Itaú Unibanco's Commitment to human rights
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Itaú Unibanco’s Commitment to Human Rights

1. General Principles

This document aims to reinforce Itaú Unibanco Holding SA’s commitment to respecting Human Rights in its relations with our employees, customers, suppliers, partners and society. This commitment is guided by the Guiding Principles of the United Nations (UN) on Companies and Human Rights, according to the parameter “Protect, Respect and Remedy”, set out in John Ruggie’s Final Report and approved by the UN Human Rights Council on June 16, 2011, and by our Sustainability and Social and Environmental Responsibility Policy.

We are committed to respecting Human Rights, as provided for in the United Nations International Charter of Human Rights, constituted by the United Nations Universal Declaration of Human Rights, 1948, the International Covenant on Civil and Political Rights, 1966, and the Covenant International Convention on Economic, Social and Cultural Rights, 1966. We also adhere to the United Nations Global Pact, the Women’s Empowerment Principles (WEPs) proposed by UN Women and the Global Pact, the Business Bill for Human Rights and the Promotion of Decent Work, by the Ethos Institute, the Pact for the Eradication of Slave Labour, managed by the Institute of the same name, and the Standards of Conduct for Businesses proposed by the Free & Equal UN.

2. Scope and Objectives

This document covers our business and relationships with stakeholders and aims to provide guidelines for the prevention of risks to Human Rights, to which we are exposed, as well as to disseminate good practices on this agenda. In it, we are guided by recommendations from the United Nations (UN), by agencies that guide our actions on critical issues, identification of opportunities, mitigation practices, remediation, monitoring and action with vulnerable groups, such as children, adolescents, the elderly, indigenous peoples, migrants, women, African Americans, people with disabilities, LGBTQIA+ and others.
3. **Institutional Policies**

Respect for Human Rights permeates our policies and is articulated with the best practices of corporate governance, sustainable development and social responsibility. Therefore, our Code of Ethics is based on principles that support an organizational culture focused on valuing people, strict compliance with rules and regulations and the permanent search for development.

Our Sustainability and Social and Environmental Responsibility Policy has principles and guidelines that are incorporated into our internal processes for analyzing customers and suppliers and in the relationship with our internal public, with investors and shareholders and with the civil society. Respect for and protection of Human Rights and diversity, the fight against child labor and slave-like labor and the criminal exploitation of prostitution and the sexual exploitation of minors, and the commitment to ethical and transparent conduct are some of the themes present in this policy, which also addresses the treatment of climate change, biodiversity, natural resources and the management of social, environmental and climate risks.

3.1 **Guidelines**

**Diversity**

We are committed to valuing diversity by promoting inclusion and equal opportunities in a safe and respectful environment.

Promoting diversity means respecting and understanding the different realities and needs of our customers, employees, shareholders, investors, suppliers, business partners and society in general, recognizing the plurality of origins, sexual orientations, races, genders, ages, cultures, beliefs, nationalities, social or civic status, and disabilities. We continually work to avoid all forms of discrimination, encouraging uniqueness and equal treatment for all. To this end, we have adopted policies and practices that reinforce our ethical and social commitment in an agenda of transformation for our employees and society as a whole.
Equality of treatment between employees and third parties

The topics of respect and equality of treatment are provided for in our Code of Ethics, in the following topics:

- **Labor Relations**: “We value our employees by respecting Human Rights and promoting diversity. For this reason, we have adopted policies and practices to prevent and combat all types of discrimination, harassment, prejudice and unworthy working conditions (such as child or forced labor”).

- **Professional attitude**: “It is necessary to promote relationships based on cooperation and respect for dignity and equality in treatment, contributing to an environment conducive to development and healthy interaction and aiming to maintain a participative and cordial climate”.

As part of this commitment, when hiring third party entities, measures are adopted to promote such practices, such as the inclusion of specific clauses in the contract to ensure compliance with labor laws, as well as adherence to sustainability recommendations (e.g., combating moral and sexual harassment and any form of discrimination; promotion of a safe and respectful environment; valuing, training and employing people with disabilities; valuing diversity; guaranteeing inclusion and equality of opportunity for all; guaranteeing adequate working conditions; combating child, forced or slave-like labor).

Thus, we understand that it is everyone’s responsibility to ensure that there is equality of treatment between employees and third parties.

