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CORPORATE GOVERNANCE POLICY

Title: Capital Management Policy

Start of validity: 01/01/2026

Responsible Area: Risk

Review schedule: 01/03/2027

01. PURPOSE:

BOCOM BBM Prudential Conglomerate ("BOCOM BBM") Capital Management Policy is a set of principles that guide the institution's strategy for controlling and managing capital.

02. CONCEPT / DEFINITION:

Capital Management is defined as the continuous process of:

- Capital monitoring and control maintained by the institution;
- Assessment of the capital requirement to face the risks to which the institution is subject; and
- Planning of goals and capital requirements, considering the strategic objectives of the institution

03. SCOPE / AREAS INVOLVED:

The capital management structure covers all the institutions of BOCOM BBM Prudential Conglomerate economic and financial consolidated and involves the following areas:

- Liquidity Risk
- Credit risk
- Market Risk
- Operational Risk
- Accounting and Fiscal Control
- Risk Committee
- Executive committee
- Board of Directors

04. RESPONSIBILITIES:

04.01. Responsible for carrying out the tasks of this policy

The Credit, Liquidity and Operational Risk areas are responsible for reporting to the Market Risk area the potential losses of their respective area and the economic capital allocated to face these risks.

The area of Accounting is responsible for monitoring and controlling the capital held by the institution and informing it to the Market Risk area.

The Market Risk area is responsible for the necessary procedures for the effective compliance with defined policies and processes, which include:

- Centralizing information regarding capital management;
- Ensuring that the operating limits are met; and

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- Disclose reports to aid in the specific decision-making process for capital management.

04.02. Responsible for monitoring the implementation of the attributions of this policy

It is the responsibility of the Risk Manager area to monitor the execution of the attributions of this policy.

04.03. Responsible for maintaining this policy

It is the responsibility of the Risk area to maintain this policy.

05. AUTHORITY:

The Executive Committee shall review the risk management policies, submitting them to the Board of Directors' approval, at least once a year.

Policies should be in line with the Risk Appetite Declaration (RAS) and the Stress Program approved by the Board of Directors.

Exceptions to this policy should be reviewed by BOCOM BBM's Executive Committee and Board of Directors.

06. GUIDELINES:

The Liquidity Risk area is subordinated to the Director of Risks and is responsible for consolidating the information related to Capital Management.

06.01. Operating Limits

The Capital Management control is based on the consolidation of the stress losses of the different business areas of the group calculated by the Banco BOCOM BBM S.A. risk areas and on the calculation of the capital made available by the institution to cover these losses.

06.02. Models and systems

Monthly, for the simulations of severe events and extreme market conditions (stress tests), BOCOM BBM's risk areas report the losses associated with these events in each business area of the economic-financial consolidated and these are consolidated taking into account the correlation between them, thus taking the total loss to which the group is subject.

In addition to the systems already used by the risk areas involved in this structure, all the necessary calculation for Capital Management is done via spreadsheet. Given the low degree of complexity of the required calculations, the operational risk involved is judged to be low.

06.03. Reports

The Risk Area shall disclose a monthly report that presents:

- Capital projection covering the one year horizon;

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- Consolidation of losses in stress and adequacy of capital made available to these losses.

07. FINAL CONSIDERATIONS:

The present policy cancels any other form of disclosure that provides for the subject matter discussed here.

08. RELATED LEGISLATION / REGULATION:

- CMN Resolution 4.557/2017;

09. INTERNAL REFERENCE:

- Risk Appetite Statement (RAS).

10. VERSION CONTROL:

Version	Date	Description	Author(s)
1.	12 February 2011	Development of Document	Gustavo Araujo
2.	03 February 2012	Document revision	Gustavo Peçanha
3.	04 February 2013	Document revision	Gustavo Peçanha
4.	27 February 2014	Document revision	Vinicius Sousa
5.	29 February 2015	Document revision	Monique Verboonen
6.	December 30, 2016	Document revision	Monique Verboonen
7.	29 February 2017	Document revision	Federico Favero
8.	January 02 2019	Document revision	Federico Favero
9.	01 January 2020	Document revision	Risk Management Department
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13.	01 January 2024	Document revision	Risk Management Department
14.	01 January 2025	Document revision	Risk Management Department
15.	01 January 2026	Document revision	Risk Management Department

11. APPROVALS:

Isabella Souza – Market Risk Manager

Monique Verboonen – Chief Risk Officer

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