

# *Annual Internal Audit Plan*

## *(PAINT) – 2024*

# Summary

**1 . Introduction**

**2 . Overview**

**3 . Audit Services**

**4 . Training**

**5 . Quality Management and Improvement**

**6 . Internal Audit Management**

**7 . Monitoring of Recommendations**

**8 . Data Collection**

**9 . Technical Reserve**

**10 . Summary Chart of Workforce Allocation**

## 1. Presentation

---

In light of the provisions established in Normative Instruction No. 5, of August 27, 2021, of the Office of the Comptroller General of the Union/Federal Secretariat for Internal Control, the purpose of the Annual Internal Audit Plan (PAINT) is to define the work to be carried out during the period covered by the plan, detailing the allocation of the workforce among the activities carried out by the Unit.

The annual plan is in line with the strategic plan, also adopted by this Unit, which establishes a broader vision of action and a definition of action for a three-year period. This combination makes it possible to achieve different time perspectives for action, to visualize the coverage of business processes, as well as to optimize and direct the carrying out of activities.

The preparation of this plan takes into account, among other things, the corporate strategy (BBTS Evolution), the analysis of the internal and external environment, the governance and risk management structures and the work of the areas that make up the three-line system.

The actions carried out by the Internal Audit also adhere to the international standards of *The Institute of Internal Auditors (IIA)* and other regulations related to the Unit's work.

All these initiatives help the Unit fulfill its institutional purpose of protecting the sustainability of BBTS, acting as an agent of transformation.

Brasília (DF), December 27, 2023.

Vanessa Mara da Silva (vanessasilva)