**Accessibility for clients**

Accessibility is a constant concern in our work with clients. The concept goes beyond aspects related to disabilities, and we believe that it plays a fundamental role in the ability to exercise financial citizenship. For our customers to be able to manage their resources well, it is necessary that everyone, with or without disabilities, can have easy access and understanding of information, products and services, resulting in inclusion and a positive user experience.

We have a team dedicated to accessibility testing in Technology, which includes people with disabilities, who ensure that all our products, services and journeys of our apps and websites
are developed in an accessible way, allowing any user to be able to perform all types of transaction, hire services or manage their finances in an autonomous, agile and secure way.

For this, we follow the international standard WCAG - Web Content Accessibility Guidelines, currently in version 2.1. We implement guidelines provided for in this regulation in our channels and carry out tests for the implemented guidelines, to ensure that they have all been applied correctly. Accessibility is evolving and we still have opportunities to improve the accessibility of our channels. However, today, we are already accessible through accessory tools such as Chat or video conference, which we make available.

In addition to the concern with digital customers, we seek to ensure accessibility at branches, including for our employees. For this, we comply, among other legislations, with the Federal Law - 13.146-2015 - Brazilian Law for the Inclusion of Persons with Disabilities (Statute of Persons with Disabilities), which in turn requests adherence to ABNT NBR 9050:2020 - Accessibility to buildings, furniture, spaces and urban equipment. Our accessibility initiatives include:

- Architectural and furniture accessibility for people with disabilities;
- Branches with self-service terminals, such as ATMs, for autonomous and safe use, regardless of the degree of mobility or perception limitations;
- Accessible equipment (water fountains and wheelchair available);
- Credit card invoices printed in braille and/or large print for blind or visually impaired customers. In addition, these accounts are available on our digital channels;
- For checking account, card, consortium, payroll, vehicle and real estate customers, individuals and companies, we have service accessible by voice and digital channels, such as: chat, Itaú Virtual Assistant (AVI), Contact Us and service channels; Additionally, we implemented a Sign Language video center, which serves account holders.

Engagement with Stakeholders (dialogue with internal and external audiences)

We are committed to maintaining an active dialogue with our stakeholders as a way of developing opportunities, enhancing positive impact, reducing risks, bringing new perspectives and innovation. We recognize that we are an important part of our society, having the opportunity to influence and be influenced by it. Therefore, our interaction with
our employees, customers, shareholders, suppliers and society in matters related to Human Rights is fundamental. Our engagement is established through dialogue with the most diverse audiences to consider different points of view and needs, in addition to sharing our initiatives, in order to learn and share best practices, share common values and build lasting relationships that guarantee respect and the promotion of human rights.

**Education and Culture**
We recognize the human right to education and seek to promote it with our employees and society, focusing on projects to improve Brazilian public education, contributing to expanding learning with equity, reducing inequalities and ensuring integral development and a dignified social life for children, adolescents and young people. Investment in education is one of the driving forces for social transformation and a basic pillar of a country's sustainable development. We also recognize that everyone has the right to culture and leisure and, in order to contribute to the exercise of these rights, we promote actions aimed at society, our employees and our customers. Expanding people's contact with cultural diversity is a way of creating paths for social development.

**Free Association**
We assure our employees the right of free union association, as well as absolute freedom to participate in union activities, always recognizing the rights and prerogatives of those who are elected to executive positions in unions, in accordance with current Brazilian legislation and the collective agreement of each professional category, of which we are part in our sector of activity.

The practice of any discrimination against associated employees and/or union representatives of the professional category is prohibited and subjects the offending individual to the application of disciplinary sanctions.

As a way of guaranteeing the preservation of this right and in order to identify any misconduct or affront to the right of free trade union association, we maintain internal channels that can be used by our employees who feel harmed, persecuted or discriminated against by exercising their option, ensuring them the right to anonymity, if they wish.
In Brazil, we have 863 active employees with functions in the different boards of the unions that represent them. As provided for in the collective agreement for bank employees, 467 employees work full-time for these unions. In addition, we allow unions the possibility of carrying out unionization campaigns and, when requested, hold occasional meetings with unions, our managers and employees, in order to seek negotiable solutions in a respectable manner and in line with ethical principles.

In the International Units, free union association complies with applicable local legislation and is in line with the ethical principles of the Code of Ethics.

