

## **I. MESSAGE FROM LEADERSHIP**

The Code of Ethical Conduct is the main conduct guide for administrators, employees, interns, apprentices, and collaborators of Bradesco Organization. We ratify our purpose of generating opportunities for people to fulfill themselves in a fair and equitable way, seeking the sustainable development of companies and society, reinforcing our commitment to environmental, social and governance aspects.

We reaffirm our values and principles as fundamental pillars in decision-making, supported by integrity, ethics, trust, quality service and transparent relationships.

We value the role of people and invest in the acculturation of good conduct practices. After all, it is people, in their personal or professional lives, who give practical meaning to build a more integral, fair and egalitarian society.

We are all responsible for complying with the guidelines of the Code of Ethical Conduct and applying its precepts. We must always cultivate, in our daily lives, a safe and healthy environment, with respect for the dignity and diversity of human beings.

Let us all be, regardless of where and who we are with, multipliers of ethical conduct!

**Board of Directors**

## II. BRADESCO ORGANIZATION

Bradesco Organization is made up of Banco Bradesco S.A., one of the largest private financial institutions in the country, and the companies it controls, in Brazil and abroad.

Its global strategy is based on a business model that brings together, among others, banking and insurance activities, leasing, securities intermediation, real estate developments, management of own and third-party portfolios and management of consortia.

We are present in all Brazilian cities and serve all public through a robust and segmented structure, with strong face-to-face and digital operations, aiming at technological advancement and new forms of relationships between people, society and the environment. Through our corporate governance, we affirm our commitment to create long-term value for shareholders, employees and society as a whole.

We understand that valuing actions with respect for all interested parties is fundamental to our existence as an institution.

To enhance our commitment to sustainable development, we have Sustainability as one of the pillars of our corporate strategy, in addition to adherence to business initiatives and voluntary commitments, according to details available on the website "[bradescori.com.br/sustentabilidade-corporativa](https://bradescori.com.br/sustentabilidade-corporativa)".

## III. SCOPE

It is applicable to managers, employees, interns and apprentices of the Organization, made up of Banco Bradesco S.A. and its controlled companies, in Brazil or abroad, to employees who are providing services on behalf of the Organization's companies or to the Organization, hereinafter referred to as "all".

## IV. CORPORATE IDENTITY

### 1. Purpose:

Create opportunities to fulfill people and the sustainable development of companies and society.

### 2. Values:

Values are the Organization's fundamental beliefs, as well as the success factors that serve as a guide to fulfill our purpose:

- a) Customer as the reason for the Organization's existence;
- b) Ethics in all activities and relationships;
- c) Transparency in the information required by the interested parties;
- d) Belief in people's value and development capacity;
- e) Respect for human being dignity and diversity; and

f) Socio-environmental responsibility, encouraging actions for sustainable development.

Additionally, our values as success factors in our business are:

- a) Strength of Bradesco brand with a strong tradition in financial, capital and insurance markets;
- b) Solid culture and corporate governance focusing on business continuity, associated with our commitment to sustainability;
- c) One of the best distribution networks in the country, in terms of modernity and scope;
- d) Broad portfolio of products, services and solutions for all segments; and
- e) High investments in technology.

## **V. PURPOSES OF THE CODE OF ETHICAL CONDUCT**

This code is a practical guide to personal and professional conduct and its basic purposes are:

- a) Strengthen the Organization's ethical culture, increasing trust, respect, transparency, truth and dignity in relationships;
- b) Guide everyone's conduct, promoting the adoption of integrity high standards;
- c) Prevent and manage conflicts of interest;
- d) Serve as a reference in handling situations that may occur in everyday life, providing guidance for evaluation and decision-making, not limited to the content presented; and
- e) Preserve the Organization's reputation and image.

The existing Codes of Ethical Conduct for specific professional categories must also be respected and observed by everyone who performs such roles in the Organization.

## **VI. PRINCIPLES**

### **1. Principle of Integrity**

Integrity means straight and impartial, honest and sincere conduct, the willingness to make decisions based on what is right, without compromising ethical standards. It also means respecting the laws of the countries in which we operate, the rules that govern the activities of our sector and the Organization's internal rules, which stipulate the direction to be taken and concretely define what is desired, permitted and prohibited.

