
Policy on transactions with related parties

Version.7

POLICY ON TRANSACTIONS WITH RELATED PARTIES

1. AREA RESPONSIBLE

- 1.1 Corporate Strategy Management (Geemp).

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 3.1 The purpose of this policy is to establish rules to ensure that all decisions, especially those involving Related Parties and other situations with a potential conflict of interest, are made in compliance with the requirements of competitiveness, compliance, transparency, fairness and commutativity, in order to serve the interests of BB Tecnologia e Serviços and its shareholders, without prejudice to the interests of its Related Parties. It applies to all employees and managers of the Company.

4. REGULATIONS

- 4.1 The main normative references for this Policy are:

- Law No. 6.404 of December 15, 1976;
- Law No. 13.303 of June 30, 2016;
- Decree No. 8.945 of December 27, 2016;
- CVM Resolution 94 of May 23, 2022;
- CPC 05 - Accounting Pronouncements Committee.

5. REVIEW PERIODICITY

- 5.1 This Policy must be reviewed at least annually or, extraordinarily, at any time - observing any changes made to Banco do Brasil S.A.'s Specific Policy on Transactions with Related Parties - and submitted to the competent bodies, as provided for in the bylaws, for deliberation.

6. CONCEPTS

- 6.1 For the purposes of applying this Policy, the definitions apply:
- 6.2 Related Party: under the terms of the applicable regulations, a related party is the

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natural or legal person with whom BBTS has the possibility of contracting under conditions other than those independence that characterize the transactions carried out with the other parties that interact with the Company, the person or entity that is related to the Company as indicated below:

- 6.3 Individual: A person, or a close member of his or her family - spouse or common-law partner; children of the individual, spouse or common-law partner; dependents of the individual, his or her spouse or common-law partner -, is related to the reporting entity if:
 - 6.4 has full or shared control of the Company;
 - 6.5 has significant influence over the Company; or
 - 6.6 is a member of the key management personnel of the Company or its parent company, under the terms of Law 6.404/1976.
- 6.7 Legal Entity: An entity is related to the Company if any of the following conditions are met:
 - 6.8 the entity and the Company are members of the same economic group;
 - 6.9 the entity is a parent, subsidiary or affiliate of the Company;
 - 6.10 the entity is the Union and all companies controlled by the Union;
 - 6.11 the entity and the Company are under joint control (joint venture) of a third company;
 - 6.12 an entity is under the joint control (joint venture) of a third company and the Company is an associate of that third company;
 - 6.13 the entity is a post-employment benefit plan whose beneficiaries are the employees of both entities, the one reporting the information and the one related to the one reporting the information. If the reporting entity is itself a post-employment benefit plan, the employees who contribute to it are also considered related parties to the reporting entity;
 - 6.14 the entity is wholly or jointly controlled by a person identified in item
 - 6.15 6.1.1.1 above, or
 - 6.16 a person identified in item 6.1.1.1 above has significant influence over the entity, or is a key member of the entity's management (or the entity's parent company).
 - 6.17 Significant Influence: for regulatory purposes, it is the power to participate in the financial and operational decisions of an entity, but which does not characterize control over these policies. Significant influence can be obtained through shareholdings, statutory provisions or shareholder agreements.
 - 6.18 Unrelated Parties: when considering each of the possible relationships with Related Parties, attention should be directed to the essence of the relationship and not merely to its legal form. In this sense, in the context of this Policy, they are not Related Parties:
 - 6.19 two companies simply because they have a director or other key management personnel in common, or because a member of the company's key management personnel exercises Significant Influence over the other company;
 - 6.20 two investors simply because they share joint control over a jointly controlled enterprise (joint venture);

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- 6.21 entities with mutual relationships, in which one of the parties is:
- 6.22 entity that provides financing;
- 6.23 entity providing public services;
- 6.24 government department or agency that does not fully or jointly control or exercise Significant Influence over the Company, simply by virtue of its normal dealings with the Company (even if they may affect the Company's freedom of action or participate in its decision-making process);
- 6.25 customer, supplier, franchisor, concessionaire, distributor or general agent with whom the Company has a significant volume of business, merely because of the resulting economic dependence.
- 6.26 Transactions with Related Parties: deals involving the transfer of resources, services or obligations from one related party to another, regardless of whether or not there is a value allocated to the transaction.
- 6.27 Conflict of Interest: arises when a person is involved in a decision-making process in which they have the power to influence the final outcome, ensuring a gain for themselves, a family member, or a third party with whom they are involved, or which may interfere with their ability to make an unbiased judgment. In other words, there is a conflict of interest when someone is not independent in relation to the matter under discussion and can influence or make decisions motivated by interests other than those of the organization.
- 6.28 When a conflict of interest is identified:
- 6.29 The manifestation of the conflict-of-interest situation and the subsequent abstention are recorded in the minutes of the meeting or in the instrument of deliberation of the Transaction with related parties;
- 6.30 If the member of the body responsible for negotiating, analyzing or approving Transactions with Related Parties does not disclose their conflict of interest, any other member of the body who is aware of the situation must do so.
- 6.31 Identification of the Related Party: the identification of related parties is the responsibility of all areas of BBTS.