**Privacy and Information Security**

Our privacy and data protection strategies involve the awareness of business teams as a central point. For this, our processes are constantly revised and evolved, so that we seek to provide a friendly experience with the theme, since the conception of the projects.

Since 2016, we have a team dedicated to Privacy and Personal Data Protection to deal with issues related to the topic in projects and processes. This is a never-ending project – as we have a responsibility to constantly improve our operations. The matter is assisted by our governance structure, the *Steering Committee* LGPD and the Executive, Audit and Data Committees.

Our information security strategy for cybersecurity was developed to prevent data breaches, minimize risks of unavailability of our services, protect integrity and prevent information leakage. To this end, we use the expanded perimeter protection strategy, a concept that considers that information must be protected, wherever it is: within the bank’s infrastructure, in a cloud service at a service provider or in an international unit, also taking into account consideration of the entire life cycle of information, from the moment it is collected, through processing, transmission, storage, analysis and destruction.

This strategy is based on strict control processes, aimed at detection, prevention, ongoing monitoring and immediate response to attacks and attempts to invade our infrastructure, thus ensuring the management of security risk and the construction of a robust foundation.
for an increasingly digital future. Within this process, the employee plays a key role in the data protection strategy.

The strategy is approved by the Board of Directors and monitored by the Audit Committee. Both receive periodic updates on the evolution of the cybersecurity environment.

We are committed to always dealing with the subject rigorously, adopting the necessary measures for the security and respect for the privacy of our customers, employees and other holders of personal data. In order to strengthen our internal privacy governance, policies that our employees must follow were created.

Within the flow of access to rights, the exercise of these guarantees must be available, in an easy way, through a friendly Privacy Policy and the Itaú Privacy Portal (https://www.itau.com.br/privacidade/), which informs about the service channels (with authentication) exclusively for customers and non-customers.

Considering the data life cycle, we also maintain a purge routine for data holders’ personal information. Our procedures are designed to maintain the necessary information in our environments.

Our engagement in improving our external policies has also evolved, with the creation of an illustrative and user-friendly privacy policy, maintaining the link to the full Policy, for those who wish to access it, and with the availability of an English version of the document.

Within the Privacy Program, we mention the coverage of the LGPD theme within the module of the Itaú Unibanco Integrity Program, which aims to ensure compliance with the Code of Ethics and the institution's principles and values, which is mandatory for all employees.

We work, in an integrated manner, with the Business and Technology departments, to maintain the architecture of solutions and products with the highest degree of security, following market trends in the digital world, as well as having a dedicated Information Security structure, which works together with our international units.

We classify contracted service providers considering several criteria, such as the type of information they will have access to, the size of the company and the type of service.
Depending on the classification, requirements regarding the protection of the provider’s infrastructure range from the provision of security recommendations to the on-site validation of the informed controls, in addition to monitoring any corrections and improvements implemented by the providers when necessary.

For some segments, we carry out periodic scans of the provider’s environment and monitor the corrections for any vulnerabilities identified. The contracts between the organization and the providers have confidentiality and privacy clauses, which must be followed by the service provider. Additionally, within privacy and data protection, we have structured a form, which is being applied to our service providers. The intention is to verify compliance with the main guidelines of the General Data Protection Law, ensuring the reliability of our flows also in the third-party environment.

In the regulatory field, we comply with the requirements of the General Personal Data Protection Law (LGPD), and corresponding legislation, Resolution No. 4,893/2021, of the Brazilian National Monetary Council, and Resolution No. 85/2021, of the Central Bank of Brazil, which deals with the adoption of a Cyber Security Policy and the contracting of relevant data processing and storage and cloud computing services. We also observe Resolution No. 35/2021, of the Securities and Exchange Commission, which establishes rules and procedures for transactions with securities in regulated markets and the new Resolution No. 638/2021, of the Private Insurance Superintendency (SUSEP), which provides for cybersecurity requirements to be observed by insurers, open private pension entities (EAPCs), capitalization and local reinsurers.

Itaú Unibanco adopts the main market frameworks as a basis to ensure that processes mitigate risks. In 2021 we had our main processes certified by an independent entity, according to the Brazilian Standard NBR ISO/IEC No 27.701, which is an extension of the Brazilian Standard NBR ISO/IEC No 27.001, which we were already certified, with the evaluation of our Information Security Management System (ISMS) and the Privacy Management System (SGPI), applied to information security governance processes, information security risk assessment, SOC (Security Operation Center), handling of security incidents of information, information security architecture, vulnerabilities in the computing environment and...
management of logical access, and the governance processes for handling personal data at Itaú Unibanco.

