政策改革持续推进,外部环境不断改善,巴西整体经济保持稳健态势。预计2022年GDP可实现1%的增长。

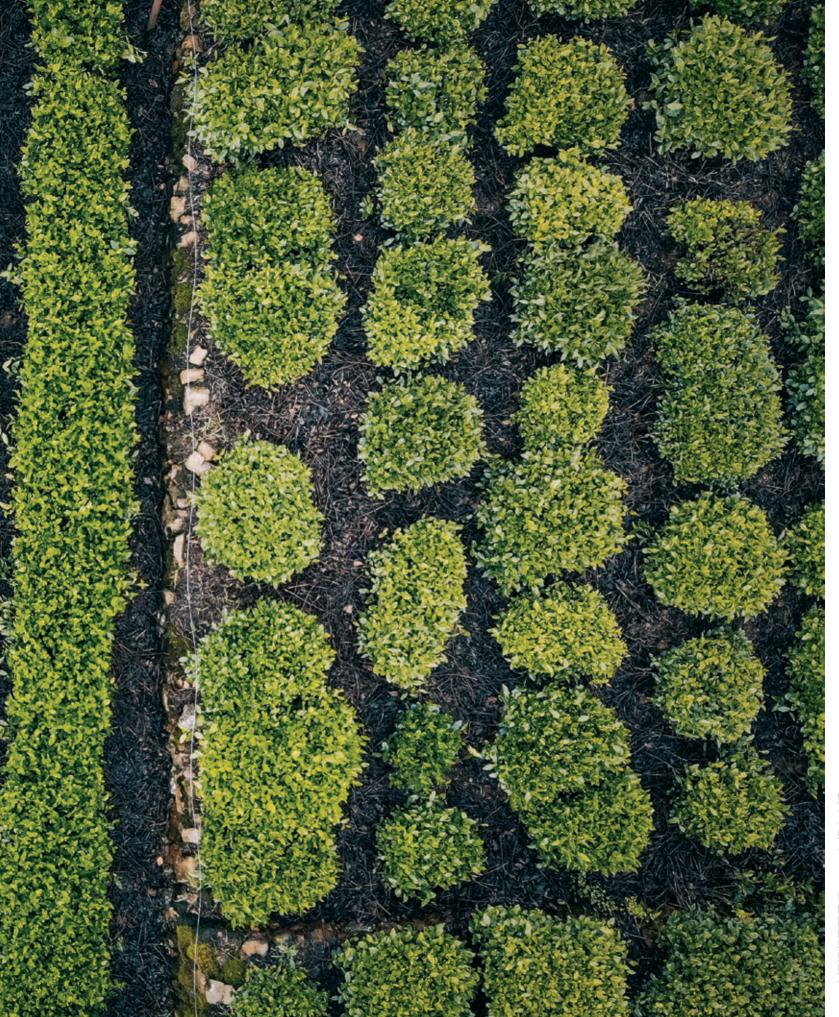
面对错综复杂的外部环境,巴西交行全面贯彻新发展理念,主动融入 新发展格局,坚持建设巴西一流银行的战略目标,呈现了稳步增长的高质量 发展态势。

全年资产规模不断扩大,结构持续优化,效益显著提升。积极参与巴西PEAC项目,推动信贷业务快速增长;加强与投资担保基金FGI业务合作,合理匹配资产负债久期结构,夯实风险防控基础;把握巴西、亚洲债券市场窗口机遇,探索创新型金融产品,成为拉美地区首家落地"债券通"业务的金融机构。

巴西交行充分发挥创新引领作用,系统运用全面风险管理和智慧化决策能力,设立了4支不同主题投资基金。2021年全行实现中间业务收入1.05亿雷亚尔,对总收入贡献23.3%。

道阻且长,行则将至;行而不辍,未来可期。面对复杂严峻的国际形势和世纪疫情,巴西交行将始终以推动高质量发展为主题,积极应对新挑战,主动把握新机遇,向全面建成巴西一流银行迈出坚实脚步。

全球经济面临一系 列新的挑战。



# 公司主要业绩

亿雷亚尔

资产总额

103

亿雷亚尔

广义信贷资产总额

18.4 %

平均净资产收益率 (ROAE)

110

亿雷亚尔

资金来源总额

亿雷亚尔

财富管理规模

中间业务收入占比

%

净息差(NIM)(计提拨备前)

# 财务摘要

(单位:百万雷亚尔,%)

	18年12月	19年12月	20年12月	21年12月
	6,298	8,658	12,215	14,184
	577	837	936	1,013
	601	653	764	841
净利润	64	89	117	147
税前利润	90	121	196	265
	4,408	6,061	9,383	10,327
	4,897	6,373	10,549	11,008
	10.8%	14.1%	16.4%	18.4%
	1.1%	1.2%	1.1%	1.1%
	5.5%	5.2%	4.7%	4.6%
	14.5%	15.1%	14.4%	12.6%
	1,468	2,084	2,705	2,154
	57.8%	57.2%	46.5%	48.3%
	64	88	105	139
服务收入(占总收入比重)4	21.2%	25.3%	23.3%	24.6%

<sup>&#</sup>x27;包括担保人,担保,信用证和承担信用风险的操作(债券,期票,农产品法案,有特别担保的定期存款,海外债券)。

# 评级

	国内信用评级	全球信用评级		<del></del> 巴西主权评级	
	本币	本币	外币	- 四生似计级	
Moody's	Aaa.br	Ba1	Ba1	Ba2	
Fitch	AAA(bra)	BB+	ВВ	BB-	

²包括股权投资收入。

<sup>3</sup>包括中间业务收入和公开市场业务调整。

⁴ 计提拨备前中间业务税前收入+服务收入+股权收入。

# 平均净资产收益率 (ROAE)

18.4% 16.4% 10.8% 18年12月 19年12月 20年12月 21年12月

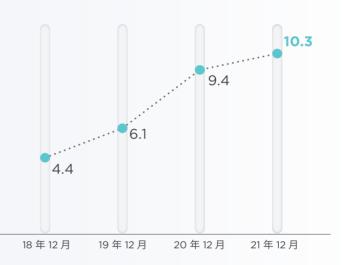
2021年底为 18.4%

#### 广义信贷资产总额

(单位: 10亿 雷亚尔)

43.8% 年均增长率

2021年末, 103 亿雷亚尔

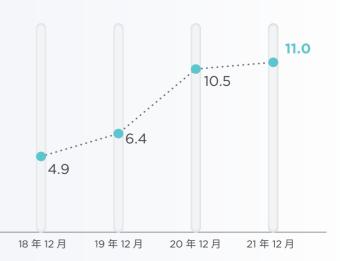


# 资金来源总额

(单位: 10亿雷亚尔)

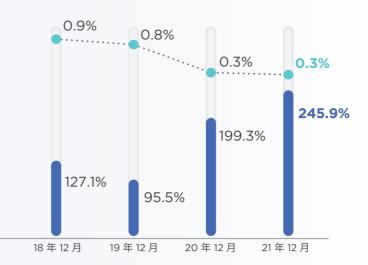
37.4% 年均增长率

2021年末, 110亿雷亚尔



## 不良率+不良资产拨备覆盖率

- 不良率
- 不良资产拨备覆盖率

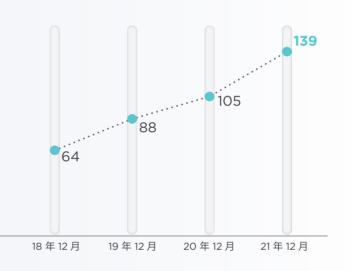


#### 中间业务收入

(单位:百万雷亚尔)

**55.4%** 年均增长率

2021年末, 1.39亿雷亚尔

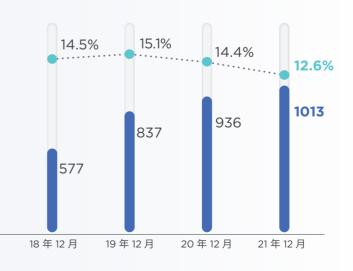


# 资本充足率(%)+ 一级资本

(单位: 百万雷亚尔)



● 一级资本



#### 16

# 2021

# 年经营亮点

经营成果

资产管理

2021年末资产管理规模

11

亿雷亚尔

公司信贷

2021年末广义信贷资产总额

103

亿雷亚尔

员工关怀成长



2021年末咨询总资产(财富管理规模)达

93

亿雷亚尔



在2020年防疫政策基础上,坚持以员工安全 为本,不断优化防控措施,安排员工有序返回 公司办公。整体防疫效果良好。

# 员工培养奖学金计划

设立奖学金鼓励、资助金融经济和技术领域的 员工参与里约天主教大学、FGV大学和巴西航 空理工学院的学习。



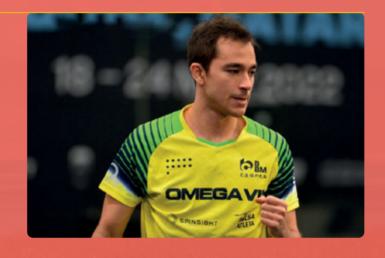


#### 支持体育运动

#### 奥运会合作伙伴

#### 助力HUGO冲刺下届奥运会

我行将与世界排名第四的巴西乒乓球明星运动员Hugo Calderano(第一位跻身奥运会四分之一决赛的拉丁美洲人)再续合作,助力其全力冲刺巴黎奥运会奖牌。



#### **ESG**

# 促进文体产业发展



在《鲁阿内法案》框架下,我行投资出版了两本关于 ESG 事业相关主题的书籍: Árvores, floresta e madeira》与《Mulheres no Brasil》。前者主要介绍本土物种和木材的使用。后者则展现了巴西女性如何争取社会地位的改变。

为"Destemidas"项目提供有力支持,旨在促进里约热内卢马累社区居民的身心健康和公民意识;参与赞助位于里约北部Rocha Miranda区的Reação柔道学校所举办的柔道课程及社会教育研讨会。



关注女性发展和性别平等

我行推行WE 项目,注重员工多元化和个性发展,落实多项措施,包括遵循企业公民项目而延长产假和陪产假;运动指导计划进行领导力培训;举办女性励志人生故事系列讲座。



# 2021

# 年經營完点

## **ESG**



## 社会活动

向家庭及慈善团体捐助食物

新冠病毒疫情肆虐的第二年,我行参与 Ação Solidária项目,为里约市Morro da Providência贫民窟的居民捐赠基本食物篮。

12月,与当地非政府组织 Viver Solidário 合作,为"情暖圣诞节"(Natal de Emoções)活动捐赠爱心物资及食品。



## 绿色建筑

我行里约总部所在大楼Vista Guanabara通过雨水收集方式实现资源再利用,提升能效,产生积极的经济、社会和环境效益,荣获巴西绿色建筑委员会 (GBC Brazil) 可持续性认证和国际LEED C&S金级认证。



# ESG政策

#### 环境、社会和公司治理

我行业务决策及员工行为规范均需遵循ESG 政策中的可持续发展原则。

追求积极的社会和环境影响,防范环境社会 风险;积极建立健全、公开透明的治理结 构;遵守法律法规,不断增强员工幸福感, 提升客户满意度。



#### 为拓宽青少年视野项目提供赞助

42 | Rio 学校项目: 提供编程培训,提高科技创新能力。

Arte Tech – Gamboa Ação: 举办数码创作、英语培训和国际象棋研修班,培养孩子们的包容性、创造力和学习能力。

Entre o Céu e a Favela: 为青少年提供专业资格培训、举办文化和体育工作坊以及构筑社会心理服务网络。

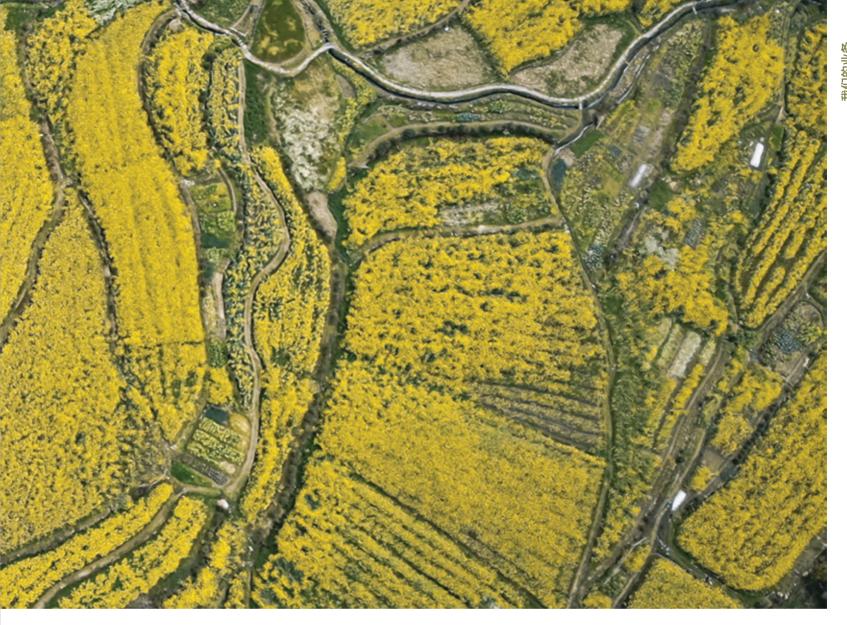


1.公司信贷

我们致力于快速响应目标客户对信贷、融资 和衍生品等金融服务的需求。







**2021**年,伴随疫苗接种率提升,全球主要地区经济逐步复苏。我行紧抓过渡期时间窗口,精准帮扶实体企业,着力扩大信贷投放规模,助力企业高质量发展。

我行公司信贷客户主要有三类:中小企业客户(年营收在 7000万至5亿雷亚尔之间,可提供具有流动性的抵押品)、公司客户(2亿雷亚尔-30亿雷亚尔)和大客户(年营收超过 30亿雷亚尔或隶属于中国控股企业集团公司)。我行着力为这些客户提供抵质押贷款以及出口贸易融资服务等。

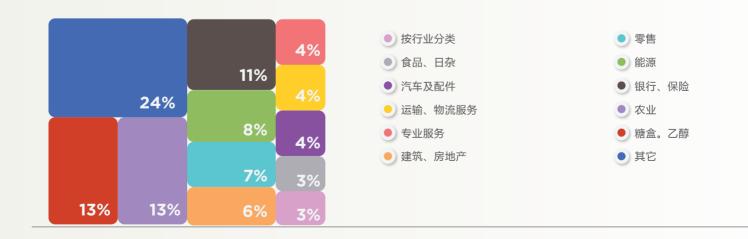
2021年末,我行疫情专项纾困贷款余额约25亿雷亚尔,有效缓解了企业的资金压力,解决客户的燃眉之急。广义信贷资产总额,包括保函、信用证和其它信贷工具(公司债承销、本票、农产品票据NPR,存放同业DPGE,外币债券等)合计103.3亿雷亚尔。

#### 广义信贷资产



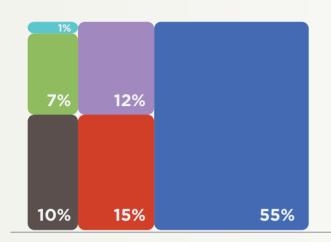
#### 广义信贷资产

按行业分类I (2021年12月)



#### 广义信贷资产

按产品分类 (2021年12月)



- 流动资金贷款
- 保函
- 出口信用票据
- 公司债券
- 贸易融资
- 其它

#### 贷款损失准备

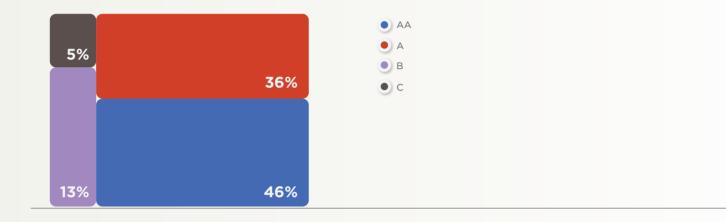
贷款和保函



2021年底为 0.7%

#### 贷款和保函

按风险分类 (2021年12月)



## 2.财富管理

# 为全球客户提供长期最优的财 富管理服务

不断创新投资工具,以开放平台模式提供专业高效的金融产品和服务,在本地和海外投资追求最佳的风险回报。

努力为每一位投资者提供最优质的服务。根据客户风险承受能力、 资产规模、流动性和现金流等方面的情况,量身定制,提供个性化的产品 和服务。

持续优化服务体验,竭诚为客户提供高效、及时、公开的财务顾问 及基金管理服务。

财富管理人员均接受过严格培训,拥有专业认证,具有在金融市场 长期工作经验,资产配置专业能力卓越,专注于提供卓越的投资建议及专 业服务。

致力于通过专属基金或直接投资的方式为个人投资者家庭配置、管理资产,为客户提供长期可持续、稳定增长的财富管理。采用严格的内部分析审批流程确保理财产品安全合规。截至2021年底,我行财富管理规模达到93亿雷亚尔。



9.3亿雷亚尔 2021年咨询的总资产。

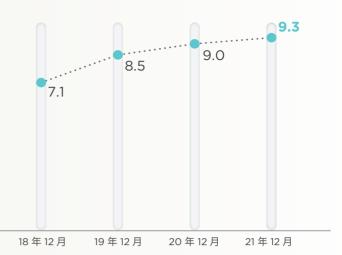


个性化服务 专注于了解客户的情况并 提供专门指导。

#### 财富管理规模

(10亿雷亚尔))

21年末,93亿雷亚尔



#### 财富管理架构

#### 财富管理架构

资源管理

- 投资组合管理 专属基金
- 市场监控

#### 财富顾问

投资组合建议

- 投资建议
- 市场监测
- 资产组合整合管理
- 不动产规划
- 个性化财富管理方案

#### 专属服务

与客户充分沟通

- 知悉客户 了解需求
- 整合交行平台提供的产品和服务



#### 系统支持

强大的后台服务支撑

- 投资交易
- 账户开立
- 客户服务
- 客户风险评估

#### 交行平台

依托交行整合优势

- **宏观研究**
- 结构化信贷产品
- 资产管理
- 金融产品
- 信贷分析
- 风险管理

# 3.资产管理

巴西交行资产管理部门已成立两年,以成熟的市场经验、值得信赖的产品、专业的团队为客户提供高品质的资产管理服务。

我们拥有卓越的宏观经济分析团队,独创的分析方法和内部模型,并 以此来管理信用风险、市场风险和流动性风险,以及行信贷分析,旨在获得最 佳收益。

资产管理组合目前包括五只基金:

交行巴西公司信贷高收益基金	不同风险偏好的主动管理型基金,投资标的为		
交行巴西公司信贷基金	交行巴西的信贷资产。		
交行巴西美股基金	于21年一季度发行,主要投资美国公司股票		
ESG全球股票基金	专注于可持续发展,投资于全球股票市场		
交行巴西中国概念基金	投资中国公司股票的交行巴西中国基金		

为客户提供持续跑赢巴西银行同业拆借利率(CDI)的中长期回报。截至 2021年末,我行资产管理规模已达11亿雷亚尔。

截至2021年 末,我行资产 管理规模已达 11亿雷亚尔。

#### 年纳入我们投资组 合的基金



交银BBM中国 基金投资于中国公司的股票。



交银BBM ESG 专注于可持续性的全球股票基金。



Bocom BBM 美国股票 投资于美国股票的基金。

## 4.金融服务

#### 资本市场融资

我们为满足条件的客户提供多样的债券市场融资方案,包括结构设计、证券 发行和衍生品交易。

为满足资本市场发行业务需求,我行为客户提供路演宣传、结构设计、市场动态、对接监管机构以及协调律所、托管银行等第三方机构的各项服务。

2021年,该板块迎来快速发展。根据巴西资本市场行业协会 (Anbima)数据,2021年资本市场融资规模同比增长了60%。其中,债券 (Debenture)发行增长超过1倍。在此环境下,2021年,我行承销的公司 债和其他证券发行规模达到42.69亿雷亚尔,较2020年的7亿雷亚尔,增长显著。

2021年,该板块迎来快 速发展。



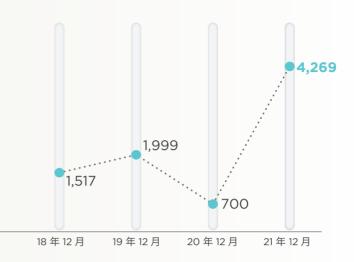
#### Π

# 交通银行巴西子行 2021年报中文版

#### 债券承销规模

(百万雷亚尔)

2021年末, 42.69 亿雷亚尔



#### 财务

资金部负责管理我行流动性,统筹优化资产负债结构。

- ●一方面开展代客做市业务,帮助客户管理风险,另一方面,主动管理市场风险,获取收益。
- 致力于为授信客户提供多样的外汇和衍生品服务方案,有效管理市场 风险敞口,包括外汇风险、利率风险、通货膨胀风险和商品风险等。

致力于为授信客户提供 多样的外汇和衍生品服 务方案,为客户有效管 理市场风险敞口。



# 1.资金来源渠道

产品方案多样、流动性结构合理、 资金渠道丰富



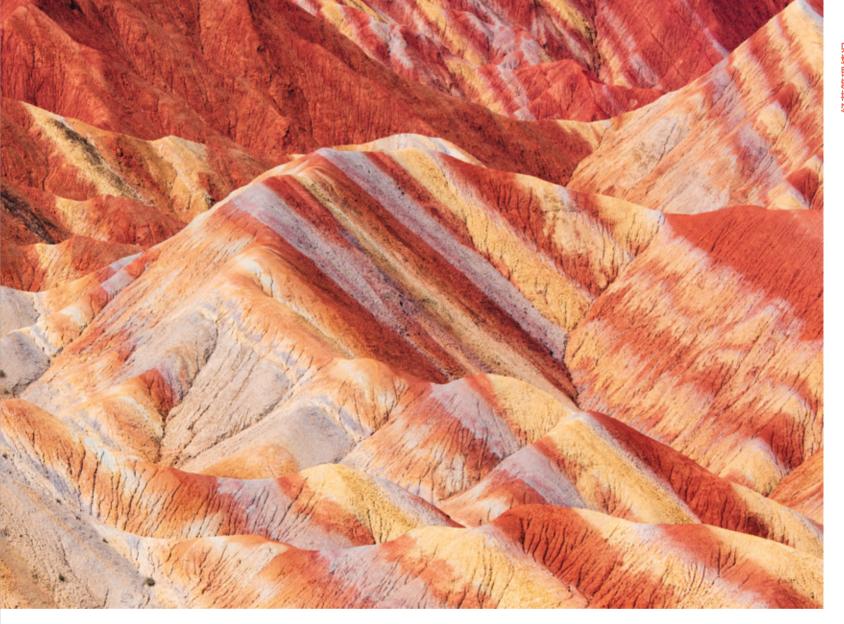
#### 离岸

与全球知名金融机构开展 资金业务合作。



#### 在岸

向机构客户、企业和个人发行 的周定收益证券



期限丰富的融资工具、健康的资产结构以及多样的融资渠道是我行在岸融资和离岸融资的关键所在。

在本地市场,同业部和财富管理部共同向机构客户(如银行、资产管理公司、保险公司)、企业客户、个人投资者提供我们发行的固定收益证券。主要包括CD(存款证)、LCA(农业信贷融资工具)、LCI(房地产信贷融资工具)和LF(金融机构融资工具)。

海外市场上,我们能够以具有竞争力的融资成本获取来自母行和全球知名 金融机构的资金支持。

全球领先的评级机构对我行的业绩表现也给予了肯定。2021年,惠誉和穆迪分别维持我行AAA(BRA)和Aaa.br的巴西最高评级。国际评级维持为BB+和Ba1。

总体来说,我行资金来源管理高效、结构合理、竞争性强、来源稳定,为我行各项业务持续发展奠定了坚实的基础。



## AAA(bra) e BB+

**2021**年,惠誉对我行继续维持 最高巴西国内评级和国际评级。

## Aaa.br e Ba1

**2021**年,穆迪对我行继续维持 最高巴西国内评级和国际评级。

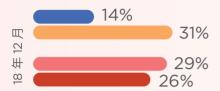
#### **资金来源结构** 按机构

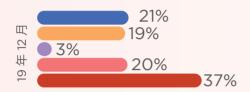


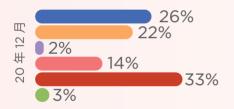
#### 33

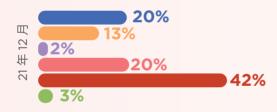
#### 资金来源结构

按产品









- 本地存款及其他
- 金融机构融资工具(LF)
- 次级融资工具(LFS)
- 农业信贷融资工具/房地产融资工具(LCA/LCI)
- 外币融资
- 高额保险定期存款(DPGE)

# 2.风险防控管理

# 持续进步不断完善,稳固行业领 先地位

多年来,我行坚持自主开发和使用高度贴合巴西 经营环境的风险管理模型和管控方法。

风险防控是我行业务发展之根基,审慎严谨是我行经营活动之原则。制度先行,管理规范,我行在资本配置方面长期积累的丰厚经验可有效防范信贷及流动性风险。



# 综合决策管理

风险监控、评估和控制是我行综合经营管理的重要组成。 经济资本计量、资金来源、贷款发放和信贷组合管理等活 动中均需使用风险模型和参数。

董事会明确风险管理政策、职责认定和模型使用, 审批我行风险偏好(RAS),确认风险管理的导向及限 额,审慎高效管理资本。

#### 信用风险

#### 定义

指因借款人或交易对手未能按时依照合同条件履行其财务承诺而可能导致损失的风险。

#### 管理架构

贷审会、董事会和其他五个管理部门,即信用风险部门、信贷分析部门、法律部门、合同管理部门和内部审计部门,共同构成了我行信用风险管理框架,具体包括:

- ■信用风险部门:由首席风险官牵头工作,主要负责监控、识别、计量、控制和报告信用风险,并确保相应限额管理按要求执行。集中分析与管理单笔交易风险和综合信贷组合风险,出具的风险评估报告提交贷审会作为额度审批的参考依据。
- ■**董事会:** 审议制定我行风险管理政策和限额,每年至少召开 一次。
- **贷审会:** 负责审批信贷额度,跟踪和评估综合业务整体集中度情况和风险水平,以贯彻我行相关信贷政策。确定逾期贷款及担保物不足贷款的处理期限。此外,如若涉及司法追偿,由贷审会决定诉讼日期。

- ■**信贷分析部门:** 分析我行信贷客户或潜在客户信用风险以及确定客户风险程度。
- **法律部门**: 审核我行与客户签订的所有合同,协调业务相关 部门贷款清收工作,确保我行债权不受损失。
- **合同管理部门:** 确保信贷业务操作及抵质押物符合贷审会信贷限额审批意见(CLP),并负责出具相应贷款合同。
- **内部审计部门:** 负责评估并持续监控我行业务部门和信贷操作流程,确保制度和流程规范执行。

#### 市场风险

#### 定义

指因汇率、利率等市场价格变动导致经济损失的风险。

#### 管控措施

我行在1997年拥有自主开发的风险管理系统,是首批将市场风险进行量化管理的银行之一。这套系统开创了国内商业银行同类系统建设的先河,并随着金融业务的发展和风险趋势的变化,开展及时有效系统升级和模型优化。市场风险管理部门由首席风险官领导,负责对市场风险敞口进行识别、计量和监控,并将先关信息提交给风险委员会和执行委员会作为决策参考。

市场风险管理框架

- 每年至少召开一次**风险委员会** ,分析审议风险管理措施,并确定讨论市场风险限额,形成提案报董事会审批。
- 市场风险管理部门,负责市场风险的日常监测管理, 确保风险可控。
- **定价管理部门**,独立于其他部门,负责产品定价模型 和相关市场数据维护。
- ■**内部审计部门**,确保我行市场风险政策执行有序,流程合规。

管理工具。我行通过每日监测VaR值,对市场风险进行限额管理,即在给定置信水平和时间下,计算正常市场波动下的潜在损失。此外计算模型还将进行定期回测,评估模型有效性。

风险限额。我行对VaR值设置了风险限额,交易部门可以在限额内,自主管理持有的风险敞口。

压力测试。风险委员会每个季度独立对压力情景进行调整,市场风险部门据此每日开展压力测试。

#### 3

# 流动性风险

#### 定义

指在不影响日常运营且不造成重大损失的前提下,无法有效履行支付义务的风险。

#### 管控措施

我行的流动性管理策略坚持审慎经营的原则,即始终持有充足资金以保证各项业务 连续性不受影响。该政策由风险委员会设立并经董事会审批,所有的经营决策都需 要遵循该政策。

流动性风险管理部门负责根据多种情景预测未来现金流,以此作为流动性风险的管理工具。流动性风险管理部门向首席风险官汇报,保证业务限额合规并形成定期报告用于业务决策。

内部审计部门确保流程适当、合规。

## 操作风险

#### 定义

操作风险是由于对内部流程、系统或者人员的管理失误或者不足,以及来自外部事件或欺诈,从而造成损失的一类风险。它同时也包括法律风险,即与立法、法院传令等可能对银行业务造成影响的风险。

#### 措施

我们制定了操作风险管理制度,对整个银行的业务流程、角色职责、文档存储、工作要求等进行了规范。独立于内部审计部,操作风险管理部门向CRO汇报,确保风险故哪里公开透明。通过该守则的指导,银行的各项业务操作符合相关的制度要求。



## 合规管理

合规部门直接向首席合规官汇报,首席合规官是银行执委会的一员,不承担其 他可能有相关利益冲突而影响其独立性的职责。同时设立合规委员会,合规委 员会通过执委会向银行的董事会汇报。

在我行高管层的支持和管理下,我们确保各项业务始终遵守各项法律、法律,并遵循业内最高道德及专业标准。

我们定期对员工进行培训,持续传播合规文化,我们坚持"诚信、透明、责任、卓越",将其作为我行道德与行为准则,指导我行各项经营管理。

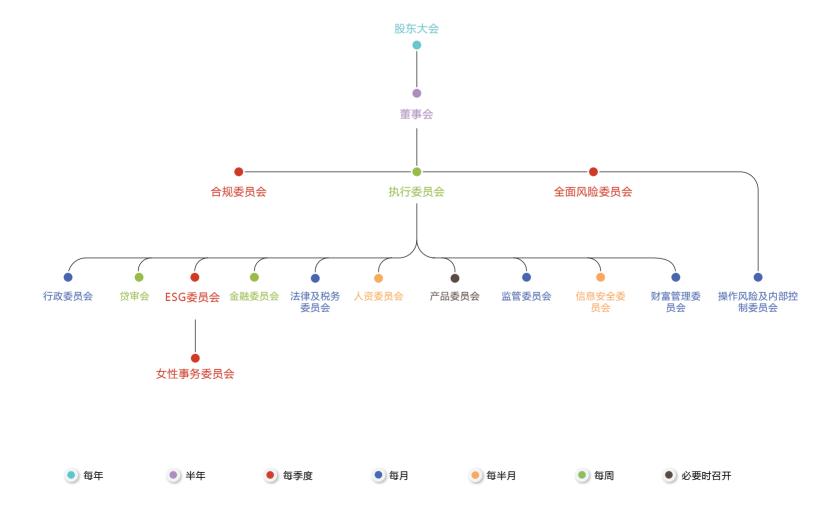
合规部门负责制定符合现行法规和市场惯例的政策和流程,强化反洗钱管理,有效防范恐怖主义融资,积极防控各领域腐败行为。

# 3.决策管理机制

# 公司治理

我行由股东大会、董事会、执行委员会和其他14个专项委员会共同进行管理,其中包括2021年新成立的两个致力于可持续发展和促进女性职业发展的部门机构,分别为ESG委员会和女性事务委员会。

我行践行公开透明、合乎道德、灵活敏捷、安全有效的管理宗旨,我 行借鉴同业先进管理经验,坚持与时俱进、不断完善。我们的组织架构如下:



#### 股东大会

最高决策机构。

成员: 我行股东。

会议频率: 每年至少一次, 或必要时召开。

#### 执行委员会

协调和执行管理层的主要指令及决定,监控我行经营业绩,审定各专项委员会(如下所述)的提案。

成员:董事会主席、执行董事、公司信贷一部、二部、资本市

场部和资金部部门负责人。

会议频率: 每周一次

#### 董事会

确定指导银行业务的战略方针,监督高层管理人员的工作,分析 和决定执行委员会的提案,必要时提交股东大会获最终批准。

**成员:** 控股股东代表5人,少数股东代表1人。 **会议频率:** 每年至少两次,或必要时召开

#### 专项委员会

本行设有14个专项委员会分别负责各项具体业务和经营活动,其中全面风险委员会和合规委员会通过执行委员会向董事会报告,其他委员会则向执行委员会报告。专项委员会的成立和各司其职充分体现我行治理规范和决策透明高效。专项委员会均拥有较强自主性,成员中至少有两名管理层人员,部分委员会成员包括CEO和董事会成员。

#### 全面风险委员会

监控和分析市场风险、信用风险、流动性风险和操作风险的主要来源,并讨论调整方案。另需负责的三项重要活动为研究确定压力情景,防范突发变化;测试和验证用于计算风险因素和指标的定量模型;以及决定操作风险与内部控制委员会和信息安全委员会提交的相应事项。

会议频率: 每季度召开一次,或有重大事项时根据需要召开。

#### 合规委员会 ■

评估和监控年度合规计划以及行内道德和行为准则的执行情况。定期分析与我行活动相关的合规风险。讨论并落实巴西中央银行、证券交易委员会和银行业自律机构的要求。制定行内反洗钱和反恐怖主义融资的相关政策。

会议频率: 每季度召开或按需召开。

#### 行政委员会

管理预算和行政费用

会议频率: 每月一次

#### 贷审会 |

制定信贷政策并批准授信额度,分析潜在借款人的财务情况以及担保情况。确保信贷业务的风险回报率保持在合理区间。采取定性、定量相结合的方法,并充分运用我行长期积累的信贷业务数据进行分析。

**会议频率:** 每周一次,同时至少每半年需召开一次同业客户专题会议,确定交易对手敞口限额。

#### 金融委员会

分析讨论经济金融形势, 监控现金流情况和资产负债结构。

会议频率: 每周一次。

#### 法律及税务委员会

跟踪法律和税法规则变化并及时预备解决方案,识别影响银行业务的司法诉讼及监管事件,审查和更新相关法律法规变化要点解读及法律判例。

会议频率: 每月一次。

#### 人资委员会

起草、审查和完善银行的人事管理政策,负责选拔、招聘、培训和薪酬等流程以及其他与员工福祉相关事宜。

会议频率: 每两周一次。

#### 产品委员会

负责新产品的分析和核准及现有产品的审查,探讨各个产品在 法律合规、操作流程等方面风险,识别和评估潜在业务机会。

会议频率: 必要时召开。

#### 监管委员会

监测金融和资本市场监管政策变化以及对我行业务影响,并提出应对方案。

会议频率:每月一次。

#### 信息安全委员会

负责管理与信息和通信技术(ICT)相关的风险,分析可能出现操作风险事件的场景并提出防范措施,直接向风险委员会报告,同时负责数据处理和云计算等外包事项。

会议频率: 每两周举行一次。

#### 财富管理委员会

研究高净值客户财富管理相关业务,监测并及时更新与财富管理业务相关的金融及资本信息。

会议频率:每月一次。

#### 操作风险及内部控制委员会

分析和讨论与操作风险有关事项,监督相关领域风险管理情况,直接向全面风险委员会报告且执行高层管理人员制定的行动计划。

会议频率: 每月一次。

#### 女性事务委员会

负责建议、实施和完善旨在增加各部门女性员工人数的招聘政策,促进职场性别平等,采取措施积极鼓励女性担任领导职务。直接向ESG 委员会报告。

会议频率: 每季度召开一次。

#### ESG委员会 \_\_\_\_\_

负责制定我行社会责任战略,监督相关活动执行情况和ESG绩效评估结果,审查 ESG相关战略、政策和目标,批准对外捐赠活动及提出行动建议。该委员会直接向执行委员会汇报工作。

会议频率: 每季度一次。

# 4.人才队伍建设

加强人才队伍建设的顶层设计和统筹推进,打造一支业务精良、同心协力、结构合理的金融人才队伍。

**2021**年巴西交行正式成立了女性事务委员会,旨在为更多的女性提供银行就业机会,同时帮助她们实现职业发展。

## 员工发展

巴西交行坚持员工与公司共同成长,重视员工发展,不断推动多元化人才发展策略,全方位引进、培养、用好人才,实施重点专业、关键岗位重点培训。目前一半以上的中层员工和近80%的高层干部的职业生涯都始于我行。