#### **Expected Conduct:**

- a) Know and respect the Code of Ethical Conduct, acting in accordance with its provisions, inside and outside the Organization, in addition to safeguarding personal conduct, to protect and strengthen our institution's reputation and image. Refuse any advantage type (pecuniary, material or immaterial, including, gifts and hospitality), in any form, in favor of oneself or third parties, from anyone, that may represent an inappropriate relationship, that

is, in conflict with the precepts of this Code and other internal Policies and Standards that regulate the Organization's activities, or that cause financial or image damage;

- b) Use the Organization's tangible resources (furniture, facilities, equipment, etc.) and intangible resources (image, brand, reputation, information, etc.) only to meet its professional purposes, in accordance with internal or external standards, when applicable;
- c) Communicate, in a complete and justified manner, to the immediate leadership or through the Corporate Reporting Channel, as described in item "XI - Governance", any situation that may constitute a violation of the Code of Ethical Conduct; and
- d) Not practice or permit, under any circumstances, a conduct that constitutes attempt or practice of bribery or corruption, such as: accepting, obtaining, financing, paying, granting, paying, promising, sponsoring or authorizing, directly or indirectly, any benefit, pecuniary or not, in any way, in favor of oneself or anyone else, including, also, concealment or dissimulation of such acts occurrence or hindering its investigation or supervision.

**To learn more about the topic, go to [Bradesco Integrity Program](#).**

## **2. Principle of Transparency**

Transparency means disclosure, to the stakeholders, in a clear, objective and timely manner, the Organization's information, whenever necessary, with an open dialogue and complete clarifications.

### **Expected Conduct:**

- a) All information contained in materials published by the Organization must be true and real, allowing correct decision-making by all interested parties, as well as cooperating with supervisory authorities, not omitting or hindering information delivery necessary to evaluate internal control activities, audits and regulators. We must also value the protection of the Organization's information, its customers and internal public, ensuring that individual and confidentiality rights are protected, in accordance with the Law;
- b) Data protection, information and cyber security and privacy management are topics governed by specific Corporate Policies, Directives and Standards;
- c) Keep all plans and relevant facts in absolute secrecy, ensuring that information disclosed to the interested parties are on time and in a symmetrical manner, duly approved according to the competent authorities. Any privileged information received due to the position or role must be protected, strictly complying with the policies to disclosure and use information on material acts or facts and to trade securities issued by Banco Bradesco S.A., and approved by it; and
- d) Only authorized people must speak institutionally on the Organization's behalf and deal with controversial news released by the press in a timely manner, as well as officially position themselves before the media, in accordance with internal Policies and Rules, preventing and mitigating any risk to our image and reputation.

### 3. Principle of People Appreciation

The Organization appreciates care for human beings, in all relationships. Respectful treatment with equal rights and opportunities effectively contributes to develop people and results of the Organization. Discriminatory conduct will never be tolerated.

#### **Expected Conduct:**

- a) Repudiate discrimination and abuse in all its forms, not practicing or admitting moral, sexual harassment and/or sexual pestering, whether in the workplace or in any relationship with the internal and external public, as well as any situation that may mean people exploitation in distorted work forms, such as forced or similar to slavery or child activity. Never use or allow using roles performed to obtain advantages, whether directly or indirectly for oneself or third parties. Reinforce the commitment that, in the event of any situation mentioned, the facts are full communicated, through our Corporate Reporting Channel;

Harassment is a conduct that causes psychological or physical embarrassment to an individual, and can be classified into two types: moral and sexual harassment.

**Moral harassment** consists of deliberate repetition of gestures, words (oral or written) and/or behaviors of a psychological nature, which expose the individual to humiliating and embarrassing situations, capable of causing offense to the personality, dignity or psychological or physical integrity, to exclude the person from his/her duties or deteriorate the work environment. Conduct habituality and intentionality (discriminatory purpose) are essential for moral harassment characterization.