**Child and Slave-like Labor**
We recognize that all forms of slave-like labor are serious violations of Human Rights, as is the use of child labor in violation of the legislation of each country. To this end, we address the issue seeking to mitigate risks to violations of this nature as a result of its performance, which is reinforced through the principle of “Respect and protection of human rights through the promotion of diversity, financial inclusion and the fight against child labor, in disagreement with the legislation, to work analogous to slavery, to the criminal solicitation of prostitution and the sexual exploitation of minors”, present in our Sustainability and Social and Environmental Responsibility Policy applicable to Brazil.

**Moral and Sexual Harassment**
We do not tolerate the practice of moral or sexual harassment, or any behavior that may cause damage to the personal integrity of any individual in the work environment. According to the Code of Ethics, the Ombudsman is the channel that must be used to forward questions, complaints, reports and suggestions regarding acts of moral and sexual harassment. At the International Units, our employees can activate the reporting channels available locally.

For cases of moral or sexual harassment that are verified and qualified as valid, disciplinary measures are implemented, guided by Itaú Unibanco's Policy for Guidance and Application of Disciplinary Measures.

**Health and Safety**
We recognize that the exercise of physical and mental health is essential for a dignified existence. To preserve health and safety in the environment, we carry out inspections to assess workplaces, we regularly survey strategic indicators and maintain open communication channels with employees to manage actions. The information is discussed by a team of experts to define priorities and provides for the involvement of the bank's senior leadership for issues of greater impact or that involve change management. To enrich the management process, we have developed instruments so that all managers can access health
indicators, updated monthly. In addition, meetings are held regularly with employee representatives specifically focused on the Occupational Health and Safety agenda.

Among the programs used to control the main demands in Health and Safety, the Telemedicine available to all employees, the support programs for returning to work (“Restart” and “Readaptation”), the employee support program and their dependents (“Stay OK Program”, with a multiprofessional team in several areas such as psychology, social assistance, nutrition, physical education, legal and veterinary), occupational medical examinations (fundamental in all spheres of prevention strategy in health and safety), the Risk Management Program (which identifies all risks in the environment, including proposals for adjustments to control exposure), the SIPAT (Internal Week for the Prevention of Accidents at Work), the investigations of Occupational Accidents and ergonomic analyses of workstations. In addition to these initiatives, we also encourage and support the adoption of habits that generate well-being. In this context, we spread the ideal that self-care is a career driver for any professional. Thus, we have a series of benefits, rules and procedures to equip our employees in search of balance: medical and dental assistance available to all employees, offer of admission to a gym plan with a wide national network, outpatient clinics in the main administrative centers and vaccination against the flu.

We operate in all stages of health and safety governance, from prevention to rehabilitation, with the goal of controlling the impacts of illness and preventable incapacitation of our employees, observing various indicators such as the absenteeism rate, the epidemiological profile of the population and the impacts of the accident rate of the Health Plan.

**Compensation**

To guarantee our employees fair working conditions and equitable remuneration, we promote meritocracy and transparency. To actively avoid any form of discrimination, we maintain compensation policies and processes that respect diversity and the HR Department, through collegiate meetings, we monitor compliance, curbing discrimination and prejudice in compensation practices.

Compensation principles and practices are consolidated in a Compensation Policy, in order to attract, reward, retain and encourage managers and employees to conduct business in a
sustainable manner. Remuneration and benefits strategies are adopted through parameters such as: salary surveys in the market; participation in research carried out in the sector; and participation in specialized forums.

**Anti-corruption**

Although current Brazilian legislation considers deviations in relations between public and private agents as corruption, we consider deviations between public and private agents and between private agents as corruption, based on the best global practices on the subject.

In order to prevent and combat this practice, we apply the Corruption Prevention Policy and the Integrity, Ethics and Conduct Program (Program), provided for by the Integrity, Ethics and Conduct Policy, which apply to all employees and administrators, in Brazil and abroad. The Program encompasses a set of guidelines and processes aimed at ensuring compliance with the Code of Ethics and our principles and values. Its governance is composed of the Board of Directors, Audit Committee, Higher ESG Commission, Integrity and Ethics Committee and Sectorial Integrity and Ethics Committees, being managed by the Corporate Compliance Board.

