

ITAÚ UNIBANCO HOLDING S.A.

CNPJ 60.872.504/0001-23

Open Company

NIRE 35300010230

ANTI-CORRUPTION CORPORATE POLICY

OBJECTIVE

The Anti-Corruption Corporate Policy is one of the components of the Corporate Program of Integrity and Ethics whose purpose is reinforcing the commitment of Itaú Unibanco Conglomerate to prevent and fight corruption in every aspect, also defining the guidelines to create, perform and continuously improve the Ethics and Integrity Program.

Itaú Unibanco Conglomerate rejects any type of direct or indirect, active or passive corruption, always trying to be transparent and honest throughout its relations.

TARGET AUDIENCE

This Policy applies to Brazil and abroad, to every manager, employee and controller of Itaú Unibanco Conglomerate's and non-profit units linked to the Conglomerate in Brazil and any person with whom the Conglomerate maintains commercial relations, including clients, partners, suppliers and other audiences.

PROHIBITIONS

It is prohibited to:

- Suggest, offer, promise or give, directly or indirectly, by request or otherwise, undue advantages of any nature (financial or otherwise) to public or private people and companies in Brazil or abroad (including third sector organizations), **as well as among people, companies and organizations of different countries**, in exchange for actions or omissions inherent to a person's own responsibilities, or to facilitate transactions or activities for Itaú Unibanco Conglomerate or aiming at benefits for oneself or for third parties.
- Suggest, request, demand, accept or receive, directly or indirectly, undue advantages of any nature (financial or otherwise) to/from public or private people and third sector organizations in Brazil or abroad **as well as between individuals, companies and organizations from different countries** in exchange for actions or omissions inherent to a person's own responsibilities, or to facilitate transactions or activities for Itaú Unibanco Conglomerate or aiming at benefits for oneself or for third parties.

ANTI-CORRUPTION RULES

The following items are principles, guidelines and procedures guiding Itaú Unibanco Conglomerate to fight and prevent corruption:

Top Management Commitment

- The Board of Directors, based on the Code of Ethics and the Corporate Policy of Integrity and Ethics of Itaú Unibanco describes the standards and values of Itaú Unibanco Conglomerate that must be complied with by people mentioned in this Policy. Such standards include the maintenance of policies and practices to prevent and fight any type of corruption, money laundering, fraud and other illegal acts to express Itaú Unibanco Conglomerate's belief that ethics is non-negotiable.
- Providing financial, material and human resources to implement and maintain the Corporate Program of Integrity and Ethics.
- Working transparently in relations, transactions and information given to the market (Code of Ethics).

Communication and Training

- Itaú Unibanco Conglomerate communicates principles and guidelines to people mentioned in this Policy to stimulate anti-corruption practices.

- Trainings to educate and raise awareness of the Conglomerate's employees and managers, including Top Management members.
- Employees and managers are obliged to be aware of Integrity policies and sign the Term of Awareness and Compliance with Corporate Integrity Policies.

Anti-Corruption Proportional Procedures

- Itaú Unibanco Conglomerate adopts procedures matching corruption risks related to the nature, size and complexity of activities performed.

Client Relation

- Procedures to know clients (KYC), as per the Corporate Policy of Prevention and Fight Against Illegal Acts.
- Diligence to identify public agents/politically exposed people
- Monitoring transactions with Politically Exposed People
- Including, when applicable, anti-corruption clauses in client agreements.

Third-party relation

- Procedures to know suppliers and service providers (KYS) and commercial partners (KYP), as per the Corporate Policy of Prevention and Fight Against Illegal Acts.
- Procedure to register, homologate, hire and monitor suppliers, service providers and practices specific of units abroad.
- Specific rules to hire or invite speakers by Itaú Unibanco in the Internal Policy.
- The Code of Ethics of Itaú Unibanco, as well as the Supplier Relationship Code, are available in the website for suppliers and service providers (www.itaubr.com.br/fornecedores)
- Reputation analysis of sponsored people and donors and practices specific to units in Brazil and abroad).
- Including, when applicable, anti-corruption clauses in third-party agreements.
- Rules and criteria to accept and offer courtesies, invitations and hospitality (Code of Ethics of Itaú Unibanco and Corporate Policy of Integrity and Ethics).