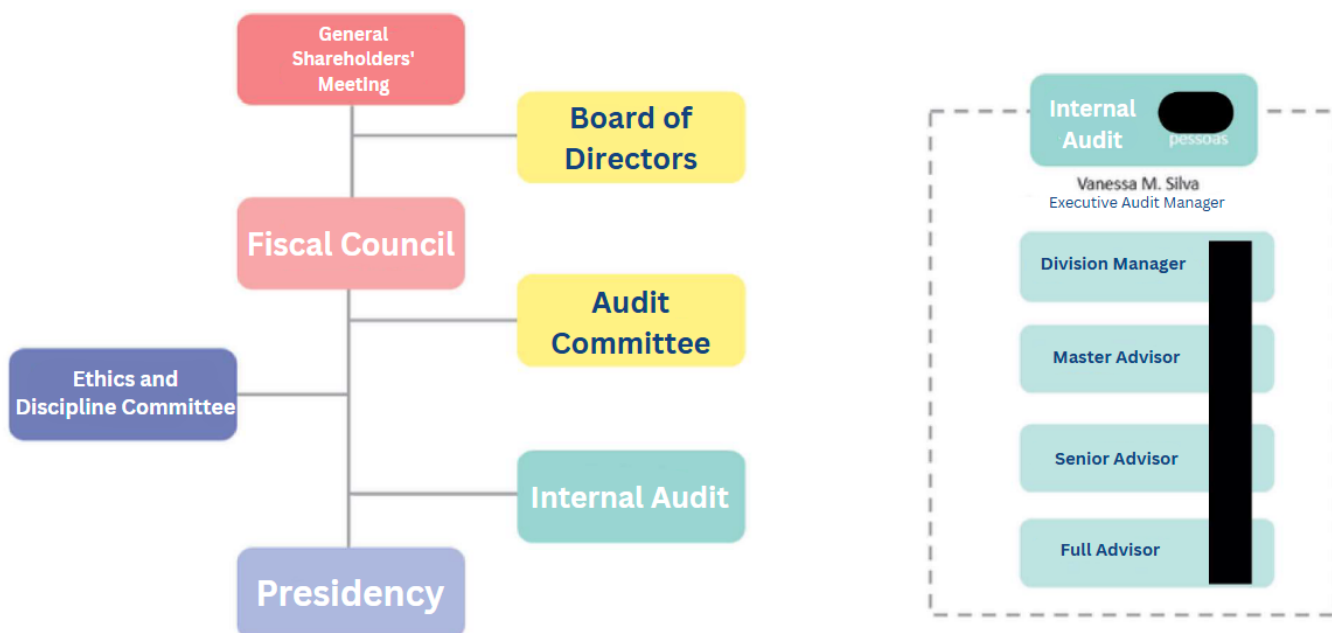
Vanessa M. Silva Auditor  
General

## 2. Overview

### Governance structure



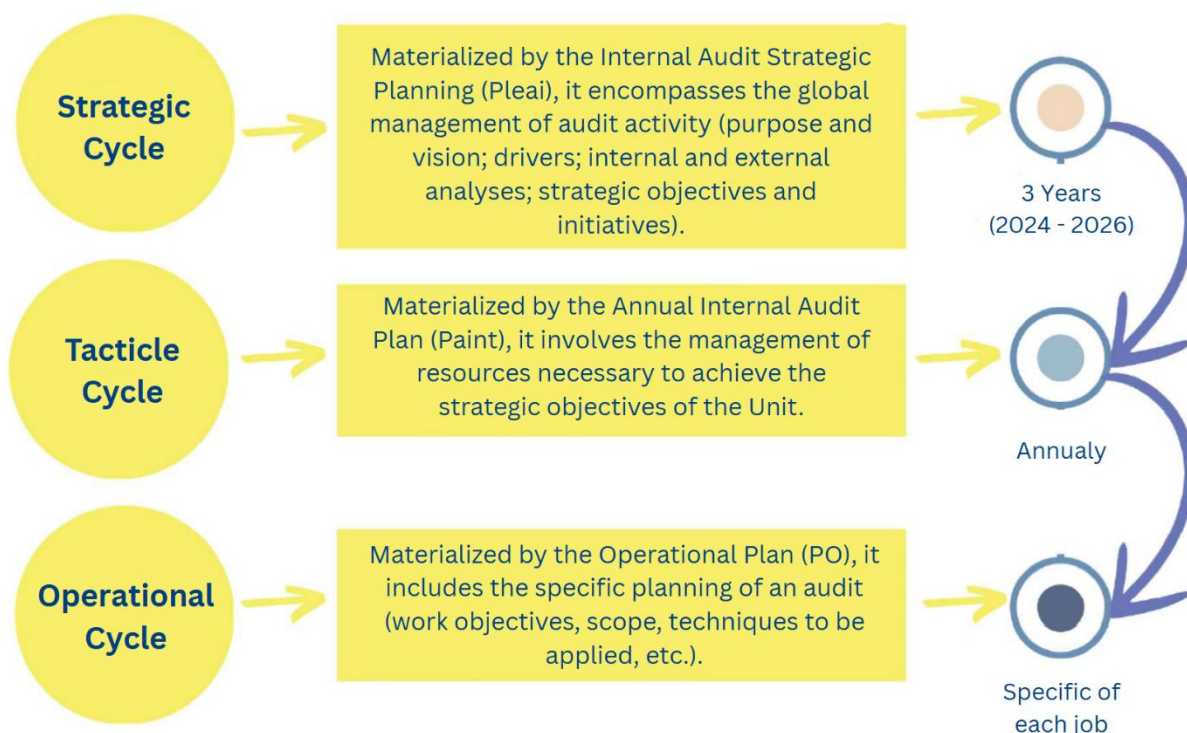
BBTS's governance is structured according to the organization chart below:



### Planning assumptions

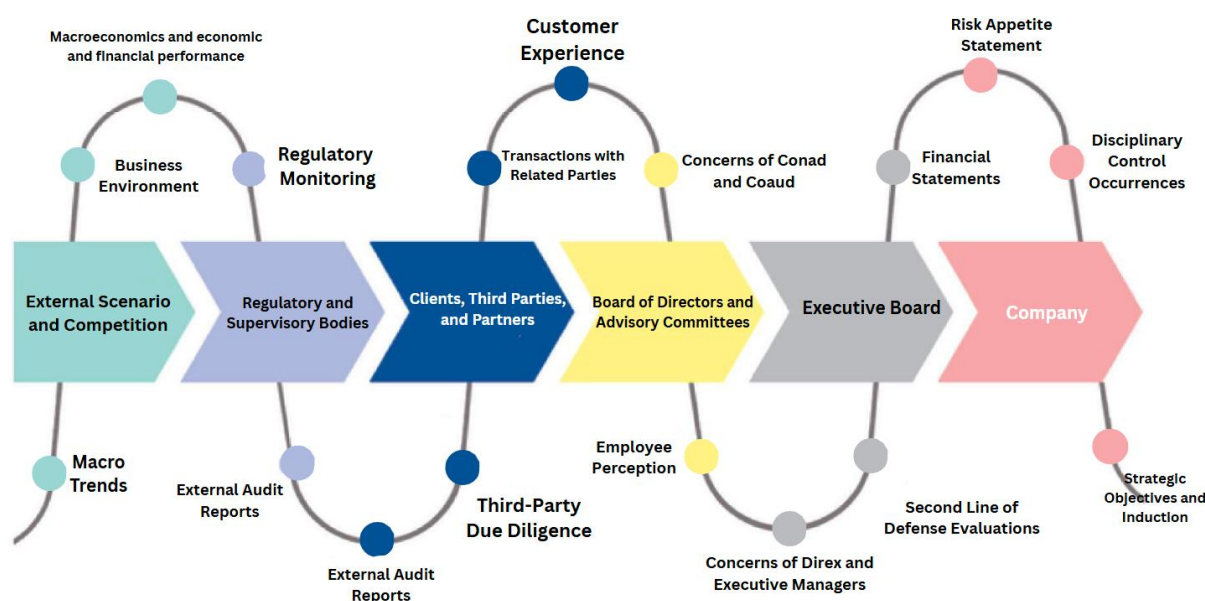


In order to fulfill its institutional responsibilities, the BBTS Internal Audit uses a three-cycle planning model to cover the long, medium and short term:



These premises contribute to planning becoming an instrument that enhances the effectiveness and quality of the audit activity. The plans drawn up facilitate the allocation of professionals and supervision; help to identify and optimize resources and schedules; contribute to directing efforts towards the most relevant risks and evaluation objects; and support decision-making in the event of changes.

In addition, it is important to note that the planning of the work is fundamentally based on a global and integrated view of the main risks to which the company is exposed. Prioritization of the work takes into account, among other aspects, information from the external scenario, regulatory and inspection bodies, clients, third parties and partners, as well as factors internal to the Company, such as the concerns of Management and the objectives set out in the Corporate Strategy:



## Execution and Follow-Up



The planning includes information on the different types of work planned, the resources needed to carry them out and training for professionals. Governance is periodically informed about the execution of the plan, the progress of the actions defined in the recommendations contained in the audit reports and the results resulting from the implementation of the actions. Thus, reports are presented monthly to the Audit Committee (Coaud) and quarterly to the Supervisory Board (Cofis) and the Board of Directors (Conad).

Extraordinary demands that arise during the execution of this plan can be met and incorporated into the original plan. To this end, significant changes in the organizational context or subsequent information that makes adjustments useful and timely must be taken into account. In any case, any changes to the work originally programmed must be approved internally by the Audit Office and communicated in a timely manner to Coaud and Conad through the periodic reports made to these Boards.

The execution of this plan and the results achieved are recorded in the Annual Internal Audit Activities Report (Raint). This document, after being submitted to Coaud and approved by Conad, is sent to CGU by the last working day of March of the following financial year to which it refers.

The audit work falls under the Quality Management and Improvement Program (PGMQ). The results of the evaluations carried out are consolidated annually in order to provide management information and identify training needs and opportunities for improving activities. The reports containing this information are presented to the governance bodies and make up the Unit's Raint.

### Restrictions and Risks



Planning involves projecting the future, with actions defined on the basis of the analyzed environment and possible scenarios. The implementation process may be faced with changes to these scenarios, restrictions and risks, which must be monitored and resolved in a timely manner in accordance with established procedures. This may involve changes in the internal and external environment, the involvement of people and the use of resources.

Limitations in the qualifications of the Audit's managerial and technical staff can also reduce the quality of the work. Continuous training actions, with identification of individual needs, indication of training solutions and management follow-up, aim to minimize this weakness. In addition, it is a premise of each assignment that staff be properly allocated, taking into account technical training, experience, level of specialization and instrumental and behavioral skills.

