

**Manager**

Human Resources

**Coverage**

Organização Bradesco

**Introduction**

The Corporate Social Responsibility Management System aims to improve the quality of the relations and conditions of the work environment with employees, collaborators and other stakeholders, taking as a reference the Organization's policies, standards and commitments.

Through the Management System, Bradesco reaffirms its commitment to continuous improvement and fulfills an important stage for the social pillar of sustainability, striving for socially responsible management.

**1. Objective and Scope**

The Corporate Social Responsibility Management System (SGRSC) covers principles that promote respect for human beings in all its aspects and aims to promote the continuous improvement of the relations and conditions of the work environment, extending the commitment to respect the Rights Human Rights, Children's Rights and Fundamental Labor Rights to its suppliers. It also demonstrates clarity and transparency in relationships, establishing a policy and procedures to manage matters that the Organization may control or influence and express to stakeholders that such practices are in compliance with this Standard, through periodic audits carried out by an independent certifying body, accredited for the subject and hired for that purpose.

This Standard is an instrument for implementing the Organization's commitment, expressed in its Human Resources Management Policy, with the legislation applicable to its activities, principles and fundamental rights in the employment relationship and other subscribed commitments as follows:

- Consolidation of Labor Laws - CLT.
- Regulatory Standards - Occupational Health and Safety NRs.
- Collective Bargaining Agreement for related categories.
- ILO (International Labor Organization) Conventions ratified by Brazil and applicable to the Organization.
- Universal Declaration of Human Rights.
- United Nations Convention on the Rights of the Child.
- United Nations Convention on the Elimination of All Forms of Discrimination.

## 2. Terms and Definitions

For the purposes of this Standard, the definitions and terms related to Corporate Social Responsibility and those specific to the Bradesco Organization apply, as follows:

**a) Corrective action:** action to eliminate the causes of non-conformities to prevent recurrences.

**b) Preventive action:** action to eliminate the cause and root cause of a potential non-compliance.

**c) Improvement opportunity:** partial service condition or possibility of improvement.

**d) Collective Bargaining Agreement:** a contract specifying the terms and conditions of employment, negotiated between an organization (e.g., employer) or group of employers and one or more workers' organizations.

**e) Value Chain:** complete sequence of activities or parts that provide or receive value in the form of products or services. Value-providing parties include suppliers, outsourced workers, contractors and others; parts that receive value include customers, advisers and other users.

**f) Collaborator:** third, service provider.

**g) Child:** anyone under the age of 15, unless the minimum age for work or compulsory education is stipulated as being higher by local law, in which case the stipulated age at the top applies in that location.

**h) Facilities:** departments, agencies and related companies of the Organization, responsible for the management and/or operationalization of a process, product or service.

**i) Performance of Corporate Social Responsibility:** measurable management results on social impacts.

**j) Stakeholder Engagement:** activity carried out to create opportunities for dialogue between Bradesco and one or more of its stakeholders, in order to provide a solid and concrete basis for the Organization's decisions.

**k) Corporate Social Performance Team - EDSC:** team made up of employees from the Dependencies responsible for the management and/or operationalization of processes that integrate and/or interact with the SGRSC.

**l) Supplier:** any Legal Entity in the supply chain that directly provides goods or services to the Organization.

**m) Employee:** professional with an employment relationship with the Bradesco Organization.

**n) Governance of the SGRSC:** system by which the Organization makes decisions and implements them in pursuit of its corporate social responsibility objectives.

**o) Non-compliance:** failure to meet a requirement.

**p) Objectives of the SGRSC:** purposes of social responsibility arising from the Bradesco Organization's Human Resources Management Policy, which should be quantified, whenever possible, by means of established goals.

**q) Stakeholder:** individual or group that has an interest in any Bradesco decisions or activities. For the purposes of the SGRSC, employees, apprentices, interns, collaborators, customers, unions, regulatory and supervisory bodies are considered as stakeholders.

**r) Applicable Regulations:** internal and external rules and procedures that govern the activities of the Organization's products and services.