巴西交行力争为员工提供具有竞争力的薪酬待遇,并设立相匹配的薪酬 调整和激励机制,鼓励员工与企业一起发展。

# 人才培养

巴西交行建立多层次的培养制度,搭建完备的培训体系,优化培训资源配置,按绩按需为员工赋能。与巴西顶尖大学达成战略培养合作,为各年级学生提供多项奖学金与赞助,选拔对口金融科技人才,为员工提供培训、比赛、交流机会,运用弹性工作制鼓励员工平衡工作与培训。



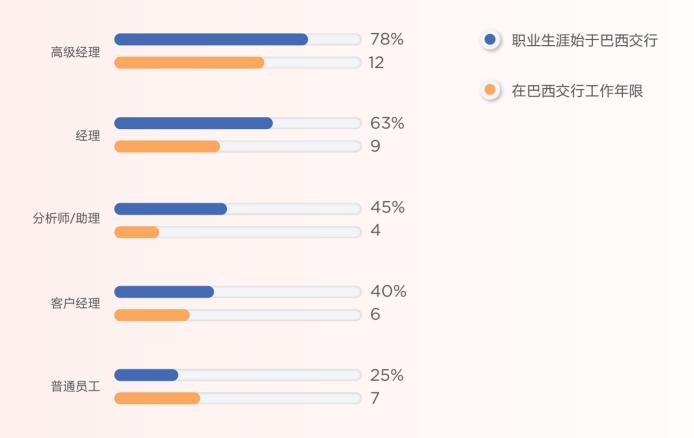
### 人才政策

鼓励员工在专业和学术方面 取得进步。

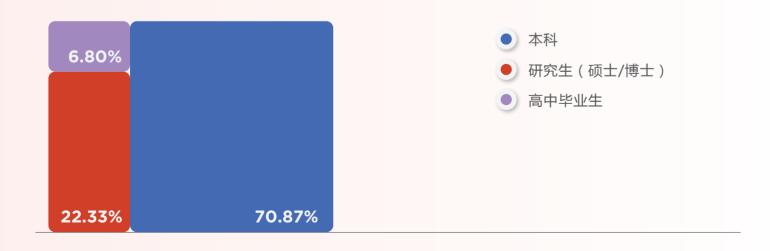
## ≈80% 和 ₄50%,

我们的管理、管理及管理职位分别由在交银银行从事金融市场工作的人担任。

#### 人才结构



# 学历构成



# 释义

#### 主动管理

通过对投资基金的主动管理,旨在获取高于标准收益的额外收益。投资基金经理通过对资产进行研究分析,选择适合的资产进行投资,以获得超额收益。

#### 农业信用证 (LCA)

金融机构发行的证券,投资时在指定时期内为投资者提供报酬,是农业综合企业参与者的资金来源。 投资者将其贷款借出以在将来获得回报。

#### 分散化

分配资源投资于不同资产,以期用最小的风险赚取 最大的收益。

#### 贷款减值准备

贷款减值准备是资产负债表中的一个科目,用于反映银行对客户未来逾期及违约造成损失的一种估计。

#### 回测

根据过去的财务模型来验证财务模型的过程。 通过给定模型在过去的性能来评估该模型在未来的表现。

#### 固定收益证券 (LF)

金融机构通过发行LF可以为客户提供期限更长的融资,其最短期限为2年。发行主体可以是全球性质的银行,商业银行,开发银行,投资银行,信贷,融资和投资公司,储蓄银行,抵押公司和房地产信贷公司发行,也可以由国家经济和社会发展银行(BNDES)发行。

回报可以采用固定或与通胀挂钩的浮动利率, 付息周期一般为半年。

#### 年均增长率

年复合增长率,是评价一项投资在一定时期内的平均

盈利能力的指标。

#### 现金和现金等价物

现金等价物是指易于转换为如商业票据、市场流动性高的证券、银行间存拆放等具有高流动性的资产。

#### **CEO**

首席执行官。

#### 银行存款证明 (CDB)

金融机构向客户提供的所有权,作为一种投资选择, 其报酬可以是固定的或非固定的。

#### 合规

遵守法律, 法规, 政策和准则, 确保道德, 透明的行为。

#### 债券

巴西公司企业在巴西国内资本市场发行的中长期债务证券,通常为固定利率,赋予其持有人对发行公司的信用权利。

#### 衍生产品

价值取决于底层资产、参考利率或市场指数的一种金融工具。

#### 衍生品

价值取决于底层资产、参考利率或市场指数的一种金融工具。

远期:一种场外合约。交易双方根据现在约定的价格, 在未来买卖一定数量的商品或金融资产

期货:一种场内合约。交易双方根据未来的价格,在 未来某个时间点交易某种资产。交割方式可以是实物 或者是现金交割。

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期权:一种场内合约,其买方在向卖方支付了期权费之后,将有权但非义务在约定日期以约定价格向卖方买或卖某种金融资产或工具。

互换:一种场外合约。买卖双方在约定时间里,交换约定金融工具的收益、利率、现金流。

#### 高额保险定期存款 (DPGE)

DPGE是一种金融机构发行的含有高额保险条款的定期存款产品,由FGC(巴西信用担保基金)提供担保。发行人主要包括商业银行、开发银行、投资银行、其他信贷机构以及储蓄银行获准发行该产品。

#### 广义信贷资产

包括贷款和含有信用风险的证券,例如债券、本票、农产品信用票据。

#### 银行同业存单(CDI)

同业存单是金融机构发行用以融资的固定收益证券,期限通常为隔夜。

#### 负债

负债是指企业过去的交易或事项形成的、预期会导致经济利益流出企业的现时义务。

#### 流动资产

现金和现金等价物、回购、同业存款、外汇和可供出 售的政府债券。

#### 多边机构

由多国参与设立的金融借贷机构,主要致力于发展政治、经济、卫生、安全和基础设施等。例如联合国、 世卫组织、世界发展银行等。

#### 操作限额

为了满足监管要求和内部政策,银行在经营活动中需

要满足的限制指标。

#### 房地产信贷融资工具(LCI)

金融机构发行的一种固定收益融资工具,资金需用于房地产销售、建设行业。

#### 回购

回购合约中,回购方在期初向逆回购方卖出债券的同时约定在未来某个时间购回。

#### 平均净资产收益率(ROAE)

该指标用于衡量公司基于净资产的盈利能力,其等于 净利润比上一定期间的平均净资产。

#### 资本偏好声明(RAS)

该文件载明了一个公司在开展经营活动的时候,对各 种风险的偏好程度。

#### 次级融资工具

附带次级条款的债务工具,即当发行人出现偿付困难时,该债券的持有者的受偿次序列于一般债权人之后。

#### 投资者适合性原则

该程序用于使投资者的投资与其风险承受能力相适应。

#### 资金来源总额

包括活期存款、定期存款、同业存款、金融机构融资工具(LF)、农业信贷融资工具(LCA)、房地产信贷融资工具(LCI)、境外融资、出口前融资。



# 信用评级

在我们看来,评级机构的信用评级是对我行信用质量进行独立、透明评估的重要信息资源。

穆迪于2021年6月30日发布了交行巴西的投资者服务报告。交行本币和外币中长期国际评级均为"Ba1",高于巴西主权评级"Ba2"。巴西国内评级方面,穆迪于21年7月2日,给予交行巴西该类评级中最高级别"Aaa. br"评级,评级展望为"稳定"。

此外,惠誉于2021年8月24日给予交行巴西"AAA (bra)"的国内长期评级,也是该类评级中最高级别。国际评级方面,给予交行巴西长期发行违约评级外币"BB"和本币"BB+"的评级。同样均高于其对巴西的主权评级"BB-"。受巴西主权评级影响,交行巴西长期发行违约评级展望为"负面"。

# 证券组合和有价证券

市场交易部门负责公司债券的管理和流通,该部门的业务主要是在二级市场主动进行公司证券交易。

# 银行分类升级

截止2020年6月,交行巴西已连续一年半保持其总风险敞口与巴西国内生产总值的比例高于0.1%。因此,根据2017年颁布的4,553号决议第8条,在2020年底达到了规定的S3级银行分类要求。



# Aaa.br

2021年穆迪对交行巴西评级

# AAA(bra)

2021年惠誉对交行巴西长期 国内评级。

Assets		Prudential Conglomerate		
	Note	12/31/2021	12/31/2020	
Current and long-term assets		14,139,490	12,177,92	
Cash	4	972,605	666,826	
Bank deposits		3		
Cash		4	=	
Free reserves		2,110	11,470	
Bank deposits in foreign currencies		970,488	655,351	
Short-term interbank investments	5	411,082	768,723	
Open market investments	4	14,333	540,00	
Interbank deposits		257,236	226,63	
Investments in foreign currencies	4	139,513	2,079	
Marketable securities and derivative financial instruments	6	4,742,472	3,706,814	
Bank portfolio		1,765,968	2,364,784	
Subject to repurchase agreements		1,786,946	283,794	
Linked to guarantees given		1,009,511	971,640	
Derivative financial instruments	21	180,228	86,716	
Allowance for marketable securities		(181)	(120)	
Interbank accounts		7,110	63,684	
Correspondent banks		274	85	
Deposits – Central Bank of Brazil		6,836	63,599	
Loan transactions	7	7,210,205	6,471,638	
Discounted securities and loans		5,397,606	5,137,907	
Financing		1,285,963	734,566	
Rural and agroindustrial financing		575,327	636,906	
Allowance for loans		(48,691)	(37,741	
Other receivables		785,002	484,304	
Foreign exchange portfolio	8	520,573	223,478	
Unearned income		18,934	19,157	
Trading and brokerage		_		
Credit assignment	7	20,887	25,937	
Sundry	13	111,539	109,666	
Tax credits	24	117,715	107,332	
Allowance for other receivables	7	(4,646)	(1,268)	
Other assets	14	11,014	15,934	
Permanent assets		44,652	36,590	
Investments		1,081	647	
Other investments		3,710	3,275	
Provision for losses		(2,629)	(2,628)	
Property and equipment in use		11,149	11,007	
Furniture and equipment		13,912	11,876	
(-) Furniture and equipment depreciation		(5,891)	(4,441)	
Improvements in third party real estate		6,936	6,936	
(-) Depreciation in improvement in third parties properties		(3,809)	(3,365)	
Lands		1	1	
Intangible	15	32,422	24,936	
Total assets		14,184,142	12,214,513	

Liabilities		Prudential Conglo	merate
	Note	12/31/2021	12/31/2020
Current and long-term liabilities		13,323,418	11,430,285
Deposits	9	2,235,688	2,802,333
Demand deposits		327,559	629,320
Time deposits		1,146,662	1,533,845
Interbank deposits		761,467	639,168
Repurchase agreements	10	1,731,600	291,208
Own portfolio		1,731,600	291,208
Funds from acceptance and issuance of securities	11	3,774,408	4,018,252
Liabilities from issuance of agribusiness credit bills - LCA		2,087,510	1,450,829
Liabilities from issuance of housing credit bills - LCI		47,910	67,442
Liabilities from issuance of financial bills - LF		1,432,992	1,456,749
Liabilities from financial letter with guarantee - LFG		_	841,472
Liabilities from issuance of financial bills - LF - Subordinated Debts		205,996	201,760
Interbranch accounts		31,831	60,097
Third-party funds in transit		31,831	60,097
Borrowings	12	4,663,429	3,462,816
Loans abroad		4,663,429	3,462,816
Derivative financial instruments	6 and 21	317,682	370,790
Derivative financial instruments		317,682	370,790
Other liabilities		568,780	424,789
Collection of similar taxes		613	32
Foreign exchange portfolio	8	1,272	2,779
Social		35,008	27,023
Statutory		62,661	56,271
Tax and social security		186,078	130,294
Securities trading		50,619	5,597
Allowance for financial guarantees	7 and 26	10,699	14,740
Sundry	13	221,830	188,053
Deferred income	27 b	19,916	19,900
Equity	16	840,808	764,328
Capital		469,300	469,300
Domiciled in Brazil		469,300	469,300
Income reserves		556,936	449,852
Market value adjustment of securities and derivative financial instrument	s	(3,589)	27,015
Securities available for sale		(3,589)	27,015
Treasury stock		(181,839)	(181,839)
Total liabilities and equity		14,184,142	12,214,513

	,	<b>Prudential Conglomerate</b>			
	Note	Second half of 2021	12/31/2021	12/31/2020	
Financial income		748,665	861,843	719,820	
Loan transactions		332,611	512,042	324,109	
Income from marketable securities transactions	5 and 6	172,006	207,884	231,053	
Gain on derivative financial instruments	21	244,048	141,917	164,658	
Financial expenses		(534,390)	(448,791)	(400,238)	
Market funding operations	17	(216,282)	(293,196)	(194,448)	
Loans, assignments and onlending operations	17	(273,673)	(137,781)	(345,001)	
Result of exchange operations	17	(36,779)	(2,964)	166,982	
(Provisions)/Reversals of allowance doubtful accounts	7	(7,818)	(14,891)	(26,925)	
(Provisions)/Reversals for marketable securities	6	162	41	(846)	
Gross financial income		214,275	413,052	319,582	
Other operating income (expenses)		(32,202)	(71,117)	(66,179)	
Service revenues	18	81,677	139,405	105,455	
Personnel expenses		(59,912)	(111,568)	(90,028)	
Other administrative expenses	19	(38,378)	(70,953)	(61,143)	
Tax expenses		(15,538)	(27,935)	(23,582)	
Other operating income		721	1,657	7,386	
Other operating expenses		(772)	(1,723)	(4,267)	
Operating income		182,073	341,935	253,403	
Non-operating expenses		32	1,133	(7,393)	
Income before income taxes and profit sharing		182,106	343,068	246,010	
Income and social contributions taxes	24	(57,187)	(117,670)	(79,614)	
Provision for income tax		(36,185)	(64,703)	(62,859)	
Provision for social contribution tax		(32,411)	(52,598)	(43,122)	
Deferred tax asset/(liabilities)		11,409	(369)	26,367	
Profit sharing – management and employees		(41,059)	(77,999)	(49,824)	
Net income		83,860	147,399	116,572	
Earnings per outstanding share		0.41	0.72	0.57	

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	Prud	Prudential Conglomerate				
	Second half of 2021	12/31/2021	12/31/2020			
Net income	83,860	147,399	116,572			
Market adjustment variation of the securities	(10,374)	(30,604)	26,636			
Securities available for sale	(15,020)	(36,785)	29,564			
Tax effects	4,646	6,181	(2,928)			
Exchange variation of investments abroad	12,613	8,371	20,349			
Derivative financial instruments used for hedging	(12,613)	(8,371)	(20,620)			
Derivative financial instruments	(18,919)	(12,942)	(36,221)			
Tax effects	6,306	4,571	15,601			
Comprehensive income for the six-month period/year	73,486	116,795	142,937			

		Income re	eserves	Market value adjustment of securities and derivatives	Hedge of			
	— Capital	Legal	Statutory	Bank	Investments Abroad	Treasury shares	Retained earnings	Total
Year ended December 31, 2020								
Balances at January 1, 2020	469,300	36,098	328,974	650	-	(181,839)	-	653,183
Market value adjustments - marketable securities				26,636				26,636
Exchange variation of investments abroad					20,349			20,349
Derivative financial instruments used for hedging					(20,620)			(20,620)
Net income for the year							116,572	116,572
– Reserves		5,829	78,951				(84,780)	-
– Interest on equity (R\$ 0.15 per share)							(31,792)	(31,792)
Balances at December 31, 2020	469,300	41,927	407,925	27,286	(271)	(181,839)	-	764,328
Changes in the year	-	5,829	78,951	26,636	(271)	_	-	111,145
Year ended December 31, 2021								
Balances at January 1, 2021	469,300	41,927	407,925	27,286	(271)	(181,839)	_	764,328
Market value adjustments - marketable securities				(30,604)				(30,604)
Exchange variation of investments abroad					8,371			8,371
Derivative financial instruments used for hedging					(8,371)			(8,371)
Net income for the year							147,399	147,399
– Reserves		7,370	99,714				(107,084)	-
– Dividends payable							(4,940)	(4,940)
– Interest on equity (R\$ 0.17 per share)							(35,375)	(35,375)
Balances at December 31, 2021	469,300	49,297	507,639	(3,318)	(271)	(181,839)	-	840,808
Changes in the year	_	7,370	99,714	(30,604)	_	_	_	76,480
Balances at July 1, 2021	469,300	45,104	468,287	7,056	(271)	(181,839)	-	807,637
Market value adjustments - marketable securities				(10,374)				(10,374)
Exchange variation of investments abroad					12,613			12,613
Derivative financial instruments used for hedging					(12,613)			(12,613)
Net income for the semester							83,860	83,860
– Reserves		4,193	39,352				(43,545)	-
– Dividends payable							(4,940)	(4,940)
– Interest on equity (R\$ 0.17 per share)							(35,375)	(35,375)
Balances at December 31, 2021	469,300	49,297	507,639	(3,318)	(271)	(181,839)	_	840,808
Changes in the six-month period	_	4,193	39,352	(10,374)	_	_	_	33,171

	Prudential Conglomerate			
	Second half of 2021	12/31/2021	12/31/2020	
Cash flow from operating activities		,		
Net income	83,860	147,399	116,572	
Adjustments to net income	(41,829)	(21,558)	15,692	
Allowance/Reversion for doubtful accounts	7,818	14,891	26,925	
Depreciation and amortization	5,169	9,908	7,708	
Expenses from civil, labor and tax allowances	_	283	3,603	
Deferred income and social contribution taxes	(11,409)	369	(26,367)	
Gain/losses on fair value adjustment on marketable securities and derivatives	(43,407)	(47,009)	3,823	
Adjusted net income	42,031	125,841	132,264	
(Increase)/Decrease in short-term interbank investments	94,610	(34,733)	(226,637)	
(Increase) in marketable securities and derivative financial instruments	(564,562)	(1,041,757)	(1,236,169)	
(Increase)/Decrease in interbank and interbranch accounts	(3,027)	28,308	(68,481)	
(Increase) in loan and lease transactions	(875,632)	(753,458)	(2,691,285)	
(Increase)/Decrease in other assets	196,184	(296,147)	157,600	
(Decrease)/Increase in deposits	(235,721)	(566,645)	1,942,024	
(Decrease)/Increase in open market funding	422,340	1,440,392	(1,405,271)	
Increase in borrowings and onlending	338,720	1,200,613	1,208,659	
Increase in deferred income	1,312	16	3,989	
(Decrease)/Increase in other liabilities	(158,223)	76,369	53,678	
(Decrease)/Increase in market value adjustments - marketable securities	(10,374)	(30,604)	26,365	
Net cash flow from operating activities	(794,373)	22,354	(2,235,528)	
Cash flow from investing activities				
(Increase) in investments	(242)	(434)	(347)	
Property and equipment for use and leased acquisition	(12,831)	(17,536)	(13,568)	
Net cash used in investing activities	(13,073)	(17,970)	(13,915)	
Cash flow from financing activities				
Dividends and interest on equity paid	27,023	27,023	48,410	
(Decrease)/Increase in securities issue resources	640,198	(243,843)	1,305,527	
Net cash used in financing activities	667,221	(216,820)	1,353,937	
Net increase in cash and cash equivalents	(98,194)	(86,595)	(763,242)	
At the beginning of the six-month period/year	1,220,511	1,208,912	1,972,154	
Changes for the six-month period/year	19,633	(32,627)	(1,037,902)	
Exchange variation for the six-month period/year	(117,827)	(53,968)	274,660	
At the end of the six-month period/year	1,122,317	1,122,317	1,208,912	
Net increase in cash and cash equivalents	(98,194)	(86,595)	(763,242)	
Non-monetary transaction				
Unpaid interest on equity	35,375	35,375	31,792	
Unpaid dividends	4,940	4,940	_	

# 1.Operations

Banco BOCOM BBM is the leading institution of the Prudential Conglomerate (Note 2) and is authorized to operate as finance bank with the following portfolios:

- Commercial:
- Investment:
- Loan, Financing and Investment;
- Foreign Exchange;
- Energy trading.

