

Code of Ethics

bs2.



Senior Management Message



Marcos
Magalhães
CEO

Building the reputation of a serious company means fulfilling transparent commitments and agreements on a daily basis with the entire relationship network that is part of the business. At BS2 Companies, this group is made up of employees, customers, suppliers, shareholders, the government, regulatory bodies and any other public that interacts with the organisation.

We believe that building **sustainable and solid relationships** necessarily involves attitudes that encourage **best practices in**

the business. Through the evolution of **our culture**, we declared Our Way of Being and Doing from a pillar that anchors our principles: ethics is non-negotiable.

This is also where Code of Ethics are. We invite you to read and to consult the contents carefully whenever necessary.

Doing the right thing, the right way, is a **commitment** to all of us.

The guidelines of this Code of Ethics must be practiced by everyone, both in the national and international sphere

EMPRESA
**PRÓ
ÉTICA**
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Pacto Global
Rede Brasil



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Conformity



Conformity with Rules and Procedures

All BS2 companies, third parties, suppliers and partners must implement and follow the current standards regulatory and self-regulatory bodies of the financial market, as well as Brazilian international laws that impact our business.

It is very important that you also know our Policies, Norms and Work Instructions that guide your actions.

For employees, the files are available in the document library. For the external public, on the web site bancobs2.com.br/corporategovernance-3/.

Didn't find what you need?

Contact **"Compliance Responde"** or send an e-mail to compliance.corporativo@bancobs2.com.br.



Combating Money Laundering and the Financing of Terrorism

BS2 Companies have strict controls in place to prevent any transactions that, by their nature or destination, involve illicit activities. Directors, leaders, employees, interns, third parties, partners and suppliers are trained and receive guidance on the institution's internal rules and procedures on the subject related to this topic.

The Prevention of Money Laundering and Terrorist Financing Policy is available on the website and in the internal library. Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction. Have you read it but have questions? Visit "**Compliance Responde**" or send an e-mail to compliance.corporativo@bancobs2.com.br.

To access the document, point the camera at the QR code.



Integrity





Prevention of Corruption and Bribery

At BS2 Companies, it is forbidden to receive or offer any kind of advantage. Employees, third parties, partners and suppliers are committed to comply with the Anti-Corruption Law (No. 12.846/2013) and with other regulations that deal with the issue in other countries where countries where we operate.

The full guidelines are described in the Prevention Policy and Bribery Prevention Policy and Relations with the Relations Policy.

Any questions? Contact **"Compliance Responde"** or send an e-mail to compliance.corporativo@bancobs2.com.br.

Point the camera at the QR code to access our policies.



Anti
corruption
and Bribery
Policy



Relationship
with public
sector



Internal and External Fraud Prevention

Preventing and combating internal and external fraud is the responsibility of all directors, leaders, employees, interns, service providers, business partners and suppliers.

Have you identified any vulnerabilities in the processes and systems used by BS2 Companies? Alert your managers immediately.

Need some guidance? Contact "Compliance Responde" or send an e-mail to compliance.corporativo@bancobs2.com.br.



We act like this



I've noticed this gap in our routine that could lead to problems.



Really? Can you give me more information, please?



I'll send you an e-mail highlighting what I've identified.



Great! Let's take advantage of this and mapped other risks. Thank you! #wegrowtogether



We don't act like this



Hi! That document that I asked you to sign, did you read it? Can I consider it approved?



I haven't been able to validate it yet.



Time is running! Suggestion to help everyone: since you won't be able to sign, I'll sign for you and we won't miss the deadline.





Combating moral and sexual harassment and discrimination

Any behaviour that causes embarrassment or intimidation, threats, offences, insults, physical punishment, humiliation and violations are unacceptable.

Discriminatory attitudes based on race, gender, religion, ideology, ethnic or social origin, sexual orientation, physical or psychological disability, appearance and/or age are forbidden.

If you are harassed or discriminated against by anyone, don't remain silent. Talk to the **Compliance** team and report it to the BS2 [Ethics Channel](#).

The channel applies to all employees, third parties, interns, business partners, suppliers and customers. Building an ethical, and transparent company is commitment.

Point the camera at the QR code to access our Ethics Channel.





We act like this



Hi, I identified an error in the report and sent it to you in the e-mail. We'll fix it and take the opportunity to improve the next ones. If you have any questions or need help, just let me know!



