Bradesco Integrity Program

Introduction:

The Bradesco Integrity Program is focused on deterring the improper conduct of our Officers, Employees, Interns, Apprentices and Associates, both in Brazil and abroad, and consists of a set of policies, standards and procedures aimed at preventing, monitoring, detecting and responding to harmful acts listed in Law No. 12,846/2013 and international laws.

This Program is structured to permeate all areas of the Bradesco Organization. In the case of units located abroad, adaptations can be implemented into this Integrity Program to suit specific local laws, but must maintain, at least, the conducts already required in Brazil.

The main operating activities and all business practices of the Organization were considered in the elaboration of the Program and are structured into strategic pillars of operation, which are the Prevention of the Risk of Corruption, the Monitoring and Detection of Inappropriate Behavior and the Response of Senior Management.

Prevention of the Risk of Corruption: preparation and communication of clear, objective policies and standards, and continual training, workshops, and lectures for all Officers, Employees, Interns, Apprentices and Associates.

Misconduct Monitoring and Detection: risk monitoring and anticorruption-related controls, and the quick identification of conducts noncompliant with the Bradesco Organization’s Code of Ethical Conduct through compliance tests, indicators, and internal and external audits and the management of whistleblowing channels.

Senior Management's Response: diligently handle all reports received and the communications made by internal audit, the external auditor, internal control and by the compliance agents, and regulatory and oversight agencies. Take disciplinary actions, continuously improve the Integrity Program, and report to the Integrity and Ethical
1. Senior Management Commitment

1.1. Board of Directors

The Bradesco Organization’s Board of Directors supports the Integrity Program to ensure its effectiveness. All ethics- and anticorruption-related policies and standards are ratified at Board meetings and must be complied with by the Officers, Employees, Interns and Apprentices of the Bradesco Organization and all its subsidiaries in Brazil and abroad in all their activities and transactions, and also apply to all Associates.

The corporate Code of Ethical Conduct and the conduct policies and standards are made available to all Officers, Employees, Interns and Apprentices of the Bradesco Organization. Its applicability also extends to Associates that are providing services on behalf of one of the companies of the Organization or for the Organization.

1.2. Board of Executive Officers

The Board of Executive Officers is in charge of setting and monitoring the actions necessary to ensure the compliance with the guidelines, set by the Board of Directors, takes place by fostering high integrity and ethical standards and disseminating a culture that emphasizes and demonstrates to all Officers, Employees, Interns, Apprentices, and Associates the importance of preventing, detecting, and settling embezzlements, fraud, irregularities, and wrongdoing especially against local and foreign public administrations.

1.3. Audit Committee

It is up to the Audit Committee to:
- establish and disseminate procedures for the reception and processing of information concerning the noncompliance with legal and regulatory devices applicable to the Company, as well as internal regulations and codes, including the prediction of specific procedures to anticipate for the protection of the information provider and its confidentiality; and

- recommend to the Company’s Board of Executive Officers, the correction or improvement of policies, practices and procedures that are identified in the framework of its duties.

**1.4. Integrity and Ethical Conduct Committee**

The Ethical Conduct Committee has the following duties:

a) assess the reports on the infringement and violation of the corporate and departmental Codes of Ethical Conduct and the disruption of anticorruption and competitive conduct;

b) adopt the necessary actions by issuing an opinion addressed to the relevant Departments, as recorded in the minutes of its meetings;

c) ensure that the infringements and violations are followed by applicable disciplinary actions, regardless of the offender’s hierarchical level, notwithstanding the applicable legal penalties;

d) ensure that the Board of Directors is aware of the matters that could have a tangible impact on Bradesco Organization’s reputation; and

e) forward matters involving Bradesco Organization’s Officers to be handled and remedied by the Board of Directors

**2. Standards of Conduct and Integrity Procedures**

**2.1. Code of Ethical Conduct**
The Code of Ethical Conduct is a Personal and Professional Conduct Practical Guide to be used by all Officers, Employees, Interns, Apprentices, and Associates in their daily interactions and decision-making, validating the policies and standards set by the Bradesco Organization based on the following assumptions:

a) strengthen the ethical culture of the Organization by raising the level of trust, respect, and solidarity in all of its internal and external relations;

b) guide the conduct of officers and employees by promoting the adoption of the highest standards of integrity;

c) prevent and manage conflicts of interests;

d) serve as reference in the assessment of possible violations of the Codes of Ethical Conduct; and

e) preserve the Organization’s reputation and image.

