

MESSAGE FROM THE LEADERSHIP

The Code of Ethical Conduct of the Bradesco Organization is based on high standards of conduct and integrity, which we should adopt in all relationships, internal or external. It presents the values and principles of the Organization, which provide guidance on the conduct of Managers, Employees, Interns and Apprentices, not being restricted to the content addressed.

This Code seeks to guarantee the integrity of our actions, to ensure and strengthen the reputation and image of the Organization, always focused on the continuity of the business and commitment to sustainability.

As such, the Organization invests in the acculturation of good practices of conduct by undertaking actions, such as training, lectures, periodic disclosures on the topic and, with this, reinforces the need to guide the routine of our relations under ethics, respect, transparency, integrity and balance in the workplace.

We are all responsible for complying and enforcing compliance with the Code of Ethical Conduct. Cultivating good habits is necessary, ensuring ethical actions associated with the principles of the Organization, which must always govern the way we act.

Board of Directors

May 2022 Page 1 of 16



I. CORPORATE PROFILE

The Bradesco Organization is composed of one of the largest private financial institutions in the country, Banco Bradesco S.A., and subsidiaries in Brazil and abroad. Its global strategy is based on the business model that comprises, among other things, banking and insurance activities, leasing, intermediation of securities, real estate ventures, management of both selfowned and third parties' portfolios, and consortium management. It operates through an extensive distribution network, which is present in every Brazilian municipality, and assists the public by means of a structure that is segmented and through several options of access, both personally and digitally. This structure is in synergy with the advances in technology and the new forms of interacting with society through digital media and mobility.

This strategy is oriented by the incorporation of good practices of sustainability and corporate governance within businesses, considering the context and potential of each region and contributing to the generation of value by the Organization, which is committed to various globally recognized initiatives, with an emphasis on the Global Compact, PRI (Principles for Responsible Investment), PSI (Principles for Sustainable Insurance), The Equator Principles and Principles for Responsible Banking of the United Nations (UN).

In the socio-educational field, the Organization's relationship with the community has its strongest link in the form of the Fundação Bradesco, which, from the return on investment that it receives as one of the main shareholders of Banco Bradesco S.A., develops one of the main private educational programs in Brazil and around the world.

III. CORPORATE IDENTITY

1. Purpose:

To create opportunities for the progress of people and the sustainable development of companies and society.

2. Values:

Values are the fundamental beliefs and success factors of the Organization. They serve as guidelines to fulfill our purpose:

- a) the client is the reason for the Organization's existence;
- b) ethics in all activities and relationships;
- c) transparency in crucial information for the stakeholders;
- d) belief in values and in people's capacity of development;
- e) respect for human dignity and diversity; and
- f) social and environmental responsibility, with the promotion of actions for sustainable development.

May 2022 Page **2** of **16**



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

- a) the strength of the Bradesco brand, with a strong tradition in the financial, capital and insurance markets;
- b) solid culture and corporate governance, focused on the sustainability of the business associated with our commitment to sustainability;
- c) one of the best distribution networks in the country, in terms of modernity and scope;
- d) broad portfolio of products, services and solutions for every segment; and
- e) large investments in technology.

IV. CODE OF ETHICAL CONDUCT OF THE BRADESCO ORGANIZATION

1. CONCEPTS

a) Ethics

Ethics is defined as a set of principles and values of the Bradesco Organization that serves as a reference and should guide the conduct of all its managers, employees, interns, apprentices and associates.

b) Conduct

Conduct corresponds to each act, action, omission, decision, attitude or behavior, which must always be guided by ethical standards.

2. PRESENTATION

This code is a practical guide to personal and professional conduct, whose basic objectives are the following:

- a) to strengthen the ethical culture of the Organization, raising the level of trust, respect and solidarity in all of its internal and external relations;
- b) to guide the conduct of managers, employees, interns, apprentices and associates, promoting the adoption of the highest standards of integrity;
- c) to prevent and manage conflicts of interests;
- d) to serve as a reference in the conduct of situations that could occur in everyday life, which should be a guide for assessment and decision-making, not limited to the content displayed; and
- e) to preserve the reputation and image of the Organization.