Prudential Conglomerate operates as a group of institutions which operate together in the financial market, with certain operations involving co-participation or intermediation of associated institutions which are part of Banco BOCOM BBM Financial Group. The benefits of services rendered by such institutions and the costs of the Financial Group's shared operating and administrative structures are fully or individually absorbed, which is practical and reasonable in the circumstances.

# 2.Presentation of the Financial Statements and Consolidation Criteria

The financial statements of the Prudential Conglomerate were prepared in accordance with the Resolution No. 4,280/2013, of the Brazilian National Monetary Council (CMN), and Circular Letter No. 3,701/2015 of the Central Bank of Brazil (BACEN), which are elaborated based on the accounting guidelines arising from the Laws No. 4,595/1964 (National Financial System Law) and No. 6,404/1976 (Corporation Law), including the amendments introduced by the Laws No. 11,638/2007 and No. 11,941/2009, in compliance with the standards and instructions from CMN, BACEN, Federal Accounting Council (CFC) and the accounting practices adopted in Brazil applicable to financial institutions regulated by the BACEN.

The preparation of these statements in accordance with the accounting practices adopted in Brazil, applicable to financial institutions, requires management to use judgment in the determination and recording of accounting estimates, when applicable. Significant assets and liabilities subject to these estimates and assumptions include: allowance for doubtful accounts, realization of deferred tax assets, provision for labor, tax and civil claims, valuation of financial instruments and other provisions. The definitive values of the transactions involving these estimates will only be known at the time of their settlement.

As of May 2020, the amendments to CMN Resolution No. 4,818/2020 and BACEN Resolution No. 2/2020 were included in Banco Bocom BBM's consolidated financial statements. The main objective of these standards is to comply with the guidelines for the presentation of financial statements in accordance with international accounting standards, International Financial Reporting Standards (IFRS). The main changes implemented were: the Balance Sheets for the period are presented

in comparison with the end of the immediately preceding year and the other statements are compared with the same periods of the previous year for which they were presented; and the inclusion of the Statement of Comprehensive Income. The changes implemented by the new standards had no impact in the Net Income or Shareholders' Equity.

#### 2.1 Consolidation

The Prudential Conglomerate's financial statements were prepared in accordance with the consolidation criteria stated by BACEN's Resolution No. 4,280/2013, which includes financial institutions and other institutions authorized to operate by the Central Bank of Brazil.

In the consolidation process of the entities participating in the Prudential Conglomerate, at the base date, there was an adjustment in order that the same classifications, criteria, procedures and accounting practices used in the lead institution are applied in the evaluation and recognition of the assets, liabilities, revenues and expenses, with the following eliminations:

- Capital share, reserves and accumulated results held between the institutions (it also should be noted that there is no intercompany transactions);
- Balances of current accounts and other Assets and/or Liabilities between the institutions, whose balance sheets were consolidated; and
- The effects on profit or loss arising from significant transactions between these institutions.

The Prudential Conglomerate financial statements comprise the financial statements at December 31, 2021 and December 31, 2020 of the following institutions:

Banco BOCOM BBM S.A. and Nassau branch

BBM Bank Ltd. (a)

BOCOM BBM Corretora de Câmbio e Valores Mobiliários S.A. (b)

Bahia Fund (c)

The Southern Atlantic Investments (b)

Jiang Fundo de Investimento Multimercado Credito Privado Investimento no Exterior (b)

Haitan Fund (a)

Tai Yang Fund (a)

<sup>(</sup>a) The indirect participation of 100% of Banco BOCOM BBM in the social capital of BBM Bank Ltd., Bahia Fund, Haitan Fund and Tai Yang Fund were eliminated from the Prudential Conglomerate.

<sup>(</sup>b) Banco BOCOM BBM directly holds 100% of the capital of these entities. The consolidation of Jiang FIM CPIE has started at March 2018.

<sup>(</sup>c) Bahia Fund was dissolved on May 27, 2021 in the Cayman Islands. All of its shares were redeemed by The Southern Atlantic Investments, Ltd.

# 3. Significant Accounting Practices

#### (a) Results of Operations

Recorded on an accrual basis.

According to BACEN Resolution No. 2/2020, recurring and non-recurring results were presented separately.

	<b>Prudential Conglomerate</b>				
	Second half of 2021	12/31/2021	12/31/2020		
Recurring net income	83,825	146,933	120,929		
Non-recurring events	35	466	(4,357)		
Fines	(68)	(185)	(178)		
(Provisions)/Reversals for contingencies	139	(144)	(3,603)		
Provision for devaluation of properties not for use (BNDU)	_	-	(2,600)		
Result from sale of properties not for use (BNDU)	_	1,261	(1,540)		
Income tax and social contribution	(36)	(466)	3,564		
Net income	83,860	147,399	116,572		

#### (b) Marketable Securities and Derivative Financial Instruments

In accordance with BACEN Circular Letter No. 3,068, securities are classified into the following categories:

- I Trading securities;
- II Securities available for sale;
- III Securities held up to maturity.

Securities classified in categories I and II are adjusted to market value, being the adjustment of the former directly accounted in the result and the adjustment of the latter in specific equity account, net of tax effects. Securities classified as "held up to maturity" are evaluated based on the cost plus the earnings.

Derivative financial instruments are adjusted to market value, in accordance with BACEN Circular Letter No. 3,082.

Investment fund quotas are restated monthly based on the quota value disclosed by the Administrators of the funds in which funds are invested. The appreciation and depreciation of investment fund quotas are presented in "Result from transactions with marketable securities".

#### 57

#### (c) Current and Non-current Assets

These are presented at their realizable value, including, when applicable, the earnings and monetary variations (on a pro rata basis) and foreign exchange variations, less corresponding proceeds from future realization and/or provision for losses. Balances maturing within 12 months (or 360 days) are classified as current assets.

#### (d) Permanent Assets

These are stated at cost, plus the following aspects:

- Evaluation of the significant investments in subsidiaries on an equity accounting basis;
- Depreciation of property and equipment in use and lease calculated on a straight-line basis, based on annual rates that reflect the economic useful life of the assets, is as following: properties in use 4%; furniture and utensils 10% and data processing 20%;
- Amortization of intangible assets calculated according to the economic useful life of the asset.

In accordance with CMN Resolution No. 4,534/2016, financial institutions and institutions authorized to operate by BACEN cannot record Deferred Assets. Balances recorded as deferred assets at the date this resolution became effective, except for lease losses to amortize, must be:

- I Reclassified to the proper asset accounts, according to the operation nature, when they refer to items that constitute an asset, according to the effective regulation; and
- II Amortized on a straight-line basis up to December 31, 2021, in the other cases.

#### (e) Current Liabilities and Long-term Liabilities

These are stated at their known or calculable values including, whenever applicable, the charges and the monetary (on a daily pro rata basis) and exchange variations, less the corresponding expenses to be allocated. Balances maturing within 12 months (or 360 days) are classified as Current Liabilities.

#### (f) Income Tax and Social Contribution

The provision for income tax is set up based on the taxable profit, at a 15% rate, plus 10% surcharge on annual taxable profit exceeding R\$ 240 thousand. The provision for social contribution tax is set up at the rate of 20%.

The deferred tax assets and liabilities arising from temporary differences were recognized in accordance with CMN Resolutions No. 3,059 of December 20, 2002, and No. 3,355, of March 31, 2006, and they take into account the history of profitability and the expected generation of future taxable income supported by technical feasibility studies. The deferred taxes were constituted based on the expected income tax of 25% and social contribution rates of 15% and 20%, since used while the rate is effective.

The president Jair Bolsonaro approved the Law No. 14,183, of 2021, arising from the Provisional Measure (MP) No. 1,034/2021, effective as from July 2021, amending the Law No. 7,689/1988, in order to increase the Social Contribution on Net Income (CSLL) rate due by financial institutions. The impact for Banco BOCOM BBM was the increase of the CSLL rate from 20% to 25%, between 7/1/2021 and 12/31/2021, as from 1/1/2022, the rate will be of 20%, according to the amendment proposed by the MP No. 1,034/2021, article 3, item III of the Law No. 7,689/1988. BOCOM BBM CCVM had the CSLL rate increased from 15% to 20%, between 7/1/2021 and 12/31/2021, and as from 1/1/2022, the rate will be of 15%, according to amendments proposed by MP No. 1,034/2021, article 3, item I, of the Law No. 7,689/1988.

#### (g) Swaps, Futures, Forwards and Options

The nominal amounts of contracts are recorded in offsetting accounts. Daily adjustments of transactions conducted in the future market are recorded as effective income or expense as they are incurred. Premiums paid or received upon the realization of operations in the options market are recorded in the respective equity accounts at cost, adjusted to market value as a counterparty to the result. The market value of swap and term operations are individually recorded in asset and liability equity accounts, as a counterparty to the respective income and expense accounts.

#### (h) Earnings per Share

These are calculated based on the average number of outstanding shares at the period.

#### (i) Impairment of Assets

In accordance with CPC 1, as approved by CMN Resolution No. 3,566 of May 29, 2008, and based on management analysis, if the carrying amount of the assets of the Bank and of others institutions of the Prudential Conglomerate exceeds their recoverable value, an impairment is recognized in the statement of operations.

#### (j) Contingent Assets and Liabilities and Legal Obligations

The recognition, measurement and disclosure of contingent assets and liabilities, and legal obligations are as follows:

Contingent assets – these are not recognized in the financial statements, except when there are evidences that offer guarantees of their realization, with no appeals.

Contingent liabilities – these are recognized in the financial statements when, based on the opinion of the legal advisors and of management, the loss of a lawsuit or administrative proceeding is evaluated as probable and whenever the amounts involved can be measured with sufficient reliability. The contingent liabilities classified as possible losses by legal advisors are not recorded and are just disclosed in the notes to the financial statements, and those classified as remote loss do not require any

59

provision disclosure. Regarding the labor suits with loss probability classified as possible by the external lawyers, management will consider some assumptions such as: procedure stage, involved right, losses background, deal possibility. Accordingly, even if the suits are classified as possible, they may be provided for.

Legal obligations – tax and social security – these refer to lawsuits contesting the legality and constitutionality of some taxes and contributions. The discussed amount is quantified and accounted for.

#### (k) Short-term Interbank Investments

Interbank investments are stated at the acquisition, investment or release cost, plus foreign exchange, monetary and interest variations, as contractually defined. When the market value is lower, a provision for the adjustment of an asset to its realization value is made.

#### (l) Loan Transactions

Credit operations are stated at the acquisition, investment or release cost, plus foreign exchange, monetary and interest variations, as contractually defined. When the market value is lower, a provision for the adjustment of an asset to its realization value is carried out. An allowance for doubtful accounts is set at an amount considered sufficient to cover any losses, and it considers, in addition to past experience, the assessment of debtors and their guarantors, as well as the specific characteristics of the transactions, in accordance with the requirements of Brazilian Central Bank Resolution No. 2,682. These are recorded at present value on a daily pro rata basis, based on the index variation and the agreed-upon interest rate, restated up to the 59th day in arrears at the financial companies, observing the estimated receipt date. After the 60th day, the recognition in the result occurs on the effective receipt of the installments. The renegotiated operations are maintained, at least, at the same level in which they were classified previously to the renegotiation and, if they have already been written-off against the provision, they are classified as level H; the gains are recognized as income upon the effective receipt.

Credit assignments without risk retention result in the write-off of the financial assets that are the object of the operation, which are then kept in an offsetting account. The result of the assignment is fully recognized when it is realized. In January 2012, as determined by CMN Resolutions No. 3,533/2008 and No. 3,895/2010, all credit assignments with risk retention are recognized in the remaining terms of operations, and the financial assets subject to assignment are recorded as credit operations and the amount received as obligations for sales or transfer of financial assets.

#### (m) Cash and Cash Equivalents

These represent cash and cash equivalents, unlinked balances with the Central Bank of Brazil and financial assets of high liquidity with maturities within three months, subject to an immaterial risk of changes in their fair values, which are used by the Group to manage short-term commitments (see Note 4).

#### (n) Other Values and Assets

The operations classified as Other values and assets represent operations arising from the execution of loan guarantees, which are initially valued at the remaining balance of the debt, and which are valued at fair value based on valuation reports prepared by professional entities with recognized qualifications, using evaluation techniques, limited to the value of the debt.

#### (o) Hedge Accounting

The Bank allocated derivative financial assets to hedge principal amounts raised and the corresponding interest due.

Derivative financial instruments used to mitigate risks arising from exposure to variations in the market values of financial assets and liabilities, and that are highly correlated regarding changes in its market value in relation to the market value of the item that is being protected, at the beginning and during the life of the contract and considered effective in reducing the risk associated to the exposure to be protected, are considered protection instruments (hedges) and classified based on their nature:

- (a) Market risk hedge: the financial instruments classified under this category, as well as their related financial assets and liabilities, which are the hedge objects, are recorded at fair value and have their gains/losses, whether realized or not, reflected in the result; and
- (b) Cash flow hedge: the financial instruments classified in this category are marked at fair value, being the effective installment of appreciation or depreciation recorded, net of tax effects, in a specific account on equity. The ineffective portion of the respective hedge is recognized directly in the result.

If the hedging instrument expires or is sold, cancelled or exercised, or when the hedging position does not fall under hedge accounting conditions, the hedging relationship ends.

The objectives of the risk management of this operation, as well as the strategy of protection against such risks during the operation, are duly documented, as well as it is documented the evaluation, both at the beginning of the protection operation and on an ongoing basis. The derivative financial instruments are highly effective in offsetting the variations of the fair value (mark-to-market) of the hedged item. A hedge is expected to be highly effective if the variation in the fair value or cash flow attributable to the risk being hedged during the hedge relation period nulls from 80% to 125% of the risk variation.

Derivative instruments used for hedging purposes, as well as the mark-to-market value of the hedged object are disclosed in Note 21.

#### (p) Deposits and Funding in the Open Market

These are recognized at the amounts of the liabilities, and the charges payable, when applicable, are recorded on a daily pro rata basis.

#### (q) Intangible Assets

These correspond to the acquired rights that aim at assets incorporated into the maintenance of the entity or exercised with this condition, in accordance with CMN Resolution No. 4,534, of November 24, 2016. It consists of (i) licenses and copyrights and use, and (ii) Software. Intangible assets with defined useful lives are amortized on a straight-line basis over the period of their useful lives in which the rights generate benefits.

# 4. Cash and Cash Equivalents

	Prudential Co	<b>Prudential Conglomerate</b>		
	12/31/2021	12/31/2020		
Bank deposits in foreign currencies	970,488	655,351		
Investments in foreign currencies	139,513	2,079		
Open market investments (a)	10,199	540,007		
Free reserves	2,110	11,470		
Cash	4	3		
Bank deposits	3	2		
Total	1,122,317	1,208,912		

(a) Committed transactions maturing within 90 days, on the date of application.

# **5.Short-term Interbank Investments**

Short-term interbank investments are as follows:

	Prudential Conglo	merate	
	12/31/2021	12/31/2020	
Open market investments	14,333	540,007	
Self-funded position	14,333	540,007	
Financial treasury bills	14,333	60,004	
National treasury bills	-	380,001	
National treasury notes – B series	-	100,002	
Interbank deposits (*)	257,236	226,637	
Investments in foreign currencies	139,513	2,079	
	411,082	768,723	
Current assets	345,282	600,326	
Long-term receivables	65,800	168,397	
Total	411,082 76		

<sup>(\*)</sup> The interbank deposits in the Prudential Conglomerate on December 31, 2021 basically refer to Time Deposits with Special Guarantees. In the year ended December 31, 2021, their maturities are between January 2022 and June 2023.

At December 31, 2021 and December 31, 2020, the collateral received through repurchase agreements amounted to R\$ 14,752 thousand and R\$ 542,414 thousand, respectively, in the Prudential Conglomerate. The provided collateral amounted to R\$ 3,425,812 thousand and R\$ 9,459 thousand during the same periods.