**s) Management Representative for Social Responsibility:** a managerial-level employee to manage the performance of the SGRSC indicated by the Organization.

**t) Management Representative for Occupational Safety and Health:** a managerial-level employee appointed by the Organization to ensure that the requirements of this Standard are met in aspects related to Occupational Safety and Health.

**u) Management Equity Conditions Representative:** a managerial-level employee appointed by the Organization to ensure that the requirements of this Standard are met in aspects related to equity conditions that impact the work environment.

**v) SGRSC:** Corporate Social Responsibility Management System.

### **3. Corporate Social Responsibility Management System Requirements**

Expression of the Bradesco's Organization commitment to human rights, principles and fundamental rights in labor relations, in line with the Bradesco's Organization Human Resources Management Policy, applicable to employees, apprentices, interns and collaborators, as follows:

#### **3.1. Essential Human Rights**

The application of the Young Apprentices and Decent Work requirements considers the awareness of apprentice administrators, employees, interns and collaborators, as well as the systematic monitoring of practices in labor relations, considering suppliers and social risk services. SGRSC Bradesco establishes a management model that monitors the positive social impacts generated by the activities of the Bradesco Organization in the scope of essential human rights

- Support for professional development.
- Promotion of a productive and quality work environment.

#### **3.2. Fundamental Rights at Work**

The application of the Labor Relations requirement covers practices of discrimination, inappropriate behavior and harassment in all its forms, including recruitment and selection, hiring, promotion and career processes; awareness programs and training for the internal public (employees, apprentices, interns and collaborators). The SGRSC Bradesco establishes a management model that monitors the positive social impacts generated by the activities of the Bradesco Organization within the scope of work relations:

- Promotion of affirmative actions.

Diversity and Social Inclusion include processes aimed at adhering to applicable laws, rules and internal regulations and best market practices. The SGRSC Bradesco establishes a management model that monitors the positive social impacts generated

by the activities of the Bradesco Organization within the scope of diversity and social inclusion:

- Promotion and Valuation of Diversity and Social Inclusion.

The SGRSC Bradesco establishes a management model that monitors the positive social impacts generated by the activities of the Bradesco Organization within the scope of Union Relations:

- Ensure freedom of association and the right to collective bargaining.

In line with the principle 4.7.8. Associations and Class Entities, from Bradesco's Organization Code of Ethical Conduct, the Human Resources Department has, in its structure, the Union Relations area, responsible for maintaining permanent dialogue and interaction with representatives of the union movement, nationwide, receiving manifestations, clarifying doubts and enabling a relationship characterized by easy access, agility and proactivity between the parties.

All employees are covered by Collective Bargaining Agreements and can participate in collective bargaining through meetings. Information on union activities are posted on bulletin boards and in the *Jornal Sindical* (Union Newspaper), available at our entrances.

We provide, for the union campaign, infrastructure and guidance to managers regarding the neutrality of the Organization in relation to the decision of employees, facilitating the campaign and not imposing any obstacle to unionization.

The application of the Work, Health, Safety and Well-Being requirements considers standards of excellence in working conditions aiming at guaranteeing the occupational safety and health of its employees, apprentices, interns and collaborators and meeting the applicable legal and conventional requirements. to the working day. The Bradesco SGRSC establishes a management model that monitors the positive social impacts generated by the activities of the Bradesco Organization within the mentioned scopes:

- Promotion of the quality of life and well-being of employees, apprentices, interns and collaborators.

Engagement with stakeholders: training and awareness, communication channels for employees, apprentices, interns and collaborators, dialogue practices, communication on social performance.

### **3.3. Management system**

The Organization will structure, systematically and through the SGRSC Procedures Manual, the procedures related to the rules established in the Organization Internal Regulations, Bradesco's Organization Code of Ethical Conduct and other rules related to the processes that integrate and/or interact with the SGRSC, ensuring compliance with the Human Resources Management Policy of Bradesco's Organization.

The concept of continuous improvement of the Management System is based on a governance model that ensures the commitment of all levels and functions required for its successful implementation. The Organization defines the processes and procedures with the purpose of establishing a management model that monitors the positive social impacts generated by the Organization's activities with the audiences with which it relates.