Employee hiring

- Compliance with criteria to select and hire employees and assessment of possible conflicts of interests (employees from private or public sector or those who are related to the government agent), respecting the definitions of the Employee Hiring Policy as per the internal policy and specific practices of international units.

Interacting with public agents and companies that are part of direct and indirect management

- Rules for the relationship with and hiring of government agents and companies belonging to direct and indirect public administration, including government relationship activities, record of interactions, bidding procedures and execution of administrative agreements defined in specific internal policy (Relationship Policy with Public Officials and Contraction with Bodies and Public Companies and specific practices of units abroad).
- Governance of Regulatory and Supervisory Bodies relations.
- Criteria to negotiate documents from government bodies, judiciary, other authorities and third-parties and specific practices of units abroad).
- Rules and criteria to accept and offer courtesy, invitations and hospitality (Code of Ethics of Itaú Unibanco and Corporate Policy of Integrity and Ethics).

Due Diligence

- Itaú Unibanco Conglomerate adopts due diligence procedures matching business risks in activities and jurisdictions in which it operates.

- Includes, when applicable, strategic partnerships and merger and acquisition clauses in agreement minutes protecting Itaú Unibanco against law violations, including Brazilian Law 12846/13.
- Performs, when applicable, during Merger and Acquisition processes, due diligence to identify possible corruption evidences.

Financial Management Transparency and Accountability

- The preparation of Itaú Unibanco Conglomerate's financial statements complies with laws, rules and regulations in force in countries where it operates and rigorously and clearly reflects transactions performed by Itaú Unibanco Conglomerate, in order to ensure equality and transparency to stakeholders.
- The Internal Audit assesses the effectiveness of accounting management controls, financial reports and the governance structure that ensures the Conglomerate's compliance with legal and regulatory rules. It also verifies the accuracy, reliability and timeliness of accounting, managing and operating information.
- The Independent Audit performs mandatory and recurrent audits of Itaú Unibanco Conglomerate's financial statements.
- Itaú Unibanco complies with the rules included in the Sarbanes-Oxley Act.

Risk Assessment and Monitoring

- Itaú Unibanco Conglomerate assesses risks related to this Policy through risk management and internal controls and compliance structure as per Risks and Control Management Policy and Integrated Management Policy of Operating Risks, Internal Controls and Compliance.
- Regular monitoring and assessments must be performed to verify the effectiveness of controls.
- There is a risk management-focused governance to assess and approve products, complying with applicable rules and regulations and the best market practices.
- The risk assessment must consider aspects related to public sector and business partners interactions, in addition to the nature of transaction.
- The Internal Audit assesses the Corporate Program of Integrity and Ethics periodically.

RESPONSIBILITIES

Audit Committee and Board of Directors

- Approving guidelines of this Policy and monitoring the Corporate Program of Integrity and Ethics.

Superior Commission of Ethics and Sustainability

- Assessing and resolving on corporate issues involving business and workplace ethics.
- Establishing guidelines and approval authorities for the Corporate Program of Integrity and Ethics.

Committee of Ethics and Sustainability

- Discussing legal anti-corruption elements.
- Appointing and approving improvements in processes arising from regulation, identified risks, accusations and others.
- Monitoring the compliance with anti-corruption policies and procedures.

Sector Committees of Integrity and Ethics

- Assessing and resolving on the Conglomerate's specific issues involving conflicts related to business and workplace ethics.
- Assessing the compliance with ethics and integrity institutional policies within transactions.
- Submitting proposals to other Committees.

Internal Controls and Compliance Office

- Certifying the efficiency and efficacy of the control environment through monitoring programs and key control tests, reporting the residual risk independently, as defined in the Integrated Management Policy of Operating Risks, Internal Controls and Compliance.
- This Office is prohibited from managing any business that may compromise its independence or generate conflicts of interests, as defined in the Policy on Integrated Management of Operational Risk, Internal Controls and Compliance.