7. ENUNCIADOS

- 7.1 We meet the requirements specified below for Transactions with Related Parties to be classified as at arm's length:
- 7.2 Competitiveness: prices and conditions compatible with those practiced on the market.
- 7.3 Compliance: adherence to legal and regulatory provisions, policies and contractual terms and responsibilities applicable to the Company and to each transaction.
- 7.4 Transparency: adequate reporting of the agreed conditions, as well as their impact on the company's financial statements.
- 7.4.1 Fairness: establishing mechanisms that prevent discrimination or privileges and adopting practices that ensure that privileged information or business opportunities

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- are not used to benefit individuals or third parties.
- 7.5 Commutativity: mutual benefit to the contracting parties, taking into account the relevant factors, such as the exchange ratio and proportional benefits for each contracting party.
- 7.6 We encourage the establishment of an independent environment for the negotiation, analysis and approval of Transactions with Related Parties, so that they are reasonable, justified and balanced and that their result is commutative and meets the interests of BB Tecnologia e Serviços without prejudice to the interests of the Related Parties.
- 7.7 We observe institutional responsibilities, designating those responsible for the decision-making process, considering the regulations and internal rules for exercising the established competencies and powers, with a view to analyzing and approving Transactions with Related Parties.
- 7.8 We condition the execution of Transactions with Related Parties to a documented analysis regarding compliance with the requirements of competitiveness, conformity, transparency, fairness and commutativity, as well as the formalization and specification of the characteristics of the operation, such as: contracting parties, motivation, price, term, terms, conditions, risks and benefits expected for BB Tecnologia e Serviços and for the Related Parties.
- 7.9 We publish on a timely basis and in a clear and precise manner the Transactions with Related Parties whose disclosure is required by the applicable legislation.
- 7.10 For the purposes of disclosing transactions with the Union, the relevant factors for establishing the level of significance of the transaction will be observed, when assessing whether the transaction is:
- 7.11 significant in terms of magnitude;
- 7.12 carried out outside market conditions;
- 7.13 It is different from normal day-to-day business operations, such as buying and selling businesses;
- 7.14 disclosed to supervisory or regulatory authorities;
- 7.15 reported to the Board of Directors;
- 7.16 subject to shareholder approval.
- 7.17 For the purposes of disclosing other transactions with related parties, the materiality criteria are:
- 7.18 Transaction or set of related transactions whose total value exceeds R\$ 50 million;
- 7.19 At management's discretion, the transaction or set of related transactions whose total value is less than R\$ 50 million, taking into account:
- 7.20 the characteristics of the operation;
- 7.21 the nature of the related party's relationship with the Bank;
- 7.22 nature and extent of the related party's interest in the transaction.
- 7.23 The following transactions with related parties do not need to be disclosed:
- 7.24 Financial investments, since the raising of financial investments as a result of financial intermediation would be different in nature from a transfer of funds to which the rules

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of the regulatory bodies refer - transfer to fulfill some obligation assumed in a contract (purchase and sale, provision of services or even loan contracts, for example), the disclosure of financial investments is dispensable.

- 7.25 Treasury products contracted on a regular and ordinary basis. Ordinary and regular can be defined as the operations carried out monthly by BBTS to manage its cash and treasury, carried out in accordance with market standards. Therefore, the exemption would not apply to extraordinary operations, i.e. those carried out without the frequency mentioned.
- 7.26 We have adopted adequate internal controls to ensure the compliance of the Related Party Transactions carried out.
- 7.27 We evaluate recurring Related Party Transactions on an annual basis in order to verify the appropriateness of continuing these transactions.
- 7.28 We classify Transactions with Related Parties by the relevance of the transaction, justifying in the decision-making documents the need and the relationship between BBTS and the Related Party.
- 7.29 We report to the Board of Directors information on the Related Party Transactions analyzed and the adequacy of the application of this Policy.
- 7.30 We prohibit directors and employees from participating in private or personal business that interferes or conflicts with our interests or that results from the use of confidential information obtained in the exercise of their position or function.
- 7.31 We advise the members of the bodies responsible for negotiating, analyzing or approving Transactions with Related Parties who find themselves in a conflict of interest to declare themselves impeded, explaining their involvement in the Transaction and abstaining from discussing the issue.
- 7.32 We have adopted a governance structure compatible with our size, the nature of our business and the complexity of our Transactions with Related Parties, comprising the Advisory Committees to the Executive Board, the Executive Board, the Audit Committee, the Board of Directors and the Audit Board.
- 7.33 We prohibit Transactions with Related Parties under conditions different from those of the market or which may harm our interests, as well as the granting of advances, purchase or sale of assets of any nature to members of the Board of Directors and its related committees, the Executive Board and the Audit Board.
- 7.34 Acquisitions of companies must be based on independent appraisal reports, drawn up without the participation of any party involved in the operation in question, provided that the cost of these reports does not make these acquisitions unfeasible.

8. APPROVAL

- 8.1 Through Technical Note 2024/0231, this policy was considered by the Executive Board on April 15, 2024 and approved by the BBTS Board of Directors (Conad) on April 16, 2024.