### **3.3.1. Planning and Implementation**

The representatives of the system's areas of competence, through the Corporate Social Performance Team - EDSC, must prepare the Development and Implementation Plan, which shows the commitment of the Bradesco's Organization Executive Board to the implementation and continuous improvement of the SGRSC.

The Development and Implementation Plan presents the activities related to the maintenance and continuous improvement of the Corporate Social Responsibility Management System. The results of the planned activities are presented by the representatives of the SGRSC at critical review meetings.

### **3.3.2. System Representatives and Responsibilities**

#### **RD - Management Representative for the SGRSC**

Human Resources Department Officer or another employee designated by him, at a managerial level, whose general responsibility is to ensure the management of the SGRSC, by means of:

- a) Participation in the meetings of the Corporate Social Performance Team - EDSC for Critical Analysis of the Corporate Social Responsibility Management System.
- b) Administration and monitoring of the actions foreseen in the Development and Implementation Plan in his/her area of competence.
- c) Compliance with regulatory and statutory requirements applicable to his/her area of competence.
- d) Approval of the SGRSC procedures under his/her responsibility.

#### **RSSO – Management Representative for Occupational Safety and Health**

Human Resources Department Officer or another employee designated by him, at a managerial level, to respond on aspects of occupational health and safety as defined in the Bradesco Standard of the Environmental Management System and Occupational Safety and Health and who, among other activities, has the responsibility to ensure compliance with the requirements of the SGRSC, in its area of competence, through:

- a) Participation in the meetings of the Corporate Social Performance Team - EDSC for Critical Analysis of the Corporate Social Responsibility Management System.
- b) Management and monitoring of the implementation and effectiveness of corrective and preventive actions resulting from action plans, in his/her area of responsibility.
- c) Management and monitoring of the actions foreseen in the Development and Implementation Plan in his/her area of competence.
- d) Approval of procedures which represent the SGRSC under his/her responsibility.
- e) Implementation of actions to promote continuous improvement of the SGRSC in his/her area of competence.

#### **RDCP – Management Representative for Facilities Management Conditions**

Facilities Management Department Officer or employee designated by him, at the managerial level, to answer about equity conditions that impact on the work environment, in his/her area of competence, by means of:

- a) Participation in the meetings of the Corporate Social Performance Team - EDSC for Critical Analysis of the Corporate Social Responsibility Management System.
- b) Management and monitoring of the implementation and effectiveness of corrective and preventive actions resulting from action plans, in his/her area of responsibility.
- c) Management and monitoring of the actions foreseen in the Development and Implementation Plan in his/her area of competence.
- d) Approval of procedures which represent the SGRSC under his/her responsibility.
- e) Implementation of actions to promote continuous improvement of the SGRSC in his/her area of competence.

#### **EDSC - Corporate Social Performance Team**

EDSC is made up of representatives from the Departments: Human Resources, Facilities Management and others that may be related to the issues at hand. Their responsibilities are:

- a) Maintenance and adaptation of processes, when necessary, to ensure compliance with the requirements of this Standard.
- b) Implementation of actions to promote continuous improvement of the Corporate Social Responsibility Management System.
- c) Participation in SGRSC Critical Analysis meetings, considering the issues at hand, presentation of results, ongoing actions, plans and goals.

#### **3.4. Communication**

The Organization establishes, implements and maintains procedures for:

- a) Internal communication between the various levels of the Organization.
- b) Receipt, documentation and responses to interested parties' comments, whenever requested.
- c) Disclosure of information on Bradesco's Organization Human Resources Management Policy, actions and results related to the effectiveness of the SGRSC to its stakeholders.

The means available for the dissemination of information on the performance of the SGRSC and the main direction are:

- a) Internet (Bradesco Sustainability and Investor Relations): intended for all audiences.
- b) Regulatory System, Corporate Portal > HR > Social Responsibility: employees.
- c) Integrated Report: the Organization's annual progress report on Social and Environmental Responsibility, aimed at all audiences.
- d) Bradesco's Book - Economic and Financial Analysis Report: quarterly report for all audiences.