2.2. Corporate Anticorruption Policy and Standard

The Bradesco Organization reiterates its commitment laid down in its Code of Ethical Conduct and sets rules and procedures aimed at preventing and combating corruption and bribery, in accordance with the laws and regulations prevailing in Brazil and in the countries where the Bradesco Organization operate their Business Units.

This standard includes guidelines that restrict or prohibit granting gifts, giveaways, and amenities to Government Agents and PEPs in accordance with the Code of Ethical Conduct and the detailed guidelines laid out in the Bradesco Organization’s relevant Policies and Standards.

The standard also determines:
- the agenda format, requirements, controls, and recordings when they concern the contact between Bradesco Organization’s Officers and Employees and Government Agents and PEPs;

- records of expenditures with Public Officials and Politically Exposed Person by means of reimbursement of petty expenses and with a corporate card;

- record of concession of gifts, rewards and entertainment for Public Officials and Politically Exposed Person;

- guidelines that are relevant to the participation of Public Officials and Politically Exposed Person in events sponsored by the Bradesco Organization, such as workshops and conferences, in Brazil or abroad;

- due diligence conducted in the hiring of Associates, as well as in concessions for donations and sponsorships; and

- anti-corruption clause; whistle-blowing channels; whistle-blower protection; training; disciplinary measures; prompt interruption of irregularities or infringements; and mergers, acquisitions, disposals and partnerships.

2.3. Supplementary Policy, Standards, and Procedures

In addition to the Code of Ethical Conduct, the Organization has in place specific Policies and Standards addressing the subjects Anticorruption, Competition, Treatment of Complaints, Donations and Sponsorships, the Regulations of the Executive Committee and of the Commission of Acquisitions and Associations of the Bradesco Organization, in addition to the Regulations of the Executive Committees of Acquisitions and Associations of the Bradesco Organization and of Accounting Practices, and other guidelines considering the correct business conduct and assessment.

3. Associates’ Conduct Standards and Integrity Policies
All Associates are required to agree to including in their service agreement the anticorruption clause and also the Commitment Statement to the compliance with the Bradesco Organization’s integrity and ethical values.

All Associates receive and agree to comply with the Code of Ethical Conduct when providing services in the Bradesco Organization and/or on behalf of it.

4. Periodic Training

The Bradesco Organization believes that its most valuable resources are its people and, for this reason, it invests in traditional face-to-face, telepresence and on-line training courses on all subjects, mainly ethical conduct and anticorruption and competition. In addition to training its Officers, Employees, Interns and Apprentices, the Bradesco Organization also holds workshops and lectures with its Associates to ensure that they always comply with our ethical conduct and transparency values.

5. Periodic Risks Analysis

Corruption related risks are periodically monitored and controlled based on compliance tests, internal and external audits, and the whistleblowing channels. The Bradesco Organization classifies its procedures, products, and services as per its corruption-related risks and defines the appropriate actions to mitigate these risks.

6. Accounting Records

All accounting records of the Bradesco Organization present fairly and accurately the operations involving the transactions and/or disposals of the Organization’s assets, in accordance with the relevant accounting standards and policies. The effectiveness of these procedures is measured by compliance tests conducted by the Integrated Risk Control Department (DCIR), the Compliance, Conduct and Ethics Department, the General Oversight Office, and the Independent Auditor.
All expenses are accurately accounted for, including the appropriate supporting documentation, and are posted in the appropriate records and classifications when paid or reimbursed.

7. Internal Control

The Integrated Risk Control Department (DCIR) is responsible for providing support to managers to identify, assess, and respond to risks by making sure that controls are in place, performed, and effective, as well as to recommend, when necessary, a corrective action or action plan to ensure acceptable levels of risks are in place in the Organization’s processes.

8. Procedures to Prevent Fraud and Illegal Activities in the Interaction with the Public Sector

All the Dependencies comply with the Code of Ethical Conduct, the Corporate Anti-Corruption Standard and Policy, the Governance Policy for Relationship with Public and Private Institutions, the Standard for Public Bidding and Building Infrastructure, Valuations, Leases, Sale of Mobile Assets/Real Estate, Procurement of Works and Office Materials, in particular those that have a relationship with the Public Sector adopt procedures and controls to mitigate any risks.

The risks and effectiveness of key controls are assessed by the Compliance, Conduct and Ethics Department (DCCE), together with the relevant managers; key controls are inventoried by the Integrated Risk Control Department (DCIR), which conducts compliance tests to check their effectiveness.

