



*POLICY MODEL*  
*Version.3*

*SUPPLIER RELATIONS*  
*POLICY*

## SUPPLIER RELATIONS POLICY

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### **1. AREA RESPONSIBLE**

1.1. Supply Management and Contract Management

### **2. SCOPE**

2.1. This policy guides the behavior of BB Tecnologia e Serviços, considering the specific needs and the legal and regulatory aspects to which BBTS is subject.

### **3. OBJECTIVE**

3.1. The purpose of this policy is to establish guidelines and directions for relations with suppliers to be observed in BB Tecnologia e Serviços' (BBTS) purchases, contracts and disposals, guaranteeing integrity, transparency and compliance in the Company's and its employees' relations with third parties, in order to ensure the mitigation of operational and reputational risks and add value for the Company and its shareholders.

### **4. REGULATIONS**

4.1. The main normative references for this Policy are:

4.1.1. Law No. 12.846/13 (Brazilian Anti-Corruption Law)

4.1.2. Law 9.613/98 (Money Laundering Prevention Act)

4.1.3. Law 13.260/16 (Anti-Terrorism Law)

4.1.4. Law No. 8.666/93 (Tenders and Contracts Law)

4.1.5. Law No. 13.303/16 (State-Owned Companies Law)

4.1.6. Bidding and Contracting Regulations of BB Tecnologia e Serviços and Banco do Brasil

4.1.7. BB Tecnologia e Serviços Code of Ethics, Conduct and Integrity 2022/2023

4.1.8. BBTS Policy on Preventing and Combating Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction

4.1.9. BBTS Anti-Bribery and Anti-Corruption Policy

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### 5. REVIEW PERIODICITY

5.1. This Policy will be reviewed every 3 years or, extraordinarily, if relevant events are identified.

### 6. CONCEPTS

6.1. **Corruption:** consists of the abuse of power or authority by a person to whom such power has been delegated, in order to obtain advantages for themselves or third parties. Corruption can be active: offering, promising or giving an undue advantage, or passive: requesting, receiving or accepting a promise of an undue advantage.

6.2. **Bribery:** consists of the action of inducing someone to carry out a certain illegal act in exchange for money, material goods or other private benefits.

6.3. **BB Tecnologia e Serviços Code of Ethics, Conduct and Integrity 2022/2023:** a document that brings together the guidelines for conducting BB Tecnologia e Serviços' business, establishing the ethical standards that must be followed by BB Tecnologia e Serviços' Employees, as well as by third parties who provide or supply goods and services to BB Tecnologia e Serviços or who act on its behalf.

6.4. **BBTS Compliance Program:** A program whose purpose is to disseminate guidelines aimed at achieving a state of compliance and business sustainability, making it possible to increase the prevention of illegal acts, reduce financial losses and damage the institution's reputation. It includes the guidelines previously set out in the BBTS Integrity Program, including the provisions of article 57 of Decree 11.129/2022, which regulated Law 12.846/2013, known as the Anti-Corruption Law.

6.5. **BBTS Policy for Preventing and Combating Money Laundering, Terrorist Financing and the Financing of the Proliferation of Weapons of Mass Destruction:** Policy that aims to establish guidelines and orientations for the development and maintenance of practices for preventing, monitoring and combating money laundering and terrorist financing, to be observed in the conduct of business and operational activities of BB Tecnologia e Serviços (BBTS), ensuring integrity, transparency, compliance in the Company's processes and protection against liability risks related to money laundering and terrorist financing.

6.6. **Anti-Bribery and Anti-Corruption Policy:** Policy aimed at establishing guidelines and directions for the development and maintenance of practices for preventing, monitoring and combating bribery and corruption, to be observed in the conduct of business and in the **fight** against corruption.

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operational activities of BB Tecnologia e Serviços (BBTS), ensuring integrity, transparency, compliance in the Company's processes and protection against liability risks related to corruption.

### **7. ENUNCIATED**

#### **7.1. GENERAL GUIDELINES**

7.1.1. We follow the guidelines of the BB Tecnologia e Serviços Tenders and Contracts Regulations, published on the website: <https://www.bbts.com.br/index.php/homepage/canal-do-fornecedor>.