I've just seen the e-mail and was about to call you. I apologise for my mistake. I'll adjust it and if I have any questions, I will ask. Thank you so much for pointing it out and supporting me!



We don't act like this



I need help with this procedure. I made a mistake when I uploaded it to our system, and I don't know how to solve it.



My goodness! You are useless! This mistake of yours will cost us a lot!





Diversity and Inclusion

BS2 Companies promote respect for human and labour rights by recognising the importance of representation and cultivating an environment that values diversity and fair pay, providing fair pay, providing opportunities that ensure equity.

In 2022, Todos BS2, the corporate Diversity and Inclusion programme, was launched to encourage initiatives in favour of an inclusive culture.

To find out more about the programme, visit the Diversity and Inclusion Policy. For questions and suggestions, contact the Sustainability and ESG team at sustainability@bancobs2.com.br.

Access our policy.





We act like this



Did you call me?
I was at the Book Club meeting.



After I saw it in your calendar. What was it like?



We read a book and reflect about gender issues. I have some contributions to our area.



Excellent! I want to hear.



We don't act like this



Have you seen the new leader? I'm sure she won't be able to cope.



Why do you think that? She seems to be an experienced professional.



She's a woman. She won't be able to take the pressure.



Transparency



Prevention of Conflict of interest

Any situation where personal or financial interest conflict with BS2 company guidelines, is prohibited.

Have you identified any conflict of interest? Fill in the Due Diligence questionnaire by the Supply team.

X Unacceptable situations:

Direct subordination between employees with a family relationship;

Approval of payments or contracting of suppliers by employees who are partners or relatives of partners of the companies contracted;

Sharing of strategic information with competitors;

Performing other professional activities, whether paid or unpaid, that affect the performance of duties or conflict with the interests of BS2;

Requesting favours and benefits from public authorities or politically exposed person (PEP) to obtain advantages on behalf of BS2;

Demonstrations and support for candidates and political parties on behalf of BS2;

Campaigning, advertising and discussing politics within the corporate environment.

Got a question about? See Conflict of Interest Policy or submit the question on "**Compliance Responde**".

3. TRANSPARENCY



We act like this



I've thought about opening a company to have more income. But without interfering with the journey or conflicting with the interests of the BS2. Is this a problem? ✓✓



Better fill in the form to let the *Compliance* and *People and Culture* teams know. Even without conflict of interest, we are transparent. 😊 ✓✓



We don't act like this



We need a photographer for the event next week. Do you know any suppliers? ✓✓



My brother! I'm sure he will be available. You don't even have to ask other people. ✓✓



But that goes against our policies... ✓✓



Nobody needs to know. Just mention that he has the lowest price and that's it. ✓✓



Gifts, Presents, Freebies, Travel and Hospitalities

Giving and receiving gifts, presents, freebies, travel and hospitality is a common practice in the market, if it occurs in a transparent and appropriate manner.

Through the page “Received anything!? Let us know here!”, on the Intranet, you declare the receipt or offer of gifts, freebies, travel and hospitality to comply with our policy on this subject. If you need help, ask your manager or Compliance team for assistance.

It is important to remember that it is not allowed to offer and/or receive gifts to/from public authorities, of any value whatsoever. All employees, third parties, partners and suppliers should consult the policy on the subject.

Find out more about transparency in receiving and offering gifts here.



3. TRANSPARENCY



✓ We act like this



Hi, we work as a project supplier in your area. Can you send me your gift policy? I'd like to send some freebies to you and your colleagues.



Thank you for your kindness! I'll send you the PDF.

Excellent! I want to hear

✗ We don't act like this



Did you manage to evaluate our budget? We want to do business with you!



Hi, we're looking at other proposals too. I'll get back to you as soon as we have a definition.



Why not make it final today? I have tickets here for this weekend's concert so we can celebrate.



That's an interesting proposal... I'm going to put some pressure on the team to make a deal with your company.



Donations and Sponsorship

Contributions made by BS2 companies, through donations and sponsorship, are carried out with maximum transparency, integrity, legality and accountability.

All guidelines to be followed for this process are detailed in are detailed in Sponsorship Policy and the Donation and Volunteer Policy.

Have you read it but still have questions? For sponsorship matters, please contact the Marketing team by email at marketing@bs2.com.

