

Anti-Corruption Prevention Policy

Law No. 12,846 of August 1, 2013

1. Objective

At BOCOM BBM (Financial Conglomerate), we are committed to following anti-corruption best practices in the performance of our activities, with responsibility and integrity, in compliance with regulatory requirements, market best practices, and our principles.

In this context, this Policy observes, where applicable, the provisions of Law No. 12,846/2013 (the Anti-Corruption Law) and its current regulation, Decree No. 11,129/2022, which establishes procedures for the administrative accountability of legal entities, the criteria for the application of sanctions, and the parameters for evaluating integrity programs. To that end, we maintain this Anti-Corruption Prevention Policy (the “Policy”) to disclose our guidelines to all persons associated with BOCOM BBM.

This Anti-Corruption Prevention Policy aims to establish clear guidelines to prevent, detect, and respond to acts of corruption, fraud, or any unlawful practices, in compliance with:

- Law No. 12,846/2013 (Anti-Corruption Law);
- Decree No. 11,129/2022;
- Other applicable domestic and foreign rules; and
- The institution’s ethical and integrity principles.

This Policy seeks to protect the BOCOM BBM Conglomerate, its collaborators, officers, and third parties against involvement, even if inadvertent, in unlawful conduct, as well as to mitigate risks related to investigations, Administrative Accountability Proceedings (PAR), and legal sanctions.

2. Who are the persons associated with BOCOM BBM for the purposes of this Policy?

- Anyone who holds a position, role, or status, or has a corporate, employment, commercial, professional, contractual, or fiduciary relationship (“Collaborators”) with BOCOM BBM, and is an integral part of the rules governing the corporate or employment relationship of collaborators;
- Service providers engaged by us, including, without limitation, representatives, attorneys-in-fact, intermediaries, consultants, agents, brokers, suppliers, outsourced personnel, and/or any other third parties acting for or on our behalf (“Third Parties”), especially before public officials or government entities; and

- Companies directly or indirectly controlled by us or by associated persons.

3. Who are public agents and public officials for the purposes of this Policy?

The concept of Public Agent or Public Official must be understood broadly, encompassing any person who holds a position, mandate, post, function, or job, even temporarily and without remuneration, in:

- Entities of the direct, indirect, or foundation-based administration of any branch of the Federal Government, the States, the Federal District, the Municipalities, or Territories (Executive, Legislative, and Judiciary), including public foundations and political parties, as well as candidates for elected office in Brazil or abroad;
- Legal entities incorporated into public assets or entities whose creation or funding has involved, or involves, public funds representing more than fifty percent of their assets or revenue (Administrative Improbability Law, Article 2);
- A position, employment, or function in a para-statal entity, and anyone who works for a legal entity providing services under contract or agreement for the performance of activities typical of the public administration (Penal Code, Article 327).

Considering that the current regulation does not clarify the meaning of “public agents” for the purposes of Law No. 12,846/2013 (the “Anti-Corruption Law”), the definition must be as comprehensive as possible so as to cover agents at the federal, state, and municipal levels.

4. Important concepts and classifications

4.1. What is corruption?

It is the act of offering something with the purpose of obtaining an undue advantage. It may also be defined as the use, by persons in public and/or private service, of illegal means to obtain undue advantages or benefits (pecuniary or otherwise) for themselves or others.

An undue advantage may take many forms, such as preferential treatment, the execution of a contract, the disclosure of confidential information, an exemption from taxes/fees, or relief from penalties resulting from a tax investigation, and generally serves to influence an individual in the exercise of their duties.

4.1.1. What is active corruption?

In Brazil, active corruption is understood as the act of offering or promising an undue advantage to a public official, in order to induce them to perform, omit, or delay an official act.

International anti-corruption conventions require signatory countries to criminalize acts of corruption involving foreign public officials in the same way as acts of corruption involving their own domestic public officials. For the purpose of such criminalization, a foreign public official is any official who works for or represents an international public organization.

4.1.2. What is passive corruption?

Passive corruption is understood as the act of requesting or receiving, for oneself or for another person, directly or indirectly, even outside one's function or before assuming it, but because of it, an undue advantage, or accepting the promise of such an advantage.