The results of short-term interbank investments in the Prudential Conglomerate are as follows:

		Prudential Conglomerate			
	Second half of 2021	12/31/2021	12/31/2020		
Open market investments	12,974	19,700	26,661		
Interbank deposits	11,571	16,922	4,846		
Investments in foreign currencies	279	425	1,902		
Income from marketable securities transactions	24,824	37,047	33,409		

# 通银行巴西子行 2021年报中文版

# 6.Marketable Securities and Derivative Financial Instruments

		Prudential Con	glomerate	
	Cost	Market	Cost	Market
	12/31/2	021	12/31/2	020
I – Marketable securities	4,608,794	4,562,244	3,586,691	3,620,098
Securities for trading (*)	1,200,934	1,168,231	858,652	862,103
Bank portfolio	452,646	446,352	806,996	810,421
Fixed income securities	442,603	436,309	806,996	810,421
Financial treasury bills	173,957	174,263	448,789	449,437
National treasury bills	301	301	274,431	276,982
National treasury notes – B series	268,345	261,745	83,776	84,002
Investment fund shares	10,043	10,043	_	_
Credit fund quotas	10,043	10,043	_	_
Subject to repurchase agreements	694,498	669,520	5,604	5,616
Financial treasury bills	35,017	35,086	-	-
National treasury notes – B series	659,481	634,434	5,604	5,616
	53,790	<b>52,359</b>		
Linked to guarantees given Financial treasury bills	33,790	32,339	<b>46,052</b> 19,329	<b>46,066</b> 19,343
National treasury notes – B series	26,208	24,777	19,529	19,545
Fund quotas given as guarantee	27,582	27,582	26,723	26,723
Securities available for sale (*)	2,182,482	2,168,635	1,899,815	1,929,771
Bank portfolio	1,170,428	1,167,052	947,138	969,981
Fixed-income securities	568,495	570,443	318,046	318,163
Financial treasury bills	285,062	285,837	58,050	58,042
National treasury bills	24,099	23,186	980	1,000
National treasury notes – B series	8	8	7	7
Promissory note	103,584	103,584	142,618	142,621
Debentures	25,052	26,145	1,525	1,489
CRA	32,653	32,653 67,541	13,934	14,072
Rural product note Private financial bills	67,541 30,496	31,489	100,932	100,932
			-	-
Marketable securities abroad	601,933	596,609	629,092	651,818
Eurobonds (a)	601,933	596,609	629,092	651,818
Subject to repurchase agreements	916,924	910,938	276,926	278,178
Financial treasury bills	211,918	212,349	9,504	9,459
National treasury bills	206,160	197,600	_	
Debentures	356,168	364,196	267,422	268,719
Eurobonds (a)	142,678	136,793	-	-
Linked to guarantees given	95,130	90,645	675,751	681,612
Financial treasury bills	20,217	20,217	274,462	274,350
National treasury bills	72,400	67,925	-	-
Debentures	2,513	2,503	401,289	407,262

		Prudential Conglomerate			
	Cost	Market	Cost	Market	
	12/31/2	2021	12/31/2	020	
Securities held up to maturity	1,225,378	1,225,378	828,224	828,224	
Bank portfolio	152,564	152,564	584,382	584,382	
Fixed-income securities	25,045	25,045	400,237	400,237	
National treasury notes – F series	-	_	400,237	400,237	
National treasury bills	25,045	25,045			
Marketable securities abroad	127,519	127,519	184,145	184,145	
Eurobonds (a)	127,519	127,519	184,145	184,145	
Subject to repurchase agreements	206,488	206,488	_	-	
National treasury bills	76,177	76,177	_	_	
Eurobonds (a)	130,311	130,311	-	-	
Linked to guarantees given	866,507	866,507	243,962	243,962	
National treasury notes – F series	630,654	630,654	243,962	243,962	
National treasury bills	235,853	235,853	-	-	
Provision for marketable securities	(181)	(181)	(120)	(120)	
Eurobonds (a)	(181)	(181)	(120)	(120)	
II - Derivative financial instruments	109,850	180,228	64,739	86,716	
Swap operations	42,483	112,043	8,833	36,162	
Term	63,874	65,050	53,222	47,981	
Options	1,430	1,072	1,501	1,390	
Futures	2,063	2,063	1,183	1,183	
Total marketable securities and derivative financial instruments	4,718,644	4,742,472	3,651,430	3,706,814	
Segregation of portfolio by maturity range					
No maturity					
Up to 3 months	1,568,836	1,532,358	1,132,346	1,139,570	
From 3 to 12 months	120,401	114,828	267,199	283,429	
Over 12 months	3,029,407	3,095,286	2,251,885	2,283,815	
Total	4,718,644	4,742,472	3,651,430	3,706,814	

<sup>(</sup>a) The amount refers to Eurobonds, of which R\$ 257,649 thousand are classified as "Securities held to Maturity" with final maturity up to September 2031, and R\$ 733,402 thousand as "Securities Avaiable for Sale" with final maturity up to September 2031.

There were no transfers in the bond category during 2021.

<sup>(\*)</sup> Securities classified as "Securities for trading" maturing in more than 12 months and which, on December 31, 2021, amount to R\$ 1,094,075 in the Prudential Conglomerate (December 31, 2020 – R\$ 710,407 thousand), are stated as current assets, according to BACEN Circular Letter No. 3,068/2001. Securities classified as "Available for sale", maturing in more than 12 months, in the amount of R\$ 1,738,655 thousand on December 31, 2021 (December 31, 2020 – R\$ 1,354,338 thousand), in the Prudential Conglomerate, are stated as long-term receivables, according to BACEN Circular Letter No. 3,068/2001, regardless its liquidity level. The effect of this classification in net current capital is shown in Note 22 – Liquidity risk.

	Prudential Conglomerate				
	Cost	Market	Cost	Market	
	12/31/20	)21	12/31/20	20	
III - Derivative financial instruments					
Swap operations	183,142	169,669	211,417	258,402	
Term	122,618	137,864	99,184	87,816	
Futures	6,464	6,463	24,193	24,193	
Options	3,748	3,686	473	379	
Liability position	315,972	317,682	335,267	370,790	
Segregation by maturity range					
Up to 3 months	84,856	88,537	14,157	16,467	
From 3 to 12 months	86,162	100,006	56,319	56,601	
Over 12 months	144,954	129,139	264,791	297,722	
Total	315,972	317,682	335,267	370,790	

The results of Marketable Securities in the Prudential Conglomerate are as follows:

	Prud	Prudential Conglomerate			
	Second half of 2021	12/31/2021	12/31/2020		
Private securities	38,088	85,706	146,966		
Government bonds	80,077	115,282	103,884		
Investment funds quotas	937	1,270	552		
Exchange variation	28,080	(31,421)	(53,758)		
Income from marketable securities	147,182	170,837	197,644		

	Prudential Conglomerate			
	Second half of 2021	12/31/2021	12/31/2020	
(Provision)/Reversal of provision for marketable securities	162	41	(846)	
Result of (provision)/reversal of provision for marketable securities	162	41	(846)	

The market values of marketable securities and derivative financial instruments are determined based on market price quotations at the balance sheet date, when available, or through price valuation models that consider certain assumptions for the valuation of instruments without liquidity and no active market and/or observable market data.

# 7.Loan Transactions, Sureties and Honored Guarantees

At December 31, 2021 and December 31, 2020, loans and guarantees provided through sureties or guarantee agreements in the Prudential Conglomerate, classified according to the clients' economic activities, are as follows:

		Prudential Con	glomerate	
		12/31/2021		12/31/2020
Sugar and ethanol	1,391,855	14.95%	1,158,216	14.60%
Agriculture	1,229,633	13.21%	888,006	11.19%
Banks and insurers	773,251	8.31%	444,854	5.61%
Building and real estate	609,250	6.55%	611,331	7.70%
Retail market	566,882	6.09%	513,970	6.48%
Utilities (energy)	546,200	5.87%	570,491	7.19%
Vehicles and parts	371,038	3.99%	256,961	3.24%
Foods – Sundry	320,966	3.45%	277,560	3.50%
Chemical and petrochemical	296,933	3.19%	218,285	2.75%
Specialized services	293,413	3.15%	198,480	2.50%
Transportation and logistics	254,369	2.73%	292,597	3.69%
Pulp and paper	246,878	2.65%	222,367	2.80%
Pharmaceutics	242,324	2.60%	249,452	3.14%
Health	216,863	2.33%	171,160	2.16%
Heavy construction	194,559	2.09%	101,990	1.29%
Meat industry	186,361	2.00%	162,630	2.05%
Metallurgy	165,193	1.77%	95,127	1.20%
Telecommunication	155,039	1.67%	100,970	1.27%
Civil aviation	135,906	1.46%	163,639	2.06%
Diversified holdings	122,718	1.32%	124,250	1.57%
Textile and leathers	113,093	1.22%	56,196	0.71%
Others (*)	514,776	5.53%	658,911	8.30%
Private sector	8,947,500	96%	7,537,446	95%
Utilities (energy)	262,002	2.81%	271,563	3.42%
Others (*)	98,146	1.05%	125,724	1.58%
Public sector	360,148	4%	397,287	5%
Total	9,307,648	100%	7,934,733	100%

<sup>(\*)</sup> The activities classified as Others include all economic sectors that individually represent less than 1% of the total active loan portfolio at the base dates December 31, 2021 and December 31, 2020.

#### Loan transactions are stated in the Prudential Conglomerate balance sheet as follows:

	Prudential Conglo	Prudential Conglomerate		
	12/31/2021	12/31/2020		
Current assets				
Loan transactions	2,835,106	2,183,045		
Private sector	2,817,313	2,154,425		
Public sector	17,793	28,620		
Other receivables	19,682	13,864		
Foreign exchange portfolio - receivables (a)	10,017	5,287		
Securities and Credits Receivable (b)	9,665	8,577		
Noncurrent Assets				
Loan Transactions	4,423,790	4,326,334		
Private Sector	4,405,263	4,276,654		
Public Sector	18,527	49,680		
Other Receivables	11,222	17,360		
Securities and Credits Receivable (b)	11,222	17,360		
Current Liabilities				
Other Liabilities	492,443	210,121		
Foreign Exchange Portfolio – Advances on exchange contracts (a)	492,443	210,121		
Subtotal	7,782,243	6,750,724		
Co-obligations and risks in guarantees provided (c)	1,525,405	1,184,009		
Total	9,307,648	7,934,733		

<sup>(</sup>a) The Advances on Exchange Contracts are classified as reduction accounts of Other Liabilities – Exchange Portfolio and as Other Receivables – Exchange Portfolio, respectively, as shown in Note 8.

<sup>(</sup>b) This refers to credit assignment, recorded in "Other credits" account.

<sup>(</sup>c) These refer to guarantees granted through sureties and guarantees. The granted guarantees are recorded in offsetting accounts and the respective earnings are classified as Results for Future Years and appropriated to the result according to the guarantees' contractual terms. The Bank also includes guarantees provided for the credit operations of BBM Bank Limited, which are eliminated in the Prudential Conglomerate.

The provision for loan transactions was calculated according to the criteria established by the CMN Resolutions No. 2,682 and No. 2,697, based on the risk classification of the transactions and on their level of arrears.

The classification of the loan transactions in the Prudential Conglomerate is as follows:

						12,	/31/2021					12/31/	2020
Risk Level		Ove	erdue – da	ays			Falling d	ue – days					
	Within 14	15 to 60	61 to 90	91 to 180	181 to 360	Within 90	From 91 to 180	From 181 to 360	Over 360 days	Total	Allowance	Total	Allowance
AA	-	-	-	-	-	1,154,255	620,504	592,786	1,873,535	4,241,080	-	4,143,787	-
Α	88	-	-	-	-	316,918	380,722	579,604	2,098,441	3,375,773	16,879	2,591,917	12,960
В	-	13	-	-	-	89,828	165,887	298,470	628,749	1,182,947	12,247	855,565	8,846
c	-	976	-	-	-	82,321	59,520	162,720	169,574	475,111	22,218	316,496	19,761
D	7	529	-	-	-	1,585	1,437	2,677	460	6,695	670	-	-
E	-	1,888	-	-	-	-	-	3,640	11,278	16,806	5,042	18,024	5,407
F	-	-	-	-	-	-	-	-	-	-	-	4,339	2,170
G	-	-	-	7,518		-				7,518	5,262	-	-
н	-	-	-	-	1,718	-	-	-	-	1,718	1,718	4,605	4,605
	95	3,406	_	7,518	1,718	1,644,907	1,228,070	1,639,897	4,782,037	9,307,648	64,036	7,934,733	53,749

The allowance below is presented in the Prudential Conglomerate balance sheets as follows:

	12/31/2021	12/31/2020
Allowance for loan losses	48,691	37,741
Current assets	24,284	16,540
Noncurrent assets	24,407	21,201
Provision for other credits	4,646	1,268
Securities and credits receivable	4,646	607
Current assets	2,891	-
Noncurrent assets	1,755	607
Provision for advances on exchange contracts	-	661
Current assets	-	661
Provision for co-obligations and risks in guarantees provided	10,699	14,740
Current liability	9,966	13,671
Noncurrent assets	733	1,069
Total	64,036	53,749

# 交通银行巴西子行 2021年报中文版

#### Changes in allowances are as follows:

	12/31/2021	12/31/2020
Balance at January 1st	53,749	47,513
Increase / (reversal)	14,891	26,925
Write-offs to loss	(4,604)	(20,689)
Total	64,036	53,749

In the year ended December 31, 2021, there were no loan transactions renegotiated in the Prudential Conglomerate (December 31, 2020 – R\$ 34,825 thousand).

In the year ended December 31, 2021, there was a recovery of losses on loan transactions in the amount of R\$ 5,482 thousand (December 31, 2020 – R\$ 5,815 thousand).

The credit risk concentration in the Prudential Conglomerate statements is as follows:

	12/31/2021	%	12/31/2020	%
Top debtor	262,002	2.8%	271,563	3.4%
Top 10 debtors	1,443,077	15.5%	1,385,395	17.5%
Top 20 debtors	2,337,617	25.1%	2,113,933	26.6%
Top 50 debtors	4,076,071	43.8%	3,591,012	45.3%
Top 100 debtors	5,909,530	63.5%	5,120,335	64.5%

The breakdown of the Prudential Conglomerate credit portfolio by type is as follows:

	12/31/2021	12/31/2020
Working capital	5,660,819	5,433,410
Co-obligations and Risk in Guarantees Provided	1,525,405	1,184,009
Export credit notes	1,257,842	710,066
Trade finance	786,416	551,635
Others	77,166	55,613
Total	9,307,648	7,934,733

# 8. Foreign Exchange Portfolio

	Prudential Conglo	Prudential Conglomerate		
	12/31/2021	12/31/2020		
Other receivables – Foreign exchange portfolio				
Foreign exchange purchases pending settlement	509,334	216,889		
Income receivable from advances granted (a)	10,017	5,287		
Rights on foreign exchange sales	1,265	1,302		
(-) Advances in national currency received	(43)	_		
Total	520,573	223,478		
Other payables – Foreign exchange portfolio				
Exchange purchase obligations	492,443	210,121		
Foreign exchange sales pending settlement	1,272	1,301		
Advances on foreign exchange contracts granted (a)	(492,443)	(210,121)		
Others	-	1,478		
Total	1,272	2,779		

<sup>(</sup>a) See Note 7.

On December 31, 2021, there were federal government securities deposited securing foreign exchange transactions with B3 in the amount of R\$ 311,944 thousand (December 31, 2020 – R\$ 65,101 thousand).

# 9.Deposits

Maturity range	Time deposits	Interbank deposits	Total 12/31/2021	Total 12/31/2020
Within 1 month	34,014	180,065	214,079	490,902
From 1 to 3 months	242,409	-	242,409	322,417
From 3 to 6 months	92,127	-	92,127	109,642
From 6 to 12 months	121,611	581,402	703,013	191,517
More than 12 months	656,501	-	656,501	1,058,535
Subtotal	1,146,662	761,467	1,908,129	2,173,013
Demand deposits			327,559	629,320
Total			2,235,688	2,802,333

The average term of interbank and time deposits for outstanding transactions at December 31, 2021 is 558 days and 822 days (December 31, 2020 – 640 and 605 days), respectively.

Maturities upon issuance	Time deposits	Interbank deposits	Total 12/31/2021	Total 12/31/2020
Within 1 month	16,707	180,065	196,772	69,189
From 1 to 3 months	161,857	-	161,857	314,663
From 3 to 6 months	46,458	-	46,458	127,898
From 6 to 12 months	53,934	-	53,934	106,859
More than 12 months	867,706	581,402	1,449,108	1,554,404
Subtotal	1,146,662	761,467	1,908,129	2,173,013
Demand deposits			327,559	629,320
Total			2,235,688	2,802,333

The breakdown per segment of the Prudential Conglomerate is as follows:

	Demand	deposits	Time d	eposits	Interbank	deposits	Total		al	
	12/31/2021	12/31/2020	12/31/2021	12/31/2020	12/31/2021	12/31/2020	12/31/2021		12/31/2020	
Legal entities	285,063	554,524	810,404	1,140,506	-	121,773	1,095,468	49.00%	1,816,803	64.83%
Institutional customers	4	4	113,699	281,833	159,039	180,907	272,742	12.20%	462,744	16.51%
Group	20,778	48,839	139,919	107,504	-	-	160,697	7.19%	156,343	5.58%
Financial institutions	-	-	24,483	-	602,428	336,488	626,911	28.04%	336,488	12.01%
Individuals	21,714	25,953	58,157	4,002	-	-	79,871	3.57%	29,955	1.07%
Total	327,559	629,320	1,146,662	1,533,845	761,467	639,168	2,235,688	100%	2,802,333	100%

	12/31/2021		12/31/2	2020
Top depositor	498,762	22.03%	301,392	10.76%
Top 10 depositors	981,382	43.35%	862,198	30.77%
Top 20 depositors	1,275,175	56.33%	1,191,485	42.52%
Top 50 depositors	1,718,296	75.90%	1,764,153	62.95%
Top 100 depositors	1,975,720	87.27%	2,251,511	80.34%

# **10.Repurchase Agreements**

The obligations from repurchase agreements in the Prudential Conglomerate are as follows:

	Prudential Con	Prudential Conglomerate		
	12/31/2021	12/31/2020		
Own portfolio				
National treasury notes	623,389	-		
Debentures	362,990	281,578		
National treasury bills	270,445	-		
Financial treasury bills	259,247	9,630		
Eurobonds	215,529	-		
	1,731,600	291,208		
Current liabilities	1,719,830	276,496		
Noncurrent liabilities	11,770	14,712		
Total	1,731,600	291,208		

The main variation was the increase in the position of prefixed national treasury notes, which the acquisition happened in December 30, 2021, maturing on January 3, 2022 and they were settled on the same date.