Regulator Relationship and Compliance Superintendence

- Coordinating the implementation, monitoring and development of the Corporate Program of Ethics and Integrity, being independent in the exercise of its duties and reporting directly to any manager or employee and having access to any information necessary to its responsibilities.
- Updating this Policy based on the regulation in force and establishing corporate guidelines.
- Setting forth parameters, coordinating the preparation and implementation of anti-corruption training and making it available to Managers and Employees in Brazil, as well as awareness-raising campaigns in Brazil and International Units.
- Answering anti-corruption questionnaires, market surveys and internal and external reports.
- Coordinating Itaú Unibanco's representatives taking part on entities representing their sectors to attend meetings, committees, commissions, sub commissions and work groups, or to occupy positions and roles at these entities, enabling the assessment and recommendation of proposals.
- Assessing possible adherence to voluntary commitments related to anti-corruption.
- Clarifying doubts related to this Policy and its application through the e-mail.
- Operating according to Operating Risk, Internal Controls and Compliance's guidelines and responsibilities described in the specific Policy.
- Reporting the Program to the Audit Committee, Board of Directors and Superior Commission of Ethics and Sustainability and coordinating the Committees of Integrity and Ethics and sector Committees of Integrity and Ethics.

Compliance and International Unit Risks Superintendence

- Adapting and applying anti-corruption trainings and campaigns according to the Parent Company and making them available to Managers and Employees of International Units.
- Coordinating the implementation, monitoring and development of the Corporate Program of Ethics and Integrity in International Units, aligned with Superintendence of Relations with Regulators and Compliance.
- Answering questionnaires, market surveys and internal and external reports related to anti-corruption regarding International Units upon with Superintendence of Relations with Regulators and Compliance request.

Corporate Security Office

- Maintaining a channel to receive suspicions and accusations related to possible violations to this Policy.
- Investigating the accusation and verifying the suspicious or confirmed situations and adopting the necessary actions.
- Recording the procedures and actions taken to address the event.
- Helping to prepare and carry out anti-corruption training and awareness-raising campaigns.

Legal Office

- Interpreting amendments to the regulation to support the update of this Policy, the Ethics and Integrity Program and guidelines about the subject.

- Clarifying specific doubts related to the regulation involving anti-corruption issues, when requested.
- Preparing, establishing and reviewing anti-corruption clauses to be included in agreements.
- Helping to prepare and review anti-corruption trainings and awareness-raising campaigns.
- Helping to prepare answers to questionnaires, received market surveys and internal and external reports related to the anti-corruption subject, when requested.
- Helping to review proposals related to this Policy discussed at the representation entities.

Conglomerate's Internal Areas

- Complying with this Policy's guidelines.
- Helping to raise people's awareness about this Policy's guidelines, including clients, partners, suppliers and other audiences.
- Defining and implementing policies, procedures and controls matching the complexity and risks associated to transactions.

Managers and Employees

- Knowing and following this Policy's guidelines.
- Knowing and following the local regulations applicable to the country where it operates.
- Performing anti-corruption trainings designed by Itaú Unibanco.
- Annually signing the Term of Awareness and Compliance with Corporate Integrity Policies proving that you know and agree with this Policy.

WHISTLEBLOWING AND DOUBTS CHANNEL

- Any doubts Itaú Unibanco's managers and employees may have regarding this Policy and its application must be addressed to the electronic address.
- Suspicions or evidences of corruption must be directly reported to the Fraud Inspection and Prevention Superintendence (Corporate Security Office) in Brazil. International units have local channels for reporting and also the option of direct report to Brazil through channels of Inspection and Audit Committee. All channels are provided to employees through local Codes of Ethics.
- Itaú Unibanco's managers, employees, clients, service providers and general public may use any of the following channels to report to the Inspection:

- Customer Service: 0800-723-0010 e 0300 100 0341;