For example, the promise, offer, or granting of an undue advantage by a supplier or business partner with the purpose of influencing a decision, conduct, or act within a private relationship, even if it does not involve a Public Agent, may constitute an unlawful or unethical practice. It is prohibited by this Policy and subject to the applicable legal and internal sanctions.

It is important to emphasize that both promising or providing, on the one hand, and requesting, accepting, or receiving, on the other hand, are corruption offenses and are condemned by the legislation in force.

4.2. Concussion

Concussion is understood as the act of demanding, for oneself or for another person, directly or indirectly, even outside one's function or before assuming it, but because of it, an undue advantage.

Unlike passive corruption, in concussion the agent demands the undue advantage, and acceptance or receipt of the amount is irrelevant for the crime to be characterized.

4.3. Malfeasance

This is an act committed by a Public Agent against the public administration in general and consists of delaying or failing to perform, improperly, an official act, or performing it contrary to an express legal provision, in order to satisfy a personal interest or feeling.

4.4. Influence peddling

This is an act committed by a private individual against the public administration in general and consists of requesting, demanding, charging, or obtaining, for oneself or for another person, an advantage or the promise of an advantage under the pretext of influencing an act performed by a Public Agent in the exercise of their function.

4.5. Extortion or facilitation payments

Certain public officials or third parties may abuse their position or authority to obtain undue advantages, for example by requesting payments, goods, or benefits in exchange for carrying out routine administrative tasks, releasing documents, refraining from imposing sanctions, or waiving fines during operations such as tax investigations. This is called extortion. Yielding to extortion constitutes a corruption offense in most countries. A payment resulting from extortion is considered a facilitation payment.

Any request, demand, or attempt to obtain a facilitation payment or undue advantage must be promptly refused and immediately reported to the Compliance area through the internal channels made available, for assessment and adoption of the appropriate measures.

4.6. Bribe or kickback

It is the means by which corruption is practiced, consisting of promising, offering, or paying an authority, government official, Public Agent, or private-sector professional any amount of money or any other favors or advantages (ranging from a bottle of beverages, jewelry, or property to hotel accommodations and airfare for a vacation trip) so that the person in question fails to act ethically in relation to their professional duties.

5. Foreign laws

In the United States, under the Foreign Corrupt Practices Act (“FCPA”), the U.S. Department of Justice prosecutes criminal corruption cases abroad and may, in some cases, initiate investigations and criminal proceedings against a legal entity outside the United States for acts of corruption committed outside the country.

The conditions for this are:

- The legal entity itself is connected to the United States in some way (for example, by conducting business in the United States); or
- The act of corruption has a connection to the United States (for example, where bribery money was transferred from a U.S. bank, where the corruption was committed by a U.S. citizen, or where instructions relating to the corruption were sent by e-mail from a U.S. server).

The criminal offense is punishable by a fine of up to US\$2 million and the civil offense by a fine of up to US\$500,000; the total amount of the penalty may be extremely severe, including fines of hundreds of

millions of dollars for legal entities, debarment from public tenders, and prohibition from obtaining capital in the financial markets.

In the United Kingdom, the UK Bribery Act 2010, in addition to addressing bribery offenses in general, creates a new offense for a commercial organization's "failure to prevent bribery by persons associated with it." Establishing and maintaining adequate procedures to prevent corruption may, however, constitute a defense for the organization against sanctions under anti-corruption laws. Sanctions include up to 10 (ten) years' imprisonment (for individuals) and unlimited fines (for legal entities). Foreign legal entities may be prosecuted under this legislation if they conduct business in the United Kingdom or if the offense is committed by a British citizen.

6. Guidelines

6.1. Principles

In carrying out our activities, we act with full transparency and in compliance with the legislation and regulations in force, and we do not accept or tolerate any practice of fraud or corruption, in any form or manifestation, by our collaborators, service providers, and third parties in general in their relationship with public or private sector officials, domestic or foreign.

As an institution that safeguards the soundness of the financial system, we adopt strict governance and compliance policies aimed at combating corruption and any acts in violation of the applicable laws and regulations, and we are continuously committed to improving standards of conduct, enhancing product quality, security levels, and the efficiency of our services.