**Sexual harassment** is defined by the Penal Code, art. 216-A, as the act of “embarrassing someone, with the intention of obtaining sexual advantage or favor, the agent taking advantage of his/her status as hierarchical superior or ancestry inherent to the exercise of employment, position or role”;

**Sexual importunity** is defined by Law nº 13.718/18, art. 215-A, as practicing against someone and without consent, libidinous acts (such as, but not limited to: touching, lascivious kiss, voluptuous contact, lascivious contemplation, among others) whose purpose is sexual satisfaction for oneself or someone else.

- b) Encourage cordiality and solidarity in relationships between people. Solidarity, however, never implies connivance with acts that violate ethical, legal standards or the Organization's internal processes; and
- c) Unconditionally prioritize people's dignity and diversity, regardless of race, ethnicity, religion, age, sexual orientation and gender identity, ensuring equal opportunities for all, in a fair and freeway. The Organization recognizes people for their performance, knowledge and skills (technical and behavioral), promoting respect for differences and inclusion for all. We value the balance between professional and personal life, and we encourage self-development and protagonism of our professionals, as well as carrying out of voluntary actions that provide the human being dignified evolution.

## **VII. RESPONSIBILITIES**

The Organization appreciates the development of economic activities in line with social demands and issues and the conscious use of resources available in the environment. We take actions to meet present demands without compromising future generations' opportunities. Through a combination of guidelines, governance, engagement, and management of environmental, social and governance (ESG) aspects, we reinforce our contribution to sustainable development.

In the socio-educational aspect, the Organization's relationship with the community has its strongest link in [Foundation Bradesco](#) which, from the investment return it receives as one of the main shareholders of Banco Bradesco S.A., develops one of the largest private educational programs in Brazil and the world.

Our goal is promoting the exercise of citizens' rights and duties, providing access to financial services and knowledge, in a safe, fair and egalitarian environment, understanding their needs and interests, to leverage society's socioeconomic development and financial well-being.

We acknowledge our role as a transformative agent in society and the potential to financially leverage people and businesses.

We also take care of the environment, acting for its conservation, through natural resources rational use, waste reuse and waste rejection. We appreciate projects aligned with environment and planet preservation.

The search for continuous and sustainable evolution is based on high standards of conduct and integrity, which guide our strategy towards an increasingly integrated action, customer focused and with benefits for the whole society.

## **1. Socio-environmental Responsibility**

Promoting sustainable development is part of the Organization's purpose and is reflected in our practices, relationships, and business results. The constant search for improving our management on environmental, social and governance factors aims to ensure that we are prepared for future challenges and are positive transformation agents, generating shared value with society, customers, employees, investors and partners, considering the interests of interested parties, even if they do not have an active role in the Organization's governance.

The Organization seeks to reduce socio-environmental impacts of its activities, based on innovation and our products and services constant evaluation, to enable accessibility, social inclusion, banking and insurance, boosting businesses with a positive impact that foster sustainable development.

### **Expected Conduct:**

- a) Support initiatives to create and appreciate citizenship, eradicate poverty and reduce social inequalities, primarily through education. In this sense, we even promote actions aimed at financial citizenship programs, in their 4 pillars: inclusion and financial education, consumer protection and participation. [Discover our Financial Education website](#);
- b) Comply with internal Policies and Standards, which we establish to reduce socio-environmental risks; and

- c) Consider, in all decisions, the impacts they will have on communities or the environment, to preserve and/or recover wherever possible. Seek sustainable development in our direct and indirect actions or within our influence range, to expand accessibility, social and financial inclusion, democratizing access to our services and products.

## **2. Organization's Responsibility**

Relations between Organization and Stakeholders are reciprocal and must be based on our purpose, values, and principles.

