

Social, Environmental and Climate Responsibility Policy

Better guidelines of a social, environmental and climate nature

We, at BOCOM BBM (Financial Conglomerate), aware of our role as intermediaries of resources between different economic agents, believe in the importance of managing risks and impacts of a social, environmental and climate nature in the conduct of our business, activities, processes, and services. We are committed to acting responsibly in the face of the challenges faced by society, encouraging long-term sustainable development, to strengthen our relationships with our stakeholders.

1. Purpose

The Social, Environmental and Climate Responsibility Policy (SECRP) and the actions aimed at its effectiveness are in accordance with National Monetary Council Resolution No. 4,945 of September 15, 2021, as amended by Resolution No. 5,194 of December 19, 2024. This policy establishes the principles and guidelines of a social, environmental and climate change to be adopted in the conduct of business, activities, processes, and services provided by BOCOM BBM, as well as in the relationship with all interested parties, in compliance with the relevance and proportionality criteria set forth in the applicable regulation.

2. Scope

This policy considers the principles and guidelines of relevance and proportionality, as well as all actions that guarantee its effectiveness, and must be adopted by all departments of BOCOM BBM.

3. Definitions

Social Nature: respect, protection and promotion of fundamental rights and guarantees of common interest.

Environmental Nature: the preservation, repair, and recovery of the environment.

Climatic Nature: the positive contribution in the transition to a low carbon economy, in which the emission of greenhouse gases is reduced or compensated, and the natural mechanisms of capture are preserved; and the reduction of impacts caused by frequent and severe weather or long-term environmental changes, which may be associated with changes in weather patterns.

Stakeholders: customers and users of products and services; the internal community; the relevant suppliers and third-party service providers; investors in bonds or securities issued; and other people impacted by products, services, activities, and processes.

Common Interest: interest associated with a group of legally or factually linked persons.

4. Responsible Principles

4.1 Social

For BOCOM BBM, these are principles of a social nature:

- the protection of human rights, through respect and appreciation of people, promoting diversity, gender equity and social inclusion;
- the promotion of an ethical, integrated, and transparent posture, whether in the construction of relationships, in the zeal for the confidentiality of information, in the prevention of money laundering, in the fight against the financing of terrorism, as well as in the identification of conflicts of interest; and
- support for vulnerable groups, through donations and sponsorship of projects to support culture, education, sport, and employability.

4.2 Environmental

For BOCOM BBM, these are principles of an environmental nature:

- prevention of possible environmental impacts that may negatively affect ecosystems; and
- the efficient and responsible use of natural resources, with a focus on intergenerational sustainability .

4.3 Climatic

For BOCOM BBM, the following are principles of a climatic nature:

- promoting the transition to a low carbon economy through the reduction or offsetting of greenhouse gas (GHG) emissions, to mitigate the impacts caused by climate change.

5. Guidelines

BOCOM BBM adopts as guidelines:

- the identification, mitigation and monitoring of negative impacts that may be generated by our businesses, activities, processes and services;
- building a close and transparent relationship with stakeholders, in order to understand their challenges and needs, and encourage them to also follow the principles and guidelines presented in this policy;
- training ethical and responsible professionals through training;
- offering products that are capable of causing positive impacts or reducing negative impacts of a social, environmental and climate nature;
- the prohibition of non-compliance with fundamental rights and guarantees of common interest.

6. Governance

BOCOM BBM adopts a robust governance structure related to SECRP, composed of different agents.

Board of Directors: reviews and approves the SECRP and the actions with a view to their effectiveness, as well as corrects them, when possible deficiencies are identified, ensuring the institution's adherence. In addition, it organizes the Sustainability Committee's attributions, ensures the remuneration structure against behaviors incompatible with the SECRP and promotes the internal dissemination of the policy and actions.

Sustainability Committee: monitors the degree of adherence of the SECRP and the actions with a view to their effectiveness, in addition to proposing changes and the review of both, recording their history.

Responsible Senior Manager: ensures that the principles and guidelines are complied with, and that actions aimed at the effectiveness of the SECRP are implemented, monitored, improved and disseminated. It also grants the board of directors the provision of subsidies and participation in the decision-making process.

7. Transparency

BOCOM BBM makes the following information accessible to all external audiences.

- a) SECRP;
- b) Actions with a view to effectiveness, as well as their evaluation;
- c) The list of economic sectors subject to restrictions in our business;
- d) The list of products and services we offer that contribute positively to sustainability;
- e) The pacts, agreements or commitments assumed in the sustainable agenda; and
- f) Mechanisms used to promote stakeholder participation.

8. Revision

The SECRP review should not exceed a period of 3 years, and should occur whenever there are relevant changes regarding the policy.

9. Responsibilities of this policy

Responsibility	Responsible
Area responsible for policy management	Sustainability

Whom it applies	This policy applies to the BOCOM BBM Conglomerate and its STAKEHOLDERS.
	STAKEHOLDERS are employees, shareholders, customers, counterparties, suppliers and the communities in which we operate.
Who approves	Responsible Director and the Board of Directors

10. Versions Control

Version	Date	Historical	Authors
1.	02/08/2022	Document Creation	Sustainability
2.	28/07/2025	Document Review	Sustainability

11. Approvals

Responsible Senior Management - Luiz Augusto Maffaziolli Guimarães

Board of Directors