The principles that summarize the guidelines described in this Policy are:

- Ethics and Legality – we act in compliance with the applicable laws and regulations and according to the highest ethical and conduct standards.
- Cooperation with Public Authorities – we adopt strict governance and compliance policies aimed at combating corruption.
- Continuous Improvement – we are committed to continuously improving standards of conduct, product quality, security levels, and service efficiency.

6.2. Cases subject to corruption practices

Under the Anti-Corruption Law, legal entities are subject to strict liability. Thus, the practice of any act against the domestic or foreign public administration that is carried out in the interest or for the benefit

of the legal entity, whether exclusive or not, will result in liability in the administrative and civil spheres, regardless of intent or fault.

Accordingly, our Collaborators and Third Parties are strictly prohibited from:

- Promising, offering, or giving, directly or indirectly, an undue advantage to a public agent or to a third person related to them;
- Knowingly financing, funding, sponsoring, or in any way subsidizing the practice of the unlawful acts provided for in this Policy;
- Proven use of an individual or legal entity as an intermediary to conceal or disguise their true interests or the identity of the beneficiaries of the acts committed;
- The following are also considered acts harmful to the Public Administration when a person or persons, or a company or companies, with respect to public bidding and contracts:
 - Thwart or defraud, through collusion, conspiracy, or any other means, the competitive nature of a public bidding process;
 - Prevent, disrupt, or defraud the conduct of any act within a public bidding process;
 - Exclude or attempt to exclude a bidder through fraud or the offering of any kind of advantage;
 - Commit fraud in a public bidding process or in a contract resulting therefrom;
 - Fraudulently or irregularly create a legal entity to participate in a public bidding process or enter into an administrative contract;
 - Obtaining an undue advantage or benefit, through fraudulent means, from modifications or extensions of contracts entered into with the Public Administration, without authorization by law, in the call for bids, or in the respective contractual instruments; or
 - Manipulating or defrauding the economic and financial balance of contracts entered into with the Public Administration.
- Hindering the investigative or supervisory activities of bodies, entities, or public agents, or interfering in their work, including within regulatory agencies and bodies overseeing the national financial system; or
- Receiving, offering, promising, making, authorizing, or providing (directly or indirectly through third parties) any undue advantage, payments, or gifts to any person, whether a Public Agent or not, with the objective of influencing or rewarding any official action or decision by such person for their own benefit or for the benefit of BOCOM BBM.

7. Compliance procedures

7.1. Gifts, presents, trips, and events

No gift, present, trip, or event may be given to any person, whether a Public Agent or not, to improperly influence or compensate an act or decision, as actual or intended compensation for any undue benefit to BOCOM BBM.

Accordingly, our Collaborators must not:

- Offer or promise gifts, assume expenses for travel, entertainment, amusement, or any service to influence or reward third parties and thereby generate any unlawful or undue advantage;
- Accept gifts, favors, donations, or contributions from any person intended to obtain an unlawful or undue advantage arising from any business relationship; and
- Promise or make donations or contributions to any person if the purpose is to influence the action of an agency, entity, company, or employee, public or private, in order to obtain an unlawful or undue advantage.

Gifts and entertainment that do not fall within the scope above may be accepted or offered, provided that the rules established in the Gifts, Gratuities, and Entertainment Policy are observed.

If there is any doubt about the circumstances involving the offering of gifts, presents travel, or events, the collaborator must consult the Compliance area for further clarification regarding what is permitted.

7.2. Contributions/Donations

We support contributions to cultural and educational projects and also authorize reasonable donations to charitable institutions.

However, such contributions must not be made to improperly influence business decisions or be linked to any undue advantage.

Accordingly:

- Beneficiary institutions of contributions/donations must be submitted to the Anti-Money Laundering (“AML”) area for analysis and approval;
- Cash contributions or donations are prohibited;
- All contributions made must be properly recorded;
- Reputable institutions must be selected; and
- Beneficiary institutions must provide periodic accountability reports in order to demonstrate that donated funds were used for their intended purpose.

If there is any doubt concerning contributions and donations, the Collaborator should consult the Compliance area or the AML area.