The Codes of Ethical Conduct for specific professional categories, such as the Internal Auditors and Accountants responsible for the Financial Statements, should also be respected and

May 2022 Page **3** of **16**



observed by the managers, employees and associates who exercise these roles within the Bradesco Organization.

3. SCOPE

This Code of Ethical Conduct is applied to every manager and employee, intern and apprentice of the Organization, composed of Banco Bradesco S.A. and its subsidiaries, in Brazil and abroad. Its applicability still extends to associates who are providing services to the Organization or on behalf of one of the Organization's companies.

4. PRINCIPLES

4.1. Principle of Integrity

Integrity means the quality of righteous, upright and impartial conduct, the willingness to make decisions based on what is right, without compromising ethical standards. It also means full compliance with Law No. 12,846/13 (Anti-Corruption Law), the laws of the countries in which we operate, the rules that govern our industry's activities and the internal guidelines of our Organization. These rules stipulate the correct course to take and precisely define what is desired, permitted and prohibited.

Expected Conduct:

i. to act inside and outside of the Organization, with every stakeholder, in strict accordance with the principles expressed in this Code, in addition to safeguarding personal conduct, so as to protect and strengthen the reputation and image of the Organization;

ii. to use the tangible (furniture, facilities, equipment, materials, etc.) and intangible (image, brand, reputation, business strategy, plans, information, concepts, technology, research, etc.) resources of the Organization, with professional objectives, in accordance with the internal and external rules, when applicable;

iii. to communicate to the immediate superior or to the Corporate Whistleblowing Channel, available on the <u>Bradesco Investor Relations</u> website, <u>Corporate Portal</u>, or by phone on 0800 776 4820 (Monday to Friday, from 8 am to 6 pm, except on national holidays), any situation, practice or action that may be considered a violation of this Code, pointing out the reasons and elements that enable the determination, regardless of who the person involved is;

iv. to refuse cash benefits, material or immaterial, including invitations to events and entertainments, favors and benefits in any way, in their own favor or in favor of third parties, or whoever they are, which may represent an improper relationship, financial loss or damage to reputation for the Organization. Gifts for promotional purposes and with no commercial value are excluded from this prohibition. Improper relationships mean everything conflicts with the provisions of this Code and of any other Policies and Internal Guidelines that regulate the activities of the Organization; and

v. not to practice or allow, under any circumstance, conduct that constitutes an attempt or practice of bribery or corruption, such as: accepting, obtaining, financing, funding, granting, paying, promising, sponsoring or authorizing, directly or indirectly, any benefit, monetary or otherwise, in any way whatsoever, in their own favor or in favor of whoever, also, including the concealment or disguise of an occurrence of such acts, or the obstruction of investigation or the supervision of such facts.

May 2022 Page **4** of **16**



4.1.1. Conflict of Interest

A conflict of interest takes place when there is the possibility of a direct or indirect confrontation between the personal interests of managers, employees, interns, apprentices and/or associates, and those of the Organization or its Clients, which may compromise or exert undue influence on the performance of their duties and responsibilities. Interest is characterized by all and any advantage, material or not, in their own favor or in the favor of third parties (relatives, friends, etc.) with whom they have, had or intend to have personal, commercial or political relations.

On conducting business and/or transactions with Related Parties, we must ensure the inapplicability of any benefit that has as its objective to serve only the private interests of shareholders, controllers, managers, and close family members of Related Parties or third parties.

The hiring of services, accredited networks, partners or suppliers must occur impartially and transparently, with the adoption of fair and objective criteria, with no discrimination of any kind, always in accordance with applicable policies, guidelines and laws.

In the deliberation of loan operations for Related Parties, it is essential to follow the precepts laid down in the Loan Standard and Policy of the Bradesco Organization.

In the face of any conflict of interest, the manager, employee, intern, apprentice or associate in conflict must inform the fact promptly to their superior and to their peer(s) involved and must not engage, even physically, in any discussions and deliberations on the theme in question.

In the event of conflict at the time of discussion or deliberation in the management or supervisory bodies, the withdrawal of the person in conflict should be recorded in the minutes of the meeting of the respective body.

If the person in conflict does not volunteer, another person can do so, if they are aware of the conflict.