The Corporate Corruption Prevention Policy reinforces our commitment to proactively prevent and fight corruption in all its forms. This document establishes guidelines and procedures proportional to the risks related to the nature, scale and complexity of the activities it carries out, training, communication and channels for doubts and complaints, in addition to procedures that aim to avoid and resolve possible conflicts of interest in relations with our stakeholders (customers, suppliers, partners, non-profit entities, among others) in the public and private sectors.

In addition, we apply the Corporate Policy for the Prevention of Unlawful Acts, which establishes guidelines on preventing and combating money laundering, the financing of terrorism, the proliferation of weapons of mass destruction, fraud and claims, in line with the legislation and regulations in force and with the best national and international market practices. This policy encompasses a set of actions that must be adopted to identify customers, suppliers, including outsourced service providers, partners and employees,
covering the capture and confirmation of information, periodic updating and storage of registration data.

For Itaú Unibanco to comply with the guidelines of this corporate policy, a program was established to prevent and combat illegal acts, based on the following pillars:

- Policies and Procedures;
- Customer Identification Process;
- “Know Your Customer” (KYC) Process;
- “Know Your Partner” (KYP) Process;
- “Know Your Supplier” (KYS) Process;
- “Know Your Employee” (KYE) Process;
- Evaluation of New Products and Services;
- Compliance with Sanctions;
- Monitoring, Selection and Analysis of Suspicious Operations or Situations;
- Reporting Suspicious Transactions to Regulatory Bodies; and
- Training.

Governance on preventing and combating illicit acts is carried out by the Board of Directors, Audit Committee, Operational Risk Committees, Risk and Capital Management Committee, and the Money Laundering Prevention Committees. This program applies to the Itaú Unibanco Conglomerate and its companies in Brazil and abroad.

**Embargoes**

The international community is increasingly attentive to acts or behaviors of countries, governments, groups, companies or individuals that violate universal precepts of peaceful coexistence, whether in relation to civil or military conflicts, terrorist activities and their financing, or with regard to illicit or reprehensible practices, such as drug trafficking, exploitation of prostitution, slave labor, corruption, fraud and money laundering, among others.

In retaliation for these actions of an economic, political, social or military nature, some jurisdictions or international organizations have established embargoes, which consist of a
total or partial ban on doing business with certain countries, groups, individuals and companies.

We have adopted the embargo guidelines established by OFAC (Office of Foreign Assets Control), UN, Council of the European Union and HMT (Her Majesty’s Treasury). Additionally, we also follow the “Cuba Restricted List”, which is edited exclusively by the US Department of State.

4. Implementation and Monitoring

The implementation, execution and monitoring of Human Rights guidelines are carried out by our competent governance departments and forums, which must internalize them in their current policies and processes. Below, some examples of the internalization of the theme in the institution.

4.1 For employees

Stay OK Program

We offer our employees and dependents the “Stay Ok” Personal Support Program, with the aim of welcoming and guiding those who are experiencing personal, family and professional conflict situations, as to the best way to manage such situations.

This service guides people 24 hours a day through the support of a multidisciplinary team of professionals and includes support from psychologists, social workers, lawyers, nutritionists, physiotherapists, personal trainers, pet consultants and financial advisors. The service is provided by phone, WhatsApp or application and is available throughout Brazil, free of charge and with a guarantee of confidentiality.

Parental support programs

The programs were designed to promote preventive, behavioral and reproductive health actions for women, in addition to promoting equal opportunities, reinforcing our vision and discourse of equality and acceptance for situations that especially affect the female population:
Parental support programs are available to all employees in Brazil in an online format.

**Mothers and Pregnant Women Support Policy**

The Support Policy for Mothers and Pregnant People establishes benefits for pregnant women and same-sex couples after the birth or adoption of a child, with a view to meeting the needs of possible family configurations. For the purpose of readaptation to work, mothers have their working hours reduced during the first month after the end of maternity leave.

Since 2018, employees who are on maternity leave for at least 1 month have their performance evaluations carried out based on the period actually worked, and not on the period of work with reduced hours and goals, with evaluations relevant to the deliveries of the period prior to leaving maternity leave. As a result, women's eligibility for career acceleration programs, educational sponsorships and promotions is maintained. In addition, the participation in the bank's profits or results started to be paid in full, and no longer proportionally to the period worked. These actions reveal an advance in the equal opportunities agenda between men and women and the policy applies to all units in Brazil.