- Site : <https://www.itaunet.com.br/atendimento-itaunet/para-voce/denuncia/>;

- Internal E-mail: "caixa INSPETORIA";

- External E-mail: inspetoria@itaunet.com.br;

- External E-mail for suppliers: fornecedor_relatos@itaunet.com.br

- Pouch Mail: recipient: Gerência de Inspeção/São Paulo;

- Mail Address:

A/C Inspeção

-Av. Dr. Hugo Boelchi, 900 - piso 1 - Torre Eudoro Villela - São Paulo - SP - CEP: 04310-030

In order to optimize the steps taken by Itaú Unibanco Conglomerate, the communication of corruption actions, practices or attempts, whenever possible, must be accompanied by the largest amount of information. Among those, we highlight the following:

- Accurate description of the fact;
- Where and when it happened or is happening;
- Who are the persons and organizations involved;
- Evidence that helps assess the case and take the proper actions.

- Possible irregularities in processes and procedures identified during the report are rectified in a timely manner.

WHISTLEBLOWERS PROTECTION

- Managers and employees may not Retaliate against those who, in good faith: (i) report or express a complaint, suspicion, doubt or concern regarding potential violations of the guidelines in this Policy; and (ii) provide information or help check such potential violations.
- Managers and employees must preserve the confidentiality of information related to investigations on potential violations of the guidelines in this Policy.
- Anonymous reports will be accepted by the Whistleblowing Channels and anonymity will be preserved;
- Disciplinary sanctions will be applied to managers or employees who attempt to or retaliate against someone who, in good faith, communicates potential violations of the guidelines in this Policy.
- Disciplinary sanctions will be applied to managers or employees who are proven to use bad faith when communicating potential violations of the guidelines in this Policy or communicate facts which are knowingly false.

PENALTIES

The failure to comply with any of the guidelines or principles established in this Policy is subject to disciplinary sanctions and administrative or criminal actions, without prejudice to other applicable penalties or actions in accordance with the legislation in effect.

RELATED DOCUMENTS

This Policy must be read and interpreted together with the following documents:

Internal Rules Related

- Itau Unibanco's Code of Ethics.
- Supplier Relationship Code.
- Corporate Integrity and Ethics Policy.
- Integrated Management Policy of Operational Risks, Internal Controls and Compliance.
- Corporate Policy of Prevention and Fight Against Illegal Acts.
- Risk Control and Management.
- Internal Audit.
- Corporate Policy on Product Assessment.
- Relationship with Regulatory Bodies, Self-Regulators, Supervisors and Inspectors.
- Brazil: Itaú Conglomerate's relationship with government bodies, judiciary, other authorities and third-parties.
- Brazil: Sponsorship Policy.
- Brazil: Donations Policy.
- Policy on Itaú Unibanco Conglomerate's Events.
- General Purchasing Policy
- Supplier Management
- Policy on Wholesale Bank Purchases and Contracting.
- Employee Hiring Policy
- Brazil: Accounting Policies and Practices.
- Compliance with Sarbanes-Oxley Act - Section 404.
- Brazil: Contracting of services to be provided by the Conglomerate's independent auditor.
- Brazil: Mergers and Acquisitions Policy (IBBA Sector).

- Brazil: Customer Registration Policy (IBBA Sector).
- Brazil: Purchase Policy (IBBA Sector).
- Argentina: Política de Prevención Y Combate de Actos Ilícitos.
- Chile - BIC: Manual de Políticas y Procedimientos de Prevención del Delito de Cohecho.
- Colombia (IBBA): Code of Conduct and Resolution of Conflict of Interest.
- Japan - Tokyo Branch: Rule for Handling Scandal Incident.
- London Branch: Anti-Bribery Policy.
- Miami: IIS: Written Supervisory Procedures.
- Miami: BII: Code of Ethics and Conduct.
- New York Branch: Bank Bribery Act, Foreign Corrupt Practices Act, - Federal Election Campaign Act, - Code of Ethics, e - Whistleblowing Guidelines.
- New York: IUAM: Code of Ethics.
- New York: IUSI: Compliance and Written Supervisory Procedures Manual.- Paraguay: Política de Gestión de Ética Corporativa.
- Portugal: Anti-Bribery Policy.
- Switzerland: Code of Ethics and Compliance Policy.

