

# INFORMATION DISCLOSURE POLICY

POL1500 v.4

## 1. RESPONSIBLE AREA(S)

1.1. Marketing and Communication Management (Gemac).

## 2. SCOPE

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

## 3. PURPOSE

3.1. The purpose of this Policy is to establish the guidelines related to the information disclosure practices adopted by BB Tecnologia e Serviços, in accordance with applicable legislation, regulations, and standards, including current corporate documents and Corporate Governance best practices.

## 4. REGULATORY FRAMEWORK

4.1. This Policy is based on the following regulatory frameworks:

4.1.1. Law No. 6,404, of December 15, 1976;

4.1.2. Law No. 12,527, of November 18, 2011;

4.1.3. Decree No. 7,724, of May 16, 2012;

4.1.4. Law No. 13,303, of June 30, 2016;

4.1.5. Decree No. 8,945, of December 27, 2016;

4.1.6. Law No. 13,709, of August 14, 2018;

4.1.7. Decree No. 10,540, of November 5, 2020.

## 5. REVIEW PERIODICITY

5.1. The Information Disclosure Policy must be reviewed every three (3) years, or on an extraordinary basis, at any time.

## 6. DEFINITIONS

6.1. **State-owned company:** a legal entity under private law whose majority of voting capital is directly or indirectly held by the Union.

6.2. **Administrators:** members of the Board of Directors and Executive Board of the state-owned company.

6.3. **Information:** processed or unprocessed data that can be used to generate and transmit knowledge, in any medium, support, or format.

6.4. **Confidential information:** information temporarily restricted from public access due to its essentiality for the security of society and the State.

6.5. **Integrity:** the quality of unaltered information, including its origin, transmission,

and destination.

6.6. **Stakeholders:** any individual or legal entity with particular, collective, or general interest in obtaining information.

## 7. POLICY STATEMENT

7.1. This Policy applies to:

7.1.1. Administrators and any individuals who, by virtue of their position or function, have access to confidential information prior to its disclosure to the market or stakeholders. They must ensure that their subordinates and trusted persons do the same, and are jointly liable in case of non-compliance.

7.1.2. Controlling shareholders, direct or indirect; executive officers; members of the board of directors, fiscal council, and any bodies with technical or advisory roles created by statute; or anyone who, due to their role in the company, its parent, subsidiaries, or affiliates, has access to such information.

7.1.3. All those with commercial, professional, or trust-based relationships with the Company, such as independent auditors, financial analysts, consultants, and distribution system participants, who must refrain from using such information for purposes contrary to the Company's interests.

7.1.4. Spouses or partners and any dependents included in the annual income tax return.

7.1.5. Administrators who leave the Company before the public disclosure of a transaction or event initiated during their term, extending for six months after their departure.

7.2. Our information disclosure is based on the needs of external audiences for economic decision-making, in compliance with regulatory and oversight bodies.

7.3. In our relationship with shareholders, investors, and opinion leaders, we provide objective, reliable, and timely corporate information, ensuring quality, transparency, truthfulness, completeness, consistency, and fairness, upholding the highest standards of Corporate Governance—even in crisis situations.

7.4. We ensure the reliability and integrity of the information provided to internal and external audiences.

7.5. We guide administrators, controlling shareholders, fiscal council members, employees, and members of other advisory or technical bodies to act in accordance with values of good faith, loyalty, and honesty.

7.6. We establish that the Company's relationship with the external public is to be

represented by the President and Executive Directors or by formally delegated spokespersons. This measure mitigates the risk of contradictory information from different departments. Spokespersons are the official voices of BB Tecnologia e Serviços, responsible for delivering the institutional message, protecting the brand, and building a positive image of the Company.

#### 7.6.1. Responsibilities:

7.6.1.1. The President is responsible for disclosing strategic matters, corporate policies, major initiatives, and topics involving multiple areas.

7.6.1.2. The Administrative and Financial Director is responsible for disclosing matters related to people management; finance, controlling, and accounting; corporate procurement; contracts with clients and suppliers; and facility and asset infrastructure.

7.6.1.3. The Director of Technology, Development, and Solutions is responsible for disclosing matters related to information security policy, ICT solution guidelines and recommendations, and continuous improvement of solutions aimed at operational efficiency.

7.6.1.4. The Director of Clients, Operations, and Services is responsible for disclosing matters related to business operations, service networks, business prospecting, structuring and implementation, and relationships with clients and partners.

7.7. We disclose information to the market as required by law and this Policy, in a broad, clear, transparent, and accurate manner, using accessible language. We ensure immediate dissemination, equal treatment for shareholders and investors, and safeguard confidential and proprietary information, never allowing privileged access.

7.8. We ensure that disclosure of the Company's financial and equity status is accurate, complete, continuous, and carried out by responsible administrators.

7.9. We subject the process of preparing and disclosing information to validation by the internal control system.

7.10. We disclose information in accordance with the full version made available on our website: [www.bbts.com.br](http://www.bbts.com.br).

7.11. We consider violation of the rules related to confidential information disclosure a serious offense, subjecting the offender to disciplinary measures as defined by BB Tecnologia e Serviços.

## **8. APPROVAL**

8.1. Pursuant to Technical Note 2025/0309, this Policy was reviewed by the Executive

Board on May 19, 2025, and approved by the BBTS Board of Directors (Conad) on May 28, 2025.