## Audit services

---

The audit services carried out by this Unit can be broken down into five types of work:

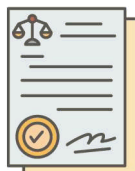
- Assessment work (Business Process Audits - APE; and Mandatory Audits - ACO);
- Investigative work (Special Audits - AES);
- Consultancy work (Consultative Audits - ACC);
- Data *Analytics* Audits (ADA); and
- Extraordinary work (Extraordinary Character Audits - ACE)

## Assessment work

The evaluation works are divided into two main categories:



Business Process  
Audits - APE



Mandatory Audits -  
ACO

Business Process Audits (BPA) consist of obtaining and analyzing information in order to provide conclusions on the management of the main business risks. The methodological approach is based on evaluating the governance system and the management of risks and controls associated with business processes that are essential for achieving organizational results. Prioritization of this work is based on the Internal Audit's own analysis of risks

Mandatory Audits (ACO), on the other hand, consist of obtaining and analyzing information in order to provide independent conclusions on a given audit object. This work is carried out in compliance with legal provisions or contracts and agreements signed with external entities or agreements signed with senior management. The results of this work can also be used to support audit conclusions about the maturity of the corporate processes to which they relate.

In fact, with regard to EPAs and ACOs, work has been planned for the next financial year, for a total of xx hours:



Horas:



Horas:



[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]



[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]




[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]



[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]



[Redacted]  
[Redacted]  
Prev. Início: [Redacted]  
Horas: [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]



[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]




[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]



[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]







Prev. Início:

Horas:

### Investigative work

The purpose of investigative work (Special Audits - AES) is to investigate acts and facts associated with behavioral deviations, service failures or illicit practices by company employees.

This type of work makes it possible to identify the potential causes or enablers of fraud and errors and contributes, along with other types of work, to improving the quality of the company's processes.

That said, based on the history of hours used in recent years, and due to the increased expertise of the team in carrying out this type of work, the following has been planned hours for this activity in 2024.


### Consultancy work

The purpose of the consultancy work is to add value to the organization and improve its governance, risk management and internal control processes, in a manner consistent with the Company's values, strategies and objectives, without the Audit assuming any management responsibility.

Through the work they carry out, auditors come into contact with a wide variety of issues that are essential to the company's operation. In addition, the strategic positioning of the internal audit function gives it a holistic view of the organization.


Previously, consultancy work was carried out through the participation of Audit managers in meetings of the Executive Board and collegiate bodies advising the Board of Directors.


To this end, five analytics projects were planned, with a total of XX hours, namely:



Prev. Início:

Horas:





Prev. Início:

Horas:





Prev. Início:

Horas:

Hours:

### Extraordinary work



Extraordinary work (Extraordinary Character Audits - ACE) consists of demands that arise during the period of execution of the annual planning, originating either at the request of external entities (inspection and control entities; Bank of Brazil; and external audit), at the request of higher collegiate bodies, or at the initiative of the BBTS Internal Audit itself.

Any changes to the work originally scheduled must be approved internally by the Audit and communicated in good time to the Audit Committee (Coaud) and the Board of Directors (Conad) through the periodic reports made to these bodies.

Although it is an audit service, as these are unplanned demands, the hours set aside for this type of work have been included in the "Technical reserve" category.

## Summary table of services

Chronologically, the auditing services were organized throughout 2024 as follows:

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

With regard to the 'total' number of hours, 18,200 hours were planned for the execution of the audit services planned by the Unit, as shown in the summary table below:

Type of Work	Estimated Hours
Evaluation Work	
Verification Work	
Consulting Work	
Analytics Work	
Extraordinary Work	
Total	

## Training

---

In order to face new challenges, such as emerging technologies, digital transformation, cybersecurity and consulting services, internal auditors need to be continuously trained. Improving existing skills (upskilling) and learning new skills (reskilling) are essential for the development of audit activities.

That said, internal training activities are segmented into three areas of knowledge: auditing and risk management (hard skills), company, processes and business (hard skills), and behavioral skills (soft skills). Employee participation in internal and external events is based on the identification of individual and Unit needs and the optimized allocation of resources.

*In this sense, due to the constant changes that the auditing area has been undergoing, as a result of the aforementioned new challenges, [censored] hours of training were planned for the next [censored] cycle*

## Quality management and improvement

---

### Quality Management and Improvement Program



The activities related to the Quality Management and Improvement Program (PGMQ) are intended to promote the evaluation and continuous improvement of the BBTS Internal Audit's work processes, the effectiveness and efficiency of its activities and the products issued.