**Extended paternity leave**

Reinforcing our commitment to valuing Human Rights, as a responsible company we adhere to the practice of extending paternity leave for another 15 days. Thus, in addition to the five days that were already legally provided for, another 15 days may be requested, which is also valid for adoption cases. The adhesion took place in January 2017 and this practice applies to all units in Brazil.
4.2 For suppliers

Supplier Relationship Code
The document complements the Code of Ethics and aims to discipline the interactions between our employees and our suppliers through the declaration of values that define the expected conduct in commercial relations and aims to achieve the same transparency, legality, quality and reliability that we have with our customers in interactions with our suppliers and service providers.

As of the release of this document, in November 2016, we started the electronic acceptance of these conditions by all suppliers in Brazil.

Social and Environmental Responsibility and Positive Impact Guide for Suppliers
In 2020, we launched the Social and Environmental Responsibility and Positive Impact Guide for Suppliers. Complementing the Supplier Relationship Code, it aims to share socio-environmental guidelines, encourage our suppliers to adopt commitments to value Human Rights and diversity in their agendas and promote sustainable practices in our supply chain.

Contract Formalization with Suppliers
Our standard contract contains specific clauses on the adequate monitoring of issues related to human rights, labor obligations, occupational health and safety standards, socio-environmental issues, compliance with environmental legislation, anti-corruption standards, liability for damages and information security, among others applicable to our suppliers and their supply chain. We periodically carry out external audits of our critical suppliers in order to map and assess respect for human rights, in addition to socio-environmental issues and, if irregularities are identified, action plans can be developed to assist the supplier in solving the problem or, in certain situations, application of penalties may lead to the suspension or termination of the respective contract. These practices apply to all units in Brazil.

4.3 For customers

Credit
Considering the principle of relevance and proportionality, at the time of granting and renewing credit, we apply an individualized socio-environmental risk assessment methodology for clients operating in sectors considered sensitive. In these assessments, in
addition to environmental criteria, practices related to Human Rights are verified, such as, for example, health and safety indicators for workers, conflicts with traditional communities and supply chain management. This methodology is conducted through media surveys, public information and self-declaration questionnaires, and its result impacts the client’s risk rating and credit decision.

In addition, our socio-environmental risk assessment in project financing incorporates material and sensitive topics such as climate change and human rights, such as, in particular, the mapping of all traditional populations that may be directly or indirectly affected by the project and the requirement for studies that map, if necessary, the respective proposal of mitigating measures.

If identified, from media surveys or lists issued by official bodies, the client’s involvement with practices considered by Itaú to be excluded - use of slave-like labor; use of child labor, in disagreement with the legislation; and incentive and/or exploitation of prostitution, including child prostitution - the client is blocked in our systems, making it impossible to contract new credit operations.

**Investments**

Itaú Asset Management has its own methodology for integrating socio-environmental variables into traditional company valuation models. This assessment identifies 8 multisectoral dimensions, four of which focus on the relationship with stakeholders - “Workers”, “Communities”, “Customers” and “Suppliers”, and four environmental dimensions - “Water, energy and materials”, “Biodiversity and land use”, “Waste management” and “Climate change”. Prioritizes the critical dimensions for each sector when evaluating companies. Part of the methodology consists of engaging with companies with the aim of establishing a constructive dialogue, deepening the understanding of Environmental, Social and Governance (ESG) issues, disseminating best practices and mitigating possible risks. Itaú Asset takes into account ESG issues for the exercise of voting rights at general meetings and has partnerships with independent consultants specialized in the subject. These practices apply to all operations in Brazil.
4.4 For the society

Working with the community and government

Our strategy is related to social development actions, such as education, culture, sport, urban mobility, longevity and combating ageism, female entrepreneurship, promotion and protection of Human Rights, as well as valuing diversity and inclusion for all the communities in which we have operations in Brazil, in partnership with numerous internal and external institutions. These same actions are extended to the press, opinion makers, the market and various social organizations. We also work together with the Government, at its various levels, to improve public policy models in Brazil.