7.3. Political Contributions

Currently, Brazilian law does not allow legal entities to make political donations.

Our collaborators are permitted to make political contributions, provided that they are made in their own name and with their own resources, without any relationship to BOCOM BBM or to their position within the institution. It is prohibited to carry out any political activity during working hours or using BOCOM BBM's resources or facilities.

If there is any doubt concerning political contributions, the Collaborator should consult the Compliance area.

7.4. Contracts with Third Parties

The selection and retention of Third Parties for the provision of services must be based on technical, financial, socio-environmental criteria and on the laws and rules applicable to us. The Collaborator responsible for hiring any Third Party must ensure that the contractor has a good reputation, the necessary expertise, and will receive compensation for its services consistent with market standards.

All Third Parties engaged by us must undergo analysis procedures prior to their hiring or renewal with the institution, which must observe the guidelines of the Contract Management Policy, as well as the Know Your Supplier/Service Provider procedures described in the Anti-Money Laundering Prevention Policy.

These procedures aim to:

- Gather, analyze, and verify information relating to reputation and any history of involvement with corruption, money laundering, or other unlawful or unethical conduct; and
- Verify the absence of any conflict of interest in relation to the counterparty.

All engagements must be submitted for evaluation and approval by the AML area, which may decide against hiring or may waive the relationship because of information revealed by these verification procedures.

The evaluation, hiring, and monitoring of Third Parties' activities must observe rules and procedures ensuring that all agreements maintained by us are formalized through written contracts, as set forth in

the Contract Management Policy. As assessed by Compliance, some contracts must also include an anti-corruption clause approved by the Legal Department. The evaluation of Third Parties must consider the risks of involvement in harmful acts against the public administration and must be carried out in proportion to the nature, complexity, and value of the contractual relationship, as well as be subject to periodic reassessments throughout the term of the contract, under Decree No. 11,129/2022.

Additionally, all Third Parties engaged by our Collaborators must adhere to Anti-Corruption requirements by signing the Anti-Corruption Declaration and undertaking to comply with the applicable laws and regulations, or anti-corruption clauses must be included in their contracts, in accordance with the applicable internal guidelines.

7.5. Interaction with Public Agents

Any and all interactions or communications with public agents or public bodies must be conducted transparently, in accordance with the ethical principles set forth in the Code of Ethics and Conduct, as well as in compliance with the laws and rules applicable to us.

Additionally, our Collaborators are recommended to observe the following:

- Hearings and meetings with public agents should, whenever possible, be formally requested in writing, with identification of the professionals who will participate in the meeting; and
- Hearings should, whenever possible, take place in public buildings, offices, or premises and during the regular business hours of the public body.

7.6. Mergers and Acquisitions

The conduct of mergers, acquisitions, or corporate restructuring processes by BOCOM BBM must be preceded by anti-corruption due diligence measures in the target company, coordinated by the Compliance area, in order to identify whether the target company and its shareholders have been or are involved in allegations or investigations of corruption or other criminal or unethical conduct, and whether they have integrity procedures for the prevention, detection, and remediation of corruption risks in line with the Anti-Corruption Law and Anti-Corruption Decree.

Based on this analysis, we may assess the inherent risks and the ways to proceed, or not to proceed, with the intended transaction.

7.7. Books and Accounting Records

All of our transactions must be transparent, fully documented, and posted to accounting accounts in such a way as to accurately reflect their nature.

We maintain internal controls ensuring that accounting records are detailed, analytical, and contain information about the history of the transactions, thereby providing reasonable assurance that:

- All transactions are approved and carried out in accordance with internal rules and procedures, as well as in compliance with the law; and
- All transactions are recorded in accordance with applicable legislation so as to allow the preparation of financial statements under accounting principles.

The identification of atypical transaction characteristics or changes in revenue or expense patterns, which may indicate the occurrence of an unlawful or irregular situation, must be promptly reported to the Compliance area.

7.8. Continuous Monitoring

The Compliance area must prepare a monitoring plan to verify the effective implementation of the compliance procedures and guidelines adopted by us and to make it possible to identify weaknesses that may require corrections and improvements. Internal Audit will be responsible for auditing this monitoring plan and assessing its effective use.