### **3.5. Management of Complaints**

Complaints involving matters relating to the Bradesco's Organization Human Resources Management Policy and the SGRSC must be made through the Centralized Reporting Channel, available to the entire Organization - administrators, employees, apprentices and interns, as well as employees and other interested parties. All reports are maintained with the prerogative of anonymity, guarantee of confidentiality and non-retaliation.

#### **3.5.1. Centralized Reporting Channel**

- Electronic form
- Telephone: 0800 776 4820, Monday to Friday, from 8 am to 6 pm, except weekends and holidays

**Note:** In the buildings of Cidade de Deus, the Social Responsibility Manifestation Boxes are also available.

#### **3.5.2. Flow of treatment of the received manifestations - Centralized Reporting Channel**

1. Receipt of the manifestation and registration in the system. A protocol is generated, which is informed to the reporting person, so that he/she can follow the progress and the result of the deal.
2. Submission to DRH-Social Responsibility.
3. Registration in the internal controls of the DRH-Social Responsibility.
4. Gathering of information on all aspects related to the manifestation, such as: recurrence, results of behavioral assessments, history of manifestations of the facility, among others, that may support the analysis of the manifestation.
5. Analysis of the manifestation in the light of all the information raised and direction to the solving party. The manifestation solving party reports, to the HR-Social Responsibility, within a predefined period, the actions taken to analyze the facts, the result of the assessment and the implemented solution, in addition to actions for follow-up.
6. The result of the deal is recorded in the DRH-Social Responsibility controls and reported to DCCE, manager of the Centralized Reporting Channel for return to the reporting person.
7. Through the SGRSC all the events, reports, indicators, etc. are managed.
8. Quarterly, the DRH reports to the Integrity and Ethical Conduct Committee the consolidated information of the complaints received in the period.

In addition, the performance of the Corporate Social Responsibility Management System is periodically reported to the Executive Sustainability and Diversity Committee, including the result of the Internal and External Audits, carried out once a year.

### **3.6. Critical Supplier Management**

The requirements for Corporate Social Responsibility related to Young Apprentices, Decent Work, Labor Relations, Diversity and Social Inclusion, Union Relations, Work

Hours, Occupational Safety and Health, Welfare and Management System, must be met by suppliers.

Resident service providers (allocated on Bradesco's premises) and activities that, by their nature, pose a risk to the health and safety of workers are considered critical for the purposes of the SGRSC. These suppliers go through awareness and engagement and must be committed to the requirements of this Standard and to the activities defined by the SGRSC, when requested.

It is the responsibility of SGRSC managers and contract managers, in their areas of competence, to ensure compliance with such requirements by resident employees, civil works and frequent criticals, whose activity may bring social risks, in addition to occupational health and safety aspects.

### **3.7. Documentation and Records**

The Managing Departments in the areas of competence of the SGRSC shall maintain appropriate records to demonstrate the Organization's compliance with the requirements of this Standard, control and maintain these records in an organized manner, in the form of a physical copy or electronic means. The Organization establishes, in the Procedures Manual of the Corporate Social Responsibility Management System, a documented procedure for identification, storage, protection, recovery, retention time and disposal of records.

#### **3.7.1. Documentation**

The SGRSC documentation includes:

- a) The guidelines of the Bradesco's Organization Human Resources Management Policy and the Social Responsibility Objectives.
- b) Standards, procedures and documents necessary for the Organization to ensure the planning, operation and effective control of its processes.

#### **3.7.2. Procedures Manual**

The Procedures Manual for the Corporate Social Responsibility Management System is based on this Standard. The officers of managing departments, according to its area of activity, or through EDSC, must define:

- a) The scope of the SGRSC.
- b) The documented procedures, established for the SGRSC, or reference to them.
- c) The description of the main elements of the SGRSC.