4.1.2. Openness to Disagree

Openness to disagree means acting with honesty and transparency, when facing a situation in which there is a conflict of opinion. It means exposing one's opinion with clarity and coherence, even if this opinion is disputed.

4.2. Principle of Transparency

This is the disclosure, in a clear, objective and timely manner, of the Bradesco Organization information that is crucial for stakeholders. The commitment to the information goes beyond the legal and statutory obligations, which favors the decision in relation to the Organization, provides an adequate assessment of our performance and value and contributes to the creation and maintenance of an image of reliability. Through open dialog and communication, we seek to clarify issues that may affect the stakeholders.

The term 'stakeholders' refers to those individuals or entities that are interested or affected, positively or negatively, by the business of the Organization (externalities). That is, those who

May 2022 Page **5** of **16**



assume some type of risk that is, directly or indirectly, related to the activities of the Organization, such as clients, shareholders, investors, suppliers, managers, employees, intems, apprentices and associates, business, environment, i.e., society in general.

Expected Conduct:

- i. to ensure the accuracy and transparency of the information contained in any published material, allowing more appropriate decisions to be made by stakeholders;
- ii. to ensure that plans and/or material facts are kept under the absolute secrecy by the people involved and that all information disclosed to stakeholders is informed in a timely and symmetrical manner, appropriately approved according to the limits of authority and in accordance with the corporate rules;
- iii. to ensure that only people appropriately authorized can speak institutionally on behalf of the Bradesco Organization, in accordance with the corporate vision of the facts regarding the news disclosed by the media, preventing damage to our image and reputation;
- iv. to ensure that the controversial news circulated by the press about the Bradesco Organization is promptly handled by people that are appropriately authorized to do so;
- v. to cooperate with the actions of supervisory authorities, not omitting or hampering the delivery of information necessary for the evaluation of internal control activities, audits and regulatory and supervisory bodies that can generate inaccurate statements of the Bradesco Organization;
- vi. to maintain always confidentiality, not disclosing client data, such as asset and liability operations and services provided by the Bradesco Organization, except in the cases stipulated by law;
- vii. not to share information about managers, employees, interns, apprentices, associates and clients, related to their activity and that put the physical or moral integrity of any other person at risk, resulting in a breach of confidentiality; and

viii. not to comment on rumors.

4.2.1. Inside Information

Information related to material acts or facts is considered inside information until those acts or facts are disclosed to regulatory bodies, the Stock Exchange or other similar entities and, simultaneously, to shareholders and investors in general, through the wide dissemination and publication of this information in the media.

Based on that, the managers, employees, interns, apprentices and/or associates who, due to their activities, have access to "inside information", both of internal and external origin, must strictly comply with the policies of disclosure of material and use of information acts or facts and of negotiable trading of securities issued by Banco Bradesco S.A., and approved by this entity.

Strictly, safeguard the confidentiality of such information until it is properly disclosed to the market, according to the institutional guidelines.

May 2022 Page **6** of **16**



4.3. Principle of Valuing People

This means taking care of the individual and of human relations with equity, respect and transparency, contributing effectively to the development of people and to the results of the Organization. Discriminatory behaviors are not permitted.

Expected Conduct:

- i. to respect dignity and diversity, while preserving the individuality and the right to different opinions and freedom of expression;
- ii. to ensure equal opportunities in recruitment, selection, hiring, promotion, career, training and development processes, and those relating to the internal public;
- iii. to recognize people for their performance, knowledge, and technical and behavioral skills;
- iv. to adopt measures that contribute to the improvement of the quality of life, enabling the balance between professional and personal life;
- v. to respect and protect the privacy of the managers, employees, interns, apprentices and associates and the confidentiality of their information;
- vi. to encourage professionals to seek self-development and protagonism in the driving of their training and career;
- vii. to repudiate and condemn any exploitation of people by distorted forms of work, such as mandatory, forced, slave or child labor, or by sexual exploitation;
- viii. to foster voluntary actions that provide benefits to all those involved through sustainable initiatives and that can develop skills and competencies;
- ix. to encourage cordiality and solidarity for a higher level of relationship between people. The solidarity, however, does not induce nor justify the participation or complicity with error, or with acts that infringe ethical rules or laws, which must be combated through appropriate procedures;
- x. not to practice or accept moral and/or sexual harassment, in the work environment and in all relations with the internal and external public;
- xi. to respect all diversities; and
- xii. not to use or allow the use of the roles exercised to, directly or indirectly, obtain an advantage for themselves or for a third party.