### **Expected Conduct:**

- a) Promote equity in our relationships and promote justice based on equal rights and opportunities, and the impartial recognition of each person's rights;
- b) Preserve a climate of trust and harmony in internal and external relationships, to avoid conflicts, disrespect, or intimidation. Also promote the maintenance of a safe and comfortable working environment;
- c) Encourage and welcome relevant contributions, criticisms and/or suggestions to improve the Organization's processes and actions. Keep the communication means updated internally, allowing everyone to be informed about the Organization's life, its goals, projects, plans, opportunities, campaigns or promotions;
- d) Respect the privacy and maintain confidentiality regarding the Organization's transactions, data and information, our professionals and other interested parties to which we have access, committing to protect and treat them in a way that ensures their integrity, confidentiality and availability. The confidentiality must be respected by everyone, even after leaving the Organization; and
- e) Comply with existing laws and regulations that govern our acting sector's activities and the Organization's internal standards, which deal with personal data privacy and protection. Using these data will be exclusively to achieve the purpose(s) for which it is intended due to the activities carried out by the Organization. Such note implies collecting and using personal data necessary for specific purposes.

Maintain records and reports in strict compliance with applicable standards and good market practices, so that all information contained therein is complete and accurate.

## **3. Responsibility to the Organization**

Everyone must commit to and actively collaborate in improving the Organization's economic and financial results, which depend on them for sustainability and fulfilling its social role to generate and distribute wealth.

### **Expected Conduct:**

- a) Know, practice and disseminate the principles and commitments, policies, standards and laws applicable to the Organization, to fight illicit and unethical acts of any nature. Not obtain any personal advantage from business opportunities within the work environment and that are clearly identified with the Organization's interests, which has total primacy in their implementation;

- b) Undertake practices that strengthen the Organization's credibility, reputation and good image, preserving attributes built over decades of existence and dedicate special attention and commitment in dealing with matters related to customers and users of our products and services, promptly clarifying their questions and treating possible complaints with reciprocal interest;
- c) Dedicate to expanding and improving our products and services, also encouraging partnerships aligned with our purpose and values, ensuring the protection of the Organization's intellectual property rights, whether developed internally or not and of third parties that are in our possession. It includes, without being exhaustive, all information, technologies, creations, programs, systems, projects, inventions, processes, strategies, plans and related materials, which are for the exclusive use and the Organization's property;
- d) Not sell, carry, ease to others or use narcotics or illicit substances on the premises and/or when working for the Organization; and
- e) Not practice any gambling type, violating the current legislation.

## **VIII. CONSTRUCTIVE RELATIONSHIPS**

Constructive relationships happen when our decisions, strategies and actions are guided by integrity, ethics and transparency, as well as when there is a commitment to generate a positive impact in favor of sustainability.

For that, we must always be aware that we are part of a complex world, involving diverse relationships with our stakeholders and, in all of them, we must appreciate the highest integrity and conduct standards.

### **1. Customers and Products and Services Users**

#### **Expected Conduct:**

- a) Having the customer as our inspiration and developing solutions so that it has a pleasant and full experience, being the center of all our decisions and actions;
- B) Appreciate service based on courtesy, effectiveness, timeliness, diligence and transparency in the operations carried out;
- c) Maintain confidentiality and integrity of information received due to commercial relationships, safeguarding banking secrecy, privacy and data protection of customers and users;
- d) Meet the needs in a fair and equitable manner and be clear, aiming at quality service to ensure respect for needs, interests, purposes, customer profile, their moment in life and also, free choice. Service quality must be ensured at all relationships phases with customers and users; and
- e) Provide special attention to vulnerable customers and ensure the adoption of necessary precautions, at all relationship phases, to ensure adequate treatment for this public.

## **2. Shareholders and Investors**

### **Expected Conduct:**

- a) Comply with guidelines contained in the policies for disclosing material acts or facts and trading securities issued and approved by Banco Bradesco S.A., when relating to shareholders and investors;
- b) Distribute results and disseminate information in an absolutely symmetrical manner and with no privileges;
- c) Respect shareholders and investors' rights in all situations, with fair and equal treatment, not allowing, under any circumstances, discriminatory attitudes; and
- d) Comply with the rules relating to Related Parties, prohibiting the practice of transactions under conditions contrary to market conditions and, thus, ensuring compliance with the rules and laws applicable to all transactions.

