



**Know Your Collaborator Policy and  
Guidelines Against Corruption, Money  
Laundering and Terrorism Financing**

**Bradesco Organization**

4.10.2008



## Know Your Collaborator Policy and Guidelines Against Corruption, Money Laundering and Terrorism Financing

Pursuant to the best Corporate Governance practices and ethical and behavioral values that guide the performance of the Collaborators of Bradesco Organization, the Board of Directors of Banco Bradesco S.A. approved the "Know Your Collaborator Policy and Guidelines Against Corruption, Money Laundering and Terrorism Financing", to be complied with, indistinctly, by all hierarchical levels of the Organization, and defining that the list of Collaborators comprise the Management, Employees, Outsourced Workers, Services Providers and Suppliers.

The performance of Collaborators, both within the context of Bradesco Organization and in the relationship with customer, non-customers, agents or public authorities, whether these are domestic or foreign authorities, shall be permanently supported by principles of transparency and confidence in the acts practiced and in absolute conformity with the Corporate Code of Ethics, the Internal Regulation of the Organization, the Corporate Governance Policy and with the "Know Your Customer Policy".

Aligned to these assumptions, this document aims at:

- \* guiding all the Collaborators when performing their duties and assignments, making them aware of the relevance of their performance within ethical and moral values established by the Organization;
- \* permanently providing consultation as to the concepts, guidelines and responsibilities defined herein; and
- \* avoiding using the Organization for illegal practices of any nature and, especially, in the events of corruption, money laundering and terrorism financing.

In this regard, it is worth mentioning the following concepts:

- \* **Corruption:** corruption is one of the main threats to the foundations of the best corporate governance and sustainability, affecting the economic, political, social and environmental development. Overall, corruption causes damages to the Countries, to the society, to the public and private sectors, harming, among others, business relations and companies that value fair and honest practices in their ventures and activities. Corruption may be active or passive, direct or indirect, internal or external, and evidenced by various forms, pointing out: bribery, kickbacks, collusion, dishonesty, fraud, embezzlement, violation of duty, usurpation, extortion, misuse of authority and influence peddling.
- \* **Money Laundering:** the crime of money laundering is characterized by a set of commercial or financial operations aiming at making legal assets obtained through the practice of delinquencies and crimes in general, and especially, those related to drug dealing, smuggling, guns and ammunition trafficking, kidnapping, corruption, crimes against the public administration and financial system, in addition to those practiced by criminal organization. In practice, the crime of money laundering utilizes, among other means, the banking system to give effect to financial transactions and transfers, usually providing an increase of economic or financial assets involved, without any grounds and proof concerning the nature, origin and legitimacy of resources. It is a crime of international magnitude, practiced on a structured basis and its harmful effects are disseminated into the organized sectors of society, compromising, including, economic activities.
- \* **Terrorism Financing:** the terrorism activities, carried out under any means, form, motivation or ideology, are financed through legal and illegal resources, and its transgressors – individuals and/or terrorist organizations – make bad use of the financial system as collecting channels and transfer of resources, whether by electronic or physical means, including boundary remittances. The money



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laundering and the terrorism financing have similar features, mainly concerning the hiding and concealment of origin, destination and purpose of resources. The terrorism and its financing are worldwide problems and a threat to peace and international security.

Acknowledging the critical situation, the severity and the harmful effect caused by the illegal acts mentioned, as well as the risks of image and reputation more and more relevant in our activities and operations, Bradesco Organization, aware of its institutional commitment, sets forth its guidelines against corruption, money laundering and terrorism financing, to be diligently observed by our Collaborators in various relationships and daily activities and their professional duties, as follows:

- \* to abstain themselves from acts that may compromise the reputation and the image of Bradesco Organization, observing the best conduct rules, not practicing, not cooperating and rejecting any illegal business or activity, among them, the practice of kickbacks, bribes, extortion, misuses and corruption in all its forms, whether in their relationships with the private sector and/or the sector and public agents, whether domestic or foreign agents;
- \* to abstain themselves from commenting on any information or issue any opinion which may be used by the interlocutor in the performance or participation in suspicious or questionable businesses or activities;
- \* to abstain themselves from offering personal or financial suggestions or advices which may suggest propensity to collaborate in businesses or activities that try to evade restrictions, standards, laws and rules required by any authority or regulation;
- \* to maintain themselves in surveillance to identify and repudiate the attempts of use of Bradesco Organization for illegal businesses or practices, frauds or crimes of any nature, mainly those related to bribery, corruption, money laundering and terrorism financing;
- \* not use the position or the name of Bradesco Organization to obtain any financial or material advantage, for himself or for third parties, or even businesses or procedures which may typify as improper action or omission in the performance of their duties, including practices of influence peddling or misuse of authority;
- \* to refuse gifts, monetary or material advantages, from whoever is, which may represent improper relationship or in financial or reputation detriment to Bradesco Organization;
- \* to keep the confidentiality about internal information and of clients to which they have access in view of the performance of their position or duty;
- \* under no circumstance provide, assign or transfer, by any means or form, documents and information that are protected by bank secrecy or confidentiality agreement;
- \* not provide, assign or transfer, by any means or form, to whoever is, his or her personal password to have access to computers network and to the information systems of the company;
- \* to abstain themselves directly or indirectly from, on his or her behalf and personal interest, execute, control, keep in custody, mediate or represent interests of clients, suppliers or third parties; and



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- \* to ensure the maintenance and integrity of any and all internal document and record, not allowing, under no circumstance, their withdrawal, alteration or destruction, in order to hide or conceal improper transaction or procedure in disagreement with internal or external regulation.