We are always attentive to the needs and opportunities in regions where we have large operational and business centers. This process allows us to study ways to work with the leaders of local communities, organized civil society and government agencies to support and implement projects in these locations.

We maintain contact with government entities, with the aim of collaborating in the construction of public policies that converge to the interests of the organization and society. The work with public bodies is based on principles of ethics, transparency, morality and legality, ensuring democracy and respect for the country’s laws and guidelines established by our Code of Ethical Conduct and the policies and commitments associated with the theme of Social Development.

We carry out several interactions with legislators and public managers on topics such as safety, consumer rights, urban mobility, fiscal and tax issues and the environment.

In 2021, 5,171 legislative proposals were followed up in the National Congress. At the state and municipal level, we monitor 16,703 legislative proposals that are being processed in the Legislative Assemblies and in several Municipal Chambers in the country.

4.5 Whistleblowing channels

We have channels for manifestations and complaints, identified below, capable of identifying and investigating practices that are contrary to this Commitment to Human Rights.
**External Ombudsman's Office**

The Ombudsman acts as the last resort for cases in which the customer had his complaint answered through the primary channels and was not satisfied with the solution. Additionally, working in partnership with our other departments, the Ombudsman contributes to the assessment of the customer’s vision in the creation of new retail products and services, ensuring compliance with the Consumer Defense Code, with a focus on transparency and customer satisfaction.

Among the Ombudsman’s main objectives is to maintain a constructive relationship with the National Consumer Defense System and with regulatory bodies, contributing to the evolution and strengthening of consumer relations.

Another important pillar of the Ombudsman’s performance is to work as an inducer of improvements within the Institution and ensure the effectiveness of the continuous improvement process (Customer Demand Management), ensuring the involvement of senior management in this agenda. This process includes: capturing complaints from the main critical channels, monitoring for analysis and prioritization of critical issues, diagnosis of root causes, definition of action plans to correct or improve products and services in partnership with all areas of the Institution, in addition to control of the implementation and effectiveness of the plans.

Access to the Ombudsman’s Office is available via a toll-free telephone service (0800 570 0011) from Monday to Friday (working days), from 9 am to 6 pm; and via the Internet (www.itau.com.br/ouvidoria).

**Internal Ombudsman’s Office**

Ombudsman is our internal ombudsman channel, an independent department with full autonomy in the organization, which reports directly to the Presidency. The channel works with the purpose of helping to build a company that values respect and integrity in all relationships and that seeks to achieve its goals without deviating from ethical values in an environment where everyone is proud to work in.
Guided by trust, dialogue, transparency, sense of ownership, integrity and ethics, the Ombudsman handles events, suspicions, reports and complaints about interpersonal conflicts and interests in the work environment, ethical deviations and behavior contrary to institutional policies and is ready to help our employees – always with confidentiality, neutrality and independence – in different situations, such as:

- guidance, advice and support;
- problems or difficulties in relationships with peers, partners or managers;
- non-compliance with rules, bad nature or any type of unethical behavior;
- critical and unacceptable issues such as moral and sexual harassment and discrimination of any kind.

The means of contacting the Ombudsman are available to all employees in the Itaú Unibanco Code of Ethics and in the internal corporate portal.

The treatment of cases at the International Units is carried out through local channels that have structures prepared to receive the complaint, activate partner departments in the investigation, when necessary, and evaluate the best way of resolution. However, it is important to highlight that, if there is any impediment in activating the departments mentioned, the Ombudsman can be contacted to assist in the resolution of the conflict, as well as in some specific situations described in internal policies.

Supplier Reporting Channel
The Supplier Reporting Channel in Brazil aims to ensure an ethical environment between us and our suppliers. Through it, reports and complaints of ethical deviations, illegal acts and non-compliance with our Code of Ethics and with the Supplier Relationship Code can be made in total secrecy, anonymity and exemption, ensuring no retaliation. Contact should be made via email suppliers_relatos@itau-unibanco.com.br and telephone 0800 723 0010 - working days from 8:30 am to 7:00 pm.

Inspector’s Office
The Inspectorate acts with complete independence and impartiality, and is responsible for receiving and investigating complaints or occurrences related to illicit acts of any nature, for internal and external investigation actions, resulting from fraud in electronic or documentary
channels in their various modalities, deviations of conduct of employees, incidents of physical, personal and property safety and support to the branch network and business departments, as well as the action of the root cause seeking the continuous improvement of processes, products and services.