External Rules Related

- United States Foreign Corrupt Practices Act (FCPA).
- UK Bribery Act 2010.
- United Nations Global Compact.
- United Nations Convention Against Corruption.
- Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OCDE Convention).
- Convention Against Corruption of the Organization of American States (OAS).
- Brazilian Penal Code.
- Brazilian Administrative Improbity Law – no. 8429/92.
- Brazilian Law on Conflict of Interests – no. 12813/13.
- Brazilian Law on Administrative and Civil Liability of Legal Entities – no. 12846/13 and respective state and municipal regulations.
- Brazilian Federal Decree– no. 8420/15.
- Brazilian Decree on corporate integrity programs assessment – no. 909/15 of CGU.
- Brazilian Decree to verify administrative liabilities and to celebrate the leniency agreement included in Law no. 12846 of August 1, 2013.– no. 910/15 of CGU.
- Government Accountability Office Policies no. 01/15.
- Normative Instruction of the Comptroller General of the Union nº 01/15.
- Integrity Program – Private companies guidelines published by the Government Accountability Office (CGU) in 9/2015.
- Febraban - Integrity Program to Fight Corruption and other acts harmful to the national or foreign public administration published in 01/2016.
- International Units: Specific regulation of each country.
- Global Reporting Initiative (GRI): 205-2, 103-1 Anti-corruption, 103-2 Anti-corruption and 103-3 Anti-corruption.
- Business Pact for Integrity Against Corruption – Ethos Institute
- Business Contribution to Promote Green and Inclusive Economy.
- Empresa Pró-Ética 2016 (2016 Pro-Ethics Company)

GLOSSARY

Public Agent: Any person who, temporarily or without compensation, by election, appointment, designation, hiring or any other type of investiture or bond, has a term of office, occupies a position, job or role at companies belonging to direct and indirect public administration.

Top Management: Officers, executive officers, general officers, VPs, presidents and board members.

Illegal Acts: Acts against laws or morale, such as money laundering, terrorism financing, corruption and fraud.

Employees: Permanent and temporary employees, as well as Itaú Unibanco Conglomerate's interns.

Itaú Unibanco Conglomerate: Itaú Unibanco Holding S.A. and subsidiaries in Brazil and abroad.

Corruption: for the purposes of this policy, any action, intentional or otherwise, that implies the suggestion, offer, promise or giving (active corruption) or the solicitation, demand, acceptance or receipt (passive corruption) of undue advantages, financial or otherwise, such as: kickbacks, influence peddling and favors, in exchange for action or omission inherent to a person's own responsibilities, or to facilitate business, operations, or activities for the Itaú Unibanco Conglomerate or aiming at benefits for oneself or third parties.

Suppliers: individuals or corporate entities, public or private, national or international, which provide products or services to the Conglomerate.

Companies and bodies belonging to direct and indirect public administration: Comprehend direct and indirect public administration. Direct administration is composed of entities and bodies belonging to Executive, Legislative and Judiciary, including Federal/State/Municipal Prosecution Service. Examples: Authorities, Ministries and Secretariats. Indirect administration is composed of entities created with their own legal character to perform Government's autonomous activities and to operate in a decentralized way. Examples: Autarchies, Foundations, Public Companies whose capital is solely public, and Mixed Capital Companies, which add public interests (50% +1) to private interests.

Retaliation: Any action involving retaliation, persecution, reciprocation or vengeance performed due to reports or communication of doubts, suspicions or challenges of potential violations of this Policy or illegal and unethical actions. Examples of retaliation are: threats, demotion, blacklisting, application of suspension, dismissal, among others.

Transnational: among people, companies and organizations of different countries.

Approved by the board of directors in 06.21.2017.