## **3. Competition and Market**

### **Expected Conduct:**

- a) Respect our competitors initiatives, repelling information abuse or any form of espionage;
- b) Repudiate any comment that could harm their image or reputation, or that could contribute to disseminate untrue information;
- c) Send and/or receive information with competitors in accordance with the Laws, Policies, Standards and principles established by the Organization;
- d) Respect intellectual property and not use it without due authorization from competitors;
- e) Not allow retaliation resulting from customer loss to the competition, and not offer undue advantages in bidding processes, or in any situation;
- f) Protect the Organization by not obtaining information from competitors through illicit means; and
- g) Not contribute to exchange competitively sensitive information that could compromise free competition.

**To learn more about the topic, go to Norm of Competition Compliance Program.**

## **4. Goods and Services Suppliers, In-Country Correspondents and Business Partners, including Joint Ventures**

### **Expected Conduct:**

- a) Previously evaluate our partners, through a strict selection and approval process;
- b) Hire suppliers of goods and services and establish business relationships with partners who operate with honest and ethical standards compatible with ours;

- c) Ensure that goods and services and business partners suppliers, who represent us before government departments, act in accordance with the principles contained in this Code of Ethical Conduct and other applicable internal policies; and
- d) Ensure that any and all conduct, whether of commercial or labor nature, by third parties who are providing services on behalf of one of the companies or for the Organization, are compatible with the provisions of this Code of Ethical Conduct.

## **5. Regulatory and Self-Regulatory Government Departments**

### **Expected Conduct:**

- a) Ensure absolute compliance with the laws and regulations applicable to our activities, including those arising from self-regulations;
- b) Ensure compliance with our policies, standards and controls to prevent and fight money laundering, terrorist financing, corruption, bribery and illicit acts of any nature, in strict accordance with the applicable laws and national and international best practices;
- c) Pay special attention to Law nº 12.846/13 - Anti-Corruption, in all processes and internal control systems of the Organization;
- d) Not promise or offer, directly or indirectly, an undue advantage to a public agent, national or foreign, or any third party related to it, nor receive any benefit, whether on behalf of the Organization or anyone else; and
- e) Not condone fraud, for example, but not limited to, tenders and contracts with governments, national or foreign, in any sphere and level.

## **6. Press and Social Media**

Exposing our image and aspects of our lives on social media is quite common these days. However, we must take care of our image and reputation in our personal lives and, especially, in the work environment, to avoid presenting an equivocal message, not aligned with the Organization's purpose and values.

### **Expected Conduct:**

- a) Ensure transparency and credibility, integrity and ethics in our strategies for all communications we carry out;
- b) Any statement on behalf of the Organization must be made by a previously designated representative, expressing the institutional position and never personal positions;
- c) Pay attention to the appropriate use of social media made available by the Organization;
- d) Not publish images, comments on social media or subject us to any exposure type that could pose risks to the Organization's image and reputation and never disseminate false information; and

e) Not publish the Organization's strategic information or any customer data without due legal support.

## **7. Associations and Class Entities**

### **Expected Conduct:**

- a) Acknowledge the important role of legally constituted associations and class entities, to dialogue and seek composing common, legitimate and legal interests; and
- b) Recognize the right to free collective bargaining, as well as freedom of association, observing the legal provisions, values and principles established in this Code of Ethical Conduct and following the guidelines contained in the Bradesco's Integrity and Competition Compliance Programs.

## **8. Political-Party Activities**

There are no restrictions on the exercise, by everyone, of political-party rights, as long as they are strictly personal and with no interference in responsibilities with the Bradesco Organization and, therefore:

- a) Everyone is free to develop, on a personal level, citizenship rights as voters, but individual opinions and positions should never be confused with our brand and our positioning; and
- b) The Organization's image must not be linked to political-party activities, and such demonstrations are strictly prohibited on its premises.

## **IX. CONFLICT OF INTERESTS**

Conflict of interest is a potential situation when there is the possibility of direct or indirect confrontation between personal interests, those of the Organization or our Customers, which may compromise or influence, in any way, the Organization's performance and the individual's duties and responsibilities.