### / )

# 11. Funds from Acceptance and Issuance of Securities

On December 31, 2021 and December 31, 2020, fundraising through Agribusiness Credit Bills (LCA), Housing Credit Bills (LCI), Financial Bills (LF), Guaranteed Financial Bills (LFG) and Financial Bills – Subordinated Debt were segregated by maturity range as follows:

				Prudential	Conglomerat	е				
Maturity	LCA	(a)	LCI	(b)	LF	(c)	LFG	(d)	LF - Subo debt	
,	12/31/2021	12/31/2020	12/31/2021	12/31/2020	12/31/2021	12/31/2020	12/31/2021	12/31/2020	12/31/2021	12/31/2020
Within 1 month	118,883	107,225	-	2,647	122,915	26,045	_	-	_	_
From 1 to 3 months	55,157	155,825	-	6,298	135,857	18,886	-	-	5,996	-
From 3 to 6 months	124,543	229,523	598	7,720	42,297	101,896	-	92,045	-	_
From 6 to 12 months	803,660	236,073	16,660	40,318	486,249	355,894	-	749,427	-	_
More than 12 months	985,267	722,183	30,652	10,459	645,674	954,028	-	-	200,000	201,760
Total	2,087,510	1,450,829	47,910	67,442	1,432,992	1,456,749	_	841,472	205,996	201,760

- (a) Agribusiness Credit Bills (LCA) are issued by the Bank and registered with B3, according to Laws No. 11,076/2004 and No. 11,311/2006 and subsequent amendments. The range between rates used for this operation are 85% of DI 123% of DI and 100% of pre-set.
- (b) Housing Credit Bills (LCI) are nominative securities created by Provisional Measure No. 2,223 on September 4, 2001, which resulted in Law No. 10,931 of August 2, 2004. The range between rates used for this operation are 92% of DI 120.7% of DI.
- (c) Financial Bills (LF) are issued by the Bank and registered with B3 according to the Law No. 12,249/2010 (Section II, articles 37 to 43), and ruled by CMN (Law No. 3,836). The range between rates used for this operation are 100% of DI 129% DI, 100% of pre-set and 100% of IPCA.
- (d) Financial Letter with Guarantee (LFG) is regulated by Resolution No. 4,795 through which the Central Bank of Brazil is authorized to carry out loan operations under specific conditions through direct acquisition, in the primary market, of Financial Bills with financial assets or securities as guarantees. The rates used for this operation are 100% of SELIC.
- (e) Financial Bill (LF) Subordinated Debt has a perpetual term and a repurchase option starting within 5 semiannual windows. The Bank uses the amount raised as complementary capital in order to make up the institution's Level I capital. The issue was private and carried out with the Bank's shareholder base. The rates used for this operation are 110% of SELIC.

# 12.Borrowings

Borrowings abroad in the Prudential Conglomerate are as follows:

	Prudential Conglomerat		
	12/31/2021	12/31/2020	
Obligations with borrowings abroad (*)	4,568,886	3,300,574	
Export credit facility	66,422	146,673	
Import credit facility	28,121	15,569	
	4,663,429	3,462,816	
Current liabilities	3,448,121	2,313,174	
Long-term payables	1,215,308	1,149,642	
	4,663,429	3,462,816	

- (\*) The amount of R\$ 4,568,886 thousand on December 31, 2021 (December 31,2020 R\$ 3,300,574 thousand), classified as Borrowings Abroad, refers:
- 1 To the fundraising in U.S. dollars with Bank of Communications with final maturity up to September 2022 representing R\$ 618,214 and March 2023 representing the amount of R\$ 378,233. The range between rates used for this operation is 0.90% 1.01%;
- 2 Money market operations in dollars and renminbi, taken with the Bank of Communications GMC, with maturities of less than 365 days representing R\$ 1,467,350 and maturities up to January 2026 representing R\$ 558,050, with the Bank of Communications Macau, with maturities of less than 365 days representing R\$ 35,480, with the Bank of Communications New York, with maturities of less than 365 days representing R\$ 558,458 and with the Bank of Communications Hong Kong, with maturities of less than 365 days representing R\$ 750 and maturities up to September 2023 representing R\$ 279,025. The range between rates used for this operation is 0.30% 3.00%; and;
- 3 Working capital operations with maturities of less than 365 days representing R\$ 673,326. The range between rates used for this operation is 0.88% 1.10%.

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# 13.Sundry

	Prudential	Conglomerate
	12/31/2021	. 12/31/2020
Other receivables – Sundry		
Debtors deposits on warranty	52,555	53,209
Taxes and contributions to offset	42,665	35,127
Sundry debtors – domestic	12,914	16,185
Sundry debtors – foreign	2,940	4,332
Advances – Salaries and constructions	465	813
	111,539	109,666
Current asset	94,912	51,690
Long-term asset	16,628	57,976
	111,539	109,666
	Prudential	Conglomerate
	12/31/2021	. 12/31/2020
Other payables - Sundry		
Sundry debtors – abroad (a)	188,003	149,466
Allowance for payments to be made	12,855	11,301
Allowance for contingent liabilities	12,462	13,201
Sundry debtors – domestic	7,661	13,361
Administrative checks	849	724
	221,830	188,053
Current liabilities	202,277	7 168,403
Non-current liabilities	19,553	19,650
	221,830	188,053

<sup>(</sup>a) It mainly refers to the prepayment of letters of credit. The original maturity date of these contracts were from May 25, 2022, September 16, 2022 and November 11, 2022.

# 14.Other Assets

	Prudential Co.	nglomerate
	12/31/2021	12/31/2020
Other values and goods		
Properties	8,323	13,454
Others	2,691	2,480
	11,014	15,934
Current asset (a)	10,187	15,934
Long-term assets	827	-
	11,014	15,934

<sup>(</sup>a) On December 31, 2021, the amount of R\$ 8,323 thousand, classified as current assets, refers mainly to the execution of guarantee of properties, recorded as properties not for use (BNDU), according to independent appraisal report, limited to the value of debt. In the year ended December 31, 2021, the bank BOCOM BBM has sold one of its buildings received as guarantee for credit operations resulting in R\$ 1,261 thousand of profit.

# **15.Intangible Assets**

	12/31/2020	Acquisitions	Write-off	Amortization in the period	12/31/2021
Intangible					
Data processing systems					
Cost	33,715	16,314	(936)		49,093
Accrued amortization	(12,171)		125	(7,097)	(19,143)
Communication and security systems					
Cost	922				922
Accrued amortization	(441)			(164)	(605)
Licenses and copyright and use rights					
Cost	4,405				4,405
Accrued amortization	(1,494)			(756)	(2,250)
Total	24,936	16,314	(811)	(8,017)	32,422

# 交通银行巴西子行 2021年报中文版

# 16.Equity

# (a) Capital - Banco BOCOM BBM S.A.

The capital comprises 282,201,085 registered shares with a par value of R\$ 1.60 each, divided into 188,626,652 common shares and 93,574,433 preferred shares. Each common share is entitled to 1 (one) vote in resolutions of the General Meeting. Preferred shares have no voting rights.

### (b) Legal Reserve

This reserve is calculated at the rate of 5% of the net income at each balance sheet date, up to the limit of 20% of capital, as determined by the Corporation Law.

# (c) Statutory Reserve

In accordance with the articles of incorporation, this reserve represents the remaining balance of net income at each balance sheet date, after the legal allocations.

### (d) Treasury Shares

On December 31, 2021, the Bank BOCOM BBM has 76,296,769 shares to be held in treasury in the amount of R\$ 181.839 thousand.

### (e) Interest on Equity

According to article 9 of Law No. 9,249/1995 and its subsequent amendments, Banco BOCOM BBM S.A., at the end of 2021, declared interest on equity of R\$ 35,375 thousand (2020 – R\$ 31,792 thousand), with withholding income tax of R\$ 5,306 thousand (2020 – R\$ 4,769 thousand), calculated at a 15% rate. The amount of interest on equity was determined based on the legal limits in force and classified in the group's official records as "Other Operating Expenses".

For the purposes of the publication of the statement of operations, as established by CMN Resolution No. 4,706, BOCOM BBM S.A., recognized as other obligations, as a counterpart for the appropriate equity account, the declared capital remuneration was set by the obligation at balance sheet date.

Interest on equity proposed at the end of 2021 reduced tax burden by R\$ 17,688 thousand (2020 – R\$ 14,306 thousand).

In the year ended December 31, 2021, R\$ 27,023 thousand was paid as interest on equity.

# (f) Dividends

	Prudential Co	onglomerate
	12/31/2021	12/31/2020
Net income – Banco BBM S.A.	147,399	116,572
(-) Legal reserve	(7,370)	(5,829)
Calculation basis	140,029	110,743
Minimum mandatory dividends (a)	25%	25%
	35,008	27,686
Interest on own capital	30,068	27,023
Dividends	4,940	-
Total	35,008	27,023

<sup>(</sup>a) The minimum mandatory dividends decided as Interest on Equity and dividends.

# 17.Financial Intermediation Expenses, Result of Foreign Exchange Operations, Loans, Assignments and Onlending Operations

	Prud	ential Conglomerat	<del>!</del>
	Second half of 2021	12/31/2021	12/31/2020
Market funding operations			
Financial bills	(52,303)	(84,533)	(57,438)
Agriculture credit bills	(58,195)	(82,119)	(33,285)
Time deposits	(33,784)	(50,559)	(30,694)
Interbank deposits	(21,222)	(31,881)	(3,500)
Foreign exchange variation (a)	(29,827)	(13,145)	32,730
Repurchase agreements	(16,545)	(23,034)	(8,887)
Credit guarantee fund	(2,537)	(5,055)	(3,566)
Real estate credit bills	(1,587)	(2,319)	(3,386)
Deposits previous notice	(267)	(543)	(722)
Expenses with securities abroad	(15)	(8)	(85,700)
	(216,282)	(293,196)	(194,448)
Loans, assignments and onlending operations			
Foreign exchange variation (a)	(250,676)	(93,631)	(287,328)
Loan expenses abroad	(22,997)	(44,150)	(57,673)
	(273,673)	(137,781)	(345,001)
Foreing exchange transactions			
Foreign exchange variations and interest differences	(48,312)	(21,985)	144,822
Other expenses	(304)	(550)	(598)
Revenue from advances on exchange contracts (ACC)	11,837	19,571	22,758
	(36,779)	(2,964)	166,982

<sup>(</sup>a) This substantially represents the effects of foreign exchange variations on loans raised by the Bank from its branch abroad through the transfer of funds raised in foreign currency. In the year ended December 31, 2021, the increase of the dollar justifies the expenses of exchange variation.

# **18.Service Revenue**

	Prud	ential Conglomera	ite
	Second half of 2021	12/31/2021	12/31/2020
Service revenue			
Management and performance fees of investment funds	22,942	45,056	24,687
Bank fee income	29,131	41,238	53,023
Guarantees commission and letter of credit	14,496	26,288	17,332
Structuring commission	12,083	21,473	5,917
Other services	3,025	5,350	4,496
Total	81,677	139,405	105,455

# **19.Other Administrative Expenses**

	Pro	udential Conglomerate	
	Second half of 2021	12/31/2021	12/31/2020
Data processing	(6,154)	(11,337)	(9,728)
Amortization and depreciation	(5,169)	(9,908)	(7,708)
Rentals	(5,095)	(9,750)	(7,890)
Specialized technical services	(4,302)	(8,459)	(7,236)
Financial system services (a)	(3,598)	(6,666)	(5,737)
Communications	(2,258)	(4,772)	(4,610)
Third-party services	(2,048)	(3,544)	(2,674)
Condominium	(872)	(1,983)	(2,049)
Property maintenance and upkeep	(1,064)	(1,885)	(1,645)
Promotion/ Advertising/ Publications	(992)	(1,824)	(1,260)
Travel	(951)	(1,262)	(1,262)
Registry	(802)	(1,251)	(1,560)
Water, energy and gas	(412)	(782)	(856)
Transportation	(415)	(642)	(414)
Fines	(68)	(185)	(178)
Material	(53)	(80)	(260)
Insurance	-	(21)	(40)
Surveillance and security services	_	_	(771)
Other administrative expenses	(4,125)	(6,602)	(5,265)
	(38,378)	(70,953)	(61,143)

<sup>(</sup>a) In the year ended December 31, 2021, this includes brokerage expenses, charges and commission related to guarantee transactions and derivative financial instruments of R\$ 2,267 thousand (December 31, 2020 - R\$ 1,692 thousand).

# 20.Related-parties' Significant Transactions

a) The transactions between related-parties were carried out using the average rates practiced by the market, effective on the operations dates, as follows:

	Prud	ential Conglomerate	
	Rate	12/31/2021	12/31/2020
Asset			
Cash and cash equivalents		499	531
Bank of Communications Co., Ltd.		30	90
Bank of Communications – GMC		10	90
Bocom Hong Kong Bocom Macau		18 441	40 401
Loan operations		52,985	101
Bank of Communications Co., Ltd.	1.02% - 1.07%	52,659	
Other related individuals/legal entities	100% CDI + 1.1	326	_
Derivative financial instruments		73,581	64,323
Bocom Brazil Holding Company Ltda.		73,581	64,323
Marketable securities		35,242	-
Bocom Macau	2.68% - 3.05%	35,242	-
Liabilities			
Demand deposits		20,778	48,839
Évora S.A.		10	10
Bahia AM Renda Fixa Ltda.		5	5
Bahia AM Renda Variável Ltda.		5 24	70.007
Bocom Brazil Holding Company Ltda. Bahia Holding S.A.		1	39,087 5
Other related individuals/legal entities		20,733	9,728
Time deposits		139,919	107,504
Bahia Holding S.A.	97% DI - 97.2% DI	11,516	18,101
Évora S.A.	97% DI	3,592	3,445
Aleutas S.A. Colares Participações S.A.	97.5% DI 97% DI	54,122 2,105	54,812 8,882
Bocom Brazil Holding Company Ltda.	97% DI	68,549	22,264
Other related individuals/legal entities	115% DI	35	-
Debentures agreements		79,065	27,023
Other related individuals/legal entities	100% DI	79,065	27,023
Government bonds agreements		23,069	-
Other related individuals/legal entities		23,069	-
Financial bills		290	-
Other related individuals/legal entities	100% - 111% DI	290	-
Agriculture credit bills		173,674	239,984
Other related individuals/legal entities	92% - 123% DI	173,674	239,984
Real Estate credit bills		46,180	59,581
Other related individuals/legal entities	92% - 120.7% DI	46,180	59,581
Derivative financial instruments		146,400	121,313
Bocom Brazil Holding Company Ltda.		146,400	121,313
Subordinated debt		205,996	201,760
Bocom Brazil Holding Company Ltda. Other related individuals/legal entities	110% SELIC 110% SELIC	165,441 40,555	162,039 39,721
Liabilities on loans abroad	110% SELIC	3,895,561	2,724,090
Bank of Communications Co., Ltd.	0.75% - 1.01%	996,447	873,917
Bocom Macau	2.63% - 3.0%	35,480	16,121
Bank of Communications – GMC	0.45% - 0.96%	2,025,401	1,574,162
Bocom Hong Kong	0.99%	279,775	259,890
Bocom NY	0.3% - 0.47%	558,458	-
Dividends and bonuses payable		30,068	27,023
Interest on capital credited to shareholders		30,068	27,023

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	Prud	ential Conglomerate	
	Second half of 2021	12/31/2021	12/31/2020
Result			
Result with derivative financial instruments	(20,872)	(11,900)	130,542
Bocom Brazil Holding Company Ltda. Other related individuals/legal entities	(20,872)	(11,900)	130,626 (84
Income with marketable securities	593	593	-
Bocom Macau	593	593	-
Loans operations income	293	293	
Bank of Communications Co., Ltd. Other related individuals/legal entities	277 16	277 16	-
Open market funding	(21,527)	(31,373)	(18,349
Time deposits expenses	(3,711)	(5,382)	(3,575)
Évora S.A. Bocom Brazil Holding Company Ltda. Bahia Holding S.A. Aleutas S.A. Colares Participações S/A Other related individuals/legal entities	(104) (1,443) (397) (1,595) (171) (1)	(146) (2,094) (590) (2,271) (280) (1)	(91 (629 (978 (1,705 (172
Repurchase agreements – Debentures expenses	(1,377)	(1,647)	(1,039
Other related individuals/legal entities	(1,377)	(1,647)	(1,039
Repurchase agreements - government bonds	(3,707)	(5,869)	_
Other related individuals/legal entities	(3,707)	(5,869)	-
Agriculture credit bills expenses	(4,538)	(6,857)	(6,857
Other related individuals/legal entities	(4,538)	(6,857)	(6,857
Real Estate credit bills expenses	(1,396)	(2,032)	(1,603
Other related individuals/legal entities	(1,396)	(2,032)	(1,603
Financial bills expenses	(10)	(10)	
Other related individuals/legal entities	(10)	(10)	-
Subordinated debt	(6,788)	(9,576)	(5,275
Bocom Brazil Holding Company Ltda. Other related individuals/legal entities	(5,452) (1,336)	(7,694) (1,882)	(4,205 (1,070
Loans expenses abroad	(16,194)	(31,830)	(46,704
Bank of Communications Co.,Ltd. Bocom Macau Bank of Communications – GMC Bocom Hong Kong Bocom NY	(6,881) (358) (6,808) (1,410) (737)	(13,169) (591) (14,498) (2,753) (819)	(18,658 (472 (26,817 (757
Foreign exchange variation with loans abroad	(5,883)	26,476	(244,182)
Bank of Communications Co., Ltd. Bocom Macau	(96,752) 90,869	(64,193) 90,669	(240,507 (3,675
Expenses with dividends and bonuses	(35,374)	(35,374)	(31,792)
Interest on Equity	(35,374)	(35,374)	(31,792)
Total	(98,964)	(83,115)	(210,485)

### (b) Key Management Compensation

The total compensation will be calculated as follows:

# I) Fixed and variable compensation

The total compensation of the Participants will comprise a fixed and a variable part. The variable compensation of the Participants will be paid as follows:

- (a) The amount equivalent to at most 50% (fifty percent) of the variable compensation will be paid in cash, immediately available for the Participant ("Short-term compensation"); and
- (b) The amount equivalent to at least 50% (fifty percent) of the variable compensation will be deferred for payment within 3 (three) years, considering the provisions below ("Deferred Compensation" together with "Short-term Compensation" and "Variable Compensation").