7.1.2. We plan the acquisition of goods and the contracting of services.

7.1.3. We conduct our processes in accordance with the general principles of legality, impersonality, morality, publicity, efficiency and administrative probity.

7.1.4. We preserve the prevalence of the public interest over private interests.

7.1.5. We build sustainable business relationships guaranteeing mutual benefits between BBTS and suppliers, with a view to reducing costs and continuously improving the goods and services supplied.

7.1.6. We prefer products and services that have less impact on natural resources such as flora, fauna, water and soil and that generate less waste.

7.1.7. We use low-toxicity products.

7.1.8. Whenever possible, based on legislation, we establish a margin of preference for national products and services.

7.1.9. We seek innovations that reduce the pressure on natural resources, with a preference for national technologies.

7.1.10. We buy materials from environmentally regular sources.

7.1.11. We purchase materials with a longer service life and lower maintenance costs.

7.1.12. We use standards for sustainable purchasing, contracting and disposal.

7.1.13. We develop partnerships with government and civil society organizations to improve the procurement process and the provision of services.

7.1.14. We hold face-to-face and virtual meetings with suppliers and on these occasions more than one BBTS employee takes part.

7.1.15. We consider outsourcing, within the terms and limits of the law, to be an alternative for increasing the efficiency, efficacy and effectiveness of the value created for the organization, shareholders, clients and society.

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7.1.16. When outsourcing services, we ensure that the organizational competencies at BBTS are maintained.

7.1.17. We have established sanctions for employees who act for their own benefit or for the benefit of others, who favor or prefer any supplier or who offer or accept offers that could be considered a quid pro quo for any contractual advantage.

7.1.18. We train our internal staff and suppliers to comply with this Policy.

### **7.2. GUIDELINES TO BE ADOPTED WHEN PLANNING THE CONTRACT**

7.2.1. We plan our purchases of goods and services with the aim of providing a procurement process that mitigates operational and reputational risks for the company.

7.2.2. We undertake to define clear and appropriate information and requirements, in such a way that the supplier is fully aware of what will be supplied and the conditions to be agreed between the parties.

7.2.3. We ensure a level playing field when looking for suppliers, with fair competition practices between participants.

7.2.4. We support joint initiatives to develop products and services and to improve processes and relationships.

7.2.5. We guarantee the confidentiality of the proposals that will constitute the estimated budget for the contract, without prejudice to the disclosure of the details of the quantities and other information necessary for the contracting process.

### **7.3. GUIDELINES TO BE ADOPTED WHEN PURCHASING OR CONTRACTING**

7.3.1. We disclose information about tenders and contracts in a transparent manner, making it available equally to all interested parties.

7.3.2. Whenever possible, based on current legislation, we prioritize the regional market, micro-enterprises and small businesses when purchasing products and services, promoting sustainable local development.

7.3.3. We work with suppliers who fulfill the contracted conditions with quality and safety standards, respecting the legislation applicable to their activity, labor, tax and social security legislation.

7.3.4. We define service level agreements and social, environmental and climate responsibility agreements with our suppliers.

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7.3.5. We work with suppliers who must declare and commit to:

- a) adopt good environmental preservation practices, protecting the environment, preventing harmful practices and carrying out its services in compliance with current legislation, especially with regard to environmental crimes;
- b) repudiate conduct that could characterize harassment of any kind;
- c) respect the Universal Declaration of Human Rights by fighting discrimination in all its forms;
- d) obey and ensure that its employees, representatives and suppliers respect all legislation, rules and regulations applicable to the conduct of social projects;
- e) ensure the safety of its professionals;
- f) continuously improving its products and services;
- g) know and comply with the BBTS Code of Ethics, Conduct and Integrity 2022/2023, the Policy for Preventing and Combating Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, the Anti-Bribery and Anti-Corruption Policy and the Privacy Policy, available on the Internet at: <https://www.bbts.com.br>.
- h) disseminate social, environmental and climate responsibility practices in the supply chain;
- i) recognize, accept and value the diversity of the people who make up the company;
- j) adopt practices to prevent and combat corruption, bribery, money laundering and terrorist financing, financial crimes and any other type of illicit activity, training employees and managers in these areas.
- k) Adopt ethical standards accepted by the Institution under the terms of the BBTS *Compliance* Program published on its website.
- l) Respect free trade union association and the right to collective bargaining.