Businesses and transactions involving people with Potential Conflict of Interests must be carried out impartially, without any undue benefit to the interests of shareholders, controllers, managers or family members of any of these.

Contracting services, agreements, partnerships or suppliers of goods and services must occur in an impartial and transparent manner, with no discrimination or privilege of any kind, in accordance with the Organization's criteria and standards and respecting applicable legislation.

Granting donations and sponsorship must occur in an impartial and transparent manner, without privilege of any kind or obtaining undue advantage, complying with the Organization's criteria and standards, with due respect for the applicable legislation.

When deliberating credit operations for related parties and other degrees of relationships, as described in item "XII - General Concepts", item "F", of this Code, it is essential to follow the precepts established in the Organization's Credit Policy and Standard.

Even in a situation of divergence, in which there is, or may be, an opinion conflict, we must act and present a frank, transparent, clear and coherent position, even if such position is contested.

In the event of conflict of interest, anyone involved must promptly inform their superior and their peers of the fact, and remove themselves, including physically, from discussions and related deliberations.

Furthermore, in the event of a conflict at the time of discussion or deliberation in any of the management or supervisory departments, removing the person in conflict must be duly recorded in the minutes of the meeting of the respective department.

If the conflicted party does not speak out, any other person who is aware of the conflict must do it.

## **X. RESPONSIBLE LEADERSHIP**

Leadership is the main inducer and example of integrity and ethical behavior, discipline, respectful relationships and trust establishment in all relationships. It monitors the Organization's results with diligence and commitment and has expanded responsibility with regard to sustainability and the construction and maintenance of a healthy and harmonious environment. Furthermore, the leadership is responsible for managing and mitigating risks that could, among other impacts, tarnish our image, reputation and purpose as an Organization. So, the leadership must adopt the following actions:

- a) Assist in talent development, opening paths to success, balanced and enthusiastic work, aiming for the best purposes and results, through team collaboration and knowledge sharing;
- b) Ensure that all internal, accounting or tax information and records are an expression of our operations reality, as well as that they are transmitted in a transparent and appropriate manner to all interested parties, in accordance with the applicable laws, regulations, and the Organization's Policies and Standards;
- c) Appreciate transparency in managing its team, informing the Organization's purposes, motivating and contributing to its growth and evolution, in addition to training successors, receiving suggestions and ideas wisely. Give and receive feedback and strive to resolve the questions of those led, in search of greater learning and internal processes improvement; and
- d) Act to preserve the health, life quality, well-being, and safety of everyone, to maintain professional and personal balance. Therefore, we are concerned to offer a collaborative, diverse and welcoming environment, in which we can fully carry out activities, regardless of ethnicity, color, gender, age, marital status, sexual orientation, gender identity, religious choice, physical condition or socioeconomic class.

## **XI. GOVERNANCE**

Our corporate governance is based on the best market practices, consisting of a set of guidelines and management structures dedicated to manage all aspects of economic, social and environmental transformations in which the Organization operates. For any of the aspects related to integrity, ethics and compliance with the guidelines set out in this Code of Ethical Conduct, we have a corresponding governance structure, responsible for mitigating, preventing and responding to any potential violations.

The Integrity and Ethical Conduct Committee reports to the Board of Directors, and it is the department whose purpose is proposing actions that regard to the dissemination and compliance with the Codes of Ethical Conduct, corporate and sectoral, and conduct rules related to anti-corruption topics and competitiveness, to ensure efficiency and effectiveness. The Board of Directors is responsible for approving all Codes.

Management and periodic review of our Code are under the responsibility of the Compliance, Conduct and Ethics Department and involve many activities related to dissemination, acculturation, training, clarification of questions regarding its scope and application, as well as due complaint processing on possible violations received by the Corporate Reporting Channel.

Adherence to the Code occurs through mandatory ethics training, available on the internal training platform. Whenever there is a review that substantially changes the guidelines contained in this document, adhesion must occur again.

### **1. Corporate Reporting Channel**

In case of questions and/or ethical dilemmas about the content of this document or when situations or suspicions of violation of corporate and sectoral Codes of Ethical Conduct arise, the communication must be made in a timely and completely manner, through the immediate leadership or the Corporate Reporting Channel.