Such monitoring may be carried out through the collection and analysis of information from various sources, such as:

- Regular reports on Integrity Program routines or on related investigations;
- Trends identified in complaints from our clients; and
- Information obtained from the whistleblowing channel.

If non-compliance with rules or the existence of failures that hinder the achievement of the expected results is identified, the Compliance area must develop action plans to remedy the irregularities or failures identified.

7.9. Training

We maintain an anti-corruption compliance training program, which is mandatory for all Collaborators who are called upon to attend, for qualification and awareness regarding the conduct, principles, concepts, and procedures set forth in this Policy.

Such training sessions, held at least annually, are conducted by the Compliance area and must include practical examples of corruption situations to which we may be exposed.

The other rules and responsibilities relating to training provided at BOCOM BBM are described in the Continuous Qualification and Training Policy.

7.9.1. Training Methods

We may use various training formats or methods, such as in-person sessions, distance learning (e-learning), teleconferences (audiovisual), audio conferences, communications, and publications.

7.9.2. Third Parties

In addition to signing an Anti-Corruption Declaration or having anti-corruption clauses formally included in their contracts, our engaged Third Parties must also receive a copy of our Code of Ethics and Conduct for Third Parties, so that they are aware of our principles, values, and standards of conduct.

7.10. Whistleblowing Channel and Reporting Violations

The whistleblowing channel is intended for reports and communications concerning violations of our Codes of Ethics and Conduct, policies, and operational procedures, as well as any other information on potential non-compliance with the legal and regulatory provisions applicable to BOCOM BBM.

Therefore, the practice of illegal or unlawful acts that violate or may violate the laws and regulations in force, as well as any violations or suspicions of violations of our policies and procedures, must be promptly reported to our Whistleblowing Channel. Reports, which may be made by collaborators, service providers, third parties, and the general public, may be submitted anonymously or otherwise.

All reports will be handled with strict confidentiality and will be duly received by the Compliance area, which will refer the facts for handling in a confidential, independent, impartial, and unbiased manner, in accordance with the Policy for the Receipt and Handling Complaints. Retaliation against collaborators who make reports in good faith is prohibited.

Whistleblowing / Reporting Channel Contacts:

E-mail: hotline@bocombbm.com.br

Telephone: (21) 2514-7788 / (11) 3704-0511

Mail: Av. Barão de Tefé, 34. 20º andar - Saúde - CEP: 20220-460 - Rio de Janeiro - RJ - A/C: Compliance Manager.

7.11. Penalties

The practice of illegal or illicit acts that violate or may violate the laws and regulations in force, as well as any violations or suspected violations of our policies and procedures, will subject the Collaborator to the following disciplinary measures, as applicable: (i) oral or written warning; (ii) suspension; (iii) dismissal; (iv) dismissal for just cause, without prejudice to the adoption of legal measures related to the compensation for damages and reporting of the facts to the competent authorities.

In the case of Third Parties, depending on the violation or illegal or illicit act, the termination of the relationship may be determined and, when applicable, the adoption of legal measures against those involved.

These penalties will be decided by the Executive Committee and the Compliance Board, as appropriate, and must be applied in accordance with the criteria of proportionality, escalation, immediacy, and the prohibition of bis in idem.

8. Final Considerations

This document is strictly for internal use, and should not be made available to third parties without consulting the Compliance Manager.

Situations not foreseen in this Policy must be evaluated and taken for analysis and approval by the Compliance Committee.

9. Related Legislation/Regulation

- Decree No. 11,129/2022 – Anti-Corruption Decree
- Law No. 12,846 of 2013 – Anti-Corruption Law
- UK Bribery Act 2010 – United Kingdom Anti-Corruption Law
- FCPA – U.S. Foreign Corrupt Practices Act – U.S. Anti-Corruption Law.

10. Internal references

- Code of Ethics and Conduct;
- Anti-Money Laundering and Counter-Terrorist Financing Prevention Policy;
- Contract Management Policy;
- Policy for the Receipt and Handling of Complaints;
- Gifts, Gratuities, and Entertainment Policy; and
- AML/CFT Operational Procedures.