The program adopted internally includes an analysis of the structure and organization of the audit activity. In this sense, the checks involve methodology, policies, procedures and resource management practices. Likewise, the aim is to verify whether Internal Audit is achieving its objectives, as well as contributing to the achievement of the Organization's objectives as a whole.

The evaluations that make up the program apply both at the level of individual audit work and at the broader level of the activity and include all phases of the internal audit activity - planning, execution, communication of results and monitoring.

The program includes internal and external evaluations, which must be duly documented. The results of the evaluations carried out are consolidated in order to provide management information and to identify training needs and opportunities for improving the internal audit activity, which are recorded in an action plan.

That said, for this activity, based on the consumption of hours in 2023, XX hours have been forecast for the next financial year.

Strategic initiatives



Based on the diagnosis carried out to map out strengths, weaknesses, opportunities and threats, the following were planned XX hours were set aside to implement the initiatives prioritized in the strategic planning, namely:



Horas:



Horas:



Horas:

Summary table



With regard to the total amount of resources for the "Management and quality improvement" category, XX hours were planned, as shown in the summary table below:

Activity	Estimated Hours
Program for Management and Quality Improvement (PGMQ)	
Strategic Initiatives	
Total	

## Internal audit management

---

In addition to typical auditing activities, the Internal Audit Unit performs other internal administrative functions, such as planning, coordinating work and carrying out activities to manage people and material and logistical resources to carry out its work. In order to carry out these activities, provision has been made for hours for the next financial year.

## Monitoring recommendations

---

Audit activities include monitoring the recommendations issued, which involves following up on the actions taken by the organizational areas to improve the system of governance, risk management and controls. The process of monitoring recommendations is carried out in a systematic and disciplined manner, with due dialogue with the managers responsible.

Since the effective added value of the audit work is usually only measured when the recommendations are complied with and the proposed improvements are achieved, the BBTS Internal Audit has sought to be closer to the audited area when monitoring recommendations.

In line with CCCI resolution 01/2023, it is worth mentioning that the internal activity of monitoring the recommendations issued observes, among others, the following guidelines: periodic analysis of measures and manifestations informed by the audited area; and periodic meetings to follow up on recommendations with those responsible for implementation.

In addition, it is also important to note that there is a monthly report to the Audit Committee (Coaud) on recommendations of greater criticality (criticality A), which, in an internal assessment, will probably not be complied with within the due date.

That said, based on the consumption of hours in 2023, the following hours have been planned for XX hours for monitoring recommendations for the next financial year.

## Information gathering

---

It represents the activity of dealing with inspection and control entities, with Banco do Brasil (Controller) and with external audits. The aim is to provide advice on supplying information requested by these entities. Accordingly, based on the consumption of hours in 2023, XX hours have been set aside for this activity in the next financial year.



Technical reserve

In order to allow new work to be carried out as a result of demands arising after the planning has been completed, whether on the Audit's own initiative, at the request of external entities (inspection and control entities; Banco do Brasil; and the external audit) or at the request of higher collegiate bodies, XX hours have been set aside to deal with this extraordinary work (Extraordinary Character Audits - ACE).

It is important to emphasize that, as stated in the Manual of Technical Guidelines for Governmental Internal Auditing Activities of the Federal Executive Branch, it is important that planning does not take up all available resources, since part of the operational capacity should be reserved for work that needs to be carried out during the year.

Summary table of workforce allocation

For the implementation of planning, the Internal Audit of BBT5 has a team of [redacted] professionals, with the following functions: Executive Manager - General Auditor [redacted], Division Manager [redacted], and Advisor [redacted]. The team is physically located in Brasília, the company's headquarters.

Considering the availability of 254 business days next year, the Unit has [redacted] net hours available for workforce allocation. As a result, the following summary table of workforce allocation for the next fiscal year has been prepared:

Activity	Estimated Hours
Audit Services	[redacted]
Training	[redacted]
Monitoring of Recommendations	[redacted]
Quality Management and Improvement	[redacted]
Internal Audit Management	[redacted]
Information Gathering	[redacted]
Technical Reserve	[redacted]
Total	[redacted]
[redacted]	
[redacted]	