4.4. Principle of Social and Environmental Responsibility

This means the responsibility of an organization for the impacts of their decisions and activities in the company and in the environment. Implies strategies, decisions and corporate actions that:

- contribute towards sustainable development, including the health and well-being of the company;

May 2022 Page **7** of **16**



- consider the expectations of the stakeholders;
- are in compliance with the applicable legislation and are consistent with international guidelines;
- are integrated across the Organization and are practiced in relations; and
- always seek sustainable innovation, including technology, based on the following pillars: intention, effort and results.

Expected Conduct:

- i. to consider, in every decision, the impacts that they will bring to the communities or the environment, in order to preserve them and recover them wherever possible. Always seek sustainable development in our direct and indirect participation or within our sphere of influence;
- ii. to support initiatives for the training and development of citizenship, eradicating poverty and reducing social inequalities as a priority through education;
- iii. to promote environmental conservation, the rational use of natural resources, especially of non-renewable resources, and avoiding any form of waste;
- iv. to comply with the internal guidelines in order to reduce exposure to risks of a social and environmental nature;
- v. to consider the interests of stakeholders, even those who do not have an active role in the governance of the Organization; and
- vi. to encourage the improvement and innovation of products, services, solutions, systems and mechanisms that enable progress in accessibility, social inclusion, banking, insurance and financial citizenship.

4.5. Principle of Commitment of the Organization

The relations between the Organization and stakeholders should account for the reciprocity of obligations, which is established in this principle and in the Principle of Commitment with the Organization.

The commitments of the Organization are:

- i. to practice equity in all our relationships. Equity presupposes the concept of a justice founded on equal rights and opportunities, i.e., it is natural justice with a willingness to impartially acknowledge each one's right;
- ii. to preserve the environment of trust and harmony in internal and external relations, seeking to avoid conflicts of interest, disrespect or intimidation;
- iii. to keep the work environment at high levels of safety and comfort;

May 2022 Page **8** of **16**



iv. to welcome, as a relevant contribution, any criticism and/or suggestions whose purpose it is to improve the processes and relations in and out of the work environment;

v. to keep all means of communication updated, internally, allowing managers, employees, interns, apprentices and associates, to be informed about the life of the Organization, its goals, projects, plans, opportunities, campaigns or promotions, which helps to raise the level of motivation:

vi. to keep our records and reports within strict obedience of the applicable guidelines and to market good practices, to ensure that all information contained therein is complete and accurate;

vii. to respect and maintain the secrecy of transactions, data and information of the Bradesco Organization and other stakeholders to which it has access, with the commitment to protect them and treat them in such a way as to ensure their integrity, confidentiality and availability. This confidentiality should be respected by our managers, employees, interns, apprentices and associates, even after the shutdown of the Organization; and

viii. to comply with rules governing the activities of our industry and the internal rules of our Organization, which deal with the privacy and protection of personal data. The use of these data will be exclusively to achieve the purpose(s) for which it (they) is (are) intended as a result of activities undertaken by the Organization. This observation implies the collection and use of personal data, which are required for specific purposes.

4.6. Principle of Commitment with the Organization

All managers, employees, interns, apprentices and associates, must be committed to the improvement of the results of the Organization, which depend on them for its sustainability and to fulfill their social role in generating and distributing wealth. Thus, in the performance of our duties, the expected behaviors are:

i. to learn, practice and disseminate the principles and standards contained in this Code and in other internal guidelines of the Organization, committing efforts to combat illicit and unethical acts of any kind;

ii. to collaborate actively towards the improvement of the financial results of the Organization, by increasing revenue or reducing costs in any scale;

iii. to undertake practices that strengthen the credibility, reputation and good image of the Organization, thus preserving these attributes that have been developed over decades of its existence:

iv. to devote special attention and commitment to dealing with issues related to the clients and users of our products and services, clarifying their queries promptly and addressing any complaints with mutual interest;

v. to dedicate ourselves to the expansion and improvement of our products and services, as well as to the contribution in creating new ones with the same nature and purpose, using our own resources or through partnerships with other entities driven by the same ideals;

vi. to ensure the protection and rights of intellectual property, of both the Organization (developed in-house or not) and of third parties that are in our power. It includes, without being