### **3.8. Measurement, Analysis and Improvement**

The Organization establishes and maintains documented, through the SGRSC Procedures Manual, the procedures for the implementation and continuous monitoring to demonstrate its effectiveness, aiming to comply with the Bradesco's Organization Human Resources Management Policy and the requirements of this Standard, as per responsibilities and authorities described above.

#### **3.8.1. Non-Conformity, Improvement Opportunity and Corrective and Preventive Actions**

When Non-Conformity is identified in relation to the Standard, and the Bradesco's Organization Human Resources Management Policy, corrective actions must be implemented, based on these notes, it is possible to build Preventive Actions when it is possible and feasible, allocating the appropriate resources, and if necessary once an Opportunity for Improvement is identified, it is necessary to revisit the processes and seek appropriate and feasible improvements using Actions and classify them.

### **3.8.2. Internal Audit and External Audit**

The Officers of the system's areas of competence must ensure that internal and external audits are carried out to verify that the SGRSC is in compliance with the planned provisions and is in compliance with the established rules and procedures.

For this purpose, evaluations will be carried out in two formats:

a) Internal Audit: performed on a documentary basis, once a year, with local checks when critical situations are identified, considering previous notes or deviations that occurred in the interval between the audits, according to the SGRSC Procedures Manual.

b) External Audit: carried out once a year, by an accredited and independent certification body, according to the Procedures Manual of the SGRSC.

### **3.8.3. Performance Analysis by Management**

The performance analysis of the SGRSC is a management tool that allows those responsible for the areas of competence, who are part of the Corporate Social Development Team - EDSC, to present to the Management the results regarding the objectives achieved and the adequacy needs for deliberation as to the effectiveness of the system and decision on the allocation of resources. Meetings can take place on two levels:

- 1st level: Departmental directory.
- 2nd level: Integrity and Ethical Conduct Committee.

The meeting must take place at least once a year, after the external audit has been carried out.

### **3.8.4. Critical Analysis of the SGRSC**

Critical Analysis is a management tool that allows the areas of competence and EDSC to assess the adequacy, relevance and continuous effectiveness of compliance with the Bradesco's Organization Human Resources Management Policy, procedures and performance of the Management System. Corporate Social Responsibility, with the definition of objectives and goals, plans and actions. It must be carried out at least 1 (once) a year, after an external audit. The records of the analyzes must be kept by means of minutes.

## **4. Entries for the Critical Analysis by the Responsible for the System's Competence Areas and by the EDSC**

Entries for Critical Analysis should include information about:

a) Results of SGRSC audits: Internal and External Audits.

b) Communication with stakeholders, including suggestions and complaints by topic.

c) Goals and objectives that contribute to the Organization's Positioning and impact the DJSI and ISE-Bovespa indices, in the aspects that integrate the SGRSC.

d) Status of corrective and preventive actions.

e) Monitoring of actions and decisions arising from previous analyzes, by the Directory or EDSC.

f) Recommendations for improvement.

#### **4.1. Critical Analysis outputs**

The analysis outputs should include any decisions and actions related to the resource needs and possible changes in the Bradesco Organization's Corporate Social Responsibility Management System Standard, in the objectives, goals and other elements of the management system.

## **5. Application of Consequences**

Consequences will be applied to actions related to the violation of conduct in breach of the Bradesco's Organization Policy and Consequences Standard, for example, but not limited to:

<b>Not tolerated conducts</b>
Non-confidential treatment of complaints.
Use of bad faith by the Administrators, Employees, Interns and Apprentices of the Organization, when making complaints.
Retaliation against Customers who make complaints.
Retaliation against the Organization's Administrators, Employees, Interns and Apprentices who make complaints.
Retaliation against Employees, Suppliers or Outsourced Service Providers who make complaints.
Violate the complaints Reporting Person anonymity without his/her authorization, legal requirement or judicial determination.

### **5.1. Application of Consequences/Disciplinary Measures**

It will be the responsibility of the Facility Administration, in which the employee is assigned, to apply disciplinary measures immediately, observing the provision in the item Types of Consequences/Disciplinary Measures, of the Consequence Standard of the Bradesco's Organization.

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