Itaú Unibanco’s Corporate Policy on Integrity, Ethics and Conduct encourages the timely communication of facts or suspicions of violations of guidelines, laws, regulations or rules, and the confidential treatment of the complaint is ensured and the protection of the whistleblower’s identity, as well as the information concerning the investigation of possible misconduct. Anyone who, in good faith, denounces or expresses a complaint, suspicion, doubt or concern regarding possible violations of the institution's guidelines will not be subject to retaliation.

In order to receive complaints, we provide channels for our employees, suppliers, customers and the external public to communicate situations with signs of illegality of any nature, related to the activities of the Itaú Unibanco Conglomerate.

Access to the Whistleblower Channel is through the following means:

- **External:**
  
  Corporate website: https://www.itau.com.br/atendimento-itau/para-voce/denuncia/
  
  or https://www.itau.com.br/fornecedores/
  
  Phone: 0800-723-0010 - working days - from 8:30 am to 7:00 pm;
  
  E-mail: inspetoria@itau-unibanco.com.br

- **Internal:**
  
  E-mail: Inspetoria;
  
  Inspetoria Online.

If any complaint is received by other means and/or service channels, our internal policy establishes that these must be redirected to the Complaint Channel under the responsibility of the Inspectorate.
In the International Units, the whistleblower can communicate with the local whistleblowing channels available in the Codes of Ethics of the respective units or in the Headquarters Whistleblower Channel.

5. Mitigation and Remediation

5.1 Employees

Internal occurrences

Of the 1,520 employees reported in the events verified by the Ombudsman in 2021, 44% showed inappropriate behavior, while in 2020, of the 1,223 employees reported in the verified manifestations, the original percentage was 39%. The main behaviors identified in the proceeding cases, in both years, were: non-compliance with rules, bad nature, lack of effectiveness in management, intimidation/retaliation, poor communication, inadequate demands, disrespect, moral harassment, sexual harassment and discrimination.

With the objective of guiding and disciplining our employees who behaved contrary to the principles of the Code of Ethics and the company’s standards, and aiming to minimize the resulting risks, in 2021, 656 guidance/disciplinary measures were implemented for those involved in events verified and qualified as valid, in accordance with the Ombudsman’s recommendations, while in 2020 that number was of 489 measures.

5.2 Suppliers

Upon registering in our system, with the acceptance of the supplier relationship code and the Itaú Unibanco Code of Ethics, we carry out an approval process to assess the companies’ adherence to our socio-environmental responsibility practices, as well as legal compliance. In this process, we assess the following risks, depending on the product or service provided:

• Reputational/regulatory: analysis of risks related to image and compliance with current legislation;
• Financial: analysis of risks related to the supplier’s financial health; and
• Labor: analysis of risks related to the fulfillment of labor obligations by the supplier.

Still in the approval process, we ask them to answer an optional questionnaire with questions about diversity and inclusion, gathering information that will help us to define strategies to boost our commitment to the theme with our chain.
In 2021, 901 new suppliers were approved (based on the pillars mentioned above), that is, they became eligible for contracting, and the approval rate of suppliers in the approval process was 90.7%.

Approved suppliers are periodically monitored, considering the same risks observed in the approval, and, if relevant non-conformities are identified, they may be blocked for new hires or have their contracts terminated.

5.3 Customers

As a basic analysis criterion, all our clients are evaluated within the themes of our Exclusion List, which are: the use of slave or child labor and the exploitation of prostitution. As per our PRSA, we understand that engaging in these practices is contrary to our values and therefore leads to customer blocking. During 2021, 33 customers were blocked for engaging in some of these activities.

6. Final considerations

For us, ethics and respect for people are above all. Any act that violates the fundamental rights inherent to any individual is inadmissible and intolerable. We seek to develop our diligence with Human Rights through the continuous improvement of our risk control mechanisms, actions of reception, investigation, mitigation and remediation of harmful impacts, in addition to the continuous mapping of new opportunities for action in order to improve our practices and guarantee the continuity and credibility of our business. For us, respecting and protecting the rights of every human being is a daily commitment to the sustainable development of society.

In line with our commitment to transparency, other initiatives based on guaranteeing and promoting Human Rights, such as the Due Diligence process, are presented in the Itaú Unibanco ESG Annual Report. Access it here.

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