The minimum and maximum amounts of the Variable Compensation of the Participants will be fixed by the Administrative Council of Banco Bocom BBM.

## II) Deferred compensation

The payment of the deferred compensation will be carried out on a scaled basis, every six months, in shares proportional to the deferral period ("Deferred Compensation Shares"), and all the deferred shares should be updated by the ROE of Banco Bocom BBM. In the year ended December 31, 2021, the payment of Deferred Remuneration occurred through repurchase agreements backed by public securities.

ROE is the profit before tax for the period divided by the Equity at the beginning of the period.

	Prudential Conglomerate		
	12/31/2021	12/31/2020	
Liabilities			
Statutory	18,035	15,254	
Management variable compensation – Short-term	6,121	7,410	
Deferred management variable compensation – Long-term	11,914	7,844	

	Pi	Prudential Conglomerate		
	Second half of 2021	12/31/2021	12/31/2020	
Result	(28,962)	(55,700)	(30,861)	
Fixed compensation	(11,699)	(21,063)	(11,099)	
Variable compensation	(17,263)	(34,637)	(19,762)	

# 83

# 交通银行巴西子行 2021年报中文版

# 21. Derivative Financial Instruments

The Bank and the other institutions of the Prudential Conglomerate participate in transactions involving derivative financial instruments to meet their own needs as well as on behalf of their clients.

Derivative financial instruments are classified according to management's intent at the inception of the transaction, taking into consideration whether or not the purpose is to hedge risks.

In accordance with BACEN Circular Letter No. 3,082, the derivative financial instruments assigned to offset, in whole or in part, exposure to risks from assets, liabilities, commitments or projected future transactions (hedged items), provided that they are considered effective in reducing the risk associated with the exposure to be hedged, are classified according to their nature.

These transactions are traded, recorded or held on B3. In the Prudential Conglomerate, international derivative transactions are traded and recorded in the OTC market, at the Chicago Board of Trade (CBOT) or Chicago Mercantile Exchange (CME).

The criteria used to calculate the market values of the derivative financial instruments are:

- Futures: value of daily adjustments to the transactions;
- Swap and term transactions: Cash flow is estimated for each part, discounted to present value according to the corresponding interest rate curves, obtained based on B3 prices or on the assets' prices;
- Options: average trading price on the calculation date or, when not available, estimated price based on pricing models, such as Black & Scholes.

At December 31, 2021, the guarantees for the transactions involving derivative financial instruments are represented mainly by government securities in the total amount of R\$ 578,159 thousand (December 31, 2020 – R\$ 460,987 thousand) and fund quotas in the total amount of R\$ 27,582 thousand (December 31, 2020 – R\$ 26,723 thousand).

# (a) At Cost and Market Value

		Prudential Conglomerate					
			12/31	/2021			12/31/2020
	Cost	Market	Up to 3 months	From 3 to 6 months	From 6 to 12 months	More than 1 year	Total
Future market							
Purchased position	2,063	2,063	145	504	1,076	338	1,183
Sold position	6,464	6,463	3,397	2,731	303	32	24,193
Swaps							
Asset position	42,483	112,043	8,940	1,498	425	101,180	36,162
Liability position	183,142	169,669	20,553	13,018	11,273	124,825	258,402
Non-deliverable forward – NDF							
Asset position	63,874	65,050	2,646	938	61,466	-	47,981
Liability position	122,618	137,864	61,130	1,513	71,168	4,053	87,816
Liability position							
Asset position	1,430	1,072	1,072	_	-	-	1,390
Liability position	3,748	3,686	3,457	-	-	229	379

The futures market includes the following positions maturing on the first business day of the subsequent month:

- Purchased foreign exchange coupon contracts (DDI) of R\$ 4,305,243 thousand (December 31, 2020 R\$ 2,597,208 thousand);
- Sold foreign exchange coupon contracts (DDI) of R\$ 436,778 thousand (December 31, 2020 R\$ 341,744 thousand);
- Purchased interest contracts (DI1) of R\$ 858,032 thousand (December 31, 2020 R\$ 466,131 thousand);
- Sold interest contracts (DI1) of R\$ 488,852 thousand (December 31, 2020 R\$ 1,010,341 thousand);
- Purchased currency contracts (DOL) of R\$ 365,725 thousand (December 31, 2020 R\$ 392,716 thousand):
- Sold currency contracts (DOL) of R\$ 1,725,701 thousand (December 31, 2020 R\$ 782,117 thousand);
- Purchased currency contracts (DAP) of R\$ 64,178 thousand (December 31, 2020 R\$ 43,404 thousand);
- Sold currency contracts (DAP) of R\$ 184,713 thousand (December 31, 2020 R\$ 131,633 thousand).

Net gains (losses) on derivative financial instruments are as follows:

	Prudential Conglomerate			
	Second half of 2021	12/31/2021	12/31/2020	
Future contracts	302,766	97,708	496,910	
Options contracts	3,173	19,555	12,473	
Swap and term contracts	(61,891)	24,654	(344,725)	
Total	244,048	141,917	164,658	

The main factor of the variation in the result of derivatives is due to the devaluation of Brazilian real against U.S. dollar, taking into account that most of our derivatives are used as hedging instruments.

# (b) Hedge Accounting

# Fundraising Fair Value Hedge (I)

During the 3rd quarter of 2017 and the 1st quarter of 2020, Banco BOCOM BBM entered into loan agreements in U.S. dollars with Bank of Communications Shanghai Branch with the objective of providing funding. They are as follows:

- On September 6, 2017 in the amount of USD 35,000 thousand with payment of pre-fixed interest of 0.90% p.a.;
- On September 18, 2017 in the amount of USD 30,000 thousand with payment of fixed interest of 0.90% p.a.;
- On September 11, 2017 in the amount of USD 35,000 thousand with payment of fixed interest of 0.90% p.a.;
- On March 25, 2020 in the amount of USD 67,500 thousand with payment of fixed interest of 1.01% p.a.;
- On December 11, 2021 in the amount of USD 10,000 thousand with payment of fixed interest of 0.75% p.a.

In order to index these flows to the CDI, a series of exchange coupon operations were carried out at B3, in accordance with the maturities and exposures of the available FRC contracts and the maturity of the operations. Disbursements were made in U.S. dollars and, upon cash receipt, a market risk hedge was contracted, designating a portfolio of derivative financial instruments, comprising DDI, DOL and ED contracts for total hedge, considering the foreign exchange exposure and interest rate risks. In order to equalize the mark-to-market effects of derivative financial instruments designated as hedge, the amount of the hedge principal, plus interest due, is stated at fair value and also marked to market.

85

Due to the fact that there is a matching of hedge object flows and the results of hedge derivatives, the effectiveness of the operation remains close to 100.57%.

		Prudential Cong	lomerate	
		12/31/2021		12/31/2020
Hedge object	Result of the object	Result of the hedge instrument	Effectiveness	Effectiveness
Fundraising (I)	(242,387)	243,773	100.57%	90.34%

### Fundraising Fair Value Hedge (II)

In June 2017, Banco BOCOM BBM designated a portfolio of derivative financial instruments constituted by DI1 and DAP contracts, with the objective of indexing to the CDI part of its funding portfolio indexed to the IPCA. In order to equalize the effects of mark-to-market derivative financial instruments designated as hedge, the value of the funding portfolio indexed to the IPCA is stated at fair value and also marked to market.

In December 2018, Banco BOCOM BBM designated a portfolio of derivative financial instruments constituted by DI1 and DAP contracts, with the objective of indexing to the CDI part of its prefixed funding portfolio. In order to equalize the effects of mark-to-market derivative financial instruments designated as hedge, the value of the pre-fixed funding portfolio is stated at fair value and also marked to market.

Due to the fact that there is a matching of hedge object flows and the results of hedge derivatives, the effectiveness of the operation remains 98.69% to LF IPCA and 99.44% to LF PRÉ.

		Prudential Conglomerate			
		<b>12/31/2021</b> 12/31/20			
Hedge object	Result of the object	Result of the hedge instrument	Effectiveness	Effectiveness	
Fundraising (II) – LF IPCA	(367)	363	98.69%	102.37%	
Fundraising (II) – LF PRÉ	8,772	(8,723)	99.44%	99.97%	

### Credit Operations Fair Value Hedge

In August 2017, Banco BOCOM BBM designated a portfolio of derivative financial instruments comprising Euro Dollar Futures contracts (ED), in order to hedge the U.S. Dollar short-term interest rate variations. In order to equalize the effects of the mark to market of the derivative financial instruments assigned as hedge, the amount of USD 29,761 thousand of the credit operation released in August 2017 by Banco BOCOM BBM SA Nassau Branch, with a fixed interest rate of 4.28 % p.a., is stated at fair value and also marked to market.

交通银行巴西子行 2021年报中文版

Due to the fact that there is a matching of hedge object flows and the results of hedge derivatives, the effectiveness of the operation remains close to 98.90%.

		Prudential Conglomerate		
		12/31/2021		12/31/2020
Hedge object	Result of the object	Result of the hedge instrument	Effectiveness	Effectiveness
Credit operations	(172)	170	98.90%	95.66%

# Investment Cash Flow Hedge Abroad

In September 2016, CMN edited the Resolution No. 4,524, establishing the criteria to record the transactions with financial instruments contracted in order to mitigate the risks associated to the foreign exchange exposure of the investments abroad.

In January 2017, Banco BOCOM BBM assigned a derivative financial instruments portfolio constituted by DI1 and DOL contracts, with the purpose of hedging the foreign exchange rate risk of its investment abroad in the amount of USD 5,000,000, which is consolidated in the Prudential Conglomerate.

Due to the fact that there is a matching of hedge object flows and the results of hedge derivatives, the effectiveness of the transaction remained close to 100.00%.

		Prudential Conglomerate		
		12/31/2021		12/31/2020
Hedge object	Result of the object	Result of the hedge instrument	Effectiveness	Effectiveness
Investiment abroad	8,371	(8,371)	100.00%	101.34%

### Bonds Held to Maturity Fair Value Hedge

In June 2020, Banco BOCOM BBM designated a portfolio of derivative financial instruments consisting of Libor flat swap contracts vs. fixed rate in USD, in order to cover the risk of fluctuations in the external profitability of bonds classified as "held to maturity" as spread over Libor due to fluctuations in the forward structure of the Libor curve. Because of the matching between the flows of the hedge object and the results of the derivatives intended for hedge, the effectiveness of the operation was of 103.78%.

		Prudential Cor	glomerate	
		12/31/2021		12/31/2020
Hedge object	Result of the object	Result of the hedge instrument	Effectiveness	Effectiveness
Bonds held to maturity abroad	426	(442)	103.78%	100.77%

### Bonds Avaiable for Sale Cash Flow Hedge

In January 2021, Banco BOCOM BBM designated a portfolio of derivative financial instruments consisting of Libor flat swap contracts vs. fixed rate in USD and in December 2021 SOFR flat swap contracts vs. fixed rate in USD, in order to cover the risk of fluctuations in the external profitability of bonds classified as "available for sale" as spread over Libor due to fluctuations in the forward structure of the Libor and SOFR curve. Because of the matching between the flows of the hedge object and the results of the derivatives intended for hedge, the effectiveness of the operation was of LIBOR 99.24% and SOFR 88.04%.

		Prudential Co	onglomerate	
		12/31/2021		12/31/2020
Hedge object	Result of the object	Result of the hedge instrument	Effectiveness	Effectiveness
Bonds available for sale abroad – LIBOR	(965)	958	99.24%	-
Bonds available for sale abroad – SOFR	12	(11)	88.04%	_

### 89

# 22. Risks Management

### **Market Risk**

Banco BOCOM BBM was a pioneer in terms of quantifying market risk in Brazil, and developed a proprietary system in 1997 which became a benchmark for the industry. The market risk management structure includes the following: a) the Executive Board, responsible for reviewing risk management policies and proposing risk management operating limits, submitting these for the approval of the Board of Directors at least once a year; b) the Board of Directors, which approves the risk policies and limits at least once a year; c) the Market Risk area, subordinated to the Risk Officer, is responsible for identifying, measuring, monitoring and reporting online to the Executive Board the Bank's market risk, ensuring compliance with the market risk management policy, as well as guaranteeing that the operational limits are observed; d) the Price department, which, among other duties, is responsible for defining the price models and sources used in mark-to-market adjustments of traded products, regardless the management departments; e) Internal Audit, which is responsible for ensuring the adequacy of procedures and the consistency between market risk management policies and the structure actually implemented.

The market risk is monitored through daily calculations of the Value at Risk (VaR), a statistical tool that measures the institution's maximum potential loss at a given confidence level over a given investment horizon. A VaR limit is established, which may be allocated by the Chief Treasury Officer among the various risk factors. The VaR calculation model is submitted to periodical back testing. Furthermore, scenarios are analyzed daily, and these scenarios are quarterly defined by the Risk Committee, independently of the management departments. A full description of the Bank's market risk management structure is available on Banco BOCOM BBM's website (www.bancobocombbm.com.br).

Market Risk means the risk arising from fluctuations in the values of assets and derivatives resulting from changes in market prices and rates, such as interest, stocks, currencies and commodities.

Market Risk control is based on the calculation of VaR – Value at Risk, a statistical tool that measures the maximum potential loss of BOCOM BBM for a given confidence level and investment horizon. BOCOM BBM's daily VaR limit calculated with 95% confidence is 2% of Equity. The model used to calculate the VaR limit is the parametric one. The variance-covariance matrix is reestimated daily using GARCH models. This model captures the presence of volatility groupings and, according to the daily estimated parameters, gives more weight to the most recent past. It should be noted that other VaR models are available, such as Monte Carlo Simulation and Historical Simulation. The effectiveness of the risk model is tested annually through back-testing, which consists in comparing the VaR estimates with the actual daily results.

\*VaR = Maximum potential risk, given the level of reliability and the investment scenario. For Banco BBM, the limit is established based on a 95% likelihood of loss at a maximum of 2% of equity in 1 day.

Reference date	VaR (in R\$ millions)
12/31/2021	3.7
06/30/2021	3.6
12/31/2020	6.1
06/30/2020	4.0

In addition to VaR, stress tests are calculated based on the stress scenarios provided by B3. Based on the envelope scenarios for each risk factor, one optimistic and one pessimistic scenario are defined, considering a holding period of 3 business days. For risk factors in which there is no shock defined by the B3 scenarios, shocks from related risk factors are used. Thus, based on the exposure of the Bank's portfolio to each of the risk factors, the consolidated financial loss of the portfolio under stress is calculated for each of the two scenarios. Finally, the scenario with the greatest financial loss is used as a reference.

Reference date	B3 stress (in R\$ millions)
12/31/2021	-111.5
06/30/2021	-57.5
12/31/2020	-20.2

# **Liquidity Risk**

Banco BOCOM BBM's liquidity target is to ensure that at any given time the Bank has sufficient cash to meet all its liabilities and other commitments. It is the responsibility of the Liquidity Risk area to monitor whether there is a sufficient free cash position to guarantee the continuity of the bank's operations in a severe stress scenario, following the limits and guidelines defined by the Risk Committee and approved by the Board of Directors.

Liquidity risk is managed based on cash flow forecasts, considering different scenarios for funding, loan and treasury operations. These cash flow analyses take into consideration: (a) the implicit risk of each client, (b) possible additional cash for compulsory deposits, (c) derivative adjustments; and (d) other existing obligations. The general principle is to ensure that the Bank's commitments are aligned with its equity and the current policies for fundraising, credit and treasury.

Banco BOCOM BBM has a liquidity risk management structure comprising the following agents, with their respective assignments: a) Liquidity Risk area, subordinated to the Risk Director, which is responsible for centralizing and measuring the information referring to liquidity risk management, ensuring that operational limits are observed and disclosing reports to support decision making on liquidity risk; b) Internal Audit, which is responsible for ensuring the adequacy of the procedures and the consistency between the liquidity risk management policies and the effectively implemented structure. A full description of the Bank's liquidity risk management structure is available on the website of Banco BOCOM BBM (www.bocombbm.com.br).

	Prudential Con	Prudential Conglomerate		
	12/31/2021	12/31/2020		
Current assets	6,228,325	5,162,336		
Current liabilities	(9,318,497)	(6,919,320)		
Working capital, net	(3,090,172)	(1,756,984)		
"Securities available for sale presented in long-term receivables"	1,738,655	1,354,338		
Loans abroad	2,121,045	1,574,162		
	769,527	1,171,516		

Banco BOCOM BBM's current liabilities are higher than its current assets calculated according to the nominal maturity of its operations. However, part of the current liabilities are loans made to the parent company in the total amount of R\$ 2,121,045 thousands which, despite having a maturity of less than 1 year, are systematically renewed.

### Credit Risk

Banco BOCOM BBM has a credit risk management structure comprising the following elements and respective duties: a) the Credit Committee, which is responsible for defining the economic groups' credit limits, and monitoring and evaluating the consolidated portfolio position, its concentration and risk level. It is also responsible for establishing the terms for solving default on credit operations or with a certain level of deterioration of the quarantees and deciding whether or not to initiate judicial collection proceedings, as applicable; b) Board of Directors, responsible for approving the risk policies and limits, at least once a year; c) Credit Risk area, subordinated to the Risk Director, is responsible for centralizing and evaluating information related to the individual and consolidated credit risk management, per operation, ensuring that operating limits are complied with, disclosing reports that make it easy to make a decision related to credit limits approved by the Credit Committee. It is also the responsibility of the risk area to previously evaluate new operational genres related to credit risk; d) Credit Analysis area, responsible for assessing the credit risk of economic groups with which the Bank maintains or intends to maintain credit relationships; e) Internal Audit, which carries out periodic audits of the business units and of the Credit processes of the Group; f) Legal Department, responsible for analyzing the contracts entered into by Banco BOCOM BBM and its clients, as well as coordinating measures to recover credits or protect the Bank's rights; and g) Contracts Department, responsible for checking the adherence of operations to the parameters established in the Credit Limit Proposal ("PLC"), as well as providing the adequate guarantees. It is also responsible for issuing contracts to be entered into by Banco BOCOM BBM and the client. A full description of the credit risk management structure is available on the website of Banco BOCOM BBM (www.bocombbm.com.br).