To formalize Complaints, the complainant, whether identified or not, must provide as much information as he/she has on the matter, if possible, accompanied by evidence or other elements that can assist in investigating the facts reported.

We ensure the right to anonymous reporting, and also that no type of retaliation is tolerated due to Reports made in good faith.

Our channel is also available to third parties and other interested parties.

We emphasize that, in our daily lives, dilemmas or situations may arise that are not foreseen in this Code and that require an individualized assessment. If you have any question, be sure to ask.

The Corporate Reporting Channel is available at:

***Electronic Form:***

[Institutional Website](#) > [Service](#) > [Complaint](#)

[Bradesco RI website](#) > [Corporate Governance](#) > [Corporate Reporting Channel](#)

[Corporate Portal](#) > [Bradesco](#) > [Complaints and Manifestations Channel](#)

**Phone Service:**

0800 776 4820 (open Monday to Friday, from 8am to 6pm, except weekends and national holidays).

The Channel ensures that the complainant monitors the complaint progress, using the protocol number generated at the registration time.

**2. Consequences/Disciplinary Measures**

Those who carry out actions that constitute violations of the Codes of Ethical Conduct, corporate and sectoral, and the internal standard that deals with the matter, are subject to the application of disciplinary consequences/measures, regardless of hierarchical level and with no prejudice to applicable legal penalties.

**XII. GENERAL CONCEPTS**

So that we can understand in an integrated way the fundamental concepts presented here, we highlight the following definitions:

- a) Ethics:** set of principles and values of the Bradesco Organization that serves as a reference and should guide everyone's conduct;
- b) Conduct:** corresponds to any and all acts, actions, omissions, decisions, attitudes or behaviors, which must always be guided by ethical standards;
- c) Principles:** present the guidelines that guide our decision-making process, in any activity, in relation to any interested party and in all relationships;
- d) Commitments:** present the way in which we must act and our commitment to all the guidelines established in this Code;
- e) Interested Parties (stakeholders):** all those with whom we interact; the individuals or entities that are interested in or affected, positively or negatively, by the Organization's business: shareholders, investors, customers, suppliers, service providers, government, society in general and, of course, our internal public, made up of administrators, employees, interns and apprentices. In short, they are those who assume or bear some type of direct or indirect risk, related to the Organization's activities;
- f) People with Potential Conflict of Interests:** for the purposes of this Code, these are all individuals or legal entities that have a certain degree of relationship with the Organization, namely:

**Related Parts:**

I - Its Controllers, natural or legal person, in accordance with art. 116 of Law nº 6.404/76.

II - Its Directors and Members of statutory or contractual departments.

III - Spouse, Partner, children and stepchildren of the people mentioned in items I and II; and

IV - Natural people with qualified corporate participation in their capital.

V - Legal entities:

i) with qualified corporate participation in its capital;

ii) in whose capital, directly or indirectly, there is qualified corporate participation;

iii) in which there is effective operational control or preponderance in deliberations, regardless of partner participation; and

iv) those that have a director or member of the board of directors in common.

**Other Degrees of Relationship:**

Relatives, blood or similar, up to second degree, of the natural people mentioned in items I and II, and not mentioned in item III, of the section "Related Parties".

**g) Privileged Information:** considered to be information relating to relevant acts or facts not yet disclosed to regulatory departments, Stock Exchanges or other similar entities and, simultaneously, to shareholders and investors in general, through wide dissemination and publication by press departments. Its misuse may result in penalties, as there are typifications in legal and infra-legal norms; and

**h) Intellectual Property:** refers to the legal protection and authorship recognition of intellectual production works such as inventions, patents, trademarks, industrial designs, geographical indications and artistic creations. Finally, any asset that is immaterial or intangible, according to Law 9.279/96.

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We declare that this is a faithful copy of the Code of Ethical Conduct of Bradesco Organization, approved in RECA nº 946, of 06/30/2003, the last review of which, with changes, was recorded in the minutes of RECA nº 3.397, of 09/6/2023.

**Banco Bradesco S.A.**