May 2022 Page **9** of **16**



exhaustive, all information, technologies, creations, programs, systems, projects, inventions, processes, strategies, plans and related materials, which exist for the exclusive use and ownership of the Organization;

vii. not to obtain any personal gain from business opportunities that arise within the work environment and that are clearly identified with the interests of the Organization, which are responsible for the overall primacy in its implementation;

viii. not to publish information on social media on behalf of the Organization, whose assignment is only for authorized people;

ix. not to commercialize, hold, facilitate others or use drugs or substances that cause physical or psychological dependence;

x. not to practice any form of gambling, with the aim of obtaining financial gain, except the official lotteries;

xi. to be aware of the appropriate use of social media made available by the Organization; and

xii. ethical conduct must take precedence, inside and outside of the workplace, concerning the principles contained in this Code, not disclosing on social media, images, comments or allowing any type of exposure that can bring risks to the image of the Organization.

4.7. Principle of Constructive Relationship

A constructive relationship with the internal or external public, is ensured when our decisions, strategies and actions are guided by ethics, integrity, transparency and commitment to disseminating the necessary information and actions are taken to serve the largest possible number of stakeholders, in a balanced and equitable manner, focused on the long term and promoting the sustainable development of the whole value chain.

4.7.1. Clients and Users of Products and Services

Without trust as the foundation, there is no customer/company relationship that can be long-lasting, especially in a competitive market.

Expected Conduct:

- i. to provide services based on courtesy and promptness, effectiveness, timeliness, responsibility, diligence and transparency in the transactions that we make;
- ii. to maintain the confidentiality of any information that is received as a result of commercial relations;
- iii. to protect the privacy of client and user data, using only what is strictly necessary to achieve the specific purposes;
- iv. to promote fair and equitable treatment to clients and users of products and services, always providing information, clearly and precisely, about our products and services; and
- v. to identify the needs of clients and users of products and services so that the marketing of products and services can be more assertive, allowing free choice and decision-making on the part of clients and users to provide items that are aligned to each one's profile.

May 2022 Page **10** of **16**



4.7.2. Shareholders and Investors

Expected Conduct:

i. to observe faithfully the guidelines in the policies of the disclosure of material acts or facts and the trading of securities, issued and approved by Banco Bradesco S.A., in our relationships with shareholders and investors:

ii. to carry out the distribution of results and the dissemination of information in a uniform manner and without privileges;

iii. to respect the rights of shareholders and investors, with fair and equal treatment, not allowing, under any circumstances, discriminatory attitudes; and

iv. to observe the rules pertaining to Related Parties, to avoid the practice of transactions in conditions contrary to those of the market and, thus, ensure compliance with the legal standards and other regulations and internal policies related to the subject.

4.7.3 Competition

Competition promoted fairly and without any abuse of power is beneficial for consumers and is essential to the proper functioning of the market.

Expected Conduct:

i. to participate in the performance of our duties, of class associations, aligned to the interests of the Organization, of the market, of our clients and of the initiatives of competitors, respecting them and rejecting any form of espionage;

ii. to observe the reputation of competitors;

iii. to perform transparently and lawfully, when sending and/or receiving information from the competition, in accordance with the principles of banking secrecy and the interests of the Bradesco Organization;

iv. to respect the intellectual property rights of competitors and not use them without proper authorization;

v. to reject any comments that may damage the image and reputation, or that may contribute to the spread of rumors about our competitors;

vi. not to allow retaliation of any kind arising from the loss of clients to the competition, as well as not provide undue advantage to a competitor bidder;

vii. not to commit any act that may characterize or be considered espionage or obtain information from competitors by illicit means;

viii. not to contribute to the exchange of sensitive information on other competitors, which may jeopardize the free competition, such as: business strategy, competitive advantages, pricing policies, contract terms, market research, geographical operations, services or technology, and

ix. to reject any form of espionage.