11. Responsibilities under this Policy

Responsibility	Responsible
Responsible for carrying out the duties under the Policy	Senior Management, Collaborators, Third Parties, Compliance, AML, Internal Audit, and Legal
Responsible for monitoring implementation	Compliance
Responsible for maintaining the Policy	Compliance
To whom it applies	This Policy applies to all persons associated with BOCOM BBM.
Who approves	Compliance Manager and Compliance Director

11.1. Senior Management

All BOCOM BBM executives and directors are committed to combating corruption at every level of the institution. In this regard, senior management is responsible, with respect to this Policy, for:

- Ensuring and supervising the application, maintenance, management and effectiveness of compliance procedures and guidelines, as well as the continuity of good practice policies adopted by the institution;
- Ensuring the dissemination of integrity standards and ethical conduct as part of the corporate culture;
- Ensuring that corrective and sanctioning measures be applied when necessary; and
- Providing the necessary means for the activities and procedures described in this document to be properly implemented, in order to ensure that the Compliance area has sufficient resources and collaborators to carry out the procedures determined in this Policy.

11.2. Collaborators

Our Collaborators are responsible for:

- Complying with the applicable laws and regulations, as well as reading, understanding, and following the principles, guidelines, and procedures contained in this Policy and in our Code of Ethics and Conduct;
- Paying attention to conduct considered suspicious;
- Contacting the Compliance area in case of doubt; and
- Reporting to the whistleblowing channel any atypical or suspicious situation that constitutes or may constitute evidence of corruption or any other possible violation of our policies and procedures and/or of the laws and regulations in force.

11.3. Third parties

Os Terceiros contratados pelo BOCOM BBM devem:

- Comply with the applicable laws and regulations, especially with regard to the Anti-Corruption Law and related regulation; and
- Sign the Anti-Corruption Declaration or have anti-corruption clauses in their contracts, as a way of demonstrating awareness of and commitment to adopting the principles and guidelines established in this Policy and in the Code of Ethics and Conduct.

11.4. Compliance

The Compliance area, as the autonomous, independent, and impartial body of BOCOM BBM responsible for implementing compliance procedures and guidelines and overseeing their observance, has the following main duties:

- Defining policies and procedures aimed at preventing acts of corruption;
- Assisting in informing and training all Collaborators and Third Parties on anti-corruption compliance matters;
- Reviewing and following up on the resolution of issues raised by Internal Audit regarding anti-corruption compliance matters;
- Clarifying any doubts concerning situations or acts that may result in, or simply be interpreted as, corruption practices;
- Receiving and analyzing reports made through BOCOM BBM's whistleblowing channel contacts, under the terms of the Policy for the Receipt and Handling of Complaints;

- Reporting to senior management atypical or suspicious situations that constitute or may constitute evidence of corruption or any other possible violation of BOCOM BBM's policies and procedures and/or of the applicable laws and regulations; and
- If irregularities or violations are identified, adopting procedures to ensure their prompt interruption and provide solutions and remedy the effects caused.

11.5. Prevention of Money Laundering

The PLD area has the following responsibilities:

- Perform the analyses of third parties and the institutions receiving contributions/donations.

11.6. Internal Audit

The Internal Audit area has the following responsibilities:

- Verify through tests the adherence to this Policy by all those involved; and;
- Perform periodic risk analysis to execute the necessary adaptations to the compliance procedures and guidelines.

11.7. Legal

The Legal area has the following responsibilities:

- Assist in the interpretation of legislations ruling on anti-corruption compliance matters, when consulted.

12. Version control and Policy validity

This Policy is valid for 4 years. Without prejudice to this term, it will be periodically reassessed, or whenever necessary, based on risk criteria, considering, among other factors, changes in applicable legislation or regulation.

Version	Date	History	Authors
1.	12/01/2014	Document creation	Compliance
2.	02/29/2018	Revision	Compliance
3.	02/03/2022	Revision	Compliance

4.	02/03/2026	Revision	Compliance
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13. Approvals

Giuliana Marconi – Compliance Manager

Luiz Augusto Maffazioli – Compliance Director