The responsibility for the observance and compliance with this Policy is indistinctly incumbent upon all the Collaborators of Bradesco Organization and especially:

- \* Managers, in the performance of their positions, who shall have flawless conduct and honesty, also promoting, within the scope of Areas under their management, the highest behavior of ethics, honesty and transparency;
- \* the Human Resources Department, responsible for the policies, rules and corporate routines of human resources, including, among its duties, the checking of personal data and professional qualifications of those to compose the staff of Bradesco Organization employees, maintaining the records of these procedures;
- \* those holding head positions, Managers and Superintendents, who shall permanently supervise their subordinates, immediately informing his or her hierarchical superior about the eventual situations described below:
  - . sudden alterations, and without any apparent justifications, in life standard or assets of their subordinate or direct dependants, not compatible with position and respective salary earned;
  - . indebtedness levels in disagreement with the subordinate's ability of payment;
  - . opposition or delay in making use of regular vacations; and
  - . behavioral or conduct deviations of any nature.
- \* the Management of the Contracting Department of outsourced companies, services providers and suppliers, that shall inform their contracted workers about the provision in this Policy and maintain the proper monitoring, aiming, where applicable, its compliance.

Any situation, conduct or event that may typify violation to the precepts of this Policy shall be addressed to his/her superior or directly to the General Inspectorship Department, Risk Management and Compliance Department, Human Resources Departments, Ethical Conduct Committee or Audit Committee. This notice may occur, including, by means of the following services: "Alô Bradesco", "Alô RH" and "Fale Conosco". This Policy also applies to Units Abroad, except for anything overlapped by local regulation.

The violation of this Policy, or even the involuntary involvement in situations deemed atypical or irregular in terms of decorum and conduct, may characterize infringement which may be subject to administrative and/or legal sanctions, pursuant to applicable regulations at every jurisdiction where Bradesco Organization maintains its activities.



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The Ethical Conduct Committee, elected by the Board of Directors of Banco Bradesco S.A., are the responsible for applying this Policy, and being liable, including, the analysis of eventual infringements and violations, informing the appropriate bodies about its occurrence, accompanied by an opinion for the adoption of required measures.

Communications may be sent to:

General Inspectorship Department  
Cidade de Deus – Prédio Amarelo Velho - 1º andar  
CEP 06029-900 - Osasco - SP  
Phone (5511) 3684-2266 - Fax (5511) 3684-2350

Risk Management and Compliance Department  
Cidade de Deus – Prédio Rubi - Piso 1  
CEP 06029-900 - Osasco - SP  
Phone (5511) 3684-9292 - Fax (5511) 3684-5633

Human Resources Department  
Cidade de Deus – Prédio Novíssimo – Térreo  
CEP 06029-900 - Osasco - SP  
Phone (5511) 3684-3366 - Fax (5511) 3684-5115

Ethical Conduct Committee  
Cidade de Deus – Prédio Novo - 4º andar  
CEP 06029-900 - Osasco – SP  
Phone (5511) 3684-4011 - Fax (5511) 3684-4630

Audit Committee  
Cidade de Deus – Prédio da Ex-Gráfica - 1º subsolo  
CEP 06029-900 - Osasco - SP  
Phone (5511) 3684-9110 - Fax (5511) 3684-9192

Alô Bradesco  
Toll-Free 0800 704 8383  
Services from Monday to Friday  
From 8:00 am to 6:00 pm

Alô RH  
Phone: (5511) 3684-4928 - Fax (5511) 3684-5087  
E-mail: 4240.rh@bradesco.com.br  
Electronic mail: 4240 - Box 424

Fale Conosco  
Communication channel via e-mail  
Internet: [www.bradesco.com.br](http://www.bradesco.com.br)



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We declare that this is a faithful copy of the policy Know Your Collaborator and Guidelines Against Corruption, Money Laundering and Terrorism Financing, of Bradesco Organization, approved in the Special Meeting of the Board of Directors # 1,172, as of 9.12.2006, with amendment to the denomination, amongst other amendments, validated in the Special Meeting of the Board of Directors #1,297, as of 4.10.2008.

Banco Bradesco S.A.

*Milton Almicar Silva Vargas      José Luiz Acar Pedro*