# **Operational Risk**

Aligned to the orientation of the Regulation Bodies and to the best market practices, Banco BOCOM BBM ("BOCOM BBM") established the "Operating Risk Management Policy", which defined principles, procedures and responsibilities to be observed in order that the internal controls systems of BOCOM BBM work and are strengthened, seeking to mitigate the risks according to the complexity of its businesses, as well as to dissiminate the culture of the controls to ensure the compliance with laws, regulations and other internal standards.

The Internal Controls and Operating Risk area is a seggregated independent organizational area of Internal Audit, under the responsibility of the Risk and Internal Controls Officer. The area is responsible for performing, together with the other components of the risk management structure, in order to comply with the guidelines established by the mentioned Policy.

The complete description of the operating risk management structure is available for the public in the website of Banco BOCOM BBM na Internet (www.bocombbm.com.br).

### Capital Management

Banco BOCOM BBM manages its capital through a structure comprising the following bodies: Board of Directors, Executive Board, Internal Control, Capital and Risk Board, Treasury Board, Fund Raising Board, Back Office, Business Units and Audit Board. The Board of Directors is the highest body within this structure, in charge of monitoring the capital adequacy. The Executive Board must review the documents to be submitted to the Board of Directors, as well as approving the methodologies to be used for the management and monitoring of the capital adequacy. Capital management and centralization is a responsibility of the Capital and Risk Board, which must continuously work to improve and oversee the institution's compliance with the capital management policy and its capital plan. The Treasury and Fundraising Boards are responsible for planning the issuance of equity instrument, if necessary. The capital management department periodically generates reports on the capital adequacy, which are sent to the Executive Board and the Board of Directors.

These reports comprise simulations of severe events and extreme market conditions. The Business Units must provide all information that the Internal Control, Capital and Risk Board deems necessary for effective capital management. The Audit department is responsible for evaluating, from time to time, the effectiveness of the capital management process. The description of the capital management structure is available on the website of Banco BOCOM BBM (www.bocombbm.com.br).

### 9

# 23.Operating Limits

In October 2013, the new rules related to capital measurement became effective. The financial institutions and similar entities have to maintain minimum equity of 8.0% of their assets, weighted by grades of risk to expositions in gold, foreign exchange and operations subject to the operating risk and to the variations in: foreign exchange, interest rate, price of commodities and price of shares classified as held in portfolio for trade, according to BACEN's rules and instructions. The Prudential Conglomerate of Banco BOCOM BBM is within this operational limit on December 31, 2021.

	Prudential Conglomerate	
	12/31/2021	12/31/2020
Reference equity level I	1,013,478	935,748
Adjusted equity	1,046,804	966,087
Decrease in intangible / deferred assets according to CMN Resolution No. 4,192	33,326	30,339
Reference equity (PR)	1,013,478	935,748
Risk-weighted assets (RWA)	641,542	521,100
Portion referring to:		
Credit risk (RWACPAD)	554,456	447,457
Foreign exchange risk (PCAM)	10,508	10,353
Interest rate risk (RWAMPAD)	6,167	4,360
Operating risk (RWAOPAD)	70,411	58,930
Margin or insufficiency value (PR - RWA)	371,936	414,648
Risk factor – 8.00% of PR	81,078	74,860
Basel rate (Risk factor / RWA)	12,64%	14,37%
RBAN	89,265	62,754
ACP required	160,386	81,422
Reference equity margin + RBAN	122,285	270,472

# 24.Income Tax and Social Contribution

Changes in tax credits and provision for deferred taxes on temporary differences are as follows:

	Prudential Conglomerate		
	12/31/2021	12/31/2020	
Asset credit tax			
Balance at January 1	107,332	68,292	
Constitution (reversal)			
- With effects in the result	(369)	26,367	
- With effects in equity			
(Securities held for sale)	10,752	12,673	
Balance at December 31	117,715	107,332	
Provision for deferred taxes (*)			
Balance at January 1	58,935	19,199	
Constitution (Reversal)			
- With effects in the result	29,936	39,736	
- With effects in equity			
(Securities available for sale)	-	-	
Balance at December 31	88,871	58,935	

<sup>(\*)</sup> The amount of provision for deferred taxes is recorded as Other tax and social security obligations.

Attending the BCB Resolution No. 15/2020, in its 13th article, the constitutions and realizations in asset credit taxes and provision for deferred taxes were highlighted, just like their nature and origins, as it is being shown at the table below:

	Prudential Conglomerate			
	12/31/2021	Constitution	Reversal	12/31/2020
Asset credit tax				
Temporary differences (a)				
– Provision for loan transactions	30,738	5,914	8,673	33,497
– Market value adjustment – marketable securities and derivatives	66,680	91,605	74,532	49,607
– Provisions for contingencies (Note 25)	5,596	207	545	5,934
- Others	13,797	25,007	24,100	12,890
Social contribution negative basis	411	25	1,953	2,339
Tax loss	493	3	2,575	3,065
Total	117,715	122,761	112,378	107,332
Provision for deferred taxes				
Temporary differences (a)				
– Market adjustment of securities and derivatives	88,834	101,279	131,215	58,898
– Adjustment of Selic Interest rate on Judicial Deposits				
- Others	37			37
Total	88,871	101,279	131,215	58,935

<sup>(</sup>a) It is expected that these tax credits will be realized up to the end of 2025 for income tax and social contribution, with a present value of R\$ 20 million respectively. The Social Contribution on tax credits was calculated considering a new rate in force of 20%, after publication of the Proposed Amendment to Constitution No. 6/2019, for additions or exclusions from March 1, 2020.

The present value of the tax credits, considering the realization expectation for the deferred tax assets and liabilities, is as follows:

	Prudential Conglomerate	
Description	Tax credits on temporary differences	Loss and negative basis
2021	(10,342)	409
2022	30,255	
2023	5,953	
2024	564	
2025	1,128	
Total	27,966	
Present value	20,038	

The tax credits of Banco BOCOM BBM were accounted for in the financial statements using the rates applicable to the period they are expected to be realized, and they are based on the future

results projections and on a technical study prepared in accordance with CMN Resolution No. 3,039/2002, amended by CMN Resolution No. 4,441/2015.

The conciliation of the expense calculated using the tax rates and the expense of income tax and social contribution accounted for in the Bank is as follows:

IRPJ 220,626	CSLL	IRPJ	CSLL
	220,626	151,105	151,106
147,401	147,401	116,564	116,564
(35,374)	(35,374)	(31,792)	(31,792)
(35,374)	(35,374)	(31,792)	(31,792)
(108,599)	(108,599)	(66,333)	(66,333)
25%	25%	25%	20%
(55,157)	(55,157)	(37,776)	(30,221)
108,578	74,577	71,744	52,782
41,645	7,644	20,905	1,943
66,933	66,933	50,839	50,839
73,349	73,349	38,102	38,102
4,190	4,190		
69,159	69,159	38,102	38,102
(59,392)	(55,337)	(36,705)	(42,989)
196,463	166,518	148,043	122,797
196,463	166,518	148,043	122,797
(49,092)	(38,506)	(36,987)	(24,719)
1,834		1,260	14
(47,258)	(38,506)	(35,727)	(24,706)
354	-	(5,154)	
(16,630)	(13,304)	(21,541)	(18,195)
(63,534)	(51,810)	(62,422)	(42,901)
(1,169)	(788)	(437)	(221)
(64,703)	(52,598)	(62,859)	(43,122)
	(35,374) (35,374) (35,374) (108,599) <b>25%</b> (55,157) <b>108,578</b> 41,645 66,933 <b>73,349</b> 4,190 69,159 (59,392) <b>196,463</b> 196,463 (49,092) <b>1,834</b> (47,258) 354 (16,630) (63,534)	(35,374) (35,374) (35,374) (35,374) (35,374) (35,374) (108,599) (108,599) 25% 25% 25% (55,157) 108,578 74,577 41,645 7,644 66,933 66,933 73,349 4,190 4,190 69,159 (59,392) (55,337) 196,463 166,518 196,463 166,518 (49,092) (38,506) 1,834 (47,258) (38,506) 354 - (16,630) (13,304) (63,534) (51,810)	(35,374)       (35,374)       (31,792)         (35,374)       (35,374)       (31,792)         (108,599)       (108,599)       (66,333)         25%       25%       25%         (55,157)       (55,157)       (37,776)         108,578       74,577       71,744         41,645       7,644       20,905         66,933       66,933       50,839         73,349       73,349       38,102         4,190       4,190       69,159       38,102         (59,392)       (55,337)       (36,705)         196,463       166,518       148,043         196,463       166,518       148,043         (49,092)       (38,506)       (36,987)         1,834       1,260         (47,258)       (38,506)       (35,727)         354       -       (5,154)         (16,630)       (13,304)       (21,541)         (63,534)       (51,810)       (62,422)         (1,169)       (788)       (437)

<sup>(</sup>a) The president Jair Bolsonaro approved the Law No. 14,183, of 2021, arising from the Provisional Measure (MP) No. 1,034/2021, effective as from July 2021, amending the Law No. 7,689/1988, in order to increase the Social Contribution on Net Income (CSLL) rate due by financial institutions. The impact for Banco BOCOM BBM was the increase of the CSLL rate from 20% to 25%, between 7/1/2021 and 12/31/2021, as from 1/1/2022, the rate will be of 20%, according to the amendment proposed by the MP No. 1,034/2021, article 3, item III of the Law No. 7,689/1988. BOCOM BBM CCVM had the CSLL rate increased from 15% to 20%, between 7/1/2021 and 12/31/2021, and as from 1/1/2022, the rate will be of 15%, according to amendments proposed by MP No. 1,034/2021, article 3, item I, of the Law No. 7,689/1988.

# 25. Provisions and Liabilities for Legal Obligation

The Bank and the Prudential Conglomerate are a party to lawsuits and administrative proceedings arising from the normal course of operations, involving tax, labor and civil matters among others.

# (a) Breakdown of Provisions

Based on information from its legal counsels and on an analysis of the pending legal and civil proceedings and labor suits, considering previous experience related to the claimed amounts, management recorded a provision in an amount considered sufficient to cover the estimated losses expected in connection with ongoing litigation, as follows:

	Prudential Co	Prudential Conglomerate	
	12/31/2021	12/31/2020	
Labor	11,787	12,154	
Civil	-	633	
Total – Provisions for contingencies	11,787	12,787	

These provisions are recorded as "Other liabilities - sundry" under Long-term liabilities. During the year ended December 31, 2021, R\$ 283 thousand was provided for contingencies in the Prudential Conglomerate.

# (b) Liabilities for Legal Obligations

Based on the preliminary injunction obtained, Banco BOCOM BBM and BOCOM BBM Corretora de Câmbio e Valores Mobiliários SA ensured the suspension of the requirement for PIS/Pasep and COFINS tax credits that are determined, with the incidence of Service Tax (ISS) in their calculation bases, as well as their respective bookkeeping for timely and future compensation, if applicable, with the respective ISS deductibility from the calculation bases of the mentioned contributions. Based on that preliminary injunction, Banco BOCOM BBM and BOCOM BBM Corretora de Valores Mobiliários SA started to collect, in November 2018, PIS/Pasep and COFINS disregarding the municipal tax in their respective calculation bases, having constituted a liability for the remaining balance up to December 2021, recorded as "Other Sundry Liabilities" in Long-Term Liabilities, as follows:

	Prudential Conglomerate	
	12/31/2021	12/31/2020
PIS and COFINS	675	414
Total – Liabilities for legal obligations	675	414

# (c) Others

On December 5, 2016, the Brazilian Administrative Council for Economic Defense (CADE) filed an administrative proceeding against Banco BOCOM BBM S.A. investigating alleged anticompetitive practices in relation to the onshore foreign exchange market between 2008 and 2012. The Bank, together with its legal advisors, has already presented its administrative defense, still pending judgment.

In November 2019, Banco BOCOM BBM SA received assessments from the Federal Revenue of Brazil with the purpose of: (i) Social security contributions allegedly due on PLR (Profit Sharing or Results) in the amount of R\$ 5.6 million and (ii) social security contributions allegedly due on food in the amount of R\$ 1.2 million, both correspond to payments made in 2015. The Bank discusses the assessments at the administrative level. In the opinion of our legal advisors, the chances of loss in these cases are possible.

# 26. Allowance for Financial Guarantees

The allowance for doubtful accounts related to financial guarantees is based on the analysis of operations according to the type of obligation provided, past experience, future expectations and management's risk assessment policy. They are reviewed periodically, as established by CMN Resolution No. 4,512/2016.

	Prudential Conglomerate		
	12/31/2021	12/31/2020	
Guarantee			
Surety or guarantee in lawsuits and administrative proceedings	369,085	364,728	
Linked to bids, auctions, service render or construction	267,340	307,213	
Other sureties	189,931	231,015	
Linked to international trade	28,829	9,205	
Total	855,185	912,161	
Changes in allowance for financial guarantees			
Opening balance	14,740	1,088	
Exchange variation	_	117	
Constitution / (reversal)	(4,041)	13,535	
Closing balance	10,699	14,740	

### 7

# 27.Other Information

# (a) Compensatory and Settlement of Obligations Arrangement

Banco BOCOM BBM has a compensatory and settlement of obligations arrangement within the scope of the National Financial System, according to CMN Resolution No. 3,263/2005, resulting in more guarantee to settle its debits with financial institutions with which it has this kind of arrangement. On December 31, 2021, the total assets mitigated by compensatory arrangement was of R\$ 1,928,401 thousand (December 31, 2020 – R\$ 203,053 thousand).

# (b) Deferred Income

Result for future years refers mainly to the earnings of guarantees granted, and its decrease in the period ended December 31, 2021 is aligned with the variation of the guarantees.

# (c) Marketable Securities Portfolio

At the end of the year, based on Resolution 3,181 of the Central Bank of Brazil, considering the trend of positive effect on the nominal rates and liquidity of the Eurobonds offered by the national treasury and that for the budget and business plan of the coming years, it is important to have predictability and avoid revenue reductions, the Bank's Executive Committee unanimously approved to continue the process of stretching the portfolio of nominal securities held to maturity selling R\$ 162,184 thousand in bonds maturing in 2025 and 2027 and buying R\$ 163,967 thousand maturing in 2030 and 2031, which generated an effect on the result of R\$ 5,068 thousand.

At the end of the year, Banco BOCOM BBM had R\$ 1,225,378 thousand in marketable securities classified as "held to maturity", according to Circular Letter No. 3,068/2001 of Central Bank of Brazil. Banco BOCOM BBM has financial capacity and intention to hold them to maturity.

# (d) Energy Trading

In order to diversify the business lines that have synergy with the group's performance in the corporate credit segment and to increase the range of services available to meet the specific needs of customers, Banco BOCOM BBM plans to operate in the energy trading market, purchasing and selling electric power. The process of obtaining the necessary regulatory authorizations was concluded. The activities are expected to begin during 2022.

### (e) Impacts of Covid-19

The year of 2021 was marked by the strong recovery of the global economy, as several social isolation measures could be relaxed as vaccination advanced in the main developed economies. Most countries in the Northern Hemisphere ended the year with more than 75% of their population immunized with two doses of the vaccine. In response to the recovery in activity, several economies reduced fiscal and monetary stimulus that took place during the pandemic, especially because of concerns about the sustainability of spending and inflation. In Brazil, the year ended with 67% of the population immunized (two doses), and growth driven mainly by the global recovery and the increase in commodity prices. Record collections, the end of extraordinary expenses resulting from the pandemic and the growth of nominal GDP brought relief to the fiscal scenario and to the debt/GDP. For 2021, growth should reach just over 4%, but prospects are not very favorable for 2022. The labor market and the service sector continue to recover, but a restrictive monetary policy, combined with high household indebtedness, poses challenges for growth. Presidential elections in Brazil and less favorable international financial conditions add even more uncertainty to the scenario. The reform agenda – such as the tax and

administrative ones – continues to be crucial for a more robust growth trajectory and for the fiscal sustainability of the Brazilian economy in the coming years.

Throughout the year, the mass vaccination and immunization of our employees allowed many to partially return to face-to-face work, and the hybrid system combined flexibility with the advantages of interactions in the work environment. Regular testing and the control protocols established by the bank were essential to prevent contamination by Covid-19 among our employees, and this year's experience and learning contribute to the return to normality of work in 2022.

Banco BOCOM BBM S.A., together with its employees, donated more than R\$150 thousand in projects aimed at mitigating the effects of the pandemic on low-income families, many of which are located in regions surrounding the Bank.

# 28. Events After the Reporting Period

# (a) Corporate Change

In 2021, Banco BOCOM BBM announced the beginning of the process of transferring 20% of its shares to Bank of Communications, current holder of the remaining 80%. This will result in the exit of individuals that controlled the share capital of Banco BOCOM BBM, it is about a continuity of the shareholders's agreement entered into in 2016 between the former owners and the Bank of Communications (when the acquisition of the initial 80% occurred). The consumption of the operations is subject to the approval from the Brazilian and Chinese regulation authorites, with probable conclusion in about a year.

# (b) Issuance of Subordinated Private Financial Bills

In February 2022, Banco BOCOM BBM issued 270 million in 10-year Subordinated Private Financial Bills, with a CDI rate plus 2.6% for institutional investors. According to BCB Resolution n° 122 the amount issued is eligible to be included in Reference Equity Level II.

ALINE GOMES - CONTROLLER CRC 087.989/0-9-"S"-BA

# photo list

cover, p. 4-5 Ningguo. Anhui | Xuancheng
p. 10-11 Longjing Plantations
Hangzhou | Zhejiang
p. 12 Longsheng Guilin | Guangxi
p. 16-17 Qingha Lake
p. 20-21 Wuyuan. Sixi Ancient Village | Jiangxi
p. 30-31 Zhangye Danxia National
Geological Park | Gansu
p. 46-47 Namtso Lake | Tibet

The photographs that illustrate the pages of this Report are by **Florian Delalee** and reveal a China of luxuriant nature.

This surprising China has learned to combine the wisdom of the past with the vision of the future, and every day it seeks new solutions for environmental preservation and sustainable development. A country that understands that investing is knowing when to sow and when to reap. We at BOCOM BBM are the result of a union between Brazil and China. A partnership that is, at the same time, thought-provoking and challenging. It is necessary

to know China, learn from China, be

surprised by China.



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