For donations and volunteering, please contact the Sustainability and ESG team at sustentabilidade@bancobs2.com.br.

Point the camera at the QR code to access our policies.



Sponsorship Policy



Donation and Volunteer Policy



Relationship with stakeholders

All BS2 Companies employees are expected to conduct their practices with transparency, honesty and accuracy, considering the context of each public.



Investors and Shareholders

Provide necessary information to investors and shareholders about the organisation's performance.



Public Power

Ensure the availability and accuracy of information and services provided to regulatory, supervisory and government agencies.



Partners and Suppliers

Just as respect and integrity are dedicated, it is expected that partners and suppliers comply with legal, tax, socio-environmental and occupational safety issues. It is also essential to respect human rights, without child labour or slavery-like conditions, and not to engage in acts of corruption, fraud and conflicts of interest.



Relationship with stakeholders



Customers

At BS2, good relationships generate results for everyone. With this in mind, BS2's relationship with its customers must include efficient service, confidentiality of information received, and a commitment to generating solutions in accordance with the law.



Competitors

The commitment of BS2 Companies is also to comply with laws that defend and protect competition. The premises are respect for freedom of initiative and free competition, adoption of legitimate competitive strategies, and rejection of anti-competitive practices.

Responsibility





Social, Environmental and Climate Responsibility

BS2 assumes the responsibility of being a catalyst for sustainable development through initiatives that connect business activities to environmental, social, and Governance perspectives.

The exercise is ongoing, bringing employees and partners together to mitigate possible negative impacts and maximise positive ones. Learn about the projects supported by BS2 atbancobs2.com.br/governanca-corporativa/.



Ethics Channel

In BS2 culture, ethics are non-negotiable. Therefore, if you witness or hear of any violation of this Code of Ethics, report it immediately. Contact the direct manager of the area, the Compliance team, or file a report on the **Ethics Channel**. The channel is managed by an external consultancy, ensuring anonymity and confidentiality.

No bona fide complainant or witness involved in an investigation process will be:

✗ Dismissed or threatened with dismissal for having filed a complaint;

✗ Subject to disciplinary action, suspension or threat;

✗ intimidated, threatened or coerced.

No retaliation is tolerated because of a complaint. Failure to comply with this rule may result in disciplinary action.

The Channel can be accessed by employees, third parties, partners, suppliers, and customers via the website contatoseguro.com.br/canaldaeticabs2, the Contato Seguro app, or by calling 0800 517 0011.

Access the Ethics Channel with the QR code.



Security





Secrecy and information security

It is our duty to preserve and guarantee the confidentiality and security of the information that comes to our knowledge for the performance of our activities.

Whether collecting, handling, storing, transporting or disposing of information, it is mandatory to:

- ✓ preserve confidentiality, with access only by authorised persons;
- ✓ ensure the completeness and availability of information.

Using information for a purpose unrelated to your activities or for your own benefit and/or third parties is illegal. Follow the Information Security guidelines and cybersecurity instructions shared by BS2 Companies.

If you have any questions or hear of any potential risks, contact the Information Security team by email at abuse@bancob2.com.br.



Privacy and Protection of Personal Data

All activities involving the processing of personal data under the responsibility of BS2 Companies, whether relating to customers, shareholders, employees, interns, third parties, partners, or suppliers, must comply with the General Personal Data Protection Law(LGPD).

This work involves the Information Security and Legal teams, as well as the Data Protection Officer(DPO), a position created by the LGPD and appointed by BS2 in 2020.

Any violation of the LGPD could result in reputational and financial damage, subject to disciplinary measures, and civil and criminal liability.

Therefore, it is everyone's responsibility to comply with the policies and standards of Cyber Security, Governance of Personal Data and Privacy.

If you have any questions on the subject, please contact the BS2 DPO(Data Protection Officer) by email at dpo@bancobs2.com.br.



Non-compliance with Standards and Conduct

Violation of the conduct established in this Code and other policies and standards of BS2

Companies is subject to administrative measures aimed at board members, directors, leaders, employees, interns, service providers, partners and suppliers at the national and international levels.

For employees, the possible administrative measures are verbal warnings, written warnings, suspension without payment, and dismissal with or without just cause.

For third parties, partners, and suppliers, ethical violations may result in contract termination.

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