7.3.6. We avoid working with suppliers who:

- a) take advantage of being a single supplier to offer high prices;
- b) expose our name, image or reputation to risk;
- c) are untruthful or deliberately misleading during negotiations;
- d) notoriously overpromise their real capacities or offer low prices in order to then request economic and financial rebalancing.

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7.3.7. In our purchasing or contracting processes, we do not allow the participation, as a bidder, of anyone who is related, in a direct or collateral line, by consanguinity or affinity, up to the third civil degree, to:

- a) head of BBTS;
- b) BBTS employee whose duties involve working in the area responsible for the tender or contract;
- c) President of Banco do Brasil.

7.3.8. We do not work with suppliers who offer advantages or benefits of any kind our employees in exchange for the award of services or business prospects.

7.3.9. We do not make purchases or contracts with individuals or companies:

- a) whose director or partner holding more than 5% (five percent) of the share capital is a director, employee of BBTS or employee of Banco do Brasil;
- b) who are serving a temporary suspension from bidding imposed by BBTS;
- c) that have been declared unfit by the Federal Government or sanctioned under the terms of Law 12.846/13, for as long as the effects of the sanction last;
- d) that is made up of a partner from a company that has been suspended or barred by BBTS, BB and its subsidiaries, the Banco do Brasil Foundation or that has been declared unfit by the Federal Government;
- e) whose manager is a partner in a company suspended or barred by BBTS, BB and its subsidiaries, the Banco do Brasil Foundation or that has been declared unfit by the Federal Government;
- f) constituted by a partner who has been a partner or administrator of a company suspended or impeded by BBTS, BB and its subsidiaries, as well as by the Banco do Brasil Foundation or that has been declared unfit by the Union, during the period of the facts that gave rise to the sanction;
- g) whose administrator has been a partner or administrator of a company suspended or impeded by BBTS, BB and its subsidiaries, as well as by the Banco do Brasil Foundation or that has been declared unfit by the Union, during the period of the facts that gave rise to the sanction;
- h) that has, on its board of directors, a person who has participated, by virtue of a similar relationship, in a company that has been declared unfit;
- i) whose owner, even as a partner, has ended their term of office or severed their relationship with BBTS less than 6 (six) months previously;

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- j) suffer sanction or punishment for participation in an act of corruption against the public administration, national or foreign.

7.3.10. We do not deal with suppliers who are involved in the exploitation of child labor, degrading labor, slave labor or labor that degrades the environment.

7.3.11. We evaluate suppliers from a multidisciplinary perspective, using internal information obtained during the business and commercial relationship and public data from open sources or by applying *due diligence* questionnaires and requesting documentary evidence, observing the limits imposed by the rules governing the protection of fundamental rights.

### 7.4. GUIDELINES TO BE ADOPTED FOR CONTRACT MONITORING

7.4.1. We monitor the provision of outsourced services based on criteria of cost-effectiveness, operational capacity, quality, suitability, social, environmental and climate responsibility, safety and risk, compliance with legal labor requirements, among others, associated with business continuity.

7.4.2. We protect and demand the protection of confidential or proprietary information that we both share.

7.4.3. We are responsible, together with our suppliers, for certifying the quality of purchases and contracted services, including specifications, methods, tests, inspection processes and other matters relating to the goods and services supplied.

7.4.4. We repudiate referrals to suppliers of outsourced professionals for the execution of contracted services, as well as interference in the professional advancement of employees of BBTS suppliers.

7.4.5. We monitor supplier performance based on indicators, internal public satisfaction surveys and compliance with service level agreements, if applicable.

## 8. APPROVAL

8.1. Through Technical Note 2023/0275, this policy was considered by the Executive Board on June 20, 2023 and approved by the BBTS Board of Directors (Conad) on July 27, 2023.