May 2022 Page **11** of **16**



4.7.4. Product Suppliers, Service Providers and Business Partners, including Joint Ventures

Expected Conduct:

i. to hire suppliers and establish business relationships with partners who operate with ethical standards compatible with ours, through a strict selection process and due diligence;

ii. to observe strictly service providers and business partners who represent us, directly or indirectly, at the government bodies, in order to ensure that they will act according to the principles contained in this Code of Ethical Conduct and in other applicable internal policies; and

iii. to require the product suppliers, service providers and business partners, including joint ventures, to adopt practices, either work-related or of a commercial nature, which are consistent with the provisions of this Code of Ethical Conduct.

4.7.5. Governmental, Regulatory and Self-regulatory Bodies

Expected Conduct:

i. to ensure compliance of laws and regulations that are applicable to the activities carried out by the Organization, in addition to the self-regulations, which we formally adhered to;

ii. to ensure compliance with our policies, guidelines and controls for the prevention and combat of money laundering, financing of terrorism, corruption, bribery and unlawful acts of any nature, in strict compliance with the applicable laws and according to the national and/or international best practices;

iii. not to promise, offer or give, directly or indirectly, any undue advantage to a public official, national or foreign, or to a third person related to him/her, as well as receive any benefit, either on behalf of the Organization or of anyone else; and

iv. not to condone fraud in procurements and contracts with Federal, State or Municipal governments (whether national or foreign), Autonomous Authorities, State-owned Companies and Government-controlled Private Companies.

4.7.6. Press

Expected Conduct:

i. to build our relationship based on transparency and credibility, always observing the ethical aspects in our marketing strategy; and

ii. to speak out only on behalf of the Organization when invested by this authorization, always expressing the institutional point of view, and never personally.

May 2022 Page **12** of **16**



4.7.7. Communities and Environment

Expected Behaviors:

i. to promote respect for the dignity of human beings, preserving their individuality, not practicing discriminatory acts of abuse or harassment of any kind;

ii. to reject any form of human exploitation through compulsory, forced, slave or child labor;

iii. to reject any type of sexual exploitation; and

iv. to be firmly committed to practicing, encouraging and valuing environmental conservation, seeking to converge corporate goals with the anxieties and interests of the community where we are present, and always in line with sustainable development.

Note: we adhere, voluntarily, to the following international agreements:

- Equator Principles;
- Global Compact;
- Sustainable Development Goals (SDGs);
- United Nations Environment Programme Finance Initiative (UNEP FI);
- Principles for Sustainable Insurance (PSI);
- Principles for Responsible Investment (PRI); and
- Principles for Responsible Banking of the United Nations (UN).

In addition to these international agreements, we are also signatories of commitments relating to issues of gender equality, violence against women and girls, female empowerment and the global movement in favor of the inclusion of people with disabilities, among others.

4.7.8. Professional Associations and Entities

Expected Conduct:

i. to acknowledge the important role that legally constituted professional associations and entities play, by means of their initiatives and practices, and reassure the Bradesco Organization's willingness to discuss any situation that involves itself; and

ii. to recognize the right to collective bargaining and the full freedom of association with class entities that do not act contrary to the provisions of this Code.

4.7.9. Political and Partisan Activities

There are no restrictions on the exercise, by the managers, employees, interns, apprentices and associates, of their political and partisan rights, as long as it is strictly personal and without any interference in their responsibilities with the Bradesco Organization and, therefore:

i. our managers, employees, interns, apprentices and associates are free to develop, in their personal sphere, citizenship rights as voters; and

ii. the image of the Organization must not be tied to political and partisan activities, or allow our managers, employees, interns, apprentices and associates to do the same.

May 2022 Page **13** of **16**



4.8. Principle of Responsible Leadership

Responsible leadership is the main inducer of the development of a team member, of discipline and of the relationship between the teams.