The main negotiations with the public sector (direct and indirect administration, parastatal agencies, and multilateral organizations) count on the involvement and advice of the Bradesco Public Sector Department (DBPP), conducting the matters related to the Banco Bradesco S.A. Executive Committee for the Assessment of Government Tenders and Business Proposals from Private Entities.

9. Internal Division in Charge
The Compliance, Conduct and Ethics Department (DCCE) is responsible for the maintenance of Bradesco’s Integrity Program.

To ensure its independence whilst in operation, the Compliance, Conduct and Ethics Department (DCCE) is comprised of highly qualified professionals, based on clear, robust procedures and has an exclusive Departmental Committee that reports directly to the Board of Executive Officers.

In possible noncompliance cases, whether materialized or not, concerning the Integrity Program, the Compliance, Conduct and Ethics Department (DCCE) acts directly and independently with the people in charge to ensure immediate interruption and/or correction, reporting in a timely manner to superior levels and up to the Board of Directors.

In the performance of its work, it can use the support of other control functions, including: the General Oversight Office, the Integrated Risk Control Department (DCIR), the Legal Department (DEJUR), Corporate Security, among others.

10. Whistleblowing Channels

The protection of any whistleblower will be ensured in good faith for the person who reports any violation of this Standard’s provisions or suspicious actions that might be directly or indirectly related to an actual instance or attempt of corruption or bribery. Preferentially, one of the following whistleblowing channels must be used:

- anticorrupcao@bradesco.com.br;

- etica@bradesco.com.br;

- concorrencial@bradesco.com.br;

- Audit Committee (Comitê de Auditoria) - (11) 3684-9110;

- General Oversight Office (Departamento de Inspetoria Geral) - (11) 3684-2266;
- Ombudsman (Ouvidoria Bradesco) - 0800 727 9933;

- etica@bradescoseguros.com.br;

- prevencaofraude@bradescoseguros.com.br; and

- Dial Fraud (Disque Fraude): 0800 701 2788 - Bradesco Seguros (Insurance).

The guidelines stated in Standard 01.810 - Handling of Complaints.

11. Disciplinary Actions

Any Officer, Employee, Intern and Apprentices caught in violation of the Laws, Code of Ethical Conduct, Corporate Anti-Corruption Standard and Policy and internal regulations will be subject to disciplinary measures, which may include dismissal in accordance with the applicable laws and policies of the Organization.

Associates that are providing services for the Bradesco Organization and/or on behalf of it who are caught in violation of the Integrity Program, Code of Ethical Conduct, Corporate Anti-corruption Standard and Policy and internal regulations shall be subject to revocation of their commercial relationship, as well as any other remedial and legal measures at the disposal of the Bradesco Organization in accordance with the applicable law.

12. Immediate Discontinuation of Irregularities or Infractions

To ensure the discontinuation of irregularities or infractions, when hiring, establishing partnerships, giving donations, granting sponsorships, and other procedures considered as higher risk procedures, the Bradesco Organization uses standard clauses in its agreement templates to elucidate:

a) the Associate’s and the other intermediary agents’ responsibility to prevent any illegal activities;
b) the need to keep practices aimed at preventing and combating corruption;

c) the possibility of suspending or discontinuing the service;

d) the possibility of terminating the contract; and

e) the possibility of imposing penalties and fines.

If any violations of ethical standards are detected, whether as a result either of whistleblowing or monitoring actions, the Bradesco Organization shall investigate and ensure the immediate discontinuation of detected irregularities or infractions, and remediate any damages on a timely basis, also by applying the appropriate disciplinary actions.

13. Due Diligence

Any Department, Officer, and Employee of the Bradesco Organization that seeks to establish a business relationship between the Bradesco Organization and one Associate, must, before executing any contract, carefully review and complete the due diligence procedures.

In general, a due diligence review must determine, but not be limited to:

a) if the Individual offering to provide a service to the Bradesco Organization in exchange for consideration is a “Public Official”;

b) if the legal entity uses or is an entity where a “Public Official” or a “Politically Exposed Person (PEP)” holds an equity interest or a seat at such entity’s board of directors;

c) if the services that such Individual or legal entity is offering are necessary to conclude a business initiative or existing agreement;
d) if such Individual or legal entity has the expertise, experience, and other qualifications to legitimately perform the necessary services;

e) if such Individual or legal entity evidence any probability of getting involved in practices that could expose the Bradesco Organization to any liability;

f) assess the entity’s experience, size, production capacity, and location;


g) research the reputation of the Associate with other customers;

h) check if the entity has any restrictions, such as inclusion of its corporate name in the "National Registry of Ineligible and Suspended Companies (CEIS)”, "National Registry of Penalized Companies (CNEP)”, and Registry of Ineligible Private Nonprofit Entities (CEPIM)”, among other internal and external search engines;

i) search several forms of media to know if there is a history of crimes against the public administration;

j) assess if the service deadline and price are consistent with market deadlines and prices;

k) check if the Associate meets the internal service engagement and outsourcing rules;

l) check their main business activity and if their Corporate Taxpayer’s ID (CNPJ) is active, and if there are any registration backlogs; and

m) check if the establishment/company is in compliance with the policies and standards of the Bradesco Organization and of the laws and regulations for hiring correspondents and business partners, as well as licenses/authorizations required by regulating authorities to operate.

The guidelines stated in Standard 01.767 - Corporate Anti-Corruption Standard.
14. Mergers, Acquisitions, Disposals and Partnerships Processes

In mergers, acquisitions, disposals and partnerships processes, the Bradesco Organization conducts due diligence procedures, where the proposal proponent/manager is responsible for such procedure, which aims at identifying liabilities or activities that could result in risks arising from corruption, money laundering/embezzlement, and/or other illegal activities, and also requiring the addition of specific contractual clauses for the business that protect the Organization.

15. Continual Monitoring of the Integrity Program

The continual monitoring of the Integrity Program allows the Bradesco Organization to check the program’s effectiveness, identify any new risks that might have arisen, and respond on a timely basis with remedies and improvements. Monitoring is made by collecting and analyzing information from several sources, such as:

a) regular reports on the Integrity Program routines or about related investigations;

b) trends verified in customer complaints;

c) information obtained via the whistleblowing channel;

d) reports from governmental regulatory and oversight agencies;

e) internal audit reports; and

f) compliance reports.

In addition to the analysis of existing information, the Bradesco Organization evaluates by means of the Corporate Self-Assessment, if the Officers and Employees are aware of the values and policies of the Organization, if they are following the procedures laid down and if the training has brought practical results. If the non-compliance with the rules is identified or the existence of flaws that are hampering the
achievement of the expected results, the Bradesco Organization takes steps to remedy the problems encountered.

16. Donations and Sponsorships

16.1. Donations to Political Candidates and Parties

The law interdicts legal entities to make donations to political candidates or parties, thus the Bradesco Organization and its subsidiaries are expressly forbidden to make, either jointly or individually, any political donations, as provided for by Law No. 9,504/1997 (Electoral Act) and Law No. 9,096/1995 (Political Parties Law).

Contribution means, in addition to financial donation, any other form of assistance, such as, but not limited to: donation and loan of goods, free lease of physical or advertising space, sponsoring events where candidates can be introduced to the public, assignment of labor, distribution of leaflets and fliers, sending emails, and putting up posters, among others.

Even though individuals are allowed to make donations, we recommend that anyone holding a statutory position in the Bradesco Organization refrain from making personal donations to electoral campaigns, a recommendation that is extended to individuals economically dependent from the Bradesco Organization.

16.2. Donations

All the donations and contributions must follow the guidelines of the 01.817 - Corporate Donation Policy and Standard 05.1206 - Donations and Sponsorships of Bradesco Organization.

It is forbidden to make any donation and/or contribution in exchange for favors and/or a donation and/or contribution that appear to be made as consideration for some type of service provided to any type of individuals or legal entity and/or government agent and PEP (Politically Exposed Persons).
16.3 Sponsorships

All the sponsorships must follow the guidelines of the 01.819 - Corporate Sponsorship Policy and Standard 05.1206 - Donations and Sponsorships of Bradesco Organization.

The Bradesco Organization develops and sponsors projects that are related to its key values of its brand: quality, safety, society and the environment respect.

All the contributions made in form of sponsorship, in addition to be consistent with the Bradesco Organization values, must also be transparent and granted under written agreements between the Bradesco Organization and the sponsored entities.

It is expressly forbidden to make any sponsorships that evidence an intent to conceal corruption, influence peddling, or money laundering. Or also, when a sponsored entity gets involved in illegal activities, this reflects on the sponsor’s reputation.