Leadership is widely responsible for the sustainability of the Organization and the construction and maintenance of a good working environment. In view of this, we are committed to:

i. maintain adequate management of the risks inherent to activities under our responsibility;

ii. assist in building talents fairly and honestly, allowing them to have success and to work with balance, enthusiasm, goals and good results;

iii. encourage teamwork as a practice of collaboration and the sharing of knowledge;

iv. give and receive feedback in order to build relationships of trust and transparency;

v. stimulate initiatives to preserve health and safety at work, and sustainability;

vi. encourage managers, employees, interns, apprentices and associates, to establish an appropriate balance between work, family and society in general, in order to maintain their professional, personal and social well-being;

vii. develop and maintain a team that is engaged and form successors that are prepared for the challenges of the present and the future;

viii. use our leadership to ensure the success of our team members;

ix. keep our team members permanently informed about the plans of the Organization, favoring their greater motivation and contribution;

x. welcome suggestions, ideas and questions which, starting from the team members, represent contribution towards learning and improving processes;

xi. celebrate victories and achievements of the team members, as an incentive to continue;

xii. fully commit ourselves, so that all internal registers, accounting or taxation, are a pure expression of reality, which should also be observed with regard to information about the Organization that must be transmitted to any group of stakeholders;

xiii. follow the results of the Organization with diligence and commitment in order to ensure its economic and financial balance – an integral part of its sustainability;

xiv. pay particular attention to subjects of interest of the clients, whether they are internal or external, and encourage the same behavior on the part of team members; and

xv. commit ourselves to setting good examples to our team members.

May 2022 Page **14** of **16**



5. MANAGEMENT OF THE CODES OF ETHICAL CONDUCT

5.1. Governance

The Code of Ethical Conduct of the Bradesco Organization and the Sector-Based Codes of Ethical Conduct are approved by the Board of Directors.

The Integrity and Ethical Conduct Committee, which reports to the Board of Directors, is the body that is responsible for proposing actions with respect to the dissemination of, and compliance with, the Codes of Ethical Conduct, corporate and sector-based, and the rules of conduct that are related to the topics of anti-corruption and competition, in order to ensure efficiency and effectiveness.

The management of the Code under the responsibility of the Advising Department of the Integrity and Ethical Conduct Committee also involves the activities that are related to the dissemination of the Code, clarification of doubts, training on conduct and the due processing of Complaints on Infringements received on the Corporate Whistleblowing Channel, available on the <u>Bradesco Investor Relations</u> website/ Corporate Governance/ Whistleblowing channels; on the <u>Corporate Portal</u>/ Bradesco/ Whistleblowing Channels and Manifestations; and/or by phone on 0800 776 4820 (Monday to Friday, from 8 am to 6 pm, except on national holidays).

5.2. Procedures in Case of Doubts and/or Ethical Dilemmas

In case of doubts and/or ethical dilemmas, refer to the Corporate Whistleblowing Channel, available on the <u>Bradesco Investor Relations</u> website, <u>Corporate Portal</u>, or by phone on 0800 776 4820 (Monday to Friday, from 8 am to 6 pm, except on national holidays) or, in the case of managers, employees, interns, apprentices and associates, immediate leadership should be consulted.

5.3. Whistleblowing on the Breach of the Codes of Ethical Conduct

When situations should arise, or there is any suspected violation of the Codes of Ethical Conduct, communication should be made promptly to the Corporate Whistleblowing Channel, available on the <u>Bradesco Investor Relations</u> website, <u>Corporate Portal</u>, or by phone on 0800 776 4820 (Monday to Friday, from 8 am to 6 pm, except on national holidays), taking into account that the contents of the allegations, anonymous or not, must always be as complete as possible, to enable the investigation of facts and, if possible, be accompanied by any documents and other elements that confirm them.

The right of whistleblowing guarantees anonymity, whereby retaliation to the whistleblower who acts in good faith is forbidden.

5.4. Consequences/Disciplinary Measures

Those who commit actions considered violations of the Codes of Ethical Conduct, corporate and sector-based, shall be subject to the applicable consequences/disciplinary measures, and to the internal guidelines dealing with the matter, regardless of the hierarchical level and without prejudice to the legal penalties in force.

May 2022 Page **15** of **16**



We declare that this is a faithful copy of the Code of Ethical Conduct of the Bradesco Organization, approved in the Special Meeting of the Board of Directors (RECA) No. 946, of June 30, 2003, whose last review, with changes, was recorded in the minutes of the RECA No. 3,364, of May 12, 2022.

Banco Bradesco S.A.

Moacir Nachbar Junior Executive Vice-President

